

May 13, 2021

Ryan Smith
President
Chatham Biotec Ltd.
761 Hillsborough Road
Riverview, NB
E1B 3W1
Sent via email: ryansmith@chathambiotec.com

Dear Mr. Smith:

Re: Registration of Avipel Seed Treatment for Use in Ontario

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA is keen to support efforts to register Avipel¹ for use in Canada. OFA would also welcome the opportunity to work with other stakeholders to facilitate Avipel's registration.

Damage to crops by birds is a serious problem for many Ontario farmers. Birds are known to destroy hundreds of acres of field and sweet corn before it has had a chance to emerge and

¹ Avipel (9,10-antraquinone) is a non-lethal and non-toxic repellent corn seed treatment, used to stop birds from eating newly planted seed. It is made from an organic chemical found in plants, including aloe, rhubarb, and buckthorn. Once ingested, the compound causes immediate, yet temporary digestive distress to birds, including sandhill cranes, but does not cause any long-term effects. Avipel is a biopesticide, with very low soil mobility, and is insoluble in water, minimizing groundwater contamination. It comes in both dry and liquid formulations and is compatible with other seed treatments.

mature. Sandhill cranes are a common nuisance bird which damage corn crops in Ontario, causing significant crop damage and yield loss. A combination of deterrent methods is recommended for bird control, including acoustic, visual, and physical deterrents.

OFA recently conducted research which found that the economic damage caused by wildlife to Ontario crop producers was nearly \$215 million in 2019. Sandhill Cranes, Canada geese and other non-migratory birds were found to be responsible for much of this damage.

We understand that Avipel is approved for use as a seed treatment for corn seed in some states in the United States, but to date, has not been approved for use in Canada. The Canadian Pest Management Regulatory Agency (PMRA)'s website indicated there is no pending application requesting Avipel registration in Canada at this time. Many of the areas in the United States where Avipel is approved border the Great Lakes and have agroclimatic conditions similar to Ontario.

OFA encourages Chatham Biotec to apply to register Avipel for use in Canada with the PMRA. Registration of this product would allow for farmers to use Avipel as an additional tool to repel sandhill cranes from damaging corn crops in Ontario.

Please let me know how OFA might support your efforts to register Avipel.

Sincerely,



Peggy Brekveld
President

cc: Brendan Byrne, Chair, Grain Farmers of Ontario
Bill George, Chair, Ontario Fruit and Vegetable Growers
Scott McGeachy, Chair, Seed Corn Growers of Ontario
Mary Robinson, President, Canadian Federation of Agriculture
Pierre Petelle, President and CEO, CropLife Canada
Mark Kunkel, Char, OFA's Northern Federations' Caucus
OFA Board of Directors