Notice to the Public – October 17, 2025

Review Panel following Notice of Objection for RVD2021-05: *Imidacloprid and Its Associated End-Use Products*

The purpose of this document is to notify the objector, registrant, and the Canadian public that Health Canada's Pest Management Regulatory Agency (PMRA) has established an expert panel to review the use of mesocosm studies in support of the re-evaluation of Imidacloprid, and to seek written representations from the public on behalf of the review panel.

Notices of Objection, filed under subsection 35(1) of the *Pest Control Products Act* (PCPA), regarding the re-evaluation decision for Imidacloprid and Its Associated End-Use Products were reviewed and assessed in accordance with the PCPA and *Review Panel Regulations*. Dr. Christy Morrissey (Professor of the Department of Biology, University of Saskatchewan) submitted a Notice of Objection related to the environmental risk and value assessments.

The assessment of Dr. Morrissey's Notice of Objection raised scientifically-founded doubt on one aspect related to the environmental risk assessment for imidacloprid, in particular, the assertion that the PMRA placed too much emphasis on mesocosm studies when assessing risk to aquatic invertebrates. Specifically, the objector stated that an uncertainty factor greater than one is needed when using mesocosm studies in environmental risk assessments.

The PMRA has convened a Review Panel, composed of three impartial external scientific experts with complementary expertise in pesticide regulation, mesocosm studies, and environmental risk assessment, to provide objective, science-based advice on questions related to mesocosm studies and their use in the regulatory decision for imidacloprid (see Appendix 1).

The re-evaluation decision for imidacloprid and its associated end-use products will not be suspended while the Review Panel is established and conducting the review.

The question being posed to the Review Panel is: "Is the effect metric (NOEC of 0.16 µg TWA/L, equivalent to 0.243 µg/L nominal, from the 2015 study, 'Outdoor microcosm study to the effects of IMIDACLOPRID SL 200 on the summer generation of the mayfly *Cloeon dipterum*.' sufficiently protective of aquatic invertebrate communities? If not, how would you recommend the PMRA approach the effects metric selection from the identified mesocosm studies?"

The PMRA invites interested persons to submit written representations to the Review Panel members. The representation must be specific to the question that the experts in the Review Panel will be reviewing (as stated above). **Please provide information within 45 days from the date of this notice to the Notice of Objection e-mail account (pmra.noo-ado.arla@hc-sc.gc.ca) with the subject line "Representation for Sub. No. 2025-2565"**. General comments regarding the Imidacloprid re-evaluation decision or it's associated Notice of Objection will not be considered by the Review Panel.

Appendix 1 – Biography of Review Panel Members

1) David Dall, Ph.D.

Dr. David Dall is a career scientist with professional experience in the public, private and higher education sectors. He holds a doctorate in Agricultural Science from the University of Adelaide, Masters degrees in Environmental Law and Intellectual Property Law from the Australian National University, and is a graduate of the Australian Institute of Company Directors.

His professional experience includes appointments as a Principal Research Scientist in the Entomology Division of the Australian Government's flagship research organisation (CSIRO), and as Principal Scientific Analyst for plant biosecurity at the Australian Department of Agriculture, Fisheries and Forestry. Since May 2023 he has held the position of Director Environment at the Australian Pesticides and Veterinary Medicines Authority (APVMA) where he is based in Canberra. He has served as Advisory Board Chair for the Australian Research Council Centre for Cubesats, UAVs and their Applications (CUAVA), based at the University of Sydney, since 2018.

Dr. Dall has experience across multiple areas of environmental and agricultural management, including plant biosecurity, vertebrate and invertebrate pest management, and regulatory consideration of use of agricultural and veterinary chemical products.

His recent technical publications relate to Australian at-border interceptions of virus and viroid contamination in imported vegetable seeds, and analysis to inform imported seed biosecurity protection.

Dall DJ et al. 2023. Prevalences of Tobamovirus Contamination in Seed Lots of Tomato and Capsicum. *Viruses* 15(4):883. doi: 10.3390/v15040883.

Dall DJ et al. 2019. Prevalences of Pospiviroid Contamination in Large Seed Lots of Tomato and Capsicum, and Related Seed Testing Considerations. *Viruses* 11(11):1034. doi: 10.3390/v11111034.

2) Karen Kidd, Ph.D.

Dr. Karen Kidd is the Jarislowsky Chair in Environment and Health and a Professor in the Department of Biology at McMaster University. Previously she was a Tier 1 Canada Research Chair in Chemical Contamination of Food Webs at the University of New Brunswick and a research scientist with Fisheries and Oceans Canada. Dr. Kidd received a B.Sc. in Environmental Toxicology from the University of Guelph and a Ph.D. in Environmental Biology and Ecology from the University of Alberta. Dr. Kidd's primary research interests are in aquatic ecotoxicology, with a particular recent focus on emerging contaminants in municipal wastewaters but her expertise also includes non-point sources of diverse contaminants - including legacy pesticides - and their fate and effects. Karen has led or been involved in three major whole-ecosystem experiments to understand how 1) the estrogen used in the birth control pill affects fish and their prey, 2) wastes from rainbow trout aquaculture affect native organisms, and 3) a commonly-used herbicide and fertilizers

affect the health of wetland communities. A fourth whole-ecosystem study on antimicrobials is currently underway. These experiments have included mesocosm studies to characterize the fate and effects of a synthetic estrogen and an antimicrobial.
She has published > 180 peer-reviewed articles in the field, served on several national and international scientific boards including the International Joint Commission, and co-authored a state-of-the-science review on endocrine disrupters for the United Nations Environment Programme and the World Health Organization. Karen received the Recipharm International Environmental Award in 2018 for research excellence in understanding the environmental impacts of pharmaceuticals, and the Society of Environmental Toxicology and Chemistry's highest honour the Founder's Award for career contributions to the field. Her impact in aquatic sciences in Canada was recognized in 2021 with the Outstanding Contributions Award from the Canadian Ecotoxicity Workshop and the Frank Rigler Award from the Society of Canadian Limnologists for major achievements in the field of limnology.

3) Ryan Prosser, Ph.D.
Dr. Ryan Prosser is an Associate Professor in the School of Environmental Sciences at the University of Guelph. Dr. Posser received a B.Sc. in Biology from Queen's University and a B.Sc (Honours) and a Ph.D in Environmental Toxicology from the University of Guelph. Dr. Prosser's research group investigates the fate and effects of chemical in the environment with research conducted on a variety of contaminants, e.g., pesticides, metals, petroleum hydrocarbons, pharmaceuticals, personal care products, naphthalene sulphonates, substitute phenylamines, polycyclic aromatic hydrocarbons, and microplastics. His research is used to characterize the risk of contaminants in aquatic and terrestrial ecosystems, as well as, researching the impact of chemicals in aquatic invertebrates.
Dr. Prosser has contributed to >300 presentations, including interviews and media relations and has published >120 peer-reviewed articles, technical reports and 1 book in his field. He has served on several university committees, in the scientific community and to the public, including the PMRA's Transparency Technical Working Group (2022-2023) and other government Science Advisory Committees. Dr. Prosser has received several awards and grants in his field.