

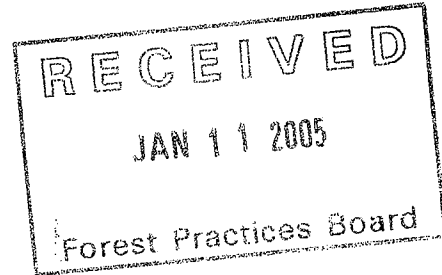


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January 6, 2005

Dr. Bruce Fraser, Chair
Forest Practices Board of British Columbia
1675 Douglas Street
Victoria, British Columbia
V8W 9R1

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Dear Dr. Fraser:

Ministry of Forests specialists have reviewed the recent report on the use of monosodium methanearsonate (MSMA) in the Nadina Forest District (Nadina Beetle Treatments – Complaint Investigation 030500, FPB/IRC/99, November 2004). While the report generally reflects the past situation, we believe that a few issues could have been presented differently, given the available facts. I would also like to address some of the report’s recommendations in this letter.

The principal concern that specialists have with the report is the implication that the use of MSMA poses a high risk to humans and to the environment. While not stated explicitly, this implication seems to underlie much of the audit’s discussion. While the Ministry of Forests is well aware of the acute toxicity and risk of MSMA, the product, *when used in the appropriate prescribed manner*, has a very low risk to human health and the environment.

MSMA is currently federally registered as a pesticide by the Pest Management Regulatory Agency (PMRA); the registration process provides for detailed assessment of the risk of a material to the environment and human health. The review of risk and toxicity is carried out by qualified toxicologists with the PMRA. The evaluation of risk encompasses both the inherent toxicity of a material AND the probability of substantial exposure. In the case of MSMA, while the PMRA is aware that the material is quite toxic, they are also of the opinion that the risk of exposure is minimal when applied according to label directions. There is also no evidence that MSMA moves through the food chain or other ecosystem processes. In fact, levels of arsenic or other MSMA breakdown products are likely indistinguishable from natural background levels of these products in the environment.

The audit document states (page 7), “Both the current registrant and the MOF have reported that they believe the product will not pass the re-evaluation process because the data required by the PMRA is too costly for them to provide.” This is not necessarily the case. While the Canadian registrant is not willing to pursue the re-registration due to the small use pattern



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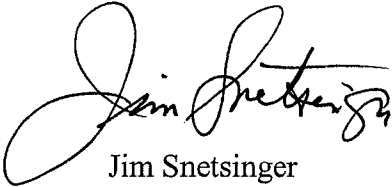
of the material, the Ministry of Forests is still examining options. We are currently in contact with both the PMRA and the United States of America suppliers who have an extensive data package in an attempt to determine just what would be required to continue the re-registration process. No decision has yet been made. In any event, if we do decide to pursue re-registration to keep this tool available for mountain pine beetle and spruce beetle management, we will ensure that all relevant scientific information, including that from Dr. Cullen, is made available to PMRA. We continue to have confidence in the expertise of PMRA to evaluate products of this sort and will accept whatever decision they make in this matter if the process proceeds.

Overall, it is expected that the use of MSMA will significantly decline due to the increasing levels of mountain pine beetle in many areas of the province. Single-tree treatments such as MSMA and falling and burning of infested trees are not appropriate treatments in the situations that exist in many areas. However, we continue to believe that this tool, and all others, must still be held available for situations that are appropriate.

The recommendations of the audit appear to be appropriate for the most part. The Ministry of Forests will endeavour to initiate a province wide approach to tracking where and when MSMA is applied and will emphasize guidelines that restrict its use to areas where public contact will be minimized. Guidelines for the harvest and utilization of MSMA-treated trees will also be re-circulated that will provide time frames of no-harvest.

I appreciate the effort that was made to conduct this investigation and welcome the constructive recommendations presented in the report. The Ministry of Forests continues to be committed to managing the forest resources of the province in a safe and environmentally appropriate manner.

Yours truly,

A handwritten signature in black ink, appearing to read "Jim Snetsinger". The signature is fluid and cursive, with a large loop at the beginning and end.

Jim Snetsinger
Chief Forester