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## Using neem oil in Canada

Posted by <u>David Maxwell</u>
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<u>David Maxwell</u>
<u>Using neem oil in Canada</u>
February 23, 2019 09:14PM
"Why is neem not allowed in Canada?"

A fascinating issue. My own take on this: Right off the top, we need to define the language. Neem is not "not allowed" in Canada. It is not "approved" by the Pesticide Management Regulatory Authority for application to food crops. This is basically because in order to gain such approval the company wishing to sell the product must submit an enormous amount of documentation, including test results from a highly specialised, certified laboratory. Obtaining the necessary approval, (which results simply in a certification number attesting to its permissability of use) runs into many hundreds of thousands of dollars. Unless sales can be expected to justify such an expenditure, no company will do it. But there is actually nothing prohibiting either the sale or availablity of neem oil in Canada. And, indeed it is quite readily available commercially, where it is sold as an ingredient to be used in cosmetics and salves.

Which leaves the next question, of whether, in fact, it is prohibited to spray one's trees with it. And here I would suggest there is a real opening. Sections 4.2 and 4.3 of the Organic Standards Regulations permit the spraying of "plant-derived products", a category used to justify the use of things like nettle teas, compost teas and seaweed extracts. My personal opinion, (supported very hesitantly by somebody from one of the organic certification organisations, who recognised that I was backing him into a place he didn't want to go), is that neem very clearly is permitted under these regulations. (So use of neem does not violate organic standards). The rub comes with their position that only materials which have a prior PMRA certification may be used, and that the organic standards apply only after the material in question has obtained approval by the PMRA. When I challenged them that seaweed or fish extracts lack PMRA approval, they had no response beyond referring back to their own regulations saying that they are allowed.

My personal opinion is that the various agencies have backed themselves into an untenable bureaucratic position, but this has never been tested. I have no particular need to challenge the system myself - I quite happily buy neem oil in Canada, (and previously imported it from Ahimsa, where it went through Customs without the slightest question), without seeking permission from the PMRA or the CFIA to use it, and spray my trees with blithe indifference. (The same thing applies to EMs, which, as far as I know can be purchased in Canada only from one particular merchant, and lack PMRA certification.) But I am not selling my produce, and I am basically beyond the control of the government agencies involved. I think if somebody wanted to push the issue, (somebody large enough to be able to fund the fight, and somebody with enough drive to want to spray neem), a good case can be made that it is permissible. But the other way to deal with it is to simply use it, and let sleeping dogs lie. My sense is that the PMRA really have no interest in trying to push it, and would tacitly look the other way rather than make an issue of it.

Don't get me wrong: I am a strong supporter of the need to have and enforce controls. But when the agencies involved are unable to apply common sense, I step outside them and make my own determinants. I am satisfied, as a scientist, that neem is not toxic either to my own health, nor to the trees, so have no hesitation to use it. What think others?

Broomholm Orchard
Zone 5b in Nova Scotia

Edited 1 time(s). Last edit at 03/03/2019 04:40PM by Michael Phillips.

Reply Quote
Joanne Corkum
Re: granulosis for codling moth
February 27, 2019 05:53PM

Thanks for the insightful post David!

Joanne
Reply Quote
Michael Phillips

Moderator

Posts: 34

Registered: 11 years ago

Registered: 8 years ago

Re: Using neem oil in Canada Posts: 621

March 03, 2019 05:05PM

Well said, David. I felt this response deserved *the spotlight* in its own right and thus the move from within another post on granulosis virus. The choice of putting this in the Tree Fruit Nutrition category is arbitrary, admittedly, but yet another way of making an important point. Pure neem oil does contain azadiractins which inhibit the molting cycle of foliage feeding pests (like moth caterpillars) but more so it's those fatty acids that feed the biology on the surface of the plant which in turn play a critical role in deep foliar nutrition. Growers in the states for the longest time referred to neem oil as "leaf polish" in order to help befuddled organic certifiers better understand its nutritional oomph.

An earlier post on Sourcing Pure Neem Oil in Canada precedes this conversation.

All power to you holistic rebels growing north of even me!

**Lost Nation Orchard** 

Zone 4b in New Hampshire

Edited 1 time(s). Last edit at 03/04/2019 01:05AM by Michael Phillips.

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