

August 31, 2022

Janine Murray
Director General
Environmental Assessment Directorate
Pest Management Regulatory Agency
Email: Janine.Murray@hc-sc.gc.ca

RE: Water monitoring on private land

Dear Ms. Murray:

Canadian Canola Growers Association (CCGA) has been participating in the PMRA Technical Water Monitoring Group and actively following the events unfolding around water sampling in Saskatchewan over the past week. CCGA would like to respectfully submit these comments reiterating our support for the proposed national water monitoring program while also sharing our deep concern around ensuring trust and collaboration with farmers is at the forefront of any such program.

CCGA represents 43,000 canola farmers from Ontario to British Columbia on national and international issues, policies, and programs to enhance the success of Canadian canola farmers. Canola farmers contribute significantly to Canada's economic sustainability as the industry contributes \$29.9 billion¹ to Canada's economy every year and supports 207,000 jobs² across the country. Canola exports were valued at \$13.7 billion in 2021 with ninety percent of canola crop exported as seed, oil, or meal. Canola farmers are committed to sustainability and work hard to enable biodiversity on the farm, to sequester carbon in the soil and to produce more canola per acre than ever before.

Canola farmers and farm organizations, such as CCGA, are committed to protecting our nation's water quality and understand the importance of a national water monitoring program on further enabling science-based decision making. This commitment and understanding led CCGA to undertake research monitoring for pesticides in water. While the research completed consistently showed no pesticide detections above any level of regulatory concern, we understand the need for it to be supported and resourced for the long-term and wanted to provide some helpful guidance while developing our national program. Through our sampling program experience, it was absolutely vital to maintain open, meaningful dialogue with the farmers participating in the sampling program. Not only does it allow for appropriate access to land, but also helps build trust in the

¹ LMC International Ltd, The Economic Impact of Canola on the Canadian Economy: 2020 Update, for the Canola Council of Canada (Oxford: 2020) at 2 online: <https://www.canolacouncil.org/download/131/economic-impact/17818/economic-impact-report-canada_december-2020>

² *Ibid*

sampling program, ensure fieldwork safety is a top priority, and provide the much-needed ancillary information to supplement and properly understand the sample data.

With this in mind, we were extremely concerned with the events that unfolded over the last week, where there were reports of water samples taken from a dugout in Saskatchewan without the landowner's knowledge. As a result, we must reiterate the importance of building trust and including farmers in the conversation from the beginning of program development and throughout its implementation. Given the recent highly publicized events, this meaningful communication is even more important now that trust has been eroded before the program has begun. CCGA would also recommend working closely with provinces and municipalities to ensure a shared understanding of program parameters that is consistent across all levels of government. Overall, as was highlighted during the PMRA hosted technical workshops this summer, farmers must be engaged substantively throughout the water monitoring program's lifespan as it is important to the successful initiation and longevity of this initiative.

There is much good that can come from a national water monitoring program, including supporting Canada's robust science-based decision making, but only if done right and in collaboration with those who it will affect most.

Thank you for consideration and please do not hesitate to reach out should you have additional questions.

Sincerely,

[Original Signed By]

Dave Carey
Vice-President, Government & Industry Relations, CCGA

CC: Janice Villeneuve, Water Monitoring National Manager, Environmental Assessment
Directorate, PMRA
Justine Raftis, Manager, Environment and Sustainability Policy, CCGA