

April 16, 2020

Program Renewal Team
Pest Management Regulatory Agency
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Re: Consultations regarding the Proposed Integrated Approach to Pesticide Evaluation

Dear Program Renewal Team,

The Canadian Canola Growers Association (CCGA) has been closely following the Pest Management Regulatory Agency's (PMRA) proposals regarding the Proposed Integrated Approach to Pesticide Evaluation (the *Approach*). CCGA represents 43,000 canola farmers from Ontario to British Columbia on national and international issues, policies, and programs that impact farm profitability. Canola is a Canadian-made crop developed by researchers at the University of Manitoba and Agriculture and Agri-Food Canada in the 1970s. It is now the most widely planted crop in Canada, on a fifth of all Canadian cropland. In 2018, canola generated the highest farm cash receipts for any agriculture commodity.

More than 95% of Canadian farm corporations are family owned. Small business owners are the foundation of the Canadian canola industry. As a trade exposed industry, that exports over 90% of its production, our growers are price takers in the global marketplace. As a result, Canadian regulatory structures that could render farmers less competitive threaten the livelihoods of Canada's 43,000 growers, as well as the 249,000 jobs¹ and \$26.7 billion² the broader canola industry contributes to the Canadian economy every year. If Canada's agriculture industry is to reach \$85 billion in agri-food exports by 2025, as outlined in the Government of Canada's Agri-food Economic Strategy Table, a level playing field with global competitors is needed.

One of our industry's most important regulatory structures is enforced by the Pest Management Regulatory Agency (PMRA), and its enabling legislation, the *Pest Control*

¹ LMC International Ltd, *The Economic Impact of Canola on the Canadian Economy*, for the Canola Council of Canada (Oxford: 2016) at 17 online: < [http://www.canolacouncil.org/news/canola-now-worth-\\$267-billion-to-canadian-economy/](http://www.canolacouncil.org/news/canola-now-worth-$267-billion-to-canadian-economy/)>

² *Ibid* at 9

Products Act (the Act). CCGA fully supports the PMRA in its mandate to protect the health of Canadians and the environment. The manner in which PMRA re-evaluates pesticides has strong impacts on our members' small business competitiveness and ability to innovate. Health and safety for Canadians and the environment must remain PMRA's top priorities.

However, several re-evaluations over the last four years have highlighted the fact that numerous aspects of our pesticide evaluation processes need to be addressed.

Along with our provincial members Alberta Canola, SaskCanola, and Manitoba Canola Growers Association (MCGA), we were pleased to join in-person consultations that took place on the *Approach* the week of March 9, 2020.

Engagement

CCGA would like to thank PMRA for the proactive stakeholder engagement that has taken place with your team, and across your entire agency, over the last three years. Building off of this engagement, we appreciate and look forward to collaborating on your proposal to solicit data from impacted stakeholders before and during the scoping process of a proposed decision. Data on how products are used as well as scale and volume of product usage could be provided at this time.

Workload

Wherever possible, CCGA supports steps being taken by PMRA to reduce the number of automatic or non risk-based evaluations. The proposed Integrated Pesticide Program has the potential to reduce workload peaks that could render the Agency's re-evaluation schedule unsustainable in the future. Continuous review and assessment of risk, leading to the possible separation of workflow prioritizations and application of resources to each re-evaluation based on a science assessment of the risk of the active ingredient, rather than treating each active equally, is positive. The Integrated Pesticide Program is a positive step that should result in the effective use of PMRA's resources, which in turn should result a positive investment climate in Canada.

CCGA is supportive of the proposal to create a new step in the re-evaluation process, a Draft Risk Assessment. This should allow for meaningful public engagement across a variety of interest groups and has the potential to address several issues with the current Proposed Risk Assessment process. A lack of robust data in proposed re-evaluation decisions, appropriate refinement of risk assessments leading up to proposed re-evaluation decisions, and effective examination of possible risk mitigation strategies, could all be addressed with the introduction of a Draft Risk Assessment. With the proposed introduction of this step, the ability to spread workload across several different mechanisms has the potential to greatly improve the sustainability of Canada's pesticide evaluation processes.

We look forward to learning more details of the proposed Integrated Pesticide Program and further consultation related to its development and implementation.

Water Monitoring

CCGA is grateful to have had the opportunity to collect and provide water monitoring data on clothianidin and thiamethoxam to PMRA over the course of the 2019 growing season. We are acutely aware of the challenges (scientific, logistical, ecological, and technological) that are a part of such an exercise. Our experience in this area has provided us with many important insights, but also solidified our view that timely, robust, real-world data on pesticides in water is needed. Canada needs a national water monitoring program so that this data may be incorporated into draft risk assessments as well as proposed and final re-evaluation decisions. Decisions that are being made in Canada that will impact chemistries registered for use in Canada need to be informed by Canadian data, and models that reflect the realities of Canadian eco-systems. Using sources unrelated to Canadian use is unacceptable.

Our organization stands ready to assist PMRA in an advisory and consultative capacity on the development of this program.

Parliamentary Review of the Pest Control Products Act

CCGA has followed the PMRA's preparations for the statutorily scheduled review of the *Act*. CCGA does not believe that the *Act* needs to be opened at this time for amendments. However, we would reiterate that concerns related to PMRA's funding, monitoring and surveillance data, risk assessment, public engagement, and competitiveness as part of PMRA's mandate, all need to be addressed.

Extraneous Considerations

On balance, the proposals put forward in the Proposed Integrated Approach to Pesticide Evaluation are positive. We look forward to further consultation on the details associated with the proposed approach. It has been acknowledged that the proposed approach cannot address all of the areas on which our organization has engaged with your Agency. As such, we would respectfully re-iterate some standing points which we have discussed over the last several years.

1. When cancellation of uses is proposed or decided upon, there is currently no comparative analysis done to consider the availability of viable alternatives, the impacts on growers' competitiveness or risk mitigation efforts that may reduce the risk profile of a chemistry, apart from de-registration. The PMRA has the mandate to do comparative analysis but does not do so as a time-saving measure to reduce the time required to reach a decision. Resources need to be allocated to fulfill this mandate.

2. It is absolutely critical that Canadian growers have and retain access to the same tools as competing exporters if the government's aggressive export targets are to be met and the canola industry's significant contribution to the Canadian economy is to be maintained. If PMRA were to account for the competitiveness of the grains sector, including on re-evaluation and special reviews, it would have significant positive impacts on our members' small businesses.

3. Given current resource constraints, the Government of Canada and PMRA should leverage the sound regulatory resources and science from trusted regulators around the world. Efforts need to be made to explore ways to minimize duplication and adopt regulatory cooperation principles, including ongoing collaboration between PMRA and the U.S. EPA. The PMRA should also continue to actively communicate and promote the rigour of the Canadian regulatory system.

4. PMRA also has an increasingly important role in using its unique and specialized expertise in crop protection to advance Canada's trade and economic interests in the area of international trade and maximum residue levels (MRLs). CCGA is concerned that missing and misaligned MRLs are a growing obstacle to trade that threaten the competitiveness of canola farmers and industry. Additional and dedicated PMRA resources are needed to advance the Canadian value chain's international interests at Codex and in other international MRL fora.

Thank you for consideration of this submission. Canola growers are committed to the highest standard of human health and environmental safety. We support the PMRA in its mandate and look forward to continued engagement with the Program Renewal Team in the future.

Sincerely,

original signed by

Rick White
President & CEO
Canadian Canola Growers Association