



June 30, 2022

Pest Management Regulatory Agency Publications Section
Pest Management Regulatory Agency (PMRA)
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Dear Sir/Madam;

The Western Canadian Wheat Growers Association is a farm advocacy organization dedicated to developing agriculture policy solutions that strengthen the profitability and sustainability of farming and the agricultural industry. We are a member-based, not-for-profit association, not relying on grain checkoff funding. Our members grow grain and oilseed crops across millions of acres. Our Board of Directors are a group of committed and passionate farmers, freely giving their time and energy to advocate on behalf of fellow farmers.

The review of the Pest Management Regulatory Agency's Pest Control Products Act (PMRA Transformation) is an important process and requires the input of those that are directly using and impacted by the PMRA – the farmers themselves. The following submission is based on input from our members and is contributed here to ensure that Canada's PMRA system remains robust and effective, based on science research and outcomes, free of political interference.

The Wheat Growers is pleased to make this submission and answer any further questions that may arise out of the review.

Yours truly,

Handwritten signature of Gunter Jochum in black ink.

Gunter Jochum
President

Handwritten signature of Daryl Fransoo in black ink.

Daryl Fransoo
Chair

Handwritten signature of Jim Wickett in black ink.

Jim Wickett
Secretary-Treasurer

Pest Management Regulatory Agency's Pest Control Products Act review

June 30, 2022

Canada's pesticide regulatory system is one of the most robust science-based regulatory systems in the world. Reviews of our regulatory systems should be done on a regular basis to ensure that the systems remain current and strong.

We understand that the Review will be based on the following principles:

- Further strengthen protection of human health and the environment;
- Build on strengths of the current system, from past and existing reform efforts, and on what we have heard to date;
- Continue to design a regulatory approach to decisions that remain science-based, within a framework that is timely, transparent and accountable;
- Bring forward proposals that make meaningful improvements and achieve objectives;
- Engage the public, Indigenous communities, partners, and other stakeholders in a timely and effective manner to inform the approach; and
- Maintain an approach with a clear focus on expected results.

The PMRA system is designed to serve farmers and to protect consumers and the environment. Canadian farmers take extraordinary steps to produce and export some of the world's best grains and oilseed products. They have been ably doing this for decades and have provide safe, sustainable food in quantities that have ensured a strong food security system not only in Canada, but in many other regions of the world as well.

For this to continue, it is imperative that the PMRA continue to solely follow a science-based mandate. The agriculture community and policy makers must defend this process and it must be free of political interference in both regulations and the spirit of the regulations. The August 4th political announcement which launched the PMRA consultation and abruptly put a pause to MRLs undermined the reputation of a system that has provided global leadership on world class regulation of the agricultural industry.

At a time when the world is coming out of a global pandemic, international war has raised its ugly head again, inflation is on the rise and global food security is at risk, now is not the time to put our PMRA value in conflict. According to Maple Leaf Foods, Canada is facing a food crisis.¹

¹ <https://www.theglobeandmail.com/business/article-canada-food-insecurity-michael-mccain/>

Canada has a strong history of leadership in agriculture technology and growing more with fewer inputs (such as fertilizer, pesticides, water and fuel) thereby strengthening global food security. The demand for even more food will continue to grow in both the short and long-term. Canada's innovation will continue and requires the support of a modernized and efficiency regulatory system. Access to innovative technologies is extremely dependent on a functional regulatory system that is founded on the principles of science, transparency and predictability.

To successfully achieve this, The Government of Canada must stand firmly behind its science-based approach to pesticide regulation to ensure farmers have timely access to the critical tools they need to protect their crops in the face of constantly changing growing conditions. Any additional funding should be committed to implementing the vast number of recommendations for administrative improvements previously identified in the 2015 statutory review and countless other consultations. Registrants have long supported increased funding and improved programming at the PMRA. Objectives that ought to result in stronger public trust while also supporting the competitiveness of Canadian producers.

The Barton report states, *“By 2025, Canada will be one of the top five competitors in the agri-food sector, recognized as the most trusted, competitive and reliable supplier of safe, sustainable, high-quality agri-food products and an innovator in value-added products to feed the dynamic global consumer. We will have a leading digital and technology-based supply chain and stand out as the world's favoured protein provider.”*²

The Canadian agriculture industry can meet this challenge but cannot be hampered by the political tides of the day that could fatally undermine the support systems that they have long counted on. The PMRA system is a world leader but will lose this standing should we open the door to non-science-based changes that would undermine our ability to remain competitive and contribute to global food security for generations to come.

We would support PMRA Program renewal with more transparent decision making, more predictable risk assessment and the ability to bring in data earlier rather than modelling worst case scenarios. Science-based decisions must be the final recommendations, and not interfered with by politicians or bureaucrats.

The recently announced panel will slow down decision making, and risk having non-science trained individuals usurp the work of PMRA's scientists. Strict service standards should be established and adhered to in order to ensure decision making is predictable and not delayed due by added bureaucracy.

² <https://www.ic.gc.ca/eic/site/098.nsf/eng/00022.html>

Increased transparency of decision making is positive. However, the resources required both within, and outside the PMRA to develop layperson’s “plain language” versions of scientific data, could be very significant. Providing the PMRA with consistent and proportional resources is critical to ensure their primary mandate is not compromised by diverting resources from other tasks (again slowing down reviews and registrations) or worse, creating confusion amongst the public.

It is important that any material changes should consider a pilot of an active ingredient or two, as a way to test the true costs and impacts, before full implementation. This avoids the potential of experiencing the negative impacts across the whole PMRA portfolio.

Further, we are pleased to see that the PMRA is receiving additional funding to support PMRA’s re-assessment process, including monitoring the occurrence of pesticides in water. Canada’s grain value chain has been asking for this since 2019. Implementation of these changes should be prioritized.

Decisions and announcements such as that made by federal Cabinet Ministers³ as recently as August 2021 put our food security in jeopardy. The Western Canadian Wheat Growers believes the *Pest Control Products Act* is fit for purpose and that added improvements and regulatory modernization can be achieved via updated guidance documents and internal policy implementation. The establishment of independent external advisors to essentially oversee the work of the PMRA is foolhardy at best and dangerous at worst. Such proposed changes could have a dramatic impact over how pesticides will be reviewed and administered in Canada over a long period of time. Rushing into these changes could have a detrimental and sometimes irreversible impact on innovation, competitive and sustainable agriculture in Canada. The PMRA should therefore take sufficient time to duly consider all implications related to the proposed changes.

One only needs to look to the real-life example of what is happening in Sri Lanka to understand the impact of political interference in food security.⁴ With political interference in the Sri Lankan food security chain, the country now faces food shortages, starvation, and the domino effect of economic collapse and political instability. Canada cannot and must not contemplate such outcomes.

The Western Canadian Wheat Growers stand with and support our fellow agriculture organizations that oppose the possibility of political interference in our PMRA system. We ask that this review arrive at the same decision, all the while continuing to support and strengthen our current system.

³ <https://www.canada.ca/en/health-canada/news/2021/08/government-of-canada-pauses-decision-on-glyphosate-as-it-strengthens-the-capacity-and-transparency-of-review-process-for-pesticides.html>

⁴ <https://www.eco-business.com/news/how-can-sri-lanka-solve-its-impending-food-crisis/>