

Opening Statement for the House of Commons Standing Committee on Agriculture and Agri-Food

Pierre Petelle, Acting President

CropLife Canada

March 7, 2017



Mr. Chair, Members of the Committee,

Madame chair, members of the committee, On behalf of CropLife Canada and its member companies, we are pleased to have the opportunity to contribute to your study of PMRA's recent proposed decision on Imidacloprid. I am joined today by my colleague Dr. Maria Trainer.

CropLife Canada est l'association commerciale qui représente les fabricants, développeurs et distributeurs des innovations de la phytologie – y compris les produits de protection des cultures et ceux issus de la biotechnologie végétale – destinées à une utilisation agricole, urbaine et en santé publique. Nous nous sommes engagés à protéger la santé humaine et l'environnement, et nous croyons qu'il faut stimuler l'innovation par la recherche continue.

Notre mission est de permettre à l'industrie de la phytologie de mettre les bienfaits de ses technologies à la disposition des agriculteurs et du public. Ces bienfaits se manifestent de nombreuses façons, notamment par la disponibilité d'outils sûrs et efficaces qui aident les producteurs agricoles du Canada à nourrir le monde, ce qui, en retour, stimule les exportations agricoles et la création d'emplois, renforce l'économie rurale et fait croître les recettes fiscales de l'État.

Agriculture, as Dominic Barton states in his recent report to government, is a sector of enormous potential for this country, but it requires a supportive environment in order to truly thrive.

CropLife Canada believes that a predictable, science- and risk-based regulatory system for pesticides in Canada is key to agricultural success. The protection of human health and the environment are top priorities for our industry and we believe that our track record clearly demonstrates that fact. The advances that have been made in plant sciences have contributed to significantly improved human health, lower risk for farmers, and reduced environmental impact.

As an industry we are strong proponents of the pesticide re-evaluation process, which ensures regulatory decisions are always founded in the most currently available science. This process protects Canadians, and it is one we wholeheartedly support. Protections like this in the Pest Control Products Act, are part of the reason why PMRA is seen as a leader in risk-based evaluations of pesticides by regulatory bodies throughout the world.

However, PMRA has deviated from its normal process in a series of proposed re-evaluation decisions it has made in the past year and that is a cause for concern. Many of these preliminary decisions - with imidacloprid being simply the latest - have lacked the transparency and predictability for agriculture stakeholders that we have come to expect from the PMRA. We fear that these essential components are being missed as the agency rushes to meet arbitrarily imposed deadlines. Some of this appears, in our view, to be fallout from the Commissioner of the Environment and Sustainable Development, or CESD, report from January 2016, and an overreaction to criticisms contained therein.

Our specific concern is that after a re-evaluation is initiated and potential red flags are identified, dialogue with the registrant is not being pursued. Had the PMRA initiated earlier dialogue with the registrant, and other stakeholders, in their re-evaluation of imidacloprid, we would not be sitting before you today.

In order to make progress on this active ingredient, there is a need to ensure that the regulator demonstrates and maintains an openness to new data and to scientific dialogue with all stakeholders, including the product registrant. Disagreements can, and do, exist on the interpretation of scientific data, which makes the need for an open dialogue especially urgent. Recently, we are seeing significantly less of that openness and desire for dialogue from PMRA.

It is worthwhile to contrast previous PMRA strategic plans to their present one, as it serves to exemplify some of our concerns. Previous strategic plans from 2003 and 2008 contained, in addition to the obvious primary mandates of human health and environmental protection, clear language about the Agency's role in "providing access to tools", "timely and predictable access", "supporting Canadian competitiveness", to quote a few. This language did not lessen the importance of human health and environmental protection but it did remind PMRA evaluators and managers that their decisions have a profound impact on agriculture and that efforts must be made to consider this in their deliberations.

The latest 2016-21 PMRA strategic plan contains no such language. This is a concern for us, particularly in light of the kinds of re-evaluation decisions being proposed, including the one you are studying for Imidacloprid. As mentioned, the audit report from the CESD sharply criticized the PMRA on some of their re-evaluation delays. We feel that in the haste to address this backlog, the Agency is sacrificing fulsome scientific dialogue for expediency. We believe that the Agency needs clear direction from the government on the interpretation of the CESD audit to ensure that decisions with clearly negative impacts on a major sector of our economy are not made in haste.

In addition to the pressure the Agency faces from the audit, there has been a huge increase in recent years in activist pressure. For example, there have been increases in form letters submitted by "click and submit" sites set up by activist groups, more media attention, and even some U.S.- style lawsuits from activist groups. Surely this is affecting workload, not to mention morale. Is it creating a risk-averse environment? Recent actions by the Agency would suggest they could be.

Mr. Chair, Canada is, and should continue to be, a global leader in sustainable agriculture. That was certainly the intent of the recent report from the Council on Economic Growth, chaired by Dominic Barton. Mr. Barton sees the immense potential that Canada has to continue to increase its agricultural productivity and exports, increase agri-food production, and truly take advantage of the opportunities that exist for us globally. The PMRA has been a leader with its strong work at the international level that has resulted in new technologies coming to Canadian growers at the same time as their competitors in the US and elsewhere. We are concerned that

this commendable action on new products is being undermined by the Agency's re-evaluation approach and decisions just as the Government of Canada is looking to agriculture as an avenue for economic growth.

Our global members need predictability in order to invest here in Canada. Recent re-evaluation proposals are sending shockwaves among our members and our fear is that if Canada becomes a high-risk or unpredictable market, we will miss out on new opportunities. This is certainly not the environment envisioned by Dominic Barton and his colleagues when they wrote their report, nor do we believe that this is the policy intent of the Government of Canada. This is why we are looking to this Committee and to the Ministers of Agriculture and Health for leadership, and to help ensure that the PMRA's re-evaluation program doesn't undo all the good work that has been done to get new products registered while at the same time tarnishing the reputation of approved products without first having a thorough and transparent examination of all the data. We need to avoid damaging the competitiveness of Canadian growers with decisions that provide questionable health and environmental protection.

Specifically, agriculture stakeholders are looking for a fair scientific discussion from PMRA with potential input from external expertise on Imidacloprid. There needs to be flexibility on timing for new data on imidacloprid so that PMRA can be certain that decisions are being based on the best possible information. We would like to see consideration given to re-evaluation process improvements, as outlined earlier. We hope for a re-insertion of 'enabling access and competitiveness' language in PMRA's strategic plan. Finally, we would like to see some consideration given to the broader Canadian agriculture strategy, as articulated in the Barton report, by PMRA in its decision making.

We thank you for your time, and look forward to your questions.