

September 26, 2023

The Honourable Lawrence MacAulay
Minister of Agriculture and Agri-Food Canada

Sent via email to: aaafc.minister-ministre.aac@canada.ca

The Honourable Mark Holland
Minister of Health Canada

Sent via email to: hcminister.ministresc@hc-sc.gc.ca

Dear Ministers MacAulay and Holland,

Re: Drone application of pesticides

The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations administered by all levels of government. We are passionate and dedicated to ensuring that the agri-food sector and rural communities are considered and consulted with for any new or changing legislation that would impact the sustainability and growth of our farm businesses.

OFA supports an efficient, science-based regulatory environment for pesticides in Canada. This system should protect human health and environmental safety while encouraging innovation and competitiveness on a local and global scale. Science-based regulations allow farmers access to the tools they need to grow food safely and sustainably for Canadians and the world. With the current system, Canadian producers are at a competitive disadvantage - many products approved for use in the US are not available in Canada or have different label instructions. OFA encourages the harmonization between the Canadian and US system for evaluation and registration of pesticide products, ensuring that Canadian farmers remain competitive on the global stage.

The Pest Management Regulatory Agency (PMRA) does not currently allow pesticide application by drone, citing it as a new application method that differs from aerial application by fixed-wing, manned aircraft. As such, registrants must submit label amendment applications, along with full data sets, to allow PMRA to characterize the hazards and risks of this *new* application method. No product labels including drone application have yet been approved by PMRA, but several 'research authorizations' have been issued permitting limited use for research purposes.

Internationally, Canada is lagging behind when it comes to drone application. Drone application in many parts of Asia have been used for more than a decade. Australia considers drone application covered by the definition of aircraft in their 2019 Spray Drift Policy. In the U.S., drone application does not require a specific label statement and many states have grandfathered drone application where other forms of aerial spraying are approved.

Drone spraying presents an opportunity for Ontario agriculture, particularly for small to mid-sized farms – drones are easy to operate, relatively inexpensive, do not compact soil or damage crops, eliminate spray equipment from travelling roads, can reach difficult places and easily handle zone or site-specific application.

To even the playing field and to realize the opportunities pesticide application by drone presents for Ontario farmers, OFA respectfully requests that PMRA expeditiously review and approve drone applications where scientific evidence supports the safe application. OFA further requests that best practices be developed for drone application of pesticides, to guide the safe handling of product as well as operator safety during application.

We believe that while we represent Ontario, other provinces support this request. The Canadian Federation of Agriculture passed a resolution at their Annual General Meeting in March to encourage expeditious approval of drone application of pesticides in Canada.

I would welcome the opportunity to meet with you and your staff to discuss the expeditious approval of drone application of pesticides at any time.

Sincerely,



Peggy Brekveld
President

cc: The Honourable Lisa Thompson, Ontario Minister of Agriculture, Food and Rural Affairs
Keith Currie, President, Canadian Federation of Agriculture
OFA Board of Directors