

March 8, 2024

Pest Management Regulatory Agency Publications Section
Pest Management Regulatory Agency
Health Canada
2 Constellation Drive
Ottawa, Ontario K1A 0K9

Sent via email to: pmra.publications-arla@hc-sc.gc.ca

To whom it may concern,

RE: Regulatory Proposal PRO2024-01, Proposed policy on continuous oversight of pesticides

The Ontario Federation of Agriculture (OFA) is pleased to provide comments to the Pest Management Regulatory Agency (PMRA) on *Regulatory Proposal PRO2024-01 entitled Proposed policy on continuous oversight 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.

Farmers use many strategies to support the growth of crops while being environmentally conscious. Pesticides are a vital tool that can be used to safely manage pests that can be harmful to the health and quality of a farmer's crop. 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.

OFA also 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. With the current system, many products approved for use in the US are not available in Canada or have different label instructions, creating a competitive disadvantage for Canadian producers.

OFA welcomes the efforts of the PMRA to modernize their business processes through the transformation agenda. We understand that continuous oversight represents improved processes that will allow PMRA to implement a more continuous and proactive approach to identify and consider new scientific information, resulting in enhanced confidence and efficiency in addressing risk and enhanced protection of human health and the environment.

While OFA is generally supportive of the proposed policy on continuous oversight of pesticides, we provide the following comments and concerns about applying the policy.

Resources required to deliver continuous oversight policy

While implementing a continuous model of considering scientific information throughout the lifecycle of a pesticide product or ingredient would appear to be an advantageous approach, details provided in the proposed policy seem to increase the regulatory effort and workload with no indication of additional resources or funding to be allocated. OFA is concerned that this increase in workload will affect the timeliness of evaluations, decisions and PMRA's efforts in addressing the backlog of products to review. Further and continuing delays lead to less products available to farmers in the marketplace while timely access to these products is essential to farmers producing crops to feed our growing population.

Minor Use label expansions

Additional delays due to pending review of new data identified under continuous oversight would have significant impact on fruit and vegetable growers who already have limited access to pest control options compared to major field crops. OFA understands that concerns exist about delays in adding a minor use crop to a product label, a relatively simple label amendment, because of continuous assessment leading to pending or ongoing reviews of new information. Minor use label expansions regularly involve older active ingredients that have been registered for long periods of time and may have larger bodies of new information available. Currently, delays in minor use registrations result if the active ingredient is under re-evaluation or special review. It is important that new data or studies identified through continuous oversight be reviewed in a timely, efficient manner that does not add to the timeline in approving a product for minor use.

Stakeholder engagement and communication

OFA encourages PMRA to explore options to engage with stakeholders to enhance working knowledge of the agriculture sector and improve awareness and understanding of the impact of regulatory decisions, systems, and policies.

OFA believes that introducing plain language summaries of pesticide decisions, and the scientific process would greatly improve transparency. Clear, concise, and plain language supports understanding and allows for stakeholders to have informed and science-based participation in the regulatory process. Plain language summaries should not be limited to pesticide decisions but should be expanded to include any public documentation, including consultation documents, risk assessments, and application summaries. Continuous oversight will result in an increase in decisions and information posted. Clear, concise, and plain language will ensure farmers and stakeholders understand the purpose and direction of the information shared, avoiding confusion and furthering public trust in pesticide regulatory system.

OFA supports a pesticide regulatory system that is science-based, efficient, and transparent while protective of human health and the environment. Farmers must have timely access to new pest management products to remain competitive, and continue to provide safe, and sustainable food to Canada and the world. OFA appreciates this opportunity to provide our feedback on Regulatory Proposal PRO2024-01, proposed policy on continuous oversight of pesticides, and look forward to continuing engagement as the transformation agenda progresses.

Sincerely,



Drew Spoelstra
President

cc: Hon. Lisa Thompson, Minister, Ontario Ministry of Agriculture, Food and Rural Affairs
Hon. Lawrence MacAulay, Agriculture and Agri-Food Canada
OFA Board of Directors