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Chair

Mr. Ben Lobb

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● (1530)

[*English*]

The Chair (Mr. Ben Lobb (Huron—Bruce, CPC)): Ladies and gentlemen, we're going to get our meeting started.

Before we get too far into our meeting and have our guests start their presentations, we have some committee business to take care of. I'll turn it over to our clerk and he'll take it from here.

The Clerk of the Committee (Mr. Andrew Bartholomew Chaplin): Pursuant to Standing Order 106(2), the first vice-chair must be a member of the official opposition. I'm now prepared to receive motions for the first vice-chair.

[*Translation*]

Ms. Christine Moore (Abitibi—Témiscamingue, NDP): I would like to nominate Murray Rankin as the vice-chair.

The Clerk: It has been moved by Ms. Moore that Mr. Rankin be elected first vice-chair.

[*English*]

(Motion agreed to)

The Clerk: I declare the motion carried and Mr. Rankin duly elected as first vice-chair of the committee.

The Chair: Okay, good.

We won't be taking any acceptance speeches on that, but congratulations.

We have three different organizations that are here today to talk to our Pest Control Products Act review. We're going start from my left and go across.

Mr. Petelle, you're up first.

The Clerk: Would you please start with the canola growers because we're making copies of the other two presentations?

The Chair: Okay, we're going to change the plans. We're going to wait for the copies of the speaking notes.

First off, and hopefully we're not putting you on the spot, is the Canadian Canola Growers Association.

Jan Dyer, go ahead.

[*Translation*]

Ms. Jan Dyer (Director, Government Relations, Canadian Canola Growers Association): Thank you, Mr. Chair.

[*English*]

Mr. Chairman, members of the committee, we thank you for the opportunity to be invited here today to speak to you about the review of the Pest Control Products Act.

The Canadian Canola Growers Association represents 43,000 canola growers. We are governed by a farmer board of directors, representing all provinces from Ontario west to B.C.

Canola is the number one cash crop in the country, contributing about $19 billion a year annually to the Canadian economy. About $8 billion of that is in cash receipts to growers alone. Over 16 million tonnes were produced this last crop year, surpassing the industry goal to increase production to 15 million sustainable tonnes by 2015. So we are a growing industry.

Crop protection products, which include herbicides, fungicides, and insecticides, are critically important tools for farmers' production. They allow farmers to produce more per acre by helping control yield-robbing weeds, diseases, and insects. Maintaining access to current crop protection products and facilitating access to new technologies is critical for canola growers to be competitive in a global market. Equally important is that the products farmers have access to be safe and environmentally sustainable.

The Pest Control Products Act is a key piece of legislation that both facilitates access to products that farmers need to remain competitive in a global market, as well as ensures these products are safe for farmers and all Canadians. It also provides an open, transparent framework that instills public confidence in Canada's regulatory system and the safety of crop protection tools being used in Canada. This is particularly important to canola producers, as the public's acceptance of modern agricultural practices is becoming more and more important.

At this time we don't feel that this act requires major changes, as it is serving farmers and Canadians well.

A key pillar of the act is science-based risk assessment. The canola industry and its successes have been built on the same foundation of predictable and science-based regulatory approval processes. This system encourages continued investment in agricultural innovations that have been critical to the development of new crop protection products. These advancements in science are continually facilitating the introduction of new crop protection products that offer benefits to farmers and to the environment.

New, more targeted products are more environmentally sustainable. New, less expensive products improve farmer competitiveness. New products that are easier to apply can reduce exposure of the product to the farmer, and the discovery of new modes of actions aids in the effort to reduce weed resistance, which is a benefit to both farmer profitability and the environment. These advances are all facilitated by a predictable, science-based regulatory approval system, which the Pest Control Products Act provides.

The current science-based regulatory system does a good job of risk assessment while encouraging continued investment in agricultural innovation. Any erosion of this science-based risk assessment would have serious consequences for canola farmers. CCGA strongly supports the PMRA in carrying out its mandate and upholding these important principles.

While it's not necessarily stipulated in the act, the PMRA also plays an important role in maintaining global access for Canadian agriculture products and ensuring functioning international markets. With 90% of canola exported annually, canola farmers rely on trade for their success, and both our industry and the government have invested significant resources to maintain and grow our trade opportunities.

Some specific examples of important PMRA work for us are the identification of Canadian priority pesticides for the establishment of Codex maximum residues, the joint product reviews through the Canada-U.S. Regulatory Cooperation Council, the joint global review process where OECD members cooperate to register products, and finally, the promotion on an international level of sound science in decision-making. These initiatives not only ensure continued access to international markets for our farmers, but also ensure they have access to the newest and latest crop technologies.

● (1535)

CCGA and our growers believe the key to PMRA's ability to effectively administer the act is having an appropriate funding level. Cost recovery consultations have been ongoing in the last few years with the latest rounds last week, and CCGA supports the modest user fee increase they have proposed and believes more funds are needed to ensure PMRA can continue to operate its current suite of programs, and meet its objectives and established performance measures. An increase in user fees to industry players would complement Government of Canada funding and ensure a strong, independent system and public confidence in the approved pesticides.

PMRA plays an important role in ensuring safety of new and existing crop protection products in Canada, creating public confidence in our regulatory system and influencing an effective global pesticide framework. The Pest Control Products Act continues to provide a good framework for bringing new crop protection tools to market, for ensuring open and fair processes, and most important, for protecting human, animal, and environmental health and safety.

I thank you for the opportunity to come to this committee today to speak about the act. I look forward to your questions.

The Chair: Thank you very much.

Next up, from CropLife Canada, we have Mr. Petelle. Go ahead.

[*Translation*]

Mr. Pierre Petelle (Vice-President, Chemistry, CropLife Canada): Mr. Chair and members of the committee, I would like to thank you for inviting us to be here today.

I am Pierre Petelle, and I am the vice-president of Chemistry at CropLife Canada.

On behalf of the association's member companies, I am pleased to provide these remarks on the review of the Pest Control Products Act. I will also be pleased to answer all of your questions following my presentation.

CropLife Canada is the trade association that represents the manufacturers, developers and distributors of plant science technologies, including pest control products and plant biotechnology, for use in agriculture, urban and public health settings.

We strive to ensure that the benefits of plant science innovations can be enjoyed by both farmers and consumers. CropLife Canada promotes sustainable agricultural practices, and we are committed to protecting human health and the environment.

● (1540)

[*English*]

Our members are continuously innovating to provide the most effective and the safest tools for food production, public health protection, utility rights-of-way, and green spaces. Canadian agriculture generates more than $100 billion annually in economic activity. Crop protection products and plant biotechnology improve crop quality and increase yields, which lead to over $7.9 billion in additional value for farmers of field, vegetable, and fruit crops. It also contributes off-farm value worth over $6.4 billion in areas such as processing, shipping, and manufacturing.

Without pesticides and plant biotechnology tools, we could lose up to 40% of our crops in Canada to weeds, insects, and diseases. On average, Canadian families save over 58% on their weekly grocery bills thanks to those plant science innovations, but these products cannot exist without a modern, predictable, and timely science-based regulatory system.

The current version of the Pest Control Products Act, brought into force in 2006, has unprecedented protections and transparency provisions for Canadians. Despite the significant changes that the new act meant, CropLife Canada and its member companies supported these measures when they were introduced, as a means of increasing the confidence of Canadians in their science-based regulatory system. We were and we remain confident in the science that supports our products, so we welcomed the additional safety provisions and the unprecedented openness of this legislation.

We believe that, on balance, the act is still working well today, and we do not support major revisions to it. The primary objective of the act is to prevent unacceptable risks to people and the environment and to measure those risks in a predictable, timely, and science-based fashion. This is an objective that we as an industry share, and we believe that the act is well positioned to continue to meet those goals.

Canadian farmers compete on a global level. They face ongoing challenges from weeds, insects, and diseases and must have timely access to the most modern pest control products in the world. They need access to those tools in order to remain competitive and to ensure our food supply remains abundant, affordable, and safe.

We should not take this for granted. Some jurisdictions have allowed their regulatory system to become driven by ideology and special interest groups, rather than relying on the robust, risk-based scientific assessment that is prescribed in our Pest Control Products Act. The results of non-science-based decision-making are numerous: declining food production, diminished trade, higher food prices for consumers, and a lack of consumer confidence in the regulatory system.

Another objective of the act is to encourage public awareness in relation to pesticides. We feel that this has been an area that the government can and should improve upon. Canada has one of the most highly respected regulatory systems around the world. It balances the need for farmers to have timely access to new technologies while protecting the health and safety of Canadians and the environment. This is something that we as a country should be proud of; however, in the face of ongoing activist attacks on the safety of pesticides in Canada, the regulator remains relatively silent.

We would encourage the government to stand up for the regulatory system and help educate Canadians about the safety of the products farmers are using to produce their food. We're concerned about the erosion in public confidence that is being orchestrated by some special interest groups. Rather than improving public confidence with this modern piece of legislation, we have seen these groups openly criticizing Health Canada and second-guessing the rigorous scientific assessments, sometimes without any scientific evidence. Indeed, Mr. Chair, they are conducting these campaigns without using the very provisions they lobbied for in the act, provisions that allow them to have new scientific information evaluated.

Some groups are also attempting to use the transparency provisions of the act to bog down the PMRA and reduce their ability to deliver the safe and effective tools that farmers and others need. While transparency is vital, and we as an industry support that, the PMRA must have the ability to do its job as a science-based regulator.

There are some who will recommend to this committee the greater use of precaution or the use of the precautionary principle in Canada when regulating pesticides. Most experts, however, would argue that our system is highly precautionary, from the requirement for a full pre-market assessment to the post-registration controls that are in place. In fact, the precautionary principle is enshrined in the current act in section 20.

Scientists around the world are raising red flags about the misuse of this precautionary principle. It is being used by some as an excuse to block all progress and innovation. In fact, if we were to apply some groups' interpretation of precaution, there would be no tools available to growers. We must not allow this distorted view to get a foothold in Canada. Canada is a major food exporter, and this agricultural trade is critical to Canada's economic prosperity. No other sector is as keenly interested in, or as heavily impacted by, trade rules as agriculture is.

Regulatory harmonization, including joint reviews, is critical for agriculture. Harmonized maximum residue limits, or MRLs, are essential to ensuring the smooth flow of trade across borders. There is no point in bringing the latest technologies to farmers if they can't use them for fear of trade disruptions when they export their commodities. We need harmonized mechanisms to establish MRLs with our trading partners.

We strongly support the leadership role that the PMRA has played at the international level. The regulatory harmonization and cooperation for pesticide regulations is the envy of other sectors. This has allowed Canada to play a significant role in joint reviews and in work sharing, and has brought new technologies to Canadian farmers at the same time as their global competitors in much bigger markets.

We support the efforts of the Government of Canada to expand and safeguard trade globally, and we appreciate the efforts being made through initiatives such as the red tape reduction strategy and the U.S.-Canada Regulatory Cooperation Council both to ease the regulatory burden on farmers and our industry and to facilitate trade. These initiatives have a very positive impact on Canada's reputation globally as a place to invest and create jobs.

In conclusion, Mr. Chair, CropLife Canada and its member companies believe the act in its current form is largely meeting our needs. In general, any changes and improvements we might like to see can be achieved through regulation and policy rather than through legislative change.

We thank you and the committee again for inviting us, and we welcome any questions you may have.

● (1545)

The Chair: Thank you very much.

Our third guest today is Pulse Canada.

Go ahead.

Mr. Corey Loessin (Vice-Chair, Board of Directors, Saskatchewan Pulse Growers, Pulse Canada): Mr. Chairman and committee members, thank you for the opportunity to present to you today. My name is Corey Loessin. I am a farmer from Radisson, Saskatchewan, and I serve as a member on the Pulse Canada board. Our farm has grown peas and red lentils for more than 20 years, along with grains and oilseeds, on land that has been our family farm for more than 100 years.

Pulse Canada is the national industry association and is funded by farmers like me who grow pulse crops, lentils, peas, beans, and chickpeas across Canada. A farmer levy is collected by the provincial organizations and combined with funding from processors and exporters of pulse crops, so that farmers and the trade work together as Pulse Canada.

Canada is the world's largest producer of peas and lentils, and a leading producer of beans. Canada is the world's largest exporter of pulses. As a trade-dependent sector, the Canadian pulse industry is an advocate of trade-enabling policy and regulatory processes in Canada and at the international level. Crop protection products like herbicides and fungicides protect crops from weeds and diseases that reduce yields. These yield-enabling technologies are the key to growing enough food for the entire world on the existing land base. They are part of a sustainable food production system.

As you know, crop protection products are available to farmers only when they have been thoroughly evaluated from a human health and environmental perspective. Each crop protection product is assigned an MRL, maximum residue limit. By definition, the MRL is the maximum amount of residue that can be detected on the crop that is harvested and is an indicator of proper use of that product. Importantly to consumers, the MRL is an indicator that also shows that the food product is well below the level of concern for health or environmental safety. A science-based risk assessment system is as important to farmers as it is to the pharmaceutical industry and the health care system. Efficacy and safety are both the cornerstones of building public trust in food systems, just as they are in the health care system.

The challenge is that unharmonized assessment systems between Canada and importing countries are making it difficult for farmers like me to be sure that the grain we grow can comply with a multiplicity of different regulatory systems on MRLs. The risks are high. A shipload of grain that could be rejected could be worth $10 million to $40 million. Of note is that 90% of our peas go to three countries in the world, and about 86% of our lentils go to five countries in the world. These are critical markets. At the same time, lentils are shipped to over a hundred different countries around the world.

The risks are getting higher each year as testing gets more sensitive, into parts per trillion, and as more countries are moving toward their own custom systems. The leadership that Canada has shown in this area globally, through Health Canada's Pest Management Regulatory Agency, needs to continue. Canada's leadership in this area will need to increase to keep up with mounting challenges, and the PCP Act review needs to ensure that the act is not a future barrier to harmonization.

With me is Gord Kurbis, Pulse Canada's director of market access and trade policy, who is prepared to describe some of our key opportunity areas.

● (1550)

Mr. Gord Kurbis (Director, Market Access and Trade Policy, Pulse Canada): Thanks, Corey.

Our messages today are that harmonized international systems are critical to our industry, and that cuts at PMRA have put that at risk. The act is workable in its current form with one potential caveat that I will elaborate on.

As Corey has described, the international regulatory landscape around food trade is becoming more challenging and complex. While there are many technical issues, the key for us is not what international regulators decide vis-à-vis certain technology, it's when.

We're in an era of increasing technological innovation, giving us the ability to test for substances right down to parts per trillion. In cases where an importing country has not completed its assessment, it is common for a zero or near zero default to be applied. This means that advanced technology could show that traces of a product are present but at levels that have never been shown to be of any concern from a health or environmental perspective. Still, cargoes can be rejected. Let me illustrate this point with a practical and real life trade example.

In 2011 the pulse industry experienced a high profile non-compliance on lentils going into the European Union, which has been known to have a sensitivity in this area. The issue was that farmers were using a crop protection product, glyphosate or Roundup, which is fully approved for use in Canada. Residues were well within Canadian and other established international food safety standards. However, the EU had never gone through the process of establishing an MRL for glyphosate on lentils, and consequently it applied a near zero default of 0.1 parts per million that resulted in the rejection of the shipment.

This also created the threat of a product recall off retail shelves, so this was a non-compliance that was treated as a food safety issue. All of this happened solely as a result of a lack of regulatory harmonization around the timing of approvals. I want to be clear to all committee members, who may not be aware of the detail and policy and processes around establishment of crop protection product tolerance levels, that Canada is among the toughest regulators in the world when it comes to establishing safety margins and the lentil shipments in question were easily compliant with Canadian standards.

I would again emphasize that the issue here is that regulatory gaps cause shipments of safe, nutritious lentils to be treated as a food safety breach and rejected randomly and unpredictably. Rather than seeing a strengthening of alignment at the international level, we see more national approaches to food safety with some countries moving away from Codex to establish their own national systems. Recent examples include China, South Korea, Hong Kong, and Taiwan, with a few of Canada's other key export markets signalling they may follow the same path. This is all making harmonization even harder.

We would suggest two positions for your committee to consider. The first is that PMRA's leadership to date on harmonization internationally must continue, and it must be fully resourced, including consideration that cost recovery fees be funnelled back into PMRA. Examples that Jan touched on of the progress that PMRA has made toward harmonization of science-based approaches include work within the NAFTA Technical Working Group on Pesticides and OECD global joint reviews.

The second is the need to find creative ways in the future to employ other competent authorities' risk assessments, in the interim, in cases where timing poses a problem and to ensure that at that point, if we go down the road or choose to go down the road of recognizing other risk assessments, that the PCP Act doesn't stand as a constraint at that time.

We favour a global approach to food safety standards. Clearly many countries including Canada will feel the need to establish separate national approaches, but we would also suggest that Canada and other countries must develop processes to allow for recognition of standards that have been established by equivalent competent authorities. This will only be acceptable to the public if there's acknowledgement that the science-based risk assessment of another competent authority, such as the World Health Organization, provides adequate protection to the health of Canadians.

If at some point in the future Canada requests that its trading partners follow this approach, we can expect to be asked how Canada would react to a similar request. Would Canada be willing to recognize a World Health Organization-driven risk assessment or tolerance as an interim tolerance in a case where an MRL had not been established by Canadian regulators?

● (1555)

The challenge is clear. Adoption of new technology is the key to sustainable intensification of food production. Canada is a trading nation and needs to export. Regulatory gaps are putting trade at risk increasingly, and Canada needs to continue, and even strengthen, its leadership role in this area.

Thank you, Mr. Chairman.

The Chair: Thank you very much.

That concludes our presentations. Now we're on to the questions and answers.

Mr. Rankin, go ahead, sir.

Mr. Murray Rankin (Victoria, NDP): Thank you very much.

I want to thank everyone for their really helpful presentations and for coming today. I really appreciate it.

My first question is for Pierre Petelle, of CropLife Canada.

Sir, during your presentation you talked about transparency, and you said some groups are bogging down the PMRA. I've been told by some groups that access to documents that the PMRA uses to evaluate pesticides is problematic. The data evaluation records, for example, don't include the studies that were looked at to see whether the agency has accepted or not particular documents or whether independent scientific literature was consulted.

There seems to be, according to those I've spoken to, a real problem with transparency, yet you've asserted that some groups are bogging it down. I would like you to elaborate.

Mr. Pierre Petelle: In actual fact, what I also said was that some groups are not making use of the provisions in the act. In the act there is a provision to access all of that information in detail in a reading room. Obviously, confidential business information is removed, but anyone can request to go and look at all of that data in its rawest form, and if they have the understanding of the science, to come to their own conclusions as to whether or not PMRA did the assessment according to how they're supposed to. Those provisions are in the act, and very few people, as I understand it, have even made use of that reading room availability.

Mr. Murray Rankin: Right. The reading room is there, absolutely, and your point is well taken about confidential business information, and the declaration that you're not going to use information that's competitive has to be done, and we respect that. But the claim has been that they have access to what the industry submits, but not to what the PMRA itself looks at in the data evaluation records. That's really problematic. Have they looked at the pros and cons in the scientific literature, or have we focused only on what industry in a particular case has submitted?

There seems to be some dissonance as to whether or not transparency is a problem in this legislative regime.

Mr. Pierre Petelle: From our perspective, regulatory data is one thing. Regulatory data is what's required for your submission, and it's outlined very prescriptively by the PMRA in terms of which data are required to satisfy which elements of the review. Those are the data that our members provide as part of the registration. Any other studies—public studies, academia studies—that the PMRA looks at as part of, for example, a re-evaluation, are all looked at as part of their package.

Now, how they reference those in the final document is, I think, what you're getting at.

Mr. Murray Rankin: Right, the extent to which PMRA has even looked at that literature remains unknown. Have they simply looked at what industry has submitted? That's a gap in the transparency regime, if you will, that others assert to exist.

Mr. Pierre Petelle: But the act is very clear that any data pertaining to an active ingredient that is provided to the PMRA or that the PMRA is made aware of has to be part of the decision-making process. It may just be a procedural thing rather than a gap per se.

Mr. Murray Rankin: I know time is short, so I want to make sure I ask about the comment you made about the red tape reduction strategy. l was really quite surprised to hear CropLife Canada talk about that in the context of a review of the pesticide legislation.

Are you suggesting there are problems? Are you suggesting that somehow the red tape reduction strategy should apply to this health and science evidence-based regime? I wasn't clear where you were going with that.

Mr. Pierre Petelle: Just in broad strokes, we support the fact that things like the Regulatory Cooperation Council work, and in terms of the red tape reduction strategy, where regulations take into account the burden they're putting on industry, that this be taken into account.

But no, in terms of the current provisions of the act and the regulations, we're not asking for any specific reductions.

Mr. Murray Rankin: My next question is to Mr. Kurbis of Pulse Canada. Thank you for your helpful remarks.

You mentioned that the cuts to the PMRA have put, as I think you said, international harmonization efforts at risk, if I have that right—

● (1600)

Mr. Gord Kurbis: That's correct.

Mr. Murray Rankin: —and you elaborated with a really excellent example about glyphosate in lentils in the EU.

Is it your suggestion, then, that the government has inadequately funded the PMRA at the international level? What are you saying specifically about cost recovery? I don't understand that part of your submission.

Mr. Gord Kurbis: On the first question, PMRA has shown real leadership in trying to lead the discussion with other international regulators to say that when we are creating international tolerances based on the same data packages, let's please have tolerances that look like they were created in the same galaxy, both in terms of timing and in terms of the levels established. Even the PMAC committee of PMRA has noted that funding levels at PMRA to support those kinds of activities are not adequate. That's a real thing that we would recommend needs to be corrected.

On the second question, could you help me...?

Mr. Murray Rankin: It was cost recovery. Could you elaborate on what you were saying there?

Mr. Gord Kurbis: There are now increased fees from industry to support registration applications at PMRA. One of our recommendations would be that instead of going into the general treasury those fees be funded back into PMRA to help with their resource constraints.

Mr. Murray Rankin: I'd like to now, if I may, ask a question of Ms. Dyer of the Canadian Canola Growers Association.

You indicated that new, less expensive products help with competitiveness in your industry, which I well understand. There's been some question about whether the generic companies are competing equally well with what are called the innovator companies in this field.

Do you have any comments on whether generics are making their way to your industry in a timely way to assist you with that competitiveness you spoke of?

Ms. Jan Dyer: Sure.

The canola growers are one of the organizations that do manage what's called the GROU process, the grower own use process, and we're actively involved in setting up the system now for how we manage data protection and other things like that for the generic registration.

What we've said all along in the consultations—and PMRA has done a good job of consulting with both the CropLife companies and the generic companies in the last year or so to improve how that process works—is that what we really need is both innovation and research. We really depend on that. We want to make sure that there is a balance there. We also need to ensure that generic companies have access to the information they need to produce generic products.

Right now, we feel that the system works pretty well. We do know that our growers do have access to generic products for growing canola. We haven't had a big upswell of growers saying that they do not have access. They seem to be satisfied with the level of access that they have right now. Of course, we are always careful to ensure that this balance continues. PMRA has made some improvements this year and is improving the process, as I understand it, for how that works, especially on the data protection side. Our growers are pretty satisfied with the system right now and the balance in the system. I would say that the PMRA has done a good job.

The Chair: Next up is Mr. Lunney.

Go ahead, sir.

Mr. James Lunney (Nanaimo—Alberni, CPC): Thank you very much, Mr. Chair.

Welcome to our witnesses today in this review process of the PMRA. My first question would be for the canola growers, Ms. Jan Dyer.

One of the products that you rely heavily on is glyphosate, which is used heavily in canola production, the Roundup Ready seed. The question I have related to this is that glyphosate is a herbicide, right? Our target here is of course the weeds. I want to ask you, given your years of experience, since it's been introduced are there weeds developing resistance to glyphosate that require use of other herbicides and pesticides—I guess it's more herbicides we're dealing with—in addition to the Roundup Ready seed?

Ms. Jan Dyer: In terms of the tolerance levels I might defer to the CropLife chemistry guy beside me.

In general that's one of the things we rely on, seed developers and pesticide companies, to develop new technologies that are more effective and so that when we do run into problems of any herbicide tolerance we do have new formulations that address it. But it's a more technical question and maybe Pierre has a better answer than that.

● (1605)

Mr. James Lunney: Mr. Petelle.

Mr. Pierre Petelle: Yes, thanks.

Our members are always obviously concerned about resistance development because that means the products are no longer effective, and therefore, are no longer of any use to the farmer. We always try to make sure that through crop rotation and chemistry rotation you're not always selecting for that resistant weed or resistant insect to take over that field. There have been some issues, frankly mostly in the southern U.S., where some weeds have really developed strong resistance to many herbicides including glyphosate and they're having a real challenge there.

We have noted through Agriculture Canada a handful of herbicide-resistant weeds in Canada in limited pockets. Our industry is very engaged in that process with Agriculture Canada and other experts to make sure that those don't become widespread issues like we've seen in some parts.

Mr. James Lunney: Also, then, when we're dealing with canola there are other pests, and there has been an issue with your use of neonicotinoids. The issue has already been raised with committee, and I'm sure it will be again before we've done our review.

Mr. Petelle, in a CropLife Canada 2013 release, I think it was you who stated that bee health in western Canada was strong despite the fact that there are approximately 20 million acres in canola production.

I want to make note of PMRA's annual report for 2013 and 2014. It addressed the issue of neonicotinoids as well as Ontario, Quebec, and Manitoba reports about bee deaths. Of course, people are concerned about those, but in fact, the issue was related to dust. The product is applied to the seed. We have quite a range of agricultural zones in Canada, and precipitation and the moisture in the soil is an issue, so therefore it's a management issue with regard to how much dust is created. I understand, according to this, that CropLife participated in a review and gathered people together to discuss this; and PMRA announced its intent to implement additional protective measures in a notice of intent in September 2013. The additional measures included the use of dust-reducing seed flow lubricants, safer planting practices, and new pesticide and seed packaging labels with enhanced warning statements.

I wonder if you would comment on the management issues, because there were some unintended consequences here and they're relative to local management practices. Can you comment on where we are in that process and your participation?

Mr. Pierre Petelle: Absolutely.

As you stated correctly, the issues that we saw in isolated pockets seemed to be related primarily to corn—which is generally a dustier crop than is, for example, canola—and to some of that seed coating actually coming off of the corn. With certain planting equipment that uses air and vacuums, that exhaust is blown out with some of that seed coating on it.

The industry, as you noted, worked with the regulators and worked with the seed industry and with growers to tackle that issue head-on. Even though it was isolated in very small pockets, we instigated widespread measures. Farmers were adding a lubricant, which was like a talc powder, to help the corn seeds flow through those big pneumatic drills, which was abrading some of the products off. The industry came up with a new product that's more of a wax-based powder and that significantly reduces the amount of dust coming off the pneumatic seeding equipment.

We can't attribute all of the diminishment of incidence to those measures, but we did see a 70% reduction in the number of incidents being reported at the time of planting, and certainly those measures contributed to that.

Mr. James Lunney: Okay.

First, did I understand you correctly that there are already indications, or is it too early to say whether the new measures are reducing the concerns about bee mortality?

Mr. Pierre Petelle: We feel that the measures in place have gone a long way to addressing any issues.

Mr. James Lunney: Great. We're glad to see progress on that front.

Are you also saying then that it was more related to corn and was not an issue with canola planting, and could you explain why it doesn't apply to canola?

● (1610)

Ms. Jan Dyer: We haven't really seen any problems in canola. The seeding methods are totally different. The canola's seeded at a depth with a vacuum seeder that goes right into the ground: there's never any dust.

Canola seeds are extremely small, maybe double the size of a poppy seed, and we seed about 10 canola seeds per square foot, so the seeding rate is very low. We don't seed at the same time that bees are foraging in the spring. The Canola Council of Canada and the canola industry have done quite a bit of extension work in terms of working with beekeepers to make sure that beehives are located in areas not being seeded, such as on abandoned farmsteads and places like that. We've put in place a number of agronomic practices to make sure that's not the case.

For example, about 43% of Canadian honey production comes from Alberta, and 80% of that production is grown on canola. It's a very nutritious source of protein and nutrients for bees, so we've seen nothing but increases in bees, colonies, and honey production in the prairie provinces where canola is grown. We've had exponential increases in honey production.

Mr. James Lunney: That's very good news. The other question then that's related to this is international harmonization, which ties in.

But you may have a chance to remark on that as we move forward. Thank you.

The Chair: Very good.

Ms. Fry, you're up now.

Hon. Hedy Fry (Vancouver Centre, Lib.): Thank you very much, Mr. Chair.

I wanted to focus a little bit on the health and environmental aspects of the issue. As you know, the Pest Control Products Act establishes as its primary principle the prevention of unacceptable risk to people and to the environment. I just wanted to ask if you think that currently this act is meeting that objective well. If not, why not?

Anybody can answer. I'm not fingering anybody.

Mr. Pierre Petelle: I can start.

Absolutely. When you look at the safety of the food that's produced in Canada, when you read about issues related to food, it's usually about microbial contamination, some sort of bacteria or virus. When have we heard about a pesticide contamination issue in food? The fact of the matter is that pesticides are being used properly by farmers, they're growing food in a safe manner, and it's not a risk issue for consumers.

On the environmental side, if you look at the profile of products registered today versus even 20 years ago, products are much less persistent. They're much more specific to the target that they're trying to attack. They don't have the profile that some of the older chemistries did. Just like any other industry, we've advanced and we've moved forward in terms of the safety and innovation of those products, so we expect that to continue.

Hon. Hedy Fry: It looked like you wanted to say something, Mr. Loessin.

Mr. Corey Loessin: I could also just comment that there's been incredible changes in equipment technology, along with some of the developments in the newer pesticide products that we deal with. The new equipment that we deal with is much more precise, much safer for the operator, the applier of the products. I think that's another change that's happened over the last 20-plus years that really has improved the safety of application and the accuracy of application. In fact, the newest crop sprayers adjust the rate as you go around a corner, so that when the inner boom is going slower, it puts less on than the outer boom, which is going at a higher rate of speed. The application technology has improved immensely.

Hon. Hedy Fry: I just wanted to ask a second question. I was going to ask about the bees but Mr. Lunney did that for me, so that's fine. I know there's a huge concern about bees. You're hearing it from beekeepers across the country stating that the population of bees is going down, the production of honey is going down, and so on. So I heard some of those answers, and I won't go there.

Do you believe that humans are protected from the kinds of regulations that exist within the countries we're importing from? You talked about exporting. I'm talking about importing. You look at countries like Mexico, some of the Latin American countries, China, and so on, that are sending food into Canada. Do you think that we apply the same rigorous controls that we do here to foods that are coming into this country? In other words, is our imported food meeting a lower standard than Canadian food, or are they required to meet a lower standard?

● (1615)

Mr. Pierre Petelle: We talked about the maximum residue levels that are established, so those apply to imported as well as domestically produced foods. The Canadian Food Inspection Agency tests thousands of products every year, both imported and domestically produced. In general, when you look at the results year after year, close to 98% of foods are well below the established MRLs, and in fact, 80% to 90% of them have no detectable residues whatsoever. I think, on average, we're getting very good protection even from imported foods.

Hon. Hedy Fry: I'm asking this because I live in Vancouver and the Fraser Valley is just down the road, and of course everyone is complaining. Farmers are saying that the criteria that they have to meet is much higher than the criteria for, say, blueberries and strawberries coming up from Chile, and coming up from other parts of South America. Therefore, they feel that they're being unfairly....

Mr. Pierre Petelle: I think that's becoming less and less of an issue with global harmonization and with many of these countries now involved at the OECD level. You're getting a higher standard globally in terms of what's acceptable, how to do risk assessments, and how to regulate these products. With the stringent import requirements and maximum residue levels set by countries like Canada, it's more and more difficult for countries to fly under the radar.

Hon. Hedy Fry: Do you believe that harmonization can be a race to the bottom where everyone will have to meet the lowest common denominator, or do you believe that countries like Canada and the European Union are raising the bar high enough so that the countries that hitherto had unsustainable practices and huge MRLs have to meet that? How does that work when you're talking about trade and other countries are fighting to bring the level down and we're fighting to keep the level up? How does harmonization affect that?

Mr. Pierre Petelle: Our experience with harmonization is that it has not been a race to the bottom, as you put it.

It certainly brings more scientists to discuss each topic and more expertise from different parts of the world. You actually end up with the best science as opposed to the least stringent, in our experience.

Hon. Hedy Fry: Okay, so you don't believe harmonization in the Americas, for instance, is a challenge.

Mr. Pierre Petelle: No. The other thing to remember is that many of the CropLife Canada members—which, by the way, are both generic and innovator, just to touch on a point earlier—are global companies. Their products are being used in these companies just as well as they are in Canada and the U.S. These companies have a very strong stake and a very direct interest in making sure there aren't safety issues even in the developing world. Many of at least the CropLife members are global players. That has helped raise the bar as well.

Hon. Hedy Fry: There was a recent article in *The Globe and Mail* about what's happening in certain parts of Sri Lanka in the desert areas and with rice production, and with kidney failure in many of these groups. I wondered if in any way, shape, or form you have been informed of whether or not it's a pesticide issue. What are the reasons that we have this huge rate of kidney failure in places like Sri Lanka? We buy rice from places like that. Do you know anything about that?

I know you only have 20 seconds left to answer that, but it is a concern for me. I just wanted to know if you knew anything about it and could expand on it.

Mr. Pierre Petelle: In terms of that specific example, no. We do know, through our CropLife international affiliates, that there are parts of the world where obviously they don't have the type of equipment Corey was describing for applying pesticides. We know it's much more rudimentary. Our industry does a lot to try to train. We have programs in place where millions of farmers doing subsistence farming have been trained on how to properly store and properly use these pesticides. There are things that people do—for instance, using their empty pesticide jugs to haul water—that we would never think of here in Canada. Our industry is trying to make sure that this isn't happening in these parts of the world.

The Chair: Thank you very much.

Mr. Young, go ahead.

Mr. Terence Young (Oakville, CPC): Thank you, Chair.

Thank you to everyone for coming today.

I'm interested in the bee population issue, and I know that my constituents in Oakville are as well, because they ask me about it. It's essentially an urban riding, so I think it's very interesting. I think everybody would agree that it would be a terrible tragedy if the populations were diminished permanently or disappeared. It's unthinkable.

Ms. Dyer, you recently said that you think we need facts, not fear, when it comes to the debate on bee health. I certainly agree with that. I wonder if you can just expand on that. How do you protect bee populations?

● (1620)

Ms. Jan Dyer: That's a complicated question, and I don't think anybody has the complete answer to that yet. A huge number of factors affect bee health—habitat loss, parasites, diseases of bees, management of hives, and pesticides play a role in acute deaths—but I don't think we actually have a complete answer to what all is contributing to pollinator health. The Senate's doing a big study now.

I think it's a combination of a number of factors that are leading to the current situation. I think in Canada we haven't seen any widespread reductions in colonies, or reductions in the number of beekeepers or in honey production. It's very local, as Pierre said. It's targeted at some very concentrated areas with a couple of crops. We just aren't seeing those kinds of deaths associated with canola production. Canola production and bee production seem to be thriving equally in the western provinces.

We believe there have been some problems with acute incidents that have been largely rectified by changing formulations of seed treatments and by changing agronomic practices, but in terms of overall pollinator health, it's very complicated in terms of what is actually causing deaths when we see colonies collapse and things like that.

I would probably defer to Pierre for more of the science—

Mr. Terence Young: I'm going to ask Mr. Petelle.

Ms. Jan Dyer: —but certainly we're not seeing that in canola.

Mr. Terence Young: Thank you; that's helpful.

Mr. Petelle, a 2013 CropLife news release stated that:

> ...bee health in Western Canada is strong despite the fact that there is approximately 20 million acres of canola planted every year, the majority of which has been treated with neonicotinoids. Additionally, honeybee colony numbers in both Ontario and Quebec have steadily increased since neonicotinoids were introduced approximately 10 years ago.

Could you please update the committee on any additional evidence you have regarding bee health, based on perhaps the populations?

Mr. Pierre Petelle: Yes, and we understand that population or colony numbers aren't the only measure of bee health, but those numbers are independent, traced by Statistics Canada. They're not our numbers, so they're easily available to anyone in the public. When we look at the numbers that are published every year—and they've been collected since the 1920s—colony numbers in Canada have been steadily increasing. The Canadian Honey Council, which represents beekeepers coast to coast, has affirmed that at the agriculture standing committee on a couple of different occasions, and the numbers from Statistics Canada show that.

In fact, if you look at the latest numbers from 2014 for Ontario, where the bulk of the issue is—as you mentioned, you're hearing it from your constituents—you will see that colony numbers since 2003, when neonicotinoids started to become widely used, have gone up 59%. Honey production varies from year to year. It depends how many producers are into producing honey versus pollination services, so that number varies year to year. On a year-over-year basis, it's gone up close to 30% just on honey production. We can only go by what the numbers are, and these numbers tell us that there isn't the crisis that maybe some your constituents are—

Mr. Terence Young: Are the total populations now larger than they were in the 1950s, 1960s, and 1970s?

Mr. Pierre Petelle: There was correction in the 1980s. I don't know how much time we have, but in the 1980s the border was closed to the U.S. What used to happen is that beekeepers in Canada would generally let their bees die over the winter and then in the spring bring in fresh colonies from the U.S. When that border was closed, we saw a lot of beekeepers get out of the business. It's a lot of trouble keeping bees alive in this -30° weather, as you can imagine, so we saw a big correction. But ever since that time, 1983 and 1984, the numbers have been steadily increasing, and those numbers are very clear.

● (1625)

Mr. Terence Young: Do you have any comments on the importance of bees to our natural ecosystem?

Mr. Pierre Petelle: First of all, just in food production, if you're just talking about the agriculture and industry that we rely on as crop production companies, many of the crops, especially in the fruit and vegetable sector, rely on pollination as step one. Without that pollination step, there's no fruit or vegetable to use our products on, so we have a very vested interest in making sure there's enough healthy pollination services for those crops.

But even in canola production, our members produce canola seed and it requires a pollination step by beekeepers. In fact some of our members are the biggest contractors of commercial honeybee hives of anyone in Canada.

Again, there's a very vested interested in healthy honeybees for our industry.

Mr. Terence Young: All right, thank you.

Mr. Loessin, first of all, welcome. I grew up in the city, and my parents always taught me the greatest respect for anybody who farms. I love that expression that farmers feed cities. I'm so glad you're here.

When the pulse association came up on the Hill one day, I went to the reception. They're not just receptions; I learned so much. I didn't even know what a pulse was when I went to the first reception five years ago. They told me about all the lentils they were sending to India and stuff like that. It's really fascinating.

But I wanted to ask you about crop rejection. Can you buy insurance against crop rejection? How do you handle all that risk?

Mr. Corey Loessin: As an individual farmer, you really can't. We would typically market our product through a licensed processor or dealer, and basically that's the point of sale for the grower.

Mr. Terence Young: Then you're out?

Mr. Corey Loessin: Then we're out.

However, as that product carries on and moves through the stream and ends up at the end user, in theory if a problem is detected, it can get traced back to where the product originated. So we have a risk but we can't cover ourselves for it, basically.

Mr. Terence Young: Yes, you said a shipload is $10 million to $40 million. That's a huge loss if it's rejected for any reason. So who would take that loss?

Mr. Kurbis, is that your people?

Mr. Gord Kurbis: Yes. It's the commercial operators that have bought grain from many farmers.

Mr. Terence Young: You must have a pool of insurance, right?

Mr. Gord Kurbis: No. You'd be surprised. Those sorts of risks can't be easily insured.

The difficulty here is that if there were a legitimate tolerance put in place that was evidence-based and you were non-compliant with it, well, your non-compliance would be your own fault, so you would lose some money. That's not an easy thing to accept but that would be the reality.

If you're going to a country that is operating on a zero tolerance just because they're 18 months away, let's say, from when they will finally have a tolerance in place, and you have any detectable residue and you get a boatload of that value rejected for that reason, it would be hard to describe that as a science-based rejection. That's the risk we're describing.

Mr. Terence Young: You have to burn it.

Mr. Gord Kurbis: In that case, the regulator can order the cargo to be destroyed or to be redirected. These things go out compliant with Canadian tolerance levels, and there are other countries around the world that would have similar tolerance levels.

Mr. Terence Young: That's very helpful. Thank you so much.

The Chair: Thanks very much.

The next round of questions is going to be in French. We'll do a test of the interpretation, because we don't want to cut into Ms. Moore's time.

Give me the thumbs up if it's working.

[*Translation*]

Ms. Christine Moore: Can everyone who needs it hear the simultaneous interpretation?

[*English*]

The Chair: Okay? Good.

[*Translation*]

Ms. Christine Moore: Thank you.

If you want to take notes, I am going to ask three questions, one after the other. These are three elements I haven't found anywhere in the Pest Control Products Act.

My first question is about the simultaneous use of two pest control products that might come from different manufacturers. It has been shown that the products are harmless or present few risks when used on their own. However, I would like to know who is responsible for ensuring the safety of two products used at the same time.

How does that work? Do you think provisions should be added to the act to address the combined use of two products?

I see that the act's mandate talks about promoting sustainable pest management, but it does not explicitly state that the Pest Management Regulatory Agency has a mandate to provide independent advice on the best products to use. Practically speaking, how does a person go about choosing the best pest control product? Perhaps Ms. Dyer and Mr. Loessin could answer that question.

When we are told that a product is the most appropriate, and it is recommended to us, or when we are told which products are available, how can we ensure that this advice is independent?

In addition, I don't see any mention in the act about what should be done when there is potential resistance to certain products. Would it be appropriate to state at what point there would be an obligation to report potential resistance and who would be responsible for doing so?

Should the agency be required to establish an action plan as soon as there is potential resistance, in order to try to nip it in the bud?

I would appreciate your comments on this.

● (1630)

[*English*]

Mr. Pierre Petelle: With regard to your first question on when two products are used together, I think you're talking about whether it's mixed at the same time and who would be responsible if something were to go wrong. Generally, the label covers what is allowed or not allowed. If a label specifically says that this product is not to be mixed with any other herbicides or whatever, then it would be an infraction of the law to do so. If it's silent on that, then the user needs to check and find out from the registrants if there are any issues with mixing the two products.

In terms of the safety, the assessment that PMRA does is based on the active ingredients and whether that product can pose a safety risk or an environment risk on its own. Any product that has a similar mode of action is also taken into account. For example, when they do their risk assessment for what you're consuming, it does take into account similar modes of action. It may not be the same type of product, but if it acts the same way on your nervous system or there are any potential health issues, the impacts of those other types of products are also taken into account.

It's not a mystery in terms of when products are mixed. It's quite often done for resistance management, for example, to make sure that you're not selecting for a weed that can develop resistance. That's a fairly common thing that the act would easily be covering.

I'll leave the mission statement to whomever provides independent advice to my colleagues here. But in terms of what to do about resistance, in fact there is quite a bit on resistance. It may not be in the act, but it may be more in the regulations. All of the products have a mode of action, a group. For example, herbicides fall into different groups in terms of their mode of action, and that's on the label. A farmer knows. Even though he may be rotating from brand A to brand B, if they both have the same group 2 indication on there, he knows he's not really rotating chemistry, and that's not a good thing. He could be selecting for resistance. That resistance labelling is on all of the products.

In addition, many of the labels will have additional use instructions, for example, “use only once per year”, or “rotate with another different mode of action on an annual basis”. There are some specific resistance prevention measures required on a label for growers.

● (1635)

Mr. Corey Loessin: Mr. Chair, I could address the second and the third question.

The second question about choosing the best product is quite a complex decision, which ultimately is the farmer's decision, based on a book that is about an inch and a half thick and is updated annually. That's a list of all of the registered products in Canada. That would be a starting point, basically. But primarily it's a long-range planning activity that you do in order to choose the best product for that particular year, which will control the pests you have, and which is safe to use, economical, and that you've had good experience with.

More, and increasingly, it's a matter of planning for years hence; in other words, keeping track of whether there's a soil residue to be concerned with in the year after, or the year after that. That's something else that you consider when you're choosing the product you use. As Pierre mentioned, I think foremost in a lot of the grower's minds now is planning herbicide or chemical rotation so that you are not repeatedly using the same groups year after year and fostering a resistant population in your fields. It really is a complex planning equation, and I would say that most growers are planning four and five years, and longer, in advance, in terms of what's going to be used on certain fields and in what year.

The advent of resistant populations is something that is increasingly catching the attention of growers. We're becoming more educated about it and devising strategies to become more diverse in terms of cropping and in terms of products we use to alleviate that risk from developing.

That would be some of the thinking as far as choosing products that are used on our farms. The other thing is that we don't always do something; we would rather not. Particularly, when an insect population starts to arise in a crop, it doesn't necessarily mean that we control it. Farmers are fairly skilled in evaluating the level of risk from that insect, and if the population is not high enough to warrant a control measure, we don't do it because it costs us money. I think as time goes on, farmers are getting better and better in terms of making accurate decisions on whether something is required or not.

The Chair: Thank you very much.

Mr. Lizon.

Mr. Wladyslaw Lizon (Mississauga East—Cooksville, CPC): Thank you very much, and thank you to all the witnesses for coming here this afternoon.

Like my colleague Terence, I also represent an urban riding but I grew up on a farm. I'm not familiar with much of the stuff you mentioned here; technology has changed over the years.

Mr. Loessin and Mr. Kurbis, you mentioned here and in news releases in the past that Canadian exporters navigate a difficult system, a Byzantine system, of regulations. You're moving your products to about 150 countries and you face these difficulties. On the practical side, I don't think this will ever disappear because there will be new products for farmers in Canada and in other countries. It will always be a two-way street. How would you suggest we find the best way to deal with it? Going back to your example of that shipment worth $40 million that was stopped. Probably someone knew before you sent that shipment that the person who was receiving it had a zero tolerance. Therefore, in that particular case, did someone just take a chance that it would pass?

If there's a new product here, some countries would not have standards. How do you deal with this? If you're sending products to 150 countries, and let's say some had higher standards than here, what would you do? Would you have a select number of farmers growing a crop that would go to those select countries and keeping their standards high? How do you deal with that? You mentioned custom unions. There's one in the European Union. Russia is trying to put together another one. It's not going very well. There may be others. Then you have big countries that have their own regulations. How do you propose to best deal with these situations so that you don't take the chance on one side, and so that whoever, whether farmers or the people who buy products from them, are not hit with a loss?

● (1640)

Mr. Gord Kurbis: That's a great question. At the risk of offending my elect director, who employs me, I'll tell you a story.

Earlier this year in California at a global harmonization workshop, which a bunch of grower groups attended, one of the representatives of one of the horticulture crop groups from California said, “Do you know what? Four years ago our growers didn't even know what an MRL was.” I would say that four or five years ago, many growers in western Canada didn't know what an MRL was either.

This is a relatively new thing to discover, that there are these tolerances in place globally that are not harmonized. If we have a four and someone else has a five, or there's an eight there and a 10 here, we can deal with all that. The real concern for us is when somebody has a zero in place. In fact, we did some analysis after that lentil incident, because we didn't know, as the national association, where else we had potentially zero tolerances being applied. In some cases it's very difficult to determine. Countries don't have any defined default policy. We don't have a tolerance in place. What will we apply if we find a detectable residue? Will it be that the sky's the limit? Will it be a zero? Will it be the tolerance that is from another taxonomically similar crop or some chemical limit of detection?

There are reasons it's not always possible to know what you need to comply with on, let's say, 30 or 40 registered products on four or five crops going into 150-plus countries. How would we propose to deal with this? This is an emerging problem that's being increasingly recognized by multiple grower groups.

We have some suggestions. One actually brings us back to the request we made to make sure the PMRA is fully resourced in its efforts to bring resolution to this, and that is participation by more countries in global joint reviews, which bring regulators from around the world together to review the same data packages and come up with more harmonized tolerances. It doesn't require any regulator to give up its sovereignty; it's just looking at it together.

We now have better systems in place. We put out grower advisories every year to say, “Look, you really don't have the freedom to operate you might think.” Just because a product has been fully reviewed and is legal for use in Canada, we need to be careful about international tolerances that may not be in place. We're in our third year of putting out an advisory to growers every summer, and we have five markets by six different desiccants or harvest management products on four crops. In about 20% of these cases, we have inadequate international tolerances.

We think part of the solution in the future is some form of recognition of other jurisdictions' tolerances, only as interims, on a voluntary basis. Let me give you an example of a couple of countries that do something like this. Panama, for example, uses Codex MRLs generated by risk assessments from the World Health Organization. But if Codex doesn't have an MRL in place, they will say that they will use the U.S. MRL. If there's both no Codex and no U.S. MRL, then they'll use the European Union's MRL. This is the sort of country where we would never face a zero tolerance because of that. Someone will have gone through that assessment process.

I think it's safe to say that the problem will get more challenging before it gets better. We need to use all the solutions that are going to be available to us.

● (1645)

The Chair: Thank you.

Mr. Wladyslaw Lizon: Is there no more time?

The Chair: It was time a couple of minutes ago, but your generous chair allowed you to carry on.

Next up is Mr. Kellway.

Mr. Matthew Kellway (Beaches—East York, NDP): Thank you very much, Mr. Chair. And through you to the witnesses today, thank you for coming. It's been a very interesting conversation today.

I wonder if I detect some regional divides in the conversation. Like Mr. Young, I represent an urban riding, and my constituents are alive to the bee and neonics issue. I was asked to attend a grade 4 class at a local elementary school recently because the kids had a petition to give me to present in the House of Commons on this very subject of pollinators and the neonics. Each of them had written letters for the minister; some of them painted bee stripes on the back of their letters. I split them between the Minister of Agriculture and the Minister of Health, and have asked for a response on the issue. When I go to the farmers' markets in the summer, people also stop and talk about this issue a lot.

I think all of you touched on the issue of public confidence in the act, and I think Mr. Petelle, you talked about certain groups undermining confidence. But one of the interesting things about the neonic thing and the bees and the pollinator issue more generally is that although the claim has been made that this is a very rigorous science-based regulatory process, different jurisdictions looking at the same science have reacted very differently. I want to use the neonic thing as just a case in point. It's even within Canada. Ontario just recently has restricted the use of neonics on 80% of, I think, soybean and corn crops.

Do you guys detect a lack of public confidence or trust in this regulatory system, and if so, to what do you attribute that?

Mr. Pierre Petelle: I can understand why constituents, especially in urban centres, would be forgiven for their belief that there is a dire crisis for bees. The statistics don't support that. Nevertheless, when we looked at the issue of potential exposure of our products to bees, we took that very seriously, and I talked about some of the measures that were put into place. Insecticides will kill insects, and bees are insects. We've never denied that. The issue is trying to keep the bees and the pesticides apart.

When those seed treatments were brought to the market, it was an innovation heralded even by some of the very groups that are countering them now, because you were now taking a very small amount of pesticide and putting it on a very small surface and putting it in the soil. There was no more spraying; there were no more granular products. It's a revolutionary way of delivering a product exactly where it needs to be, and we still maintain that's the case.

Mr. Matthew Kellway: But on the statistics.... The Ontario Beekeepers' Association is calling for a moratorium on the use of neonics, and the Province of Ontario has a big website dedicated to the health of pollinators and human health. They look at all the statistics, and they've come to the conclusion that there should be a major restriction on the use, etc.

I don't want to look at the particular issue of the bees, whether they are dying or not, or this issue between statistics. But for the claim that this is a science-based process, it doesn't seem very predictable, because the confidence, I think, comes out of predictability. Yet jurisdictions around the world.... The European Union has looked at the statistics, and the same science.

Mr. Kurbis, you mentioned about having the same data packages and hoping that the tolerance levels looked like they came out of the same galaxy. This seems to be an issue here. Everybody is looking at the same science, but the outcome, the regulatory response, isn't very predictable. That's my point.

What's responsible for that?

● (1650)

Mr. Pierre Petelle: I would argue that if you look at all the jurisdictions that are focused on the neonics or the pollinator issue, there is consistency. PMRA is joined with the U.S. EPA and California DPR, arguably the biggest regulators in the world, and they're going through the re-evaluation process. They haven't had any knee-jerk reaction to the issue. They are continuing that process.

Ontario has proposed a decision and we're not sure where that's going to end up. They don't have the 300 scientists that PMRA does, so we're not sure. When we asked what information they had that PMRA doesn't, they didn't have any additional information. We're not sure how they came to this conclusion.

With regard to Europe, that would be a whole other discussion to have. They have a different structure there. In fact, the data that led them to their decision to put a moratorium on some products with neonics was based on a protocol that wasn't even adopted yet. In fact, if you take that protocol and you put any chemistry through it, whether it's a herbicide, fungicide, or insecticide, today none of them would pass that screening.

No one is arguing that all pesticides should be banned or put on a moratorium, even in Europe. This issue is very complex, and there is a lot of misinformation out there unfortunately. The issue has become emotionally charged and it's very difficult to have a rational discussion, which is why when we have a science-based system like the Pest Control Products Act and scientists review those data, they can set aside the emotion and look at the core science and what the information is telling us. To date, the information is telling them that restrictions aren't necessary.

Mr. Matthew Kellway: So—

The Chair: Mr. Kellway, we are over but you will have the opportunity for another round.

Mr. Matthew Kellway: Mr. Kurbis had a quick response I think, if that's okay.

The Chair: Sure.

Mr. Gord Kurbis: I'll be quick.

When we look at a generation of international tolerances, it really does seem as though there are very few products that regulators don't agree on or come up with different approaches on. It seems to me that it's analogous to the pharmaceutical system, in which there really are very few drugs that are controversial in terms of their effects on humans. I don't know if the neonicotinoid issue is representative of the broader package of products that are registered for crops.

The Chair: Mr. Warawa.

Mr. Mark Warawa (Langley, CPC): I'm going to give my time to Mr. Lunney.

Mr. James Lunney: Thank you.

I want to pick up on the issue of harmonization. I was headed that way in the last round and we ran out of time. I think you mentioned the challenges and opportunities for our products, which are presented for us first as an exporting nation. I think we all recognize how extremely important that is for our great farmers who not only put food on our table but also help to feed other nations.

However, there are challenges and opportunities there, and I think there is a lot of fear of the unknown, and the realm of the unknown is where misinformation can sometimes proliferate because of that vacuum of information. We certainly see that in other areas. You mentioned, for example, arsenic in food. That would raise the alarm. Nobody wants to be eating arsenic, but we have it in our drinking water. That takes us to discussions, which I want to head into in a moment, about the new testing procedures that can detect parts per trillion. You can detect almost anything anywhere under those circumstances.

The first thing I wanted to mention in this regard is the work that the PMRA is doing with, for example, the Environmental Protection Agency in the United States on a pollinator science risk assessment framework. We're working on understanding those types of questions, because I think we're all concerned about pollinators. Those of us who live on little hobby farms have our mason bees out there. My neighbour grows bees. We want to encourage and we value the bees for our fruit trees, and so on, even though we're not commercial producers. I think people are emotionally attached to those issues.

With regard to the OECD, I see that PMRA is working with Europe on looking at ecosystem guidance documents and harmonized international guidance for the use of pesticides. Our ecosystems aren't the same. I think our agricultural practices across Canada are different, which is what led to this concern about neonicotinoids and their use on different sizes of plants and different types and sizes of seeds. We have to adapt our technology, and we think that's a responsible response by regulators and industry.

We talk about a product we have lost in Canada, which was exported for years, and that was asbestos. We thought that was being used safely as long as it was handled and used properly. But in other parts of the world where they didn't manage the products properly, because they don't have the same standards we have, it became a huge problem in creating illness elsewhere, as well as practices here that weren't in place.

Mr. Loessin, you mentioned that changes in technology are happening very rapidly and new products are coming out rapidly, and it's a huge challenge to communicate what we're actually dealing with and to manage those risks because some real risks were anticipated. I just wanted you to comment on the international efforts and how important that type of engagement is. I think you mentioned it earlier, but I think we're beginning to understand that it's pretty important that we engage with our international community on advancing these issues of understanding crop management and product management.

● (1655)

Mr. Gord Kurbis: Fair enough. One of the focus areas for our industry has been trying to work within the Codex system to come up with a more robust international reference point for setting these tolerances. A large majority of the countries that we export pulses to are countries that don't have the kind of regulatory capacity that Canada has. Consequently, they don't have a PMRA, they use Codex, the World Health Organization, to set their tolerances.

The more countries we see moving towards their own custom national approaches, the greater the need to make sure that we have a functioning Codex, which has some capacity problems. We're trying to work internationally, and PMRA has shown great leadership in trying to make sure that they have fewer delays.

In general, it's a challenging problem. There are two problems that I think we've touched on today. One is the lack of harmonized tolerances when regulators go through the process of doing the risk assessments. That might become serious for our industry someday, but it's not today. It's really the absence of tolerances, so it's the lack of harmonized timing and the zero, or near zero, tolerances that we could be subject to in a parts per trillion environment.

Mr. James Lunney: I think that's where we lost a shipment, or at least it was rejected, because of testing at parts per trillion. I can think of other examples in Canada with products because there's zero tolerance. You could detect with new devices today the presence of almost anything anywhere in trace amounts, which creates a real challenge I'm sure.

You mentioned that there's a whole different range of standards in some countries. You use numbers four, six, five, eight—a range you can adjust to—but zero is hard to manage. I guess there's no simple answer on what the tolerance levels are without being more specific in the crop type and what the product is.

I wanted to ask another question related to emergency provisions under the act for PMRA and how there can be a request for an emergency approval.

The Chair: We are over time there, again. Sorry.

Okay, Mr. Rankin.

Mr. Murray Rankin: Yes, thank you. I appreciate this.

My first question is to Mr. Petelle of CropLife Canada. You talked about the precautionary principle during your testimony, and I totally agree with you about how that can be used and abused as a concept. It's found in section 20 in the act, as you say. I wasn't clear where you were going with it. Are you suggesting any change in the legislation? Are you just saying we should be more vigilant about how we apply the principle? After all, the Supreme Court of Canada in the Spraytech case told us we had to in this very field, so I wasn't quite clear where you were going.

Mr. Pierre Petelle: What I was saying is that you may hear from other witnesses who raise this and we constantly hear this in our circles. It was more of an ask to recognize that the system is already very precautionary, that the actual principle is embedded in the current act, and that we don't go down a path that takes us to where we use it as a blocking tool.

● (1700)

Mr. Murray Rankin: My next question builds on what Dr. Lunney has been asking about on the neonicotinoids, and of course, Mr. Young and others have raised this as well.

I'm going to focus though on the legislation, which is after all what we're trying to review here. There are so many pesticides that are conditionally registered and they come back to the well over and over again. Sometimes, I'm told, in the context of the neonicotinoids —maybe you can correct me if I'm wrong—that the registration stays conditional even though chronic toxicity studies are still outstanding. They say, okay, we're going to let you register it for another year, but you better get that study in, and that goes on and on. Sometimes it's years until that's done. Is the legislation deficient in allowing this lagging failure to really bite the bullet, allowing us to conditionally register pesticides that often don't have the full data package before them?

I guess I'd ask Mr. Petelle that question first, and then invite anyone else to comment.

Mr. Pierre Petelle: In terms of the conditional registration, it's very clear when that can be used. The data to conduct a risk assessment, both for human health and for the environment, has to be sufficient for the PMRA to be able to conduct their full risk assessment without those data that are conditional. It's not that there is missing data that they're guessing at on the risk elements. It's that they have enough data to make their risk assessment decision from both a health and an environmental perspective.

What the conditional registration often does is give them the ability to request additional data. Maybe it's confirmatory data or maybe it's on a bigger scale than what was submitted during the evaluation. It's to confirm that the assumptions and the risk assessment they've made are indeed what it is. This has been used for a number of products.

In fact, it's used for bee health products, for products used in a beehive. There's one that's very commonly used by beekeepers that has a conditional registration currently. It's a fairly common practice, and it should not be perceived as a data gap. It is confirmatory data, and I think the PMRA has explained that to the Senate committee on pollinator health in good detail.

Mr. Murray Rankin: Well, I'm told that the PMRA itself has referred to the lack of chronic toxicity study in bees as a critical data gap, yet they've given continual conditional registrations for neonics year after year. It seems to me that if you have a chronic toxicity study of neonics effects on bees that's been outstanding since the first registration in 2003—that's over a decade ago—there seems to be a real problem in the legislation. That's my assertion. It's not me saying this. It's the PMRA that says there's a critical data gap. That's problematic.

Mr. Pierre Petelle: My understanding.... I mean, this is now an active ingredient-specific case, which we typically wouldn't get into a discussion on. My understanding in that particular example is that the conditions have actually been satisfied over that decade. They're not the same conditions that were in place a decade ago. What's happened is that the PMRA asked for a set of data, those were provided, and they're being assessed or they were assessed. In the meantime, they've asked for additional conditions as part of that registration, so they've kept it on a conditional registration status.

Mr. Murray Rankin: So you don't—and I'd ask others to chime in if they will—consider it problematic that we can have outstanding important data gaps identified by the PMRA year after year, thanks to the conditional registration system, and nothing's done about it in such a sensitive area? It strikes many critics as a huge gap, and you don't see that. Is there anybody else who has a problem with this?

The Chair: Thank you very much.

I'm going to ask a couple of questions here if that's okay. I'm going to take the opposite approach to what Mr. Rankin asked. Wouldn't it be worse if the PMRA never asked for any additional information? I would look at that and say that if they approved it in 2003, 2004, and then walked away and never looked at it again, that would be the failing, but in fact what they're doing is asking for additional information as time passes on. Is that it or am I looking at it the wrong way?

Mr. Pierre Petelle: Absolutely, and if you look at the requirements for insecticides moving forward, you see that it's going to be much more time-consuming and costly to get those products registered because of the additional data requirements that will now become more standard.

It goes back to my precautions discussion. If you take precautions to the extreme, you can always ask for more and more data, never actually register the product, and never actually have the tools for farmers to use. That's the ultimate use of that precautionary language, which is why I mentioned it in my opening remarks. What the system under the current act gives the PMRA and the minister is the ability to call in data any time they want, and it also forces them to look at any data generated by anybody anywhere in the world and take it into account in their decision-making process.

The last component is that the products have to be re-evaluated on a 15-year cycle, so you don't get products that are registered for 20, 30, or 40 years with the same data. Every 15 years at the maximum, the PMRA will look at all the data, including any new data that have been generated in that 15-year period, and make a new decision on that product. It's a very robust system.

● (1705)

The Chair: I have one other question, if time will allow.

Certainly in my riding there is a tremendous number of rivers and creeks and streams that are fed from drain from farms. There are certainly systematic drainage systems in almost every field now and of course out through the lake; in my case, Lake Huron. One of the minister's responsibilities in this act is to prevent a risk to the environment, obviously. Can you briefly explain how that process works? How do you demonstrate, when registering a product, that the residuals, the pesticides, through a heavy rain after a planting don't end up in a river and into the lake?

Mr. Pierre Petelle: That's a great question, Mr. Chair.

Regulatory data is designed to show the extreme scenario. When we talk about the half-life of a product—I'll use neonics as a good example—we often hear that products can last three years or more in the soil. The reason you're hearing that statistic is that when the regulatory data is generated for these products, it has to be under worst-case conditions. With no microbial activity, no sunlight, how long will that product sit in a soil column before it breaks down? That's the extreme end so that the regulator can know what the absolute maximum is. When you actually start to do field studies with the products, you then get a more realistic half-life. That's when you get more of the three, six, or nine months that we're seeing with many of these products.

It's the same with its mobility. We know the properties of the product. We know how mobile it is in water. We know whether it adsorbs to soil and becomes unavailable. All of that data is provided to PMRA so that they can do a risk assessment on the environment and determine the things you've just talked about. Based on the application rate, what is the likelihood of that product moving into the soil, moving into the water, or ending up in streams? What residues would that leave? Would that be toxic to aquatic life?

All of that is part of the data package that is evaluated by PMRA under the act.

The Chair: Okay. We've had a great discussion today. We do have a little bit of time left over if anyone has any other questions.

I see one hand. Does anyone else have any more questions? Okay. I'll just go through the list here. We have a Conservative slot. I used one of them, so we have a Conservative member who can ask and then certainly next on the list is a Liberal.

From the Conservatives, who would like to ask some questions?

Go ahead, Mr. Lunney.

Mr. James Lunney: Thank you.

Are there pest products that your industry used in the past that are no longer approved for use, and can you give us examples? What products are you no longer able to use, and what effect has this had on the industry? Did you lose products through the process, products that were once in use and were replaced by better products, or were there problems with products that took them off the market?

Mr. Corey Loessin: I can comment briefly. There have been examples of products that have been taken off. I recall one insecticide that we used years ago that was discontinued and actually replaced by the seed treatments we've been talking about. Our perspective in western Canada is that the way seed treatments go down with canola seed has as close to zero impact that you could have. There is no dust. There is no seed on top of the soil. It's all injected into the soil. So as far as safety goes, it appears—to me, at least—that it is a safe system to use.

Alternatively...and we've seen it; years ago we used to have canola fields completely eaten off by flea beetles, which is what the neonics are controlling. In their absence, our only alternative would be to overspray with a topical application, which is far more environmentally impactful. So that has occurred.

● (1710)

Mr. James Lunney: Could you repeat what you called those beetles?

Mr. Corey Loessin: Flea beetles.

Mr. James Lunney: Are they in the soil, or...?

Mr. Corey Loessin: No, they fly around. When the canola is just little, that's the time they attack it, about two weeks into its life. They will turn a field from green to completely black in a matter of a few days, really.

Mr. James Lunney: That was a question I'd wanted to ask, and you've answered it for me. Thank you.

The other comment I'll just throw out there again is that I think the very fact that we have so many different soil types here.... Even canola is grown in a range of ecosystems across the country. Ontario is quite different from western Canada in some regards in terms of terrain.

I guess when you're dealing with this internationally, the variations and the unknowns are multiplied in some other countries where they don't have the established practices and procedures that we have. I guess it only underscores the need as to why we have to continue with international collaborative efforts—to have a better understanding of the ecosystem applications.

Do you have any examples or comments from your long-time experience, Mr. Loessin, in pulse crops in particular?

Mr. Corey Loessin: I would like to say it's important for farmers to know the rules. We accept that prior to being shipped to India or China or wherever it's headed for, all of our product gets commingled with 100 other farmers' product, so if those 100 farmers know the rules that are available, know the tools, and know how to use them, that's the best-case scenario from our point of view. If international limits are set so that farmers know what is allowed and what isn't, that is the best-case scenario for keeping the product uniform and safe.

Mr. James Lunney: When there is a lack of regulatory oversight or regulatory capacity, shall we say, in some of the countries we may be exporting to, that creates challenges there as well as for educating farmers.

Mr. Corey Loessin: Absolutely and, as we mentioned, it's going to get increasingly complex as testing becomes more precise and as countries that are importing product become more sophisticated in their purchasing. It is going to become an increasing challenge and it will likely never go away. It's one we're always going to have to be vigilant on.

Mr. James Lunney: Thank you.

The Chair: Ms. Fry.

Hon. Hedy Fry: I'd like to go back to what Mr. Rankin was talking about. Originally when I asked you the question, I talked about the fact that the major reason for this particular act is to look at health and environmental effects, and to ensure that the safety to people and the environment is paramount.

I also asked about whether harmonization has brought us down to a lowest common denominator. I am a little concerned because I'm hearing about people moving away from Codex, which was the best form of harmonization—the World Health Organization looked at everyone having some fairly clear guidelines—and moving into creating their own regional guidelines or block guidelines, etc. For me, that means there is going to be a big differential between the kinds of safety measures and environmental measures that we see.

I want to go back to this. I brought up Sri Lanka and Mexico, where we see a lot of illnesses caused by people who use pesticides, etc., on foods that we are sent here, and which in the name of trade.... I have no problem with trade. Of course we're a trading nation; we need to trade. At the same time, I do have a problem with the talk about bees and how Europe is using a different set....

I mean, I'm a physician. Looking at drugs, there are very clear international guidelines, and we see what happens when anyone strays from them. An example is that sometimes Canada is very slow to accept certain drugs that other countries have accepted, and the reason is that Canada is working really hard to try to make sure there are no adverse effects. I'm a little concerned that what other countries have found—especially very developed countries, like in Europe, which has very rigid and high levels of safety in terms of health and the environment—is dismissed.

We hear these concerns in Canada, and we are being told, “Well, you know, they're using different methods.” Surely to goodness in pesticide testing, and in the use of pesticides and other ways of looking at sustainable farming around the world, there has to be some clear decision about which is the best way of having an international standard. Again, to me, Codex seems to be that.

The argument that we would look at this every 15 years does not leave me, as a physician, with a lot of hope about human health effects. That 15 years is a long time; 15 years is almost a generation. Do you not regularly do adverse reporting in terms of risks? Is there no way of ensuring that people are checking every two years, that physicians can write in and say, “We're suddenly seeing these kinds of effects and we have reason to believe it is your pesticides.”

Look at the whole lawn issue. Pesticides on the lawn created a massive backlash in Canada, and now municipalities have been setting different standards for looking at pesticides on lawns.

The precautionary principle is something you talked about, but the precautionary principle, surely to goodness, is about human health and safety. Could Canada not follow its drug regulatory mechanism where it won't allow a drug that it doesn't think is safe, rather than saying, “I'm going to allow you to have it, and if I see problems three years later...”? Isn't that closing the stable door after the horse has bolted?

The bottom line is that even if you don't care about the environment, you don't want adverse effects on human beings. Wouldn't it be better to say “Because we're hearing different reports from different countries, we may want to hold off”, rather than the other way around? Mr. Lobb spoke about this, and he said that it's good that people are relooking at things.

My question is on allowing something to occur and relooking at it to see adverse effects, as opposed to not allowing it—as we do with drugs—because we're not sure we have good enough results based on outcomes, not on process.

● (1715)

Mr. Pierre Petelle: Drugs are a good example, and I would argue that the pesticide regulatory system is very analogous to the drug review and that the pre-market assessment is virtually identical in terms of requirements. In fact, we have an additional requirement because we have to do environmental fate as well, which drugs don't have to do.

In terms of adverse effects, this new act brought those requirements into legislation. Our members are obligated to provide any report that they get to PMRA. Also, any member of the public, doctors or anybody, can provide information as well, through the voluntary incident reporting systems.

Those measures are there. In fact, to characterize it as registering and then seeing what happens, I would say is not a fair characterization. I would say that your requirements on the pre-market assessment are extremely rigid and very analogous to the pharmaceutical world.

Hon. Hedy Fry: Yet we have the Auditor General saying that our post-market assessments and post-market surveillance in terms of drugs for humans are very different. What happens? I think for me that's the question. It's one thing to have something registered in law and say that you're supposed to do it in regulations, but does it happen?

The Auditor General said that we're not doing a very good job on adverse reporting on drugs. We're waiting. There are drugs that have been on the market for three years and nobody has bothered to act. The regulatory body has not bothered to act on this soon enough or to inform patients “and/or”,yet in Europe there is a very open and transparent way of doing this.

I understand the need to find balance between creating strong and viable agricultural products that we trade in—absolutely, good grief. It's an economic thing. But how do we really find the balance? I would like to hear that balance spoken to differently rather than being told that it's all working very well and everything is fine. I don't know of any system that's working well that isn't fine.

I don't know what happens to adverse reporting. I don't know if it's dismissed, because you told me it's 15 years before somebody re-evaluates, or at least that's what I heard you say. I need to clarify this, because my concern is about human health and safety.

● (1720)

The Chair: A brief response, please, because we are over the time.

Mr. Pierre Petelle: Yes. Just to clarify, 15 years is the absolute limit in the sense that if there is no other major evaluation of that product or no major new use of that product, at minimum in 15 years it will be re-evaluated. But if anything comes in in the meantime, whether it is incident reporting or new data from any source, that 15-year timeline is not.... Any new information is what takes precedence. That 15 years is the extreme end of the review.

In reality, what happens is that most companies will add a new use, for example, or a new crop, and that will require new data. The products are generally always being looked at with fresh data.

The Chair: Mr. Kurbis, a brief response, and then we'll get to Ms. Moore.

Mr. Gord Kurbis: In terms of harmonization, I would like to make the comment that my sense of working directly in this area is that we will never get to 100% harmonization, because regulators around the world will encounter situations once in a while where they will have legitimate differences of opinion on how data is to be interpreted.

What I would suggest is that we could achieve 90% of the harmonization objectives we have, without even running into those areas of controversy, just by making regulators around the world aware that there are 18 other countries that have office buildings of biologists just like them, and could they please be aware that each other exists. If we could achieve that, we could go so far, without going into those areas of legitimate differences of opinion.

The Chair: Thank you very much.

For our last questions of the day, Ms. Moore.

[*Translation*]

Ms. Christine Moore: Thank you.

I would like to come back to the idea of independent advice and planning for pesticide use.

Mr. Loessin clearly stated that pesticide use is part of a plan and subject to long-term planning. This use is adjusted based on the circumstances. When something doesn't go as expected and the desired results are not achieved, maybe because a product is no longer available or for some other reason, the plan must be adjusted as a result. There is also the fact that certain large farms or large crops may get help from people who are a little more qualified to do this planning, but other smaller farms may not necessarily have the same resources.

Would it be relevant for the act to include everything relating to advisory services for farmers so that pesticide use planning is the best possible? This should also be done independently to ensure that the best products are used, without farmers being pressured and without information being left out when it comes from one manufacturer in particular.

Ms. Dyer could also answer, since she didn't have time in the last round of questions.

[*English*]

Mr. Corey Loessin: I can quickly try to address that for you.

Some of the large farms do have agronomists right on staff, as you identified, so they may well have their own in-house agronomic advice. Smaller farms, generally, have access to similar advice provided by independent agrology services. Most retailers would have a licensed agronomist on staff who is capable of delivering impartial advice.

As far as incorporating it right into the act goes, I'm not sure that's required. All of the products are registered, so then crop choices become more a matter of planning and the desires of individual farmers regarding the way they want to farm. When they do make choices, those are registered choices that are applied under strict guidelines. So I think advice is there for virtually any farm, big or small, that wants it or needs it.

● (1725)

Ms. Jan Dyer: I would just add that I think this is one of the things industry does really well. The Canola Council of Canada, for example, in the case of canola, has lots of agronomists on staff. So if you're not a big farmer, if you're a small farmer and you need the advice, you can go to those organizations. They're actually engaged hands-on in giving farmers advice, and in translating information that comes from some of the new product development, from the new products, directly to farmers.

They give independent advice. They really specialize in the area. I think it would be very difficult for a federal organization or a federal act to do that better than individuals at the industry level who are engaged in that business of providing advice. They do a really good job of outreach to growers of all kinds, giving the advice they need. We have crop advisories all the time regarding when to spray. For example, the Canola Council of Canada has a website that tells you about spray to swath. It gives you very precise advice about when you should spray, what times you should spray, and what products you should spray. Farmers have access to that information all the time.

I think that's one of the things that industry does very well. It's facilitated by clear guidelines and an enabling framework from the act. As for the actual hands-on translation and the advice about products, I think we already have a really good system for doing that.

The Chair: Thank you very much. We've had a good discussion today. Thank you for your time and for answering all the questions.

We're going to adjourn, and we'll see you back here Thursday.

The meeting is adjourned.