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Chair

Mr. Pat Finnigan

Standing Committee on Agriculture and Agri-Food

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● (1100)

[*English*]

The Chair (Mr. Pat Finnigan (Miramichi—Grand Lake, Lib.)): Welcome, members of the committee.

[*Translation*]

Mr. Brassard is with us today, replacing Mr. Shipley.

[*English*]

Welcome to all of the other members. I think we're all here. Also, I want to welcome our guests, whom we will get to almost immediately.

I want to do a little bit of quick business. We need to approve two budgets: one for our travel, and one for this study we are doing.

You've all received a copy of the budgets. If you want to first look at the travel budget, what I need is consensus to adopt it as I will be presenting it to the Liaison Committee on Thursday. I don't know if you have had a chance to look at it. It is basically what we discussed, and it's for the amount of $46,841.60.

Are there any questions on the budget itself? Can we get consensus on my presenting it to the Liaison Committee on Thursday?

Some hon. members: Agreed.

The Chair: We're all good.

[*Translation*]

Do you agree, Ms. Brosseau?

[*English*]

Thank you.

We have consensus on that one.

The other one is a standard budget for our study. We have an amount that we fixed there of $17,000. We may not use all of it. This is for witness appearances, video conference expenses, the expense of working meals, and all that. Are there any questions on that one?

Some hon. members: Agreed.

The Chair: It's all good. We have consensus on both. Thank you so much.

To get back to today's study, this is our first meeting on the neonicotinoid insecticide study. I want to welcome our witnesses for the first hour. From the Department of Health, we have Scott Kirby, director general, environmental assessment directorate, pest management regulatory agency. That's a long title. From the Department of Agriculture and Agri-Food, we have Andrea Johnston, director general, sector development and analysis directorate, market and industry services branch.

I'm sorry, Mr. Aucoin. I missed you on the first one.

We also have Mr. Richard Aucoin, executive director, PMRA.

Welcome all of you. We will have opening statements for up to 10 minutes each.

Go ahead, Mr. Aucoin, for 10 minutes.

[*Translation*]

Dr. Richard Aucoin (Executive Director, Pest Management Regulatory Agency, Department of Health): Hello, Mr. Chair.

Hello, honourable members of the committee.

Thank you for inviting us to speak to you today. I am Richard Aucoin, the executive director of the pest management regulatory agency (PMRA) of Health Canada. I am here with Scott Kirby who is the director general of our environmental assessment directorate.

As you are aware, PMRA is responsible for regulating pesticides in Canada. Our role is to ensure that pesticides authorized for use in Canada do not pose unacceptable risks to human health or the environment.

We do this through an extensive and robust scientific review process, both before a pesticide can be sold and used in Canada, and with periodic re-evaluations to ensure these pesticides continue to meet modern standards.

● (1105)

[*English*]

Our post-market re-evaluations and activities allow PMRA to monitor and respond to any new risks and to consider modern science. This includes using new science to re-evaluate pesticides on a 15-year cycle, performing special reviews in response to new health or environmental concerns, and collecting and analyzing information about pesticide incidents in Canada and around the world.

All of these post-market activities have played a role in PMRA's ongoing scientific review of the neonic pesticides. This is a very complex activity that involves a high level of engagement with other federal and provincial partners, academic scientists, international experts, regulatory bodies around the world, manufacturers, and the agricultural sector.

As I'm sure you know, the level of public and international interest in the relationship between neonics and pollinator health issues has been very high for some time. Our ongoing scientific assessment of the evidence has been conducted under very substantial public pressure to discontinue the registration of these pesticides.

Following bee deaths linked to planting of neonicotinoid-treated seeds in 2012 and 2013, instead of moving to restrict or discontinue registrations, PMRA worked very closely with many stakeholders. For example, we worked with grain farmers, the seed industry, the provinces, and the beekeeping industry to understand and develop approaches to planting that would reduce exposure to bees. With all these mitigation measures in place, the number of incidents fell by about 80%, and that trend has continued over the last few years. This speaks to PMRA's focus on the scientific evidence as paramount in our decision-making, as well as acknowledging the important role the agriculture sector can play in risk management.

Our current assessment is that the risk to managed bees from the use of one of the neonics, imidacloprid, is manageable, although there remains substantial work to be done in this area, including ensuring there are no unacceptable risks to wild bees and other pollinators. It is important to note that the initial part of our assessment really focused on managed honeybees, for example pollination services and commercial beekeeping operations. We still have some work to do to understand whether there are any unacceptable risks to wild bees and other pollinators.

As part of our broader, cyclical re-evaluation of the three major neonics, we are conducting an examination of all the available science—both published and proprietary information—regarding risks to the aquatic environment. These risks are evaluated in the context of how neonics are used in Canada and all the available information. This includes actual levels found in water by federal and provincial governments and academic sources in Canada. We have completed our review of the risks to the aquatic environment of the neonic imidacloprid, one of the three neonics, and the reviews of two other neonics are in progress.

One of the key outcomes of PMRA's re-evaluation of the neonic imidacloprid was the conclusion that the use of imidacloprid in Canada is causing harm to aquatic environments. High levels of imidacloprid found cannot be traced to a specific use on a specific crop, and we really have no alternative regulatory instruments available to us to effectively address such a broad risk issue, other than cancelling the authorization. PMRA is consulting with Canadians until March 23 on its proposal to phase out, over the next three to five years, all the agricultural uses of imidacloprid that we believe are contributing to this risk. Before making this proposal, we considered any alternative risk mitigation options that could achieve the same objective in the same time frame. We've also consulted extensively with colleagues from Environment Canada, with the U.S. EPA, and with some of our colleagues in Europe on our findings.

PMRA recognizes the importance of imidacloprid and the other neonics to Canadian agriculture. This is why, in addition to an extended public consultation period, PMRA is engaging with stakeholders through technical briefings, webinars, and a monthly multi-stakeholder forum chaired by our colleagues at Agriculture and Agri-Food Canada. PMRA will take into account all the information gathered through this process in making its final decision. In addition, if there is compelling new science that comes to light in the short term, we will take that into consideration. We will not, however, unreasonably delay our decision-making.

It is important to note that if a final decision is made to discontinue the registration of imidacloprid or any other neonic or pesticide, any new information or data that comes to light that shows it can, in fact, be used safely could be included in a new submission for registration by a manufacturer. We intend to continue to work with our stakeholders to minimize any potential impacts of the final re-evaluation outcome.

● (1110)

[*Translation*]

With that Mr. Chair and honourable members of the committee, I welcome any comments and questions you or the members may have.

Thank you very much.

The Chair: Thank you, Mr. Aucoin.

[*English*]

Now we go to Ms. Johnston for up to 10 minutes.

Thank you.

Ms. Andrea Johnston (Director General, Sector Development and Analysis Directorate, Market and Industry Services Branch, Department of Agriculture and Agri-Food): Good morning. Thank you, Mr. Chair.

It is my pleasure to appear before this committee to discuss the department's activities regarding the multi-stakeholder forum, following Health Canada's publication of its proposed re-evaluation decision on imidacloprid.

[*Translation*]

Agriculture and Agri-Food Canada (AAFC) plays a facilitator role in bringing key players together in an effort to reach a common understanding of the issue and develop potential ways forward.

[*English*]

Neonics, including imidacloprid, are important insecticides for Canadian agricultural producers. Over the last two decades, they have replaced many active ingredients from previous generations and are commonly used by our trading partners.

Neonics are used on many crops including canola, soybeans, corn, pulses, horticulture crops such as potatoes and carrots, and to a lesser extent, wheat and barley. For many of these crops, neonics are applied as a seed treatment, where the coatings are applied to the seed before planting, which helps to contain and isolate the active ingredient. Neonics are also used as a foliar spray, where the pesticide is sprayed onto the leaves and fruit of the plant, as well as a soil application, where the pesticide is placed into furrows in the soil.

Given the widespread use and importance of pesticides to the agriculture sector, AAFC facilitated the multi-stakeholder forum for neonicotinoids. This forum brings together representatives from the agriculture industry, environmental stakeholders, academics, and officials from provincial and federal governments. Three working groups have been established, focused on environmental monitoring, mitigation of risks, and identification of alternatives.

The environmental monitoring working group is examining water monitoring data related to neonic levels in the environment. The working group obtained all data considered by PMRA for the proposed risk assessment, and any data that was brought to light subsequent to the publication of the draft report. Data collected by this working group is designed to help pinpoint specific application methods, uses, or other factors that may result in higher or lower levels in water.

The mitigation working group is researching and exploring possible risk mitigation actions that could lower concentrations of neonic actives in the environment below any risk thresholds identified by PMRA to cause harm to aquatic insects.

The alternatives working group is examining alternative products to imidacloprid for various crops and pest pressures. The working group is identifying whether there are alternative products available, whether those alternative products have disease or insect resistance, and providing a grower assessment of their viability as alternatives.

The working groups plan to submit their data and work plans to PMRA during the consultation period.

[*Translation*]

AAFC recognizes that changes to the availability of pest control products could have implications for farmers and the agricultural sector. Through open engagement and consultation, AAFC will continue to work with stakeholders and Health Canada to identify the best possible solutions.

[*English*]

Thank you very much.

The Chair: Thank you, Ms. Johnston.

We'll start our round of questions. We'll start with Mr. David Anderson, for six minutes.

Mr. David Anderson (Cypress Hills—Grasslands, CPC): Thank you, Mr. Chair.

I want to thank our guests for being here today.

I think many of us have a great concern about this decision we're here to talk about today. We want to try to sort out what has happened. There have been a number of scientific studies—and I've spent some time going over them—and it's interesting, from what I can see, that virtually all of the use has been within the guidelines that were proposed when the studies were done. They haven't found.... Other than some extreme points, one in the Morrissey study, everything seems to be within the guidelines recommended.

It's interesting that a couple of the studies seem to conclude there might be a problem in the future, but we don't really know what that is. That science apparently hasn't been done as well as it could have. I know the discussion around this started around the loss of the bee colonies and that there was a general sense that might have something to do with it. Science has basically proven there's not a direct correlation there right now.

The Ontario government reacted. You mentioned the words “public pressure”. I don't think they reacted to science. They reacted to public pressure. Now I'm concerned that we're seeing some of the same folks who would have been influencing the Ontario government in Ottawa here, and seeing some of the same reactions.

I want to ask a few questions. One of them has to do with the fact that there's relevant water monitoring data out there. I looked through the Morrissey study, and actually on imidacloprid, basically she found no detection on any of her studies in it. That chemical seems to be ruled out of her study. There's a lot of relevant water monitoring data out there, some of it Government of Canada data, that wasn't used in the assessment.

Can you explain why? Why wasn't a broader use of data used to make a decision?

● (1115)

Mr. Scott Kirby (Director General, Environmental Assessment Directorate, Pest Management Regulatory Agency, Department of Health): With respect to the water monitoring data, all the water monitoring data was considered. We received quite an extensive amount from across the country, more than we would normally have for a normal re-evaluation. Much of the information was lacking what we call ancillary data, which is data about where the site was, what was cropped around it, and whether the pesticide was used in those areas, so that information is of limited use in making a risk assessment decision.

The areas where we do have robust monitoring data include the Morrissey study as well as work that was done by Environment Canada in Ontario and the province of Quebec. Those sites have information about what was cropped there. Those sites had regular monitoring over the course of several years. In Ontario and Quebec, those sites indicated there were levels that were of concern to us.

Mr. David Anderson: A couple of those sites indicated that. When I look at those studies, that was not generally indicated. Am I correct? I looked at the studies. There are a couple of sites where the levels were high. Most of the sites were actually below the thresholds that had been set by the government.

I have another question, then, I guess. Have you changed the threshold? Are you changing thresholds? We have a completely different level of threshold depending on where we are. Canada has one. The U.S. EPA has a different one. The EU has another one. The EU is getting consistently tighter on their thresholds. What's going on with the thresholds? Are you changing them in Canada?

Mr. Scott Kirby: Absolutely, because—

Mr. David Anderson: When I see the data, it looks to me as if most of the studies are within the thresholds that were set previously.

Mr. Scott Kirby: The thresholds are set based on the available data. Over the course of time, since imidacloprid has been registered, there have been many toxicity studies conducted that feed the information to develop thresholds. The more, what we call, "toxicity end points" you have, the more they feed into the development of thresholds. So yes, the thresholds have been changing based on the available information.

Our assessment now has included at least 30 different studies to develop that threshold. The threshold that we have lies basically in the middle of the published thresholds out there. There are thresholds that are more conservative than ours, and there are thresholds that are less conservative than ours.

Mr. David Anderson: Is it still at that 230?

Mr. Scott Kirby: Sorry...?

Mr. David Anderson: Is it still at the 230 nanograms per litre? Is that where we're set in Canada now, or has that changed in the last couple of years?

Mr. Scott Kirby: It depends on what you're talking about.

With respect to the PMRA's benchmark that we're using for our risk assessment, our threshold is set at 0.04 micrograms per litre, I believe, for chronic effects. That is the benchmark we use for our risk assessment.

There are other thresholds that are published by Environment Canada, the U.S. EPA, and the European Union. Those are not necessarily thresholds we would use in an assessment.

Mr. David Anderson: Do you have a different assessment level than Environment Canada has?

Mr. Scott Kirby: The Environment Canada threshold was developed basically over a decade ago, I think, and it was based on a limited amount of information, so that threshold is no longer relevant.

Mr. David Anderson: You make a decision before the departments sit down together and set the thresholds they find acceptable. Do you have different thresholds in different departments?

Mr. Scott Kirby: No. We actually consulted with Environment Canada ahead of our decision. We shared our risk assessment with them. They went through it. They concurred with our approach. We also consulted with the Department of Agriculture ahead of time to discuss where we were at.

● (1120)

Mr. David Anderson: Everything looks as if your proposed decision is just based on some hypothetical risk to a couple of aquatic species. Do you have any real-world data to indicate that the species are actually being adversely impacted?

When I look at the studies, they indicate that the levels go up in the springtime and the levels drop off in the fall—which is exactly what we would expect—and that the levels are consistently below the threshold of where there is going to be a long-term problem.

You seem to believe there's something else going on here. Do you have any real-world data to back that up?

Mr. Scott Kirby: We have no real-world data in terms of impacts actually in the environment. We virtually never do. That's not something we normally receive. The information that we have is what we're basing our assessment on.

I just want to make sure we understand that the onus is on the registrant to provide us with the information to demonstrate that the risks are acceptable. So it's not—

Mr. David Anderson: But just a minute. You left them out of this discussion until after you had already made the decision. Why was there a lack of transparency and accountability in the whole process here, if you say it's the registrant's responsibility to provide you with the data?

We don't hear anything to say that there was general consultation here. Basically, this was driven by the agency. There were arbitrary timelines put on it. There wasn't a general discussion. You said that you used widespread data, but it doesn't appear that's the case here.

There's a decision that has been made that looks like it's political, not scientific. I'm just wondering why it was done in the way it was, basically leaving the industry outside and environmental groups outside, everybody outside of that decision before—

The Chair: Mr. Anderson, the time is up. I'm sorry. We have to move on to the next one.

[*Translation*]

Mr. Breton, you have six minutes.

Mr. Pierre Breton (Shefford, Lib.): Hello, everyone.

Mr. Kirby, I do not see a problem with your answering the question Mr. Anderson just asked.

[*English*]

Mr. Scott Kirby: I'd just like to make it clear that the decision was not political. The decision was driven by science. That's how we make our decisions.

As Mr. Aucoin pointed out with the pollinator assessments, there was a lot of pressure to deregister the chemical based on the impacts on pollinators. We let the science speak. We have yet to make a negative decision on that. In fact, our preliminary assessment says that we don't think there are major issues.

I absolutely feel and believe that there is evidence out there that there are risks of concern. From my perspective, the benchmark has not been met in terms of giving us the information that we need to determine that the risks are acceptable. We are working with the multi-stakeholder forum. We have right from the beginning. We are participating in all three working groups. We're helping stakeholders to develop a plan for developing monitoring information that might help the decision. If that information can be generated in a reasonable amount of time ahead of the final decision, we'll consider it.

The information has to be compelling in that it shows a different picture than what we're seeing now.

[*Translation*]

Mr. Pierre Breton: As Ms. Johnston said earlier, these products are important to our farmers.

On other international markets, there are pesticides that could be registered in Canada to ensure that our farmers are at least competitive.

What can you tell us about the registration of those potential products and how quickly they could reach the market here?

[*English*]

Ms. Andrea Johnston: As you mentioned, it is a proposed decision. The alternatives working group is looking at alternatives to imidacloprid, and at whether those alternatives have what we call MRLs, maximum residue limits, so whether there would be any market access challenges.

If there is a decision moving forward to do the phase-out, what we would like to ensure is that growers have access to alternatives that are widely accepted by trading partners because that is required as part of Canada's trading requirements.

[*Translation*]

Mr. Pierre Breton: I am not that knowledgeable about this, but I understand there are conditional registrations and more permanent registrations. I don't know if I'm using the right terms.

Mr. Aucoin, what is the difference between a conditional registration and a permanent registration? Are there actually conditional registrations? How do you go about accepting a product depending on whether it is a conditional registration or a permanent registration?

[*English*]

Dr. Richard Aucoin: With regard to conditional registrations, there are, in fact, some registrations that remain conditional. Some of the neonics are in that category of conditional registrations. These are registrations where, when they were first made, the actual risks of those new pesticides were deemed to be acceptable. We allowed them to be authorized for use in Canada, but there remained some outstanding data, usually some confirmatory data. We needed to be sure that the continued use of these chemicals over the long term would remain safe.

In that time, we allowed conditional registrations. Since that time, the department has indicated its intent, and we've moved ahead with a new regulation that repeals those conditional registration provisions. We have recently gone through the *Canada Gazette*, part I, process to repeal that authorization to create conditional registrations. We anticipate that will be in force by the end of the year, and we will no longer be issuing any kind of conditional registration.

I do want to stress that whether a new pesticide was registered first as a conditional registration or as a full registration, in both cases we deemed that the risks were acceptable. It's just that in one case we realized that we wanted some additional confirmatory data and information. That was a requirement of the ongoing registration, to ask the manufacturers to produce this kind of data information.

In the case of the neonics, we had some long-term interest in ensuring there would be no pollinator impacts on bees, for example. We were working with the manufacturers to make sure we had that kind of assurance, that the data and information available would continue to support the use of neonics.

● (1125)

[*Translation*]

Mr. Pierre Breton: So there are products that are still temporarily or conditionally registered. Can you tell me in 30 seconds what will happen after this announcement?

[*English*]

Dr. Richard Aucoin: Yes, a number of the neonics, not all. Two of the neonics, thiamethoxam and clothianidin—long names—are chemicals that do in fact have conditional registrations.

[*Translation*]

The Chair: Thank you, Mr. Breton.

Ms. Brosseau, you have six minutes.

Ms. Ruth Ellen Brosseau (Berthier—Maskinongé, NDP): Thank you, Mr. Chair.

[*English*]

I thank the witnesses for their testimony before the committee today. This is a really important issue. I've been on this committee since 2012 and we've had this come to the surface on many occasions. We've even had farmers come in and talk about the losses they've sustained in their colonies in Ontario.

This is a very complicated issue. It's not black and white. I have a few questions.

When you say that you're “consulting with Canadians”—I know that it has been prolonged until March 23—what exactly does that mean? How many people participate? Is that online? Are these round tables? What kinds of results are there? Also, will the results of these consultations be public? I would like some more information about that, please.

Dr. Richard Aucoin: As with all PMRA's major decisions, it's an obligation under the Pest Control Products Act to do a full public consultation before we make any major decision. We do publish an extensive scientific review of everything we've looked at, referencing all the information and studies we've looked at that support that decision. During this consultation period, we take in all kinds of comments from the public. In this case of imidacloprid, you can be assured that we're up to perhaps 100,000 comments.

In addition to that, in this case, we're working very closely with stakeholders in a forum chaired by Agriculture and Agri-Food Canada. We'll be taking into account all the information that comes from those working groups. We will also be taking in information that comes from the public and all the information that comes from the manufacturers during that period. The consultation period ends on March 23.

Ms. Ruth Ellen Brosseau: For the pollinators, there's another risk assessment being done. When will the results be done for the pollinators, the bees?

Dr. Richard Aucoin: We're continuing to work really closely with the United States Environmental Protection Agency and California on the pollinator risk assessment. The pollinator aspect is kind of in parallel with the aquatic risk assessments that we've been doing on the neonics.

On the pollinator story, we have a preliminary assessment of one of the neonics that says that we think this situation is manageable but we do have more work to do to make sure there's no impact on wild bees or pollinators. On the pollinator side, there are two additional neonic pesticides that we're continuing to do work on, and again, with the U.S. and with California.

● (1130)

Ms. Ruth Ellen Brosseau: What does “going ahead with a phase-out” mean? If I'm a farmer using these pesticides, what exactly does that mean? What other options would I have if I want to continue to use something similar? What would that look like? I know that Canadians are asking questions. They're really concerned about the health of our planet and they're concerned about the protection of waterways.

I think this touches everybody. When we have people in Montreal and Vancouver banning neonics, everybody is touched by this, but if I'm a farmer, what does it mean for me when the government goes ahead and phases out neonics?

Dr. Richard Aucoin: It's a very good question. In terms of what we proposed in this case for imidacloprid, for example, the actual proposal is to phase it out over a three- to five-year period, so the proposal, at least, indicates that a significant transition period is available.

I would point out that for many and perhaps most—but not all—of the existing approved uses of imidacloprid, there are alternatives. There are approved pesticides that could be used for those uses. On paper, at least, there are alternatives. I do acknowledge that some of those alternatives may not be as economically viable or economically advantageous for agriculture, but for the most part, there are registered alternatives available.

As well, over the next few years, depending on the phase-out period, we would anticipate manufacturers approaching us for approval for new pesticides to be used in place of imidacloprid, should we have to go there. I should point out that we're still in a consultation phase on a proposal.

Ms. Ruth Ellen Brosseau: Does Environment Canada do monitoring of water?

Dr. Richard Aucoin: Environment Canada does monitor a very wide range of substances, including some pesticides in surface water.

Ms. Ruth Ellen Brosseau: Does it monitor neonics or imidacloprid?

Dr. Richard Aucoin: Actually, Environment Canada was the source of much of the surface water monitoring data that we used in our assessment in Ontario. It came from an Environment Canada scientist.

Ms. Ruth Ellen Brosseau: Is there any information coming from out west?

Dr. Richard Aucoin: Some of the information that we received from out west was, for example, from Dr. Morrissey at the university.

Mr. Scott Kirby: I would just add that there was information submitted from most of the regions, including the west. Some of it was Environment Canada data, some of it was provincial data, and some of it was academic data from Dr. Morrissey. As I said, a lot of that data is missing some of that ancillary information that would make it useful. The monitoring working group is working hard to try to obtain that ancillary information to make the information more useful.

Ms. Ruth Ellen Brosseau: Would you say that neonics and some pesticides are being overused?

Mr. Scott Kirby: I would say that agricultural producers have to make decisions based on the pests that they have, and they make them, so I can't really speak to whether or not they're overusing them.

Ms. Ruth Ellen Brosseau: Okay.

How much time do I have? Oh, it's over.

[*Translation*]

The Chair: Thank you, Ms. Brosseau.

[*English*]

Now we go to Mrs. Lockhart for six minutes.

Mrs. Alaina Lockhart (Fundy Royal, Lib.): Thank you, Mr. Chair.

Thank you all for being here today.

Ms. Johnston, I have some questions about the multi-stakeholder forums that you mentioned. Who's been involved in those, and how has the ag sector been engaged?

Ms. Andrea Johnston: Immediately following the proposed decision by Health Canada, AAFC created a multi-stakeholder forum, and it includes participants that are most impacted by this proposed decision. Those include grower groups, academics, research scientists, industry associations, and federal and provincial governments. We've had two face-to-face meetings, one in mid-December and one in mid-February. The real intent is to bring people together, share information, and figure out possible solutions so that we can inform the government's decision-making process.

Mrs. Alaina Lockhart: Can you expand on some of the suggestions or concerns you've heard at those two face-to-face hearings? What has come up from the ag sector at this point?

Ms. Andrea Johnston: We had a really good discussion with the growers. They indicated how they're using these pesticides and the importance of these pesticides. We talked about some of the alternatives, and how effective or not effective they could be. These are important pesticides. They're important to the competitiveness of the sector, and growers feel that this is a serious issue and they welcome the opportunity to share their experiences as well as look at alternatives and potential solutions moving forward.

● (1135)

Mrs. Alaina Lockhart: Farmers have told us that there isn't a lot of access to alternatives at this point, so are they coming up with next steps? Where do we go from here, and what are the timelines from their perspective?

Ms. Andrea Johnston: The alternative working group is working on an Excel spreadsheet or database of all the alternatives to imidacloprid for different crops. That provides an opportunity for growers to assess whether an alternative will really work in real life based on their experience, as well as understand whether other markets accept these alternatives. They will submit that database by the end of the consultation period, and that provides an opportunity to have the growers' perspectives on the alternatives available to growers.

Mrs. Alaina Lockhart: Do they feel now that they're getting the scientific information they need to be able to make suggestions? Is that forthcoming? Is there enough information out there to start planning a path forward at this point?

Ms. Andrea Johnston: Do you mean in terms of the alternatives?

Mrs. Alaina Lockhart: Yes.

Ms. Andrea Johnston: I should put a caveat around it that the alternatives will be used in the event that Health Canada makes a decision to go with the phase-out, so it is looking at the alternatives only as a precautionary approach. Further discussions will have to be held in the event that Health Canada does decide to proceed with a phase-out.

Mrs. Alaina Lockhart: I also had a question about pesticides and their approval. We've had environmentalists suggest—out of concern—that certain pesticides were authorized for sale without adequate scientific research.

Can you speak to those concerns?

Dr. Richard Aucoin: Certainly. As with our comments on the conditionally registered pesticides, I think that's at the heart of that issue. There was a perception that when we approve a pesticide and give it a conditional registration, there is somehow information missing or data gaps, or there's a lot of uncertainty remaining. But as I indicated earlier, when we do make a risk assessment decision, we make sure that we're satisfied, we're confident, that the long-term risks will be acceptable for people and the environment.

We don't believe there was any different assessment at the time. We registered the neonics for the first time, by and large, based on all the available information that we had. We believed that the human and environmental health risks of the neonics would not be unacceptable, and we made a decision on that basis.

Mrs. Alaina Lockhart: The flip side of that is that we often hear from farmers as well that they don't have access to the new pesticides, that they're already approved in other countries but may not be available here.

Has PMRA made improvements to expedite that process to have those approved?

Dr. Richard Aucoin: Yes. Certainly over the last decade, for example, we've worked really closely to align our regulatory and registration approval processes with, for example, the United States specifically, so that we could both have access to the best science on both sides of the border and help address some of these access issues that Canadian agriculture was pointing out to us.

We think we've come a really long way on the joint review alignment process, and as a result of that, farmers on both sides of the border have very close access to the same pesticides. It's not perfect, but it's very close. We've taken that exact same approach working closely with OECD countries in Europe, for example, such that Canada and the United States and a lot of our global partners actually have now a global joint review process that most of the major manufacturers are taking advantage of. They're putting these new pesticides into this global joint review process amongst many countries at the same time, so that all countries essentially get access to these new pesticides in a similar time frame.

● (1140)

The Chair: Thank you, Mrs. Lockhart.

[*Translation*]

Mr. Drouin, you have six minutes.

[*English*]

Mr. Francis Drouin (Glengarry—Prescott—Russell, Lib.): Thank you, Mr. Chair.

I want to clarify a point. I'm just reacting to some of the comments that I saw yesterday within the media. This process is not tied to PMRA. PMRA is doing its own process. What we're doing here.... We don't report to the Minister of Health; we report to Parliament. I think it's important for people who want to appear before this committee to know that we haven't denied access to anyone to come forward. If anyone wishes to come forward, they can do so by sending an email or calling the clerk.

I thought it was important to put that on the record.

My question is for Mr. Aucoin or Mr. Kirby.

You've talked about better alignment with the U.S. on the registration side for pesticides. In the bigger picture, we have the Regulatory Cooperation Council. We're trying to align our interests. On the front end, I get that you said you've done some good work with the U.S. in terms of aligning interests, but what about on the back end, when it comes to banning pesticides, for instance? How much work are you guys doing on the back end with the U.S.?

If Canada is proposing to move forward with a ban, how is the U.S. EPA reacting to that, and what are their thoughts?

Dr. Richard Aucoin: Just to clarify, we co-operate very closely with our partners at the U.S. EPA and other regulatory authorities around the world. The focus of that co-operation is typically a little more at the front end, as you describe it, in terms of understanding how we use all the available science and how we do our assessments. However, at the end of the day, we all recognize that we're all going to be making our own independent decisions.

In the case of imidacloprid, as an example, we completed our assessment of imidacloprid some time ago, and we made sure that we collaborated with the U.S. EPA. It essentially peer-reviewed our risk assessment, and came to essentially the same conclusion we did in terms of the level of risk that it posed. The U.S. also published its own risk assessment on imidacloprid recently, and it essentially agrees with the outcome of our risk assessment on imidacloprid.

We've done a lot of work with the U.S. EPA on the front end, if you're talking about pre-market authorizations. If you're talking about our re-evaluation program, post-market, many years down the road, we still collaborate with the U.S. EPA as much as we can. For example, on the pollinator issues around the neonics, we collaborate very closely. For many of the older chemicals, we are in contact with it. Sometimes our re-evaluation schedules don't fully align with those of the U.S. Both in the United States and in Canada, we have a statutory obligation to re-examine old pesticides on a 15-year cycle.

Mr. Francis Drouin: Is work being done to ensure that our re-evaluation periods align? One of the complaints we hear is that we're putting people at a competitive disadvantage or that they won't be on a level playing field with the U.S. if we ban this first and it comes in after.

Dr. Richard Aucoin: In terms of the schedule, older chemicals typically tended to be authorized for use in the United States first and in Canada much later, which resulted in a lot of access concerns for Canadian agriculture. However, because we both have this statutory obligation around the cyclical re-evaluation, the timing is out of sync for us to work together on a lot of the older chemicals. As we do new chemicals jointly, we anticipate that we're going to be picking up those chemicals together in the future.

Mr. Francis Drouin: I want to ask about the mitigation strategy and again how it relates to that of the U.S. You said that the U.S. reached conclusions similar to those of PMRA, but have you had any signs of what the U.S. is proposing? Now that it needs to react to the science, what is it proposing to move forward in terms of mitigation? Is it proposing a ban, or is it proposing a different use of the pesticide?

● (1145)

Dr. Richard Aucoin: The United States has released its risk assessment, but it has not made a determination on how it's going to manage that risk yet, which is to say that it hasn't proposed phasing it out, for example.

Mr. Francis Drouin: Does PMRA do any field testing to ensure that when you decide to propose a ban as opposed to a mitigation strategy to using the pesticide...? How does that decision come forward? Do you do on-field testing to see whether if you use the pesticide in a certain way you get different results? Is that done through PMRA?

Mr. Scott Kirby: If I understand your question correctly, the answer would be no. The PMRA has no research and monitoring mandate, so we don't actually do any testing. That's either left to the registrants, if we require data from them, or it can be generated through some of the departments that do have a research mandate, such as Agriculture Canada, Environment Canada—

Mr. Francis Drouin: How did PMRA come to decide that it was going to propose a ban as opposed to suggesting a mitigation strategy?

Mr. Scott Kirby: We came to that conclusion based on our scientific assessment. We had over a hundred studies submitted by the registrants. We looked at over 200 studies by academics that were in the open literature. We also reviewed the regulatory decisions of the EPA, FSA, FDA, and the Department of Agriculture in the U.S. Having looked at all that evidence plus the monitoring information provided to us by academics, provinces, and federal departments, we came to the conclusion that the risks were unacceptable.

The Chair: Thank you, Mr. Kirby.

[*Translation*]

Thank you, Mr. Drouin.

[*English*]

Now Mr. Anderson.

Mr. David Anderson: Thank you, Mr. Chair.

You mentioned the Morrissey study. Are you using that as one of your main datasets for western information?

Mr. Scott Kirby: The Morrissey data is not pivotal to the imidacloprid decision in indicating risk at this time. The more pivotal pieces of information are from Ontario and Quebec. The Morrissey data comes largely from areas where the other two neonics are used more extensively—that would be thiamethoxam and clothianidin—and that information will figure in our special reviews of those two chemicals. With respect to imidacloprid, there is some use in the area where Dr. Morrissey did her work, but it is not to the extent of the other two.

Mr. David Anderson: Actually, I think your summary of the data said that there's no exceedance of the acute freshwater invertebrate end point, and there are very few exceedances, I think maybe one, of any kind of chronic end point. Despite that, you're saying you're going to use that as data to encourage the cancellation of the agricultural uses across the country of that product. Why would the other neonics expect to be treated any differently?

Mr. Scott Kirby: If the science says that they should be treated differently, they will be. With respect to imidacloprid, in Morrissey's study the issue is to what extent imidacloprid was used in that area. If there's not a lot of use, you don't expect to see a lot of detects and lot of high concentration. If we had information that indicated that there was extensive use of imidacloprid in those areas and we still were seeing low levels, then we would consider a decision that would be based on that science.

Mr. David Anderson: Looking at the science on the other products, you'd say they're below the thresholds that have been set, so you would say it looks like good data, data that would encourage the continuation of the use of that product.

Mr. Scott Kirby: Right now the special reviews are ongoing. We're considering all the available information. At this stage I'm not ready to pronounce as to whether or not the risks are acceptable or not. I will say that we are meeting monthly with the multi-stakeholder forum, and we're updating them on the progress of our special reviews. When we get to a point where we're able to make some preliminary determination as to whether we're seeing a good picture or a bad picture, we will let them know so that we can put measures in place to help them look for alternative strategies.

Mr. David Anderson: There's a benefit of about $200 million a year to agriculture from these products. Do you do any kind of cost-benefit analysis when you're looking at your decision-making?

Dr. Richard Aucoin: Under our statute, our primary mandate is health of the environment. That's our fundamental mandate under the PCPA. We also are required to ensure that pesticides have value, but there is no direct cost-benefit analysis or risk-benefit comparison as part of our decision-making. Obviously, we are very cognizant of the potential value of some of these agricultural chemicals, so we can and we do put in a fair amount of effort trying to understand risk mitigation and risk management options before we proceed to, for example, phasing out a chemical. That's why, in fact, what the proposal says is that we're proposing a transition period of three to five years right now.

● (1150)

Mr. David Anderson: What role does the precautionary principle play in this whole thing and the approach? Ms. Johnston mentioned that. Basically, the notion that some people have is that you can't do anything until you can prove there's absolutely no risk to anything. So no one moves, no one gets hurts, no one gets a benefit, nothing. What role does that play in your decision-making? It seems to be playing an increasing role in your decision-making. Is that true?

Dr. Richard Aucoin: No, I don't think that's accurate. In the case of all the chemicals that we re-evaluate, we don't take a different approach. We aren't taking a different approach, really, with the imidacloprid or the neonics. We use the same formula, the same sort of paradigm, when we look at this chemical as when we look at any chemical. We look at all the available information, including some modelling data. If we have information on what's being found in the environment, we use all that information.

We do take—and in the legislation we are required to take—a fairly precautionary approach. We do factor into our decision-making an understanding of where there might be uncertainty. We put in safety factors to protect human health, for example. We don't have human data, only animal data, so we are required in our legislation—and it is good science—to understand that there can be some uncertainties in the data.

Mr. David Anderson: This isn't an issue of human health, is it?

Dr. Richard Aucoin: No. It's not. Pretty much all the human health assessment work we've done on the neonics does not show a significant health issue.

Mr. David Anderson: We find ourselves in a situation whereby you're saying you're relying on science, but the science that we've been looking at says there's no direct correlation with bee kills. You're saying you're doing some other work on that. Science doesn't indicate that there's any permanent impact on water species at this point. There doesn't seem to be much information on that or whatever, yet your decision is that you're still going to ban these chemicals.

I don't see that this decision is being based on science the way it should be. I think producers out there are feeling the same way. You excluded the industry and agriculture from the discussions until you made your decision. I don't think that's a solid scientific approach to a subject or to a decision.

I've been here long enough. We've had some PMRA battles over the years, and I'm wondering what you can do to reassure us that you're paying attention to the agricultural community on these issues in ways that weren't the case in the past.

The Chair: Thank you, Mr. Anderson.

Unfortunately, I have to cut it here.

Mr. Peschisolido, you have six minutes.

Mr. Joe Peschisolido (Steveston—Richmond East, Lib.): Mr. Chair, thank you.

I too would like to thank the witnesses for coming here to have a conversation on a very complex and multi-faceted, probably grey issue. There's no black and white, even though certain groups believe that.

Whenever you want to change something, you need an alternative. I don't remember who asked this question, but I would like to follow up with Dr. Aucoin or Mr. Kirby on the working group you have for alternatives.

Have you looked at the impact when you're switching from these pesticides, which are quite efficient when you just need one application, to other pesticides where you need more than simply one application? What would the impact be on the farming community and also on the environment?

Mr. Scott Kirby: We haven't entered those discussions yet in terms of the potential impact of whatever alternatives are being proposed. However, I committed at the multi-stakeholder forum that once we identify alternatives, especially in light of the concern from beekeepers about the impact those pesticides might have, we would work with them to help them decide which ones were more bee friendly.

Typically as a matter of normal business we don't do what we would call a comparative risk assessment to say that one pesticide is better than the other. If they are all registered, they are considered acceptable for use. Obviously, certain ones will have different profiles that are more favourable for different parts of the environment, and that's where I think we could help the growers with respect to looking at that risk profile.

● (1155)

Mr. Joe Peschisolido: Can you follow up a little on the nature of these working groups? I believe you have at least three working groups. We can talk about the alternative part, but also the mitigation.

Have these working groups started? Who has been appearing? What have been the topics?

Ms. Andrea Johnston: You're correct. There are three working groups: data monitoring, which is looking at the existing data and new data that has come since the proposed decision by Health Canada; the mitigation working group, which will work closely with the data monitoring as the data monitoring should be able to pinpoint some of the crop uses, and from there the mitigation working group will assess if there are mitigation measures that could be taken into account and get to an acceptable level; and finally, the alternatives working group, which you just raised.

That work, the work plans, and any data will be submitted to PMRA before the end of the consultation period, but the work will continue past the consultation period because there's the intent of doing further data monitoring.

Mr. Joe Peschisolido: With regard to alternatives, there are alternative pesticides, but there's also an alternative way of doing things. One of the largest sectors in agriculture has been the organic industry.

Has the organic industry been involved in this process?

Ms. Andrea Johnston: They haven't highlighted themselves specifically as organic producers so I'm not sure, but you're correct. That is an alternative option and a producer choice in terms of the protection methods they may want to take into account.

Mr. Joe Peschisolido: Earlier on, Mr. Anderson talked about real-world data and I believe, Mr. Aucoin, you talked about model data, so basically you're doing an assessment on the risks. You talked about models. What models do you have? There are agencies. There are departments. In the private sector, companies have their models and there's a seal of approval through an audit process—so either KPMG, PWC, or whatever the big four are. Perhaps you can talk a little about the models you use. What is there that gives us the seal of approval? It seems as if the problem you have now is that there's a lack of trust in the process. I'm not saying it is, but it seems as if you're getting a lack of trust on both the farming side and the environmental side, and that's why we have a few folks here today.

Can you talk a bit about the model that you use, how you came about that model, and how you verify the models that you do have?

Mr. Scott Kirby: Most of our models are specific to predicting concentrations in water bodies, and those models have been developed in concert with the U.S. EPA. Over the course of the years, these models have been refined. There's been what they call science advisory panels that have been held to validate some of those models, and they are models that are being used jointly. As we've progressed from one model to the other, we've validated that the results are consistent with what we were expecting.

The models are used as an initial lower-tiered estimate of what animals or fish or insects would be exposed to, and then if those show significant risk, if we have good monitoring data, then we will turn to that to see whether or not the predicted model outcomes are similar to what we're seeing in the environment. If they are, then that validates our assumptions in terms of risk. If they're not, that's when we need to do more work to see whether or not the models are overly conservative and whether the true real-world data is actually telling us a different story.

When we have good, solid monitoring information, as far as we're concerned, that's where the bar is set. The sad thing is that we often don't have that very good, strong, robust monitoring data.

The Chair: Thank you, Mr. Kirby. Thank you, Mr. Peschisolido.

That will conclude our first hour of the panel. I want to thank Mr. Kirby and Mr. Aucoin with the PMRA, and also Ms. Johnston for appearing with us today. It's been a very interesting conversation.

We will switch. Also, I will ask Ms. Brosseau if she will chair the second hour. Unfortunately, I can't be here. Also, I'll ask if you will allow her to ask her questions because I'm creating all this disturbance, so I think it would be good if you would allow that.

Thank you so much. We'll break for a few minutes and have a new chair.

● (1200)

(Pause)

● (1205)

The Vice-Chair (Ms. Ruth Ellen Brosseau): I have the gavel. Watch out.

[*Translation*]

Hello, everyone.

We will begin the second part of our study on pesticides with the presentation by Mr. Pierre Petelle, who is the vice-president of chemistry at CropLife Canada.

Please go ahead, Mr. Petelle.

[*English*]

Mr. Pierre Petelle (Vice-President, Chemistry, CropLife Canada): Thank you, Madam Chair and members of the committee.

On behalf of CropLife Canada and its member companies, we are pleased to have the opportunity to contribute to your study of PMRA's recent proposed decision on imidacloprid.

I'm joined today by my colleague, Dr. Maria Trainer.

[*Translation*]

CropLife Canada is the commercial association that represents manufacturers, developers and distributors of plant science innovations, including crop protection products and plant biotechnology products for use in agriculture, in cities and in public health. We are committed to protecting human health and the environment and we believe in ongoing research to stimulate innovation.

Our mission is to enable the plant science industry to make the benefits of its technologies available to farmers and the public. These benefits are varied, including reliable and effective tools to help Canadian farmers feed the world and, in turn, stimulate agricultural exports and job creation, strengthen rural economies, and boost government tax revenues.

[*English*]

Agriculture, as Dominic Barton states in his recent report to government, is a sector of enormous potential for this country, but it requires a supportive environment in order to truly thrive. CropLife Canada believes that a predictable, science- and risk-based regulatory system for pesticides in Canada is key to this agricultural success. The protection of human health and the environment is a top priority for our industry, and we believe that our track record clearly demonstrates that. The advances that have been made in plant sciences have contributed to significantly improved human health, lower risk for farmers, and reduced environmental impact.

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

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

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

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

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

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

In addition to the pressure the agency faces from the audit, there has been a huge increase in activist pressure in recent years. For example, there have been increases in form letters submitted by click-and-submit sites set up by activist groups, more media attention, and even some U.S.-style lawsuits from activist groups. Surely, this is affecting workload, not to mention morale.

● (1210)

Is it creating a risk averse environment at the agency? We're not sure, but recent actions by the agency would suggest it could be.

Canada is and should continue to be a global leader in sustainable agriculture. That was certainly the intent of the recent report from the council of economic growth chaired by Dominic Barton. Mr. Barton sees the immense potential that Canada has to continue to increase its agricultural productivity and exports, increase agri-food production and truly take advantage of the opportunities that exist for us globally.

With its strong work at the international level, the PMRA has been a leader, which has resulted in new technologies coming to Canadian growers at the same time as their competitors in the U.S. and elsewhere. We're concerned that this commendable action on new products is being undermined by the agency's re-evaluation approach and decisions, just as the Government of Canada is looking to agriculture as an avenue for economic growth.

Our global members, some of whom are sitting here next to me, need predictability in order to invest here in Canada. Recent re-evaluation proposals are sending shock waves among our members. Our fear is that, if Canada becomes a high-risk or unpredictable market, we will miss out on new opportunities.

This is certainly not the environment envisioned by Dominic Barton and his colleagues when they wrote their report and we do not believe that this is the policy intent of the Government of Canada. This is why we're looking to this committee and the Minister of Agriculture and the Minister of Health for leadership to help ensure PMRA's re-evaluation program doesn't undo all the good work that has been done to get new products registered by, at the same time, tarnishing the reputation of approved products without first having done a thorough and transparent examination of all the data.

We need to avoid damaging the competitiveness of Canadian growers with decisions that provide questionable health and environmental protection. Specifically, agriculture stakeholders are looking for a fair scientific discussion from PMRA with potential input from external expertise on imidacloprid.

There needs to be flexibility on timing for new data on this product, so that PMRA can be certain that decisions are being based on the best possible information. We would like to see consideration given to re-evaluation process improvements as outlined earlier. We hope for a reinsertion of “enabling access” or competitiveness language in the PMRA strategic plan.

Finally, we would like to see some consideration given to the broader Canadian agriculture strategy, as articulated in the Barton report, by PMRA in its decision-making.

Thank you for your time. We look forward to your questions.

● (1215)

[*Translation*]

The Vice-Chair (Ms. Ruth Ellen Brosseau): Thank you very much, Mr. Petelle.

We will now hear from Mr. Paul Thiel, from Bayer CropScience.

You have 10 minutes, Mr. Thiel.

[*English*]

Mr. Paul Thiel (Vice-President, Product Development & Regulatory Science, Bayer CropScience Inc.): Madam Chair, members of committee, thank you for inviting me here today to share with you Bayer's view on the proposed regulatory action on imidacloprid with respect to aquatic invertebrate safety and its potential impact on segments of production agriculture in Canada.

Bayer is one of the world's leading innovative crop science companies in the area of seeds, crop protection, and non-agricultural pest control. Our company offers an outstanding range of products, including high-value seeds, innovative crop protection solutions based on chemistry and biologicals, as well as an extensive service backup for modern sustainable agriculture. Headquartered in Calgary, Bayer's crop science division employs over 450 people across Canada, as well as 200 summer students each year.

More than 60,000 grower customers adopt our technologies for many of their crop production needs, including crop protection products, seeds, and plant biotechnology.

The committee has heard much discussion on this regulatory proposal for imidacloprid, and I would like to take the opportunity to add to this important discussion. Imidacloprid is a member of the neonicotinoid insecticide family. These insecticides represent an important advancement in agricultural technology that has helped Canadian farmers increase productivity and improve competitiveness and sustainability. These products provide clear performance and environmental advantages over the older insecticides they replaced, and by effectively controlling pests they provide incremental yield benefit, are adapted to integrated pest management systems, and present a lower risk to users.

Imidacloprid has been registered in Canada since 1994, when it first received an emergency-use registration in potatoes to control Colorado potato beetle, which was resistant to most of the other registered insecticides of the time. Since that initial approval, imidacloprid products have been widely expanded to fill a need left by the loss of older pesticides that were removed from the market. Imidacloprid was also the first generation of innovative seed treatment technology with systemic activity for protection against seedling and seed insect pests. It is also used for structural control of pests such as bedbugs, and with pets in the control of fleas and ticks.

Late last year the PMRA, in its review of the dossier, stated that there was no concern related to human health; however, PMRA's proposed re-evaluation decision of imidacloprid found that in aquatic environments, exposure to imidacloprid from spray drift and from runoff may result in toxic effects to aquatic insects. On this basis, the PMRA is proposing to phase out all of the agricultural and a majority of other outdoor uses for this product over the next three to five years.

Bayer disagrees with this regulatory proposal based on potential harm to aquatic invertebrates. Bayer is of the view that it fails to adequately discern regional differences or production practices of concern, fails to adequately address potential associated mitigation options, and does not take into account higher-tier risk assessments, resulting in an overly conservative threshold value based on a single species.

Data reviewed to arrive at this proposed action include more than 11,000 water samples taken from coast to coast. Of these water samples, only a few programs were considered adequately robust, including three sampling sites in southern Ontario and one in Quebec that had levels of imidacloprid above the new proposed threshold value of 41 parts per trillion. Other sampling data that had detections below this threshold have been discounted due to the lack of ancillary information.

In their review of the registrant and published data, the PMRA has relied exclusively on laboratory data to generate the threshold values of concern, using the mayfly as the most sensitive representative species. Bayer has submitted 22 mesocosm studies as part of the dossier for the imidacloprid registration. These studies are higher-tier studies that more properly represent the aquatic invertebrate community in a natural setting, as opposed to an artificial laboratory setting. However, each of these studies was rejected by the PMRA for this assessment. Many years ago our industry moved to this type of study to better characterize risk in the natural environment; however, we now find ourselves taking a step backward to rely on more conservative laboratory data.

● (1220)

Bayer has had a long and collaborative relationship with the PMRA. Their role as a regulator and ours as a registrant are well understood and accepted. However, in this case, the proposal was published with no advance discussion and consideration of potential mitigation steps that may resolve any concern. The proposal to phase out many uses of imidacloprid is not supported by any monitoring evidence of the aquatic invertebrate community, or any evidence that its use has caused harm in this area.

Furthermore, with limited data, or the absence of information from many regions of Canada, this proposal is nationwide. With the lack of effective alternative products such action may result in the use of increased tillage for the control of soil-dwelling insects such as wireworm, leading to an increase in soil erosion, loss of land productivity, increased carbon emission, loss of revenue, and a reduction in sustainability metrics.

As a leader in Canadian agriculture, we understand the value of biodiversity and the role of aquatic invertebrates in the food chain. We also believe that imidacloprid, when used according to label directions, poses no undue risk to the aquatic invertebrate community and the nature that depends on these as a food source. We believe the products we develop, market, and steward represent the latest innovations in crop protection that have helped make Canadian agriculture productive, sustainable, and competitive. I look forward to answering your questions.

Thank you.

[*Translation*]

The Vice-Chair (Ms. Ruth Ellen Brosseau): Thank you very much, Mr. Thiel.

We will now move on to Mr. Chris Davison, from Syngenta Canada.

You have 10 minutes.

[*English*]

Mr. Chris Davison (Head, Corporate Affairs, Syngenta Canada): First, let me thank the chair, vice-chairs, and members of the committee for the opportunity to meet with you today.

By way of background, Syngenta is a leading agriculture company helping to improve global food security by enabling millions of farmers to make better use of available resources. Through world-class science and innovative crop solutions, our 28,000 people in over 90 countries are working to transform how crops are grown. The Syngenta Canada team is approximately 300 people strong, supporting products and services for the country's major crops, including wheat, barley, canola, corn, potatoes, pulses, soybeans, and specialty crops.

While the focus of your meeting today is the PMRA's proposed decision concerning the neonicotinoid imidacloprid, which is manufactured and marketed by Bayer, as just mentioned, the topic is also of critical interest to us at Syngenta, as we are the manufacturers and marketers of one of the other neonicotinoids, thiamethoxam. As well, the PMRA's proposed decision regarding imidacloprid triggered a special review of other neonics, including thiamethoxam, also with a focus on aquatic invertebrates. It is worth noting that there are currently four different re-evaluations and special reviews under way that include thiamethoxam in their remit.

We are supportive of and regularly tout Canada's rigorous and stringent regulatory system. Our system protects the health and safety of Canadians by ensuring that no products are approved that would pose an unacceptable risk to human health and the environment. Our system also ensures that products are regularly re-evaluated and reassessed to ensure they continue to meet the latest scientific standards. That being said, it is fair to say that we have some concerns with some of these current activities, which we will return to in a few minutes' time.

We are also cognizant of the fact that this committee and other bodies of the government have previously spent significant time on the subject of neonics, so we'll use the majority of our time with you here today to focus on some considerations and potential implications of the most recent regulatory actions regarding neonicotinoids.

The PMRA is very clear that before any pesticide can be registered in Canada, Health Canada must review the scientific information to make sure it has value and there are no unacceptable health or environmental concerns related to its use. The focus on value, health, and environment is clear and shared by us as registrants of these products.

With regard to thiamethoxam specifically, it is an extremely important and valuable tool for controlling various insect pests across a variety of crops. Its introduction, together with other neonics, ushered in a new era of insect control and management.

Thiamethoxam is registered for different uses on different crops as a foliar, soil-applied, and seed treatment insecticide. The majority of its use in Canada is as a seed treatment, which also brings additional value and benefits, including protection of seeds and emerging plants from insect damage during the critical first weeks of development.

From an environmental perspective, the benefits as a seed treatment include a significantly lower amount of active ingredient per acre compared with foliar and soil-applied pesticides, direct application to the seeds, reduced impact on non-target organisms, and protection from increased pest pressure associated with a range of agronomic practices, including reduced and no-till field conditions.

From an agronomic and production perspective there are also a number of other benefits, including optimizing seeding rates due to improved plant stand; minimizing the need for replants; extending the application window for in-season pesticide applications, if and when needed; supporting earlier planting practices, which helps to maximize labour and production efficiency; and complementing trait technology to manage insect pests.

Over the past several years various government, industry, and other stakeholders have undertaken work to quantify these benefits to Canadian agriculture, and while they have all employed different criteria and had a different scope for their analyses, all have confirmed the on-farm value of this class of chemistry.

Likewise, the impact of loss of or restriction of uses of these technologies has also been documented and would be expected to impact production in three main ways: yield loss or depression, quality losses, and additional need for foliar applications of insecticides, the majority of which would involve older chemistry with less favourable profiles.

The most recent action by the PMRA related to thiamethoxam, as mentioned earlier, is the special review regarding potential environmental risk to aquatic invertebrates. This special review was announced by the PMRA on November 23 and was triggered by the proposed re-evaluation decision regarding imidacloprid, which was announced the same day. To speak to this, I'm going to turn things over to my colleague Dr. Paul Hoekstra.

● (1225)

Mr. Paul Hoekstra (Senior Stewardship and Policy Manager, Syngenta Canada): Thank you, Chris.

Madam Chair and committee, thank you for the opportunity to speak today as well.

The focus of this most recent special review is aquatic insects. With that in mind, I think it's important that we start with some brief comments about thiamethoxam and water.

First, as a systemic compound, thiamethoxam is inherently water soluble. Essentially, thiamethoxam breaks down in water into metabolites. It doesn't mean you're not able to detect thiamethoxam in water. However, it rapidly degrades through microbial action and sunlight.

It should also be emphasized that detection does not equate to risk. The presence of a pesticide, thiamethoxam or otherwise, does not in and of itself imply a safety issue, and it needs to be placed in the appropriate context based on rigorous scientific information related to various components in the ecosystem. Pesticides in water are considered, evaluated, and accounted for as part of the registration and approval process that governs the approval and use of these products.

With this in mind, we are reviewing the proposed re-evaluation decision regarding imidacloprid, and specifically, the methodology applied to it, for potential implications for the special review of thiamethoxam. While that work is still ongoing, we can provide you with an indication of a few areas of focus for us.

Regarding data quality, studies considered to be of value for ecological risk assessment should first be evaluated to determine whether their end points, the observations made in the studies, were derived with adequate scientific rigour and robustness before being used to characterize potential risk. It is not apparent to us at this time that this approach was taken in evaluating all the scientific data incorporated in the imidacloprid assessment.

A second area of interest relates to the establishment of a chronic water concentration. This is the value proposed from which the long-term impact of a pesticide is assessed. Given the limited dataset employed in the imidacloprid assessment, it is not clear that determination or derivation of a chronic concentration is scientifically supportable.

More generally, care is needed when extrapolating findings from one specific watershed or geography to an entire country. It is vital to account for differences in agricultural practices, cropping systems, product usage, and land use characteristics.

Suffice it to say, we will use the special review as another opportunity to bring all of the science to bear that supports the safe use of thiamethoxam and, as is required with the special review, all requested data has been provided to the PMRA for its consideration.

Above and beyond this, I can also tell you that other parties have assessed, and continue to assess, available data on the potential impact of thiamethoxam to aquatic life; that includes our own data and other data published in scientific literature. We believe this work is an important component of a comprehensive weight of evidence assessment regarding neonics and aquatic invertebrates and will be published in the public domain as it's completed.

● (1230)

Mr. Chris Davison: Thanks, Paul.

Finally, I think it's important to situate Canadian regulatory actions, generally, and the actions that are being contemplated vis-à-vis neonics, specifically, in a somewhat broader and holistic context. To do that, I would make the following comments for consideration.

Comments have already been made about the Dominic Barton report and the opportunity for the Canadian agri-food sector. Implicit in realizing this is support for a research and innovation driven sector, inclusive of significant advancements in plant science that will help ensure we continue to make great strides in crop production for years to come. Neonics generally and thiamethoxam specifically are excellent examples of such advancements, advancements that we want to encourage and continue to bring to Canadian agriculture and Canadian farmers in order to sustain their productivity and competitiveness in a globalized economy.

Second, as part of the various evaluations and special reviews and the various actions that may or may not result from them, there is considerable speculation, and we are asked about replacements for or alternatives to neonics in the event that one or more of them were to be restricted or removed from the marketplace.

To our knowledge, there are no one-for-one replacements for this technology. While there are other active ingredients that control some of the pests on some of the crops with some of the uses that neonic products do, there are none that are as broad spectrum, that are registered for as many crops and uses, or that are as effective as neonics.

Furthermore, restrictions or removals on their uses would result in more reliance on fewer modes of action, which would increase resistance risk and, even more important, drive more use of foliar sprays based on older chemistries with risk profiles that are less favourable than neonics.

It is also critically important to keep in mind that decisions about the development of new or alternative products won't be made in Canada or just with the Canadian situation in mind. Plant science innovations, as was referenced earlier, are generally developed and registered largely on a global basis. To think that somebody or some organization would develop a Canada-specific solution does not reflect the reality of the years of intensive research, development, registration, and commercialization, and the financial resources required to do so.

Finally, as the majority of crop production agriculture in Canada is destined for export, it is critical that Canada be at the front end of the innovation and adoption curve, to keep our growers competitive and our status as one of the world's largest agricultural exporters. This need not and should not happen at the expense of or in place of human health and the environment, but in concert with it. We should be working to make sure that our regulatory system finds the right balance to achieve this.

Thank you.

[*Translation*]

The Vice-Chair (Ms. Ruth Ellen Brosseau): I would like to thank all the witnesses.

We will now proceed with questions and comments.

[*English*]

David, you have six minutes.

Thank you.

Mr. David Anderson: Thanks for being here today.

We talked before about modelling and real-world data, and that kind of thing. I just want to come back to that again. You said that Bayer had 22 studies done on aquatic invertebrates and they were rejected by the PMRA. When they were here, they talked about how they see modelling data as being important. I guess we're all aware of how unpredictable and uncertain that can be. They also talked about focus on predicting levels in water bodies with the EPA.

How does modelling and lab data and real-world data fit together, and how would you like to see that fit together in order to get a better balance in decisions such as this?

Mr. Paul Thiel: I think what you described are pieces of the puzzle that describe the story. We work through a series of tiered risk assessments, starting with the very most fundamental, controlled, in-lab types of studies, which give us direction as to what we should look for at the next level. Eventually you get out into the environment you're monitoring, which is the highest-tiered risk study you can possibly run.

Modelling is used to predict what you might find out there. Obviously, a model and real-world monitoring in a perfect world will match up. You'll find what you're looking for. A mesocosm study simulates the natural environment but tries to control the variables, which are numerous when you go out into a natural body such as a wetland or a stream running through an agricultural area.

In this case, all these studies were not considered in the assessment. They were deemed for whatever reason to be inadequate, although previously, I will say, they were used to grant the initial registrations.

● (1235)

Mr. David Anderson: It's just interesting, because they talked to us about how they were considering all the science and all the different data they could find.

It seems to me, though, that there are two parts to this. One was that these chemicals were being blamed for the bee kills. It turned out that they didn't have the impact that people thought they would have on them. Then it seems as though there has almost been an effort to shift this attention to something else, to see if we can find a place where these things are considered more toxic and then ban them. It's almost as though we're trying to find an excuse for the ban rather than doing the science to prove it, or whatever.

With the real-world data you've done on aquatic invertebrates, are you comfortable with the results and would you like them to consider that? Do you consider that to be valuable for them?

Mr. Paul Thiel: Yes, absolutely.

Mr. David Anderson: Okay. Maybe we can encourage them to take a look at that.

We talked a little earlier about changing thresholds and values. I think you mentioned thresholds as well. Do you participate when those values are changed? A gentleman mentioned that they've changed a number of times. How do the companies fit into that when the government decides they're going to change threshold values? Do you have any say in it?

Mr. Paul Thiel: Our experience has been that when the government was going to make a regulatory proposal, we had the opportunity to discuss that with them. In this case, the discussion did not take place prior to publication of the proposal.

Mr. David Anderson: That's everyone's experience.

I thought Mr. Hoekstra made a really good point, which doesn't come through in the studies actually, but detection does not equate to risk. If you read some of the studies, you'd think that the mere presence of something proves that there's an issue or whatever. It just seems that some people think this assumption is critical to banning these things.

There's a study out of Guelph that talks about more prescriptive direction, more prescriptive use of the chemicals. Would you see that as an alternative to this ban, as a useful alternative to the ban, or do you think that the chemical prescriptions are already adequate?

It's your product.

That leads into my other question: why do you expect the other chemicals to be treated differently?

First of all, can you answer the question, do we need more prescriptive directions for the use of the chemical, a bit more control on it? Would that make it acceptable, or do you think it's fine the way it is?

Mr. Paul Thiel: I believe the label as it stands today is fit for use. It provides adequate direction to growers. When used according to the label direction, it poses no undue risk.

Mr. David Anderson: Now the other question about why you expect—

Mr. Chris Davison: The PMRA has a process, but I think that's what Paul's comments were. We're looking at the methodology that's being applied in the proposed imidacloprid decision because basically a new study has been triggered also looking at aquatic invertebrates in the context of thiamethoxam.

That's why Paul made the comments he did about the areas of focus or of concern for us in terms of the methodology that's been used. That's why we're here and why we have a keen interest in the proposed decision regarding imidacloprid.

Mr. David Anderson: Do you feel the multi-stakeholder forum is being used to do some of PMRA's work for them? Is it work that should have been done ahead of time by them, or should have been done in participation with you, and now it's being passed off and it's being said, “Do you want to do this work now and prove to us A, B, and C?"

Mr. Pierre Petelle: I can touch on that one.

I think the process is novel. To my knowledge, it has not been done for any other consultation in my time with CropLife. Should it have been done before the publication of the proposed decision? Absolutely. I think there's a lot of good work being done there, except it's being done on a very tight timeline. Had that been done as a consultative process with the agriculture sector and the registrants, if these issues had been talked about in advance and not in this politically charged climate of a proposed ban hanging over everyone, I think it would have been much more productive.

● (1240)

Mr. David Anderson: Do you actually think you're going to have an impact on that ban?

The Vice-Chair (Ms. Ruth Ellen Brosseau): You're at almost seven minutes.

I'm being generous. I'll be good on your side, too.

Mr. Longfield.

Mr. Francis Drouin: It's biased.

The Vice-Chair (Ms. Ruth Ellen Brosseau): No, it's not. I'm fair.

Mr. Lloyd Longfield (Guelph, Lib.): Thank you, Madam Chair. Welcome to the position.

I'm going to continue the pattern that we've been developing here with this committee. Could you maybe answer Mr. Anderson's question on where you see this heading in the future for you?

Mr. Pierre Petelle: For this specific active...?

Mr. David Anderson: Do you think this is going to have an impact on the ban? Is the multi-stakeholder forum participation actually going to make a difference?

Mr. Pierre Petelle: We're certainly entering into it with that belief. We've put a lot of human resources into the working groups, as have other agriculture stakeholders. We're taking it seriously, and we're putting in the time and effort with the belief that the outcome of that could affect the decision.

Mr. Lloyd Longfield: Thank you.

First, thanks to everybody for coming. We are scrambling a bit. We also found out about this late in the game.

I want to talk about timing. When we found out... After November 23 we went into the holiday season. When we came back and had to get to work as a committee, we sent in a letter to ask if we could get an extension. We were able to get 30 days. Then we had a motion to do this study to try to get some of the testimony forward that could have been involved previously. As other witnesses have said, that wasn't part of the process this time.

In January, a study came out of Europe from the HFFA. Are you familiar with that two-year study on...? It wasn't specifically on imidacloprid but it was to do with neonics. If any of you have read that study—it came out January 2017—do you any comments on the findings? No?

Dr. Maria Trainer (Managing Director, Science and Regulatory Affairs, CropLife Canada): Is that the value of the neonics? It's the European Union—

Mr. Lloyd Longfield: Yes, the EU study.

Mr. Chris Davison: The Humboldt study.

Mr. Lloyd Longfield: Exactly.

Mr. Chris Davison: Yes, I'll just make a general comment because I referenced it in passing. There have been a number of studies done by different bodies, including government, industry, and other stakeholders, a couple of think tanks, etc., over the last several years. The comment I made was that, while the scope of their analysis and the methodology or the criteria they would have used to do those vary depending on where they were from and what they were focused on, they all came to the conclusion that there was economic and other on-farm value for this class of chemistry.

Yes, we are broadly aware of that particular study as well as a number of others.

Mr. Lloyd Longfield: That's good, thanks.

It was something that came up in a conversation at the University of Guelph. I met with the research chair for sustainable pest management from the school of environmental studies, and she is considered an expert in the world on this. She also said that she hadn't been consulted prior to the announcement. She also said that modelling was used more than field data. A concern she had was that data from the field wasn't being used or wasn't being gathered.

As we go forward now, we have three working groups. When were you involved with those working groups, and what's the term of those groups? How long do they have to report into PMRA?

Dr. Maria Trainer: The working groups were formed in late December, shortly before the holiday break, as a result of the first meeting of the multi-stakeholder forum. They've been meeting weekly, or each of them meets on a weekly basis by teleconference. They have work plans developed and I believe that tomorrow is the date that those work plans get presented to the PMRA to give them an update on where the groups are at and what the anticipated timelines for completing the deliverables will be.

Mr. Lloyd Longfield: It seems like those work groups are the cart after the horse. We could have had work groups to inform the decisions versus having work groups to try to reverse or defend the agriculture positions. It puts us in a very difficult position because the agriculture committee is reporting back to Parliament to say how this lines up with health considerations, how it lines up with Dominic Barton's report saying that we have this huge opportunity that could be addressed through the technologies that your companies and organizations are working on, but it feels like the legs are getting taken out from under us a bit.

There are nods of the head, which go on the record as nods of the head.

I'm really struggling with this, because there is science that needs to be brought forward. Do we have enough time to get that science on the table and will it make a difference in the final decisions? If you'd been into the work groups and with the progress, we haven't had a lot of time to develop science.

I'll also say that the University of Guelph said to me that they don't have an alternative in the pipeline. I thought that because this decision had been made it must mean that there was an alternative in the pipeline, and they said in order to go through regulatory approvals there's no way that we'd be able to match the phase-out period with the development of a new product.

● (1245)

Mr. Pierre Petelle: Maybe I'll just touch on that alternatives question because we hear a lot about that, that as long as there are alternatives, the impact on growers will be minimal.

It goes back to what I said earlier. If the regulatory environment is questionable or if the companies are at a fundamental disagreement on the science with the regulator, the ability for them to bring new innovations to Canada will be diminished over time, without question. These are global companies. Canada is a relatively small market. It is a small market. Other than canola, and wheat maybe, every other crop is considered a very small crop, so it's not Canada that's driving the agenda for new chemistry.

Like I said in my testimony, PMRA has played a leadership role in getting those new technologies to Canada, so we commend them, absolutely, for that, but we can't be undoing that on the back end, to quote Mr. Drouin, on our re-evaluation decisions. Otherwise, the regulatory attractiveness of Canada will diminish.

Mr. Lloyd Longfield: Thank you.

The Vice-Chair (Ms. Ruth Ellen Brosseau): Thank you, Mr. Longfield, and thank you, witnesses.

I get a spot, so I'm taking off my chair hat and putting on the NDP member's hat. You can time me, too. I'll be honest and I have

[*Translation*]

the clerk, who will help me.

[*English*]

I would like to thank the witnesses for their participation at this study. It's a start. We had government officials earlier today. We had Health Canada and we had Agriculture.

This is a complex issue. It's been going on for quite a few years. Neonics have been approved since, I think it was, the 1980s, 1990s. Over the last few years, I think farmers have been using these pesticides and certain other products. There have been studies. There have been a lot of questions by Canadians and environmental groups and I think yesterday brought it to the forefront, talking about the study that is being done at the ag committee and the interest, not just from Canadians but from environmental groups.

I think this is a study that we're starting. We're in our second hour. We're going to have another meeting later on. I think that if there's interest to delve into this a little bit deeper, it would be important that we consider making sure that we have—not all voices heard, that's going to be impossible—a great and deep study on this issue.

I know it was brought up that you don't have very much confidence in PMRA and the evaluation. There was a lot of speculation about the problems with flexibility and transparency.

Mr. Thiel, you were talking about the water samples, 22 studies that were submitted to the PMRA. I asked this question of the previous witnesses: is Environment Canada taking a leadership role in testing waters and doing the real-world data? It's not happening. What would you like to see come forward? I know we're talking about maybe science that will help reinforce mitigation measures that could be adopted. What are you hoping to see in this consultation period that is going on until the March 23?

Mr. Paul Thiel: Thank you very much for the question and the opportunity to respond.

I think first and foremost we would like to see the PMRA consider more of the data that is available than what is currently in their decision. There is a wealth of data out there that wasn't part of this decision. It was discounted. This included higher-tier risk assessments as well as considerable monitoring data from across Canada that demonstrated there was no level of imidacloprid in the water samples of concern.

I don't profess to be an expert at all on the role of Environment Canada. I know that they have relied extensively on Environment Canada water sampling. One thing that has become very clear, however, is that there is no national program, no national standard, on how this type of work should be conducted. Perhaps that might be a positive outcome here.

● (1250)

The Vice-Chair (Ms. Ruth Ellen Brosseau): Some groups have kind of applauded and praised the decision by Health Canada to phase out this pesticide. Obviously, from a farmer's point of view, there are questions: "What am I going to do? What does this phase-out mean for me?" There's some kind of uncertainty.

Could you maybe comment on what this would mean for you if this got phased out in Canada? This product is being used widely across Canada and all provinces, I would imagine. What would this mean if in the next few years we phased this out? If this would be big losses for your company, you'd then maybe have to improvise, and try to push forward and have other products assessed and hopefully approved to compensate for the loss of use.

Mr. Paul Thiel: If I may, I'd like to answer that in three parts.

First of all, we constantly look at new innovation for the marketplace. We're constantly trying to introduce new technologies that better serve Canadian production agriculture, be it chemistry, trait development, or biologicals.

With respect to what it would mean to us financially, imidacloprid has a very broad label. It's used extensively for everything from fleas and ticks in your dogs and cats to control of wireworms in wheat production in Saskatchewan. It is a generic product. It's supplied by many people in the marketplace, which is an advantage for growers. It's a very affordable product. It represents good economic value for growers.

What would it mean to us if it were phased out? More importantly, I think, is what would it mean, as Pierre said, to the reputation of Canada when we have a very safe, efficacious product that's been in use for 20 years with no reported negative environmental impact, but it's decided to be phased out by this country? What would that mean to the competitiveness of Canadian agriculture and to the reputation of the PMRA as a regulatory agency?

The Vice-Chair (Ms. Ruth Ellen Brosseau): I guess we could also reflect on the fact that there are some European countries that have banned similar products. We just signed a trade deal. Certain countries are approving it, and gradually it will happen soon enough. Maybe that would help improve trade with certain countries in Europe, because Canada is going.... It can be said both ways, I guess, because in Europe they'd ban in certain places, so maybe it could be beneficial.

With regard to the transition period, obviously we're so unsure. If I'm a farmer and this actually goes ahead, what other products would be used to compensate for this?

Mr. Paul Thiel: The—

The Vice-Chair (Ms. Ruth Ellen Brosseau): You don't have to answer. I apparently have 20 seconds left.

I want to be just with everybody, because I don't want to get my fingers slapped.

[*Translation*]

Mr. Drouin, you have six minutes.

[*English*]

Mr. Francis Drouin: Thank you.

First off, thanks for being here. I want to touch on a comment by the PMRA, that the U.S. is sort of heading the same way as Canada. Do you feel that, or are you speaking with your U.S. counterparts on that? It's just that they mentioned that at the committee an hour ago, and I wanted to see whether you've had chats with your U.S. counterparts and if that's really where they're going.

Mr. Paul Thiel: I'm in touch with my U.S. colleagues on a weekly basis, as are other colleagues of mine here in Canada. The difference between the action taken by the PMRA versus the EPA is that the EPA has come out and said it wants to enter into a consultation prior to putting out a proposal to take regulatory steps. In this case, the horse is in front of the cart.

● (1255)

Mr. Francis Drouin: Is it your opinion that advocating for a total ban versus perhaps revisiting some of the mitigation strategies that may exist...? Have your companies or members gone through their mitigation strategies to see whether or not to work with farmers? I know you guys already do that, but given the proposed decision by PMRA, have you gone back and looked at potential mitigation strategies?

Mr. Paul Thiel: We're actively participating in the mitigation round table. To be honest, we disagree with the threshold values and we disagree that there's an issue. It's hard to mitigate an issue that we don't believe exists.

Mr. Francis Drouin: I've asked PMRA before about better aligning our.... We have the Regulatory Cooperation Council way up at the top, and then collaborating.... I know many farm groups have asked us to provide better collaboration with the U.S. They're claiming they're doing it on the front end, but on the back end and on the re-evaluation of certain products, that's not being done.

Do you see an advantage for the PMRA and the U.S. EPA in collaborating when they suspect there may be an issue, or when they've been provided new scientific evidence of a certain product?

Mr. Pierre Petelle: As an industry we advocate for working together or harmonization, so, like I said on the front end, we've achieved a lot. On the re-evaluation side, on the older chemistry, there's still a lot of work to do. Richard pointed out the timelines. Some of the timelines are statutory, so it's hard to play with those, but wherever possible, absolutely, aligning those re-evaluation decisions and coming up with approaches and proposals that are consistent for growers in Canada and the U.S. is something we always advocate for.

Mr. Francis Drouin: I'm always trying to find a middle ground where parties on opposite sides can come to some sort of agreement. Again, I think the basis has to be found in science. That science conversation, does it happen? Dr. Paul, do you get calls from scientists on the other side, or does that conversation not happen at all?

Mr. Paul Hoekstra: One thing Canadians should probably be aware of is that we're incredibly blessed with a very talented pool of academic researchers in this country who deal with environment issues. From the University of Guelph to the University of Winnipeg in Manitoba to the University of Saskatchewan, there is a wide range of researchers involved in pesticide and environmental issues as a whole. Have they been engaged on this? I would say, yes, to a certain degree. Have they been engaged on this in terms of a PMRA perspective? I can't comment on that.

Mr. Francis Drouin: I'm no scientist. I don't understand the science and I would never claim to understand it, but based on our past study of GMO salmon, it was evident that among those who advocated against GMO, the science just was not there. We asked them to provide the science, and unfortunately all they could advocate for was that we provide more research dollars to do more research. There seems to be a disconnect between some groups, and urban Canada could be concerned about pesticides, especially not knowing where food comes from anymore.

Public trust is built into the new agricultural policy framework. We know there's an issue. I'm trying to see, from an industry perspective, how we can provide that public trust with the other side to ensure we continue having that adult conversation so that we're not constantly confronted with Internet science.

Mr. Pierre Petelle: You'll note that even in his testimony, Dr. Aucoin mentioned possibly 100,000 submissions. For a typical PMRA re-evaluation, if you get 30 submissions, that's a lot of interest. It's the registrants and maybe a few academics. It's a very technical area.

A possible 100,000 submissions means that 99,000 of those are activist-based “click and send”, as I said in my testimony.

We've looked at those websites, and basically even on this issue, even on this active ingredient, they talk about death to bees and the alarm around dying bees and even human health issues. Things that are clearly out of scope, clearly addressed by PMRA in this document, are being used to scare the public into engaging on this issue.

Our concern is that these 100,000 submissions, or even the fact that they're mentioned here today, is an issue for us.

● (1300)

Mr. Francis Drouin: Do you have enough time, with the March 23 deadline, to submit the scientific data that you wanted to submit?

Mr. Pierre Petelle: I'll let Paul answer that first.

Mr. Paul Thiel: Yes, Bayer CropScience will have a submission in by March 23.

Mr. Pierre Petelle: On the broader question of data for this summer, trying to tease out some of the water monitoring obviously takes a season or more to do. It is here that we've asked for some flexibility on the timelines.

The Vice-Chair (Ms. Ruth Ellen Brosseau): Thank you. I would like to thank our witnesses today and my committee member colleagues for great questions and comments.

[*Translation*]

Thank you, everyone.

The meeting is adjourned.