



Canadian Association of
Physicians
for the
Environment

Pest Management Regulatory Agency (PMRA)
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March 18, 2016

To: PMRA Publications

**Re: Notice of Intent Regarding Conditional Registrations under the Pest Control Products Regulations,
January 19, 2016**

I am writing on behalf of the Canadian Association of Physicians for the Environment (CAPE) to express qualified support for the Federal Government's decision to discontinue the granting of new conditional registrations for pesticide products effective June 1, 2016.

Founded more than 20 years ago by physicians who understood the deep link between human health and the environment, CAPE is a physician-run non-profit organization with thousands of donor-members across the country. We have a long history of involvement in issues related to pesticides. We have spent more than a decade effectively advocating for municipal by-laws and provincial regulations that limit the use of, and exposure to, high risk chemical pesticides to protect human health and the ecosystem upon which we all depend.

Our members have expressed concerns for many years about the use of conditional registrations by the Pest Management Regulation Agency (PMRA) which allow pesticide products to be put on the market before all scientific data required by the PMRA has been submitted by the proponent, reviewed by independent staff at the PMRA, and made available for public scrutiny. When we reviewed the Pesticides Safety report prepared by the Federal Commissioner of the Environment and Sustainable Development, we were dismayed to learn that conditional registrations apply to 80 pesticide products that are on the market today; 29 for more than 5 years and nine for more than 10 years.

Eight of the nine latter products are neonicotinoid pesticides (or neonics), a class of pesticides that have been strongly linked to increased mortality among bees, harmful impacts on other pollinators, and adverse effects on the broader ecosystem. The Task Force concluded that: "the wide-scale use of these persistent, water-soluble chemicals is having widespread, chronic impacts upon global diversity and is likely to be having major negative effects on ecosystem services such as pollination that are vital to food security and sustainable development."¹ Researchers at the Harvard TH Chan School of Public Health have estimated that, if all insect pollinators were lost, global fruit supplies would decrease by 23%, vegetables by 16%, and nuts and seeds by 22%. They predicted that these changes in food supplies could increase global deaths from chronic and nutrition-related diseases by 1.42 million people per year.²

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So, we strongly support the Federal Government's decisions to discontinue the granting of new conditional registrations for pesticide products. We believe this is a very important decision that is needed to protect human health, particularly that of sensitive populations, and the environment. However, we believe that it does not go far enough. We believe that the PMRA must close the loophole that applies to the pesticides to which conditional approvals currently apply. We believe that a hard date in the very near future must be set by which all conditional registrations are ended with registrations withdrawn or properly approved.

We would also like to note the Federal Commissioner's report identified a number of other serious failings in the PMRA's current registration process. For example, The Federal Commissioner found that the PMRA:

- Has not been assessing the cumulative health effects associated with pesticides on a consistent basis as required by the 2006 revisions to the Pest Control Products Act;
- Has been moving too slowly on the re-evaluation of pesticides that were registered before 1995;
- Has been slow to cancel registrations for products that pose unacceptable risks; and
- Has not been transparent with communications between the PMRA and proponents. For example, the PMRA has not been sharing with the public, the data and/or studies that are being requested from proponents that have conditional registrations and why they are being requested.

The Federal Government must move quickly to address these failings and weaknesses in the current process as well in order to protect human health – particularly that of sensitive populations such as young children - and the environment. It must also do so to gain the trust of health professionals in the pesticide regulating process.

Yours truly,

Kim Perrotta, MHSc
Executive Director
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cc. Federal Minister of Health, Jane Philpott

References:

- (1) Van Lexmond MB et al. 2015. Worldwide integrated assessment of systemic pesticides – Global collapse of the entomofauna: exploring the role of systemic insecticides. *Journal of Environmental Science and Pollution Research* 22:1-4. <http://www.tfsp.info/worldwide-integrated-assessment/>
- (2) Smith MR et al., 2015. Effects of decreases of animal pollinators on human nutrition and global health: a modelling analysis. *The Lancet*. July 16, 2015.

