



David  
Suzuki  
Foundation



environmental  
defence

May 19, 2017

Hon. Jane Philpott  
Minister of Health  
70 Columbine Driveway  
Tunney's Pasture  
O906C  
Ottawa, ON  
K1A 0K9

**Re: Timeline for the PMRA's second Special Review on atrazine**

Dear Minister Philpott,

We are writing to you on behalf of five leading environmental and health organizations - **Équiterre, Ecojustice, the Canadian Association of Physicians for the Environment (CAPE), Environmental Defence, and the David Suzuki Foundation**, regarding the **Pest Management Regulatory Agency's (PMRA) new special review on atrazine**. While we agree with the PMRA's decision to re-examine risks associated with atrazine in a second special review (Re-evaluation Note REV2017-10, Special Review Initiation: Atrazine, published March 31 2017), we are concerned that the PMRA has not indicated a timeline for this work. We ask you to direct the PMRA to commit to completing the special review of atrazine within a year. Continued delay could needlessly prolong risks to human health and the environment.

Atrazine is an herbicide used extensively in corn and sorghum production in Canada. Canadians are deeply concerned about its widespread use. Well over 46,000 citizens recently signed a petition circulated by Équiterre and Environmental Defence that called for a ban of atrazine's use in Canada.

Atrazine has been banned in the European Union since 2004 because of environmental concerns associated with widespread groundwater contamination. As you are aware, section 17(2) of the Pest Control Products Act (PCPA) requires the PMRA to launch a Special Review of any pesticide that has been banned in another OECD jurisdiction. In 2013, ***nearly a decade after the EU banned atrazine***, the PMRA launched its Special Review of atrazine, narrowly scoping the review to evaluate contamination of groundwater as the only "aspect of concern" because it was the reason that led to the ban in the European Union. This narrow scope meant that the PMRA did not consider critical evidence of risks posed by atrazine, including Canadians'

drinking water exposure through contaminated surface water; the endocrine disrupting effects of atrazine on the environment which have been widely shown to lead to sex changes in frogs and other aquatic animals; and potential health impacts for farmers, farm workers, pesticide applicators and rural communities.

This initial special review was flawed. According to the Commissioner of the Environment and Sustainable Development (CESD), the Special Review process allows the PMRA to consider **any** new information on risks at any time, and it is intended to enable your regulatory agency to act promptly on new evidence of risks.

The PMRA concluded this Special Review of atrazine in March 2017, choosing to continue the registration of atrazine for use in Canada **despite** acknowledging that additional concerns, including potential health risks, merited further evaluation in a second Special Review (initiated under section 17 (1) of the PCPA). In the meantime, Canadians and our environment continue to be exposed to atrazine with no timeline for assessing risks identified in the latest Special Review.

Given that:

- The PMRA should have launched a thorough Special Review of atrazine as soon as the section 17(2) requirement under the PCPA entered into force in 2006;
- The PMRA should have scoped this initial Special Review to evaluate **all health and environmental** risks associated with atrazine and its value in order to satisfy the requirements of the PCPA; and
- 13 years later, Canadians are still waiting for a thorough evaluation from Health Canada, and the ongoing delays continue to erode public trust in our regulatory system;

**We respectfully request that you instruct the PMRA to complete this special review of atrazine by April 2018, so as to meet your statutory responsibility to protect the health and environment of Canadians from unacceptable risks posed by pesticides.**

While we recognize a number of these decisions predate your mandate as Health Minister, you now have an opportunity to restore Canadians' trust in decision-making by acting promptly on the special review of atrazine. The PMRA is publishing its revised work plan on Special Reviews and Re-Evaluations in June 2017, and as such, we recommend the timeline for the final decision on the new atrazine Special Review be listed as April 2018.

We thank you for your attention to this important matter and remain available to to meet with your office to discuss this matter further.

Sincerely,

Annie Bérubé  
Director of Government Relations  
Équiterre

Kim Perrotta  
Executive Director  
Canadian Association of Physicians for the Environment

Elaine MacDonald  
Program Director -- Healthy Communities  
Ecojustice

Tim Gray  
Executive Director  
Environmental Defence

Faisal Moola  
Director-General, Ontario and Northern Canada  
David Suzuki Foundation

cc. Richard Aucoin, Executive Director, PMRA