

PEST MANAGEMENT ADVISORY COUNCIL

MEETING REPORT

November 25-26, 2002

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Pest Management Regulatory System

Claire Franklin, Executive Director, Pest Management Regulatory Agency (PMRA) and Council member, chaired the meeting for this item which was intended to provide an overview of the regulatory system for the benefit of new members.

Presentations were made by Diana Somers, Director, Health Evaluation Division, PMRA (see Appendix C: *Submission Review Process and Health Effects Assessment*), Valerie Hodge, Senior Evaluation Officer, Environmental Assessment Division, PMRA (see Appendix D: *Environmental Risk Assessment*), and Richard Aucoin, Director, Efficacy and Sustainability Assessment Division, PMRA (see Appendices E: *Value Assessment* and F: *Risk Management and Decision Making Framework*).

The following summarizes major themes raised during the discussion.

- Harmonization with the United States (U.S.) remains critically important to manufacturers and users of pesticides. It was noted that data requirements and assessment methodology are largely harmonized. Two areas of difference are: (1) efficacy studies, which are reviewed in Canada but not in the U.S. (although the U.S. does require efficacy studies to be conducted); and (2) application of extra safety factors to protect pregnant women, and hence children, from risks posed by occupational exposure to pesticides in Canada but not in the U.S.
- Data requirements should be commensurate with potential risks posed by different types of pesticides and should not inhibit the registration of lower risk products. Consideration should be given to exempting very low risk products from registration or from regulation under the Act altogether.
- The importance of testing for developmental neurotoxicological effects was stressed.

- A broad view of alternative pest management products and practices should be taken into account in assessing the value of a pesticide. As well, the health or environmental risks of the pest and the health or environmental benefits of the pesticide should be considered. It was noted that value can never override unacceptable risks.
- The importance of assessing new information about registered pesticides was stressed.
- Stakeholders are interested in the efficiency of the PMRA in reviewing pesticide registration applications.

Introduction / Review of Agenda

Richard Van Loon, Council chair, welcomed new members. It was agreed that one hour at the end of the meeting would be devoted to articulating recommendations to the Minister.

Remarks from Minister's Office

David Thelen of Minister McLellan's office, who attended the meeting on the first day, assured the Council that the Minister appreciated the wide variety of perspectives represented by the Council members and was looking forward to their advice.

Cost Recovery Program Evaluation

Robert Woods, Director, Management Planning & Coordination Division, PMRA, and Janice Hopkins, Director, Alternative Strategies & Regulatory Affairs Division, PMRA, provided an introduction to this item. The PMRA has completed five years of cost recovery (1997-98 to 2001-02) and is undertaking an evaluation of its cost recovery initiative as required by Treasury Board. The review will examine three areas:

- (1) the effectiveness of the PMRA costing model;
- (2) whether and how PMRA performance has been affected by cost recovery; and
- (3) the impact of the PMRA cost recovery initiative on a broad range of stakeholders.

An Evaluation Steering Committee (ESC) and a Technical Sub-Committee (TSC), made up of a broad range of stakeholders, have been established. Some Council members are members of the ESC. It is expected that a Request for Proposal to conduct the evaluation will be issued soon once it is approved by the ESC and the Executive Director, PMRA.

The Council was briefed on this initiative because it will be asked to advise on any recommendations and proposed actions that are of a broad policy nature once the evaluation is completed. The target date for completion of the evaluation is July 2003.

The following issues were raised during the discussion.

- Some members suggested that the scope of the evaluation should be broadened to include an assessment of whether or not cost recovery is beneficial per se. Other members disagreed, stating that broad policy issues such as this are more properly within the mandate of the Council.
- Some members expressed the view that the evaluation should assess differential impacts on various types of pesticides.
- Some members suggested that the evaluation should include opportunities for public input. It was noted that minutes of ESC meetings, as well as any reports and action plans, will be posted on the PMRA web site.

New Minor Use Pesticide Initiative

Claire Franklin, Executive Director, PMRA, and Mary Komarynsky, Director General, Adaptation & Financial Guarantee Programs, Agriculture and Agri-Food Canada (AAFC), presented an overview and the status of new AAFC and PMRA initiatives for minor use pesticides (see Appendix G).

The following summarizes major themes raised during the discussion.

- Additional resources have been allocated to support both minor use pesticides and reduced risk pesticides, with an emphasis on reduced risk minor use pesticides. It is unlikely that this will create any conflict in establishing priorities since most new pesticides are reduced risk.
- Council members expressed an interest in accountability for the additional resources allocated to this area and in performance measurement. Two measures that were suggested were the number of minor use registrations approved and a comparison of minor use registrations in Canada and the U.S. It was also suggested that status reports should be made to the Council on a regular basis. It was noted that it may take some time to catch up to minor use registrations in the U.S. which have been funded for 40 years by the U.S. Department of Agriculture.
- Some Council members felt that the current definition of “minor use”, i.e., “a use for which the manufacturer projects that sales in Canada will be too low to justify the costs to support registration”, is not adequate. Support was expressed by some for including a restriction based on hectares of crop grown.

- Questions were raised as to whether or not any resources would be allocated to technology transfer to support broad implementation of integrated pest management (IPM) or to support organic agriculture. It was noted that education and training are primarily within provincial jurisdiction. Organic agriculture is supported by AAFC through other programs.

Agricultural Policy Framework

Terry McRae, Environment Bureau, AAFC, presented an overview of the environmental elements of the Agricultural Policy Framework and the implications for the pest management regulatory system (see Appendix H).

The following summarizes major themes raised during the discussion.

- Farmers support the goal of environmental risk reduction as evidenced by the many voluntary measures taken over the years, such as the disposal and recycling of pesticide containers. At the same time, one must remain cognizant of the impact of increased pesticide regulation on competitiveness.
- Agricultural policies aimed at reducing environmental risks should not be developed in isolation. Many factors will influence how far it is practical to go in this direction, such as the ability of forecast weather in order to reduce pesticide use, the availability of reduced risk products, input costs, agricultural policies in other countries, the risks of the pests to be controlled. Interdepartmental discussions are necessary to ensure that the goals of various departments are not contradictory.
- International harmonization is important so that Canadian farmers are not put at a competitive disadvantage. It was noted in this regard that the PMRA is reviewing the 0.1 ppm default maximum residue limit for pesticides in food and will be publishing a consultation document in the near future.
- Specific goals for pesticide risk reduction could be developed by identifying where the broad goals of various related areas coincide, e.g., environmental farm plans, food safety initiatives, sustainable pest management approaches.
- Risk reduction goals will not be met unless there is adequate monitoring and surveillance. It was recognized that this would require federal/provincial collaboration.
- Performance measurement mechanisms would need to be developed taking into account many diverse perspectives. Goals may be absolute or relative. For pesticide risk reduction, indicators

could include the amount and type of pesticides used, as well as the use of practices that reduce risks from pesticides such as integrated pest management.

New PMRA Initiative for Canadian Submissions for Reduced-Risk Pesticides

Richard Aucoin, Director, Efficacy and Sustainability Assessment Division, PMRA, described the extension of the North American Free Trade Agreement (NAFTA) Joint Review Program for Reduced-Risk Pesticides to include submissions made to the PMRA only, which was announced on May 31, 2002 through the publication of Regulatory Directive DIR 2002-02 (see Appendix I).

The following comments and clarifications were noted during the discussion.

- The criteria used to determine eligibility for the program are the same as those used by the U.S. Environmental Protection Agency (EPA). A rationale approved by the EPA for the same use will be accepted in Canada.
- The reduced risk designation does not mean that the product poses lower risks in all areas. If concerns are identified during review of the application, the product may be moved out of the reduced risk program.
- The definition of “biopesticide” should include behavioural chemicals other than semiochemicals.
- The program is open to pesticides proposed for both urban and agricultural use.
- Registration of reduced risk pesticides is encouraged through the commitment to a shorter performance standard for review of the application, i.e., 15 months versus 18 months for new chemical active ingredients. There are a range of timelines outlined in the Directive.
- Some Council members encouraged the PMRA to consider exemptions for very low risk products, such as those on the U.S. GRAS (Generally Recognized as Safe) list. It was noted, however, that some products on the GRAS list may pose risks when used at levels necessary for effective pest control.

Overview of Pesticide Risk Reduction Strategy using Commodity-Based Approach

Janice Hopkins, Director, Alternative Strategies & Regulatory Affairs Division, PMRA, and Ken Campbell, Research Coordinator, AAFC, presented an overview of proposals to address pesticide risk reduction on a commodity basis (see Appendix J).

The following summarizes issues raised and points of view expressed by Council members during the discussion.

- Some members suggested that mechanisms should be explored to encourage wide-scale adoption of IPM strategies, such as making a pesticide's role in IPM a criterion for registration or funding.
- Other members contend that IPM will be adopted as long as it makes economic sense and, therefore, economic factors must be taken into account in the development of the IPM strategy in the first place. Successful approaches in one commodity will be adopted by others.

Specific Commodity-Based Approaches

Presentations were made by JoAnne Buth, Canola Council, and Monique Paré, PMRA (see Appendix K: *Integrated Pest Management in Canola*), Richard Martin, PMRA (cranberries), Dean Thomson, CHC (see Appendix L: *Development of National Integrated Fruit Production Guidelines for Apples*), Jacques Drolet, PMRA (see Appendix M: *Potato Crop and Pulses*), and Janice Hopkins, PMRA (conclusion). The presenters discussed lessons learned from three commodity-specific initiatives facilitated by the PMRA (canola, cranberries, apples) and plans for two more initiatives (potatoes, pulses).

The following summarizes major themes raised during the discussion.

- Support by growers was key to the success of the IPM approaches developed so far. Where they exist, national commodity organizations can be helpful. The PMRA role was important to coordinate, contribute a broader experience gained through experience with previous projects, and facilitate the registration of reduced risk pesticides. Provincial governments also play an important role.
- The degree of adoption of IPM approaches will be influenced by many factors such as competitiveness and marketability. For example, IPM produced crops may command a premium in the marketplace or may be less desirable if there are concerns about some alternatives such as genetically modified crops.
- There are many issues to consider in designing performance measurement mechanisms, for example, the need for baseline data, the need to consider other factors such as fossil fuel use. One could measure the relative use of chemical vs biological control methods, the degree of awareness/adoption of IPM, or trends in certain defined risks. The measurement could be carried out by means of an independent scoring system, a self-assessment survey, formal accreditation by an organization such as ISO (International Standards Organization), or farm audits.

Healthy Lawns Strategy

Rob Ward, a\Section Head, Sustainable Urban Pest Management, PMRA, presented an update of progress on elements of the Healthy Lawns Strategy since the March 2001 Council meeting (see Appendix N).

Council members made the following comments.

- Good progress in reducing reliance on pesticides in the urban setting is being made in some provinces. For example in British Columbia, pesticide use by homeowners has been addressed first, to be followed by pesticide use on golf courses and in public buildings.
- The approach in Quebec may be different than in other provinces, i.e., they are phasing out urban pesticide use, but the objectives are similar, i.e., reduced risk, reliance and use.
- Some members expressed the view that reduced risk and reduced reliance should be emphasized, rather than reduced use of pesticides.

Recommendations

The Council agreed on the following recommendations. These will be conveyed to the Minister of Health in a letter from the Council chair which will accompany the meeting report. Council members will be given the opportunity to comment on a draft letter before it is finalized.

1. A communications strategy with respect to the new legislation should be developed with a view to enhancing public knowledge and confidence in the regulatory system and the safety of pesticides. As part of this strategy, the PMRA should publish an annual report. Council members may make specific suggestions to the PMRA on content and mechanisms for its dissemination. A draft report should be discussed at the next Council meeting.
2. The Council should be given an opportunity to provide preliminary comments on the content of proposed new regulations under the new Act before they are published in Canada Gazette Part I. This should be done in as expeditious a manner as possible so as not to delay implementation of the new legislation.
3. The PMRA should clarify/refine the definitions of “reduced risk” and “minor use” pesticides. Draft proposals should be prepared for discussion at the next Council meeting and should include an indication as to how these definitions are used to determine data requirements and priorities for application review.

4. The IPM projects should be evaluated with a view to assessing their impact on pesticide risk reduction. The evaluation should also include recommendations for expanding the use of IPM so that it becomes standard practice.

Appendices

- Appendix A - Agenda for the meeting of November 25-26, 2002
- Appendix B - Participants at the meeting of November 25-26, 2002
- Appendix C - Presentation: Submission Review Process and Health Effects Assessment
- Appendix D - Presentation: Environmental Risk Assessment
- Appendix E - Presentation: Value Assessment
- Appendix F - Presentation: Risk Management and Decision Making Framework
- Appendix G - Presentations: Minor Use Pesticides Initiative
- Appendix H - Presentation: Putting Canada First - An Architecture for Agricultural Policy in the 21st Century
- Appendix I - Presentation: The PMRA Initiative for Reduced Risk Products
- Appendix J - Presentation: Commodity-Based Approach to Pesticide Risk Reduction
- Appendix K - Presentation: Integrated Pest Management in Canola
- Appendix L - Presentation: Development of National Integrated Fruit Production Guidelines for Apples
- Appendix M - Presentation: Potato Crop and Pulses
- Appendix N - Presentation: Healthy Lawns Strategy - Update