

**Pest Management Advisory Council**  
**November 8-9, 2005**  
**DRAFT Meeting Report**

The Pest Management Advisory Council (PMAC) met in Ottawa on November 8-9th, 2005. Appendix A contains a list of all meeting attendees.

**Opening of the Meeting**

Mr. Ambrose Hearn, Chair of PMAC opened the meeting.

Action items arising are listed in Appendix B.

The meeting agenda was reviewed and accepted by members.

**PMRA's Strategic Agenda**

Dr. Karen Dodds, Executive Director of the Pest Management Regulatory Agency (PMRA) presented an overview of PMRA's priorities over the next 18-24 months.

The following is a summary of the discussion.

- PMAC members gave their general endorsement of the direction and priorities of the Agency.
- One of the key priorities discussed was stakeholder engagement which is addressing questions such as how does PMRA consult, how do stakeholders like material presented and where can improvements be made. Members were supportive of PMRA's recent move towards increased opportunities for stakeholder input and consultation.
- Members representing different use sectors suggested that it would be beneficial to PMAC to understand in more detail the unique issues of the various use sectors.
- It was agreed that proactive communication was an important priority. It was clarified that the PMRA has provided information to municipalities and to medical officers of health and will, upon request, provide further information on the federal government role to municipalities. The PMRA will respect the rights of municipalities to enact bylaws, and cannot be seen as interfering in this right.
- Some members questioned why international regulatory co-operation was not listed as a priority. It was indicated that harmonization is a key area of work when there are efficiencies to be gained in health or environmental science capacity or if it eases trade.

**Implementation of the new Pest Control Products Act**

Trish MacQuarrie gave a presentation on the status of the implementation of the new Pest Control Products Act.

A number of clarifications were provided including:

- When there is an election call, the government is not able to undertake any new consultations including such things as publishing proposed regulations in Canada Gazette Part 1.
- The Own Use Import (OUI) Task Force will likely be examining what post registration controls should be in place for products imported under the OUI program. It was explained that a variety of instruments could possibly be used to facilitate control such as regulation, policy or through administration, for example, as a condition of receiving a permit.
- It was clarified that the precautionary principal is considered currently in PMRA's decision making, but the consideration of a policy will be part of a subsequent phase of implementation.
- The PMRA is sorting through re-evaluation decisions that are pending in order to determine which should be made under the new Act for the increased transparency requirements.

The following is a summary of the main points of discussion.

- The importance of a smooth transition from the existing PCPA to the new PCPA was emphasized, including the move to new regulations, policies, and revised administrative functions. The importance of effective internal communication about the Act was also indicated.

#### **Adverse Effects Reporting:**

- **Update on Regulations**

Jean-Pierre Lachaine presented an overview of Adverse Effects Reporting Regulations including a summary of the PMRA's intended changes in view of the publication of the regulations in Canada Gazette, Part II.

The following is a summary of the main points of clarification and discussion:

- Several members expressed concern over the removal of the mandatory reporting of pest resistance. This was a concern because early detection of resistance could prevent the need for additional use and unnecessary exposure to the pesticide. It was suggested that since the PCPA provided the foundation for ensuring the value of pesticides, failure in efficacy and pest resistance should be a reportable event. It was emphasized that resistance management is extremely important to farmers and that information doesn't always get to farmers through existing channels and therefore these regulations were seen as a solution to this problem. PMRA indicated that the reported efficacy failure information could be used to establish trends, but true resistance must be confirmed in a laboratory setting.

- It was suggested that the regulations have a prescribed period of review in order to evaluate the impact of changes.
- Many members were concerned with the reporting of the adverse effects on the PMRA website before they could be substantiated to determine causality and emphasized that an analysis of the information was essential before it is posted on the website. It was emphasized that all reports must be clearly communicated to avoid misinterpretation by the reader.
- There was a concern raised that the name of the regulations, Adverse Effects, implies that there is a causality link with the pesticides, and that this may result in overreaction from the public.
- Members were assured that there was still opportunity to comment on the intended path forward, and that a summary of comments received since publication in Gazette I and analysis would be posted on the PMRA website in the weeks to come.
- It was discussed that, in developing the regulations, the PMRA has considered what other countries are doing with respect to Adverse Effect Reporting.

### **Adverse Effects Reporting**

- **Report from the PMAC Voluntary Reporting of Adverse Effects Working Group**

Jean-Pierre Lachaine presented an overview of the work of the PMAC Working Group on the Voluntary Reporting of Adverse Effects.

The following is summary of the main points of discussion:

- Some members expressed concerns about the proposal for the voluntary reporting of adverse effects program. The concerns included that the data collected could not be usable by doctors, that no reportable outcomes such as cancer data would be collected and that the perceived inability to connect the data with disease endpoints would not be useful from a public health perspective as an early warning system.
- It was discussed that the proposed system was designed as a post-market system, and not a system that was designed as a public health surveillance tool. The membership and mandate of the WG for the future was discussed in light of the concerns over the ability of the current system to meet the needs of the public health system.
- One member noted the ProdTox system would allow for a single window to voluntarily report human adverse effects on all types of chemical products.
- There were concerns over the publication of unsubstantiated reports and the need to look at trends over time with reports from the voluntary system. It was suggested that when PMRA receives a report, it should be shared with the registrant so that it can be compared with any other adverse effects, and comments could be provided from the registrant.
- The session was concluded with the following areas of agreement and path forward:
- The implementation path of the Adverse Effects Regulations will be separate from the voluntary reporting system.
- A summary of comments and analysis received on the Adverse Effects Reporting Regulation as a result of consultation in Gazette I will be posted on the

- PMRA website in the weeks to come.
- Based on a review of initial comments received and those heard at PMAC, a half day session just on Adverse Effects may be held to further consult with stakeholders.
  - Another Working Group, under Karen Lloyd, will develop voluntary adverse effects reporting for the environment and domestic animals.
  - The need to work with existing resources was also recognized.
  - The WG should continue work on the environmental and domestic animals aspects and engage the public health community on the human health side. The need to work with existing resources was also recognized.
- It was recognized that the health reporting system is an intersect between pesticide regulation and public health and the involvement of PHAC is important. The scope and membership was agreed to be re-examined and to include PHAC. The member representing public health was asked to bring this forward to PHAC for consideration.

### **Communication**

- **Report from the PMAC Communications Working Group**
- **Report from PMRA**

Glen Sampson, Nova Scotia Agricultural College presented a summary of the Communications Working Group report to PMAC and the resultant recommendations.

Trish MacQuarrie, Director of the Alternative Strategies and Regulatory Affairs Division, presented the recent progress and plans of PMRA in improving their communications approach.

The following is a summary of the main points of discussion:

- Some members were fully supportive of the report, others were generally supportive, and some had significant comments.
- Due to the diversity of audiences listed in the report, some key audiences should be defined.
- A communication network will be established to aid in getting messages out to the broad range of target audiences and this network would be useful in discussing communication approaches.
- It was suggested that one key message that everyone should support is that pesticides need to be used responsibly. The report does not yet address the concern that messaging must be open about the fact that not all pesticides have yet been re-evaluated. Messages need to be clear that we are talking about pesticides, while recognizing that some audiences want to hear about integrated pest management. It was also indicated that the new PCPA gives the opportunity for broader messaging about sustainability and reduced risk products.
- The role of the PMRA is not to promote or advocate pesticides or their use, but to communicate and provide information about the federal government's role in regulating

pesticides.

- The report currently has overlapping sections and repetition of information and should be simplified and streamlined.
- Recommendations should be tested against a few cases to validate the approach and determine if the recommendations in the report are enough.
- The council was not yet ready to endorse the report without further input. The report would be sent to members electronically and members would be given two weeks to comment on it. The WG would then consider the comments from the PMAC meeting, and those received electronically and revise the document with a goal of sending a more solid document back to PMAC within a month's time for concurrence via e-mail.
- It was agreed to allow the Working Group to complete its work based on feedback from PMAC, and in the meantime a message can go to the Minister to say that communications are important and that PMAC is supportive of proactive communications and that media interaction should reflect an accurate reporting of the regulatory system. Some members were concerned that the WG had gone beyond the initial charge to the group, and members were asked to indicate this in their comments.

### **Development of a “Value” Framework for Pesticides**

Dr. Richard Aucoin presented a follow up item from the June 2005 meeting on a “value” framework for PMRA.

- There was considerable discussion regarding the importance of integrated pest management (IPM) in the value framework. Many members spoke strongly in support of IPM indicating that it is of value as it allows for the minimum use of pesticides within a range of pest management tools. Some members thought it needed an enhanced profile within the value framework. It was also discussed that a product may have a narrow window of activity but be the only tool for a particular pest and therefore be of high value.
- The word value could imply a comparative value relative to other alternatives. PMRA clarified that for new product chemistries, a review of existing registrations for the use is done in an effort to understand how the new product fits within the existing toolbox.
- It was discussed that non-chemical alternatives should be included in this framework as they are of value. It was indicated by PMRA that an expert panel would be convened to look at citronella specifically, but to consider generally whether there could be alternative approaches to regulating products that prevent or control pests.
- It was discussed that reduced rates and reduced frequency of application are all valuable. It was clarified that during the efficacy assessment that PMRA conducts, one goal is to find the lowest rate to get consistent control.
- The issue of whether Canada was harmonized with other countries in regard to how value is assessed, was discussed. Generally, PMRA is harmonized with other OECD countries with regard to value, although there are some differences.
- All members agreed with the next steps for the value framework as outlined in the presentation.

### **Low Risk Pesticides:**

- **Report from the PMAC Low Risk Working Group**
- **Report from PMRA**

Karen Lloyd, Director of the Environmental Assessment Division gave a presentation on behalf of the Low Risk Working Group, and presented information on recent progress at the PMRA regarding low risk products.

- The Generally Regarded As Safe (GRAS) program utilized in the U.S. was discussed in relation to its potential use in regulating low risk products in Canada. It was discussed that:
  - A large burden of proof is necessary in order to get on the GRAS list and that this would not encourage the submission of low risk products in Canada. Products on the GRAS list are for a very specific use and may not be applicable to pesticide use.
  - There was not an existing list from other jurisdictions or programs that could easily be adopted for the purpose of low risk products in Canada.
  - A tiered approach, which requires increasing amount of data with increasing concern, was presented.
- There was PMAC support for the presented approach and next steps to regulating low risk products. It was agreed that the WG had met its objectives and would disband. The WG will submit a final report to PMAC.

### **Pesticide Research and Monitoring**

- **Federal Research and Monitoring**
- **Provincial Research and Monitoring**
- **Round Table on Other Research and Monitoring Activities**

Karen Lloyd, Director of the Environmental Assessment Division at PMRA, gave a presentation on research and monitoring activities at the federal level across Canada.

Madeline Waring of B.C. Agriculture, Food and Fisheries, gave a presentation on research and monitoring activities at the provincial level across Canada.

All PMAC members were given an opportunity to present overviews of any research and monitoring activities that members were either involved in or aware of. The following is a summary of the research and monitoring activities shared:

- Food processors have active research programs including as examples, monitoring for food residues and uptake analysis. IPM is extremely important to growers who have tight profit margins and an appreciation of any solutions to cutting pesticide usage, cost and risk. A comment was made that less of this type of work is happening at the

provincial level than in the past, and there is a need to facilitate more research, in particular for reduced risk products.

- The province of Quebec is currently doing a biomonitoring study looking for metabolites of the commonly used phenoxy herbicide 2,4-D.
- The City of Toronto Public Health Department is currently doing pesticide research relating to children's health.
- There are a number of organizations across Canada including the Expert Committee on IPM (ECIPM) and the Weed Science Society which are national co-ordinating committees for discussing pesticide research and making recommendations including on alternatives and how all available pest management options fit together. These groups often have members of both federal and provincial government, including the PMRA, as well as researchers collaborating towards common goals. It was discussed that historically the ECIPM used to produce an annual report on pest management and the effects on the environment, but approximately 3-4 years ago the report was discontinued as there was so little research in the area to report on.
- The Biocontrol Network, founded in 2001 is a NSERC funded research network focussing on biological control of pests and includes 57 researchers and collaborators across the country. The research focus was initially very broad, however with reduced funding is now primarily focussed on covered crops such as greenhouse vegetables, ornamentals and reforestation. The network produces a variety of publications, hosts regulatory and microbial workshops, inputs to regulatory reform such as the PMAC Low Risk WG, conducts surveys, does press releases, and has a strong training focus with success in running an annual summer school program for student researchers. It was indicated that the network does not represent all biological researchers across the country.
- The PMRA in conjunction with United States Environmental Protection Agency, industry and academia are involved in a variety of task forces that are generating data to help refine risk assessments related to occupational and residential exposure. Information on this work can be found at [www.exposuretf.com](http://www.exposuretf.com)
- The U.S. Agricultural Farm Worker Study was started in 1999 and is looking at farmer exposures and health outcomes. The study is following 100,000 individuals including farmers and their spouses. The study overview is in Alavanja, MC et al., 1996 . The Agricultural Health Study is published in Environmental Health Perspectives 104: 362-269. <http://ehp.niehs.nih.gov/>.

The following is a summary of the main points of discussion:

- As a result of the round table discussions, council members noted with concern that there was an overall trend in declining research around pesticides. This trend was attributed to a number of causes including:
  - the retirement of many researchers at Agriculture Canada, a key government organization responsible for pesticide research
  - fewer university researchers with a focus on pesticides
  - fewer individuals with expertise to participate in national groups such as the

- Weed Science Society
  - much of pesticide research is applied science and the funding bodies are more interested in empirical science
- It was agreed that a letter would be drafted to the Minister of Health outlining the concerns of Council, and recommendations to address these concerns. A small drafting group was established to take on this task.
- Appendix C contains the final letter to the Minister regarding research and monitoring.

### **Pest Control Product Labelling**

Pierre Petelle, Office of Policy and Strategic Advice, PMRA gave a presentation on the development of guiding principles in the labelling of pest control products.

The following is a summary of the major areas of discussion.

- Most members supported the guiding principles for labelling.
- It was discussed that the indelibility of labels is of concern for some products which are reported to blur the text on the labels. It was also discussed that some agricultural labels that have plastic sleeves come off during rain or extreme weather conditions. It was clarified that legibility of labels is a legal requirement, and that these concerns were a compliance issue for PMRA.
- It was indicated that the label is the culmination of the risk assessment providing the user with the conditions of use and the information regarding its proper use. It was stressed that this is important work as the label is the key piece of information that users refer to, and there is often confusion around this information. Council members agreed that the standardization of labels is important so that users, especially homeowners know where to look for information on the label. It was suggested that a 1-800 number should be on the front panel of all labels.
- There were some members who indicated that agricultural labels were too long and complex. It was suggested that labels could be shortened and supplemented with additional information in a guidance document that was not part of the “legal document”.
- The harmonization of labels between U.S., Canada and Mexico was discussed including that comments had been provided to the PMRA on the regulatory changes necessary in order to facilitate a NAFTA label. It was indicated that industry is moving towards more consistency on labels between countries.

### **Federal/Provincial/Territorial (FPT) Initiatives**

- **Overview of the F/P/T Committee on Pest Management and Pesticides**
- **Agricultural Buffer Zones**

Madeline Waring of B.C. Agriculture, Food and Fisheries, gave a presentation on the Federal/Provincial/Territorial Committee on Pest Management and Pesticides.

- It was indicated that the FPT Committee on Pest Management and Pesticides will now be reporting through the Ministers of the Environment, provincially, and to the Health



Canada Committee of Health and the Environment.

Ted Kuchnicki, Section Head, Environmental Assessment Division, PMRA, gave a presentation on Agricultural Buffer Zone proposal.

The following is a summary of clarifications and main discussion points.

- It was clarified that the buffer zone project was started in 1995 to address the concern that there was no flexibility in the labelled buffer zone. In addition, there are farmers who invest in expensive nozzles or other technology to reduce drift, and there should be a mechanism for these farmers to use reduced buffer zones.
- Many members indicated that the agricultural buffer zone proposal was very complicated, and would require a tremendous amount of training for users to understand how to apply it.
- There was a concern raised over the fact that the proposal discussed what modifications to make in wind speeds of up to 25 km/hour whereas some provinces do not recommend that applicators spray in wind speeds above 10 km/hour. It was also of concern that the depths of bodies of water varies by a metre or more over a single use season, and that different sloughs have different depths and farmers would not know the depth of the water at any given time.
- It was suggested that this information could be supplementary to the label, in a type of guideline or booklet.
- It was pointed out that the proposal delineates a contradiction in that you are proposing to reduce the environmental burden, yet are allowing the farmer to spray closer to water.
- As this proposal was recently published for comment, some members indicated that they would be submitting written comments to the PMRA.

#### **Other Business**

- **Review of Action Items Arising from the June Meeting**
- **June 2005 Meeting Report**
- **Information Items**

There were no questions or comments on these items.

- **Recommendations to the Minister**

The following is a summary of the key outcomes of the meeting and recommendations to the Minister.

- PMAC fully supports the PMRA's strategic agenda and is looking forward to continued progress on these key work areas.
- A summary of the comments received on the Adverse Effects Reporting Regulation will be posted on the PMRA website, and depending on the need, a ½ day consultation session would be held to further address stakeholder concerns and finalize the regulations.

- The communications report will be sent out to PMAC members this week, and members have until the 18<sup>th</sup> of November to provide comment back to the WG. Following this, the communications WG will incorporate comments and finalize the report and recommendations to PMAC. This will also be a completion of the work of the WG and will have subsequent closure of the WG. **Recommendation:** PMAC members agree that communications are important and fully support proactive communications.
- There was general support for the value framework as presented.
- The next steps on low risk as presented were supported. The Low Risk WG will come forward with a final report to PMAC.
- The need for increased funding for pesticide research and monitoring were sent to the Minister under a separate letter, and is appended as Appendix C.
- There was general support for the labelling guiding principles, with some cautions about going too fast.
- The comments provided by PMAC on the Agricultural Buffer Zone Proposal were to be considered by PMRA.
- **Recommendations for Future Agenda Items**

Members suggested that research and monitoring be on the next agenda to track progress of the recommendations from this meeting, and to follow up on the submission to PMAC from John Borden regarding the regulation of biopesticides.

- **Date for Next Meeting**

It was indicated that the Secretariat would like to plan meeting dates more in advance and would therefore be sending out the dates for the next two future meetings in the next couple of weeks.

- **Meeting Evaluation**

Members were reminded to fill in their written evaluation forms.

Appendix A:

**PEST MANAGEMENT ADVISORY COUNCIL**  
**Participants - November 8 - 9, 2005**

**CHAIR: (1)**

**Mr. Ambrose Hearn, *Independant***

**COUNCIL MEMBERS: (17)**

**Mr. Chris Andrews, *Canadian Nursery Landscape Association***

**Dr. Neil Arya, *Ontario College of Family Physicians***

**Dr. Richard Bélanger, *Laval University***

**Mr. Gary Brown, *Canadian Horticultural Council***

**Ms. Kathleen Cooper, *Canadian Environmental Law Association***

**Mr. Derek Daws, *B.C. Poison Control Centre***

**Dr. Karen Dodds, *Pest Management Regulatory Agency (Government Employee)***

**Dr. Claire Infante-Rivard, *McGill University***

**Ms. Margaret Kirkeby, *Consumers' Association of Canada***

**Ms. Julia Langer, *World Wildlife Fund***

**Dr. Karsten Liber, *University of Saskatchewan***

**Dr. Jeremy McNeil, *University of Western Ontario***

**Mr. Glen Sampson, *Nova Scotia Agricultural College***

**Mr. Alain Renaud, *Druide***

**Mr. Henry Walthert, *Canadian Institute of Treated Wood***

**Ms. Madeline Waring, *B.C. Ministry of Agriculture and Lands***

**Dr. Eric Young, *Council of Chief Medical Officers of Health***

**ALTERNATES: (5)**

**Ms. Shannon Watt (for Bob Friesen), *Canadian Federation of Agriculture***

**Mr. Peter MacLeod, *CropLife Canada***

**Dr. Robert Whiting (for Anne Gravereaux), *Canadian Centre for Occupational Health and Safety***

**Mr. Chris McCurdy (for Drew Franklin), *Canadian Consumer Specialty products Association***

**Ms. Angela Rickman, (for Elizabeth May) *Sierra Club***

**SECRETARIAT: (3) (Government Employees)**

**Ms. Trish MacQuarrie, *Pest Management Regulatory Agency***

**Ms. Lynn Skillings, *Pest Management Regulatory Agency***

**Ms. Josée Beaudoin, *Pest Management Regulatory Agency***

**PRESENTERS: (6) (Government Employees)**

**Dr. Richard Aucoin, *Pest Management Regulatory Agency***

**Ms. Francine Brunet, *Pest Management Regulatory Agency***

**Mr. Jean-Pierre Lachaine, *Pest Management Regulatory Agency***

**Ms. Karen Lloyd, *Pest Management Regulatory Agency***

**Mr. Pierre Petelle, *Pest Management Regulatory Agency***

**Mr. Ronald Denault, *Pest Management Regulatory Agency***

**Dr. Ted Kuchnicki, *Pest Management Regulatory Agency***

**OBSERVERS: (9)**

**Mr. Craig Hunter**, *Canadian Horticultural Council*

**Ms. Judy Shaw**, *Syngenta Crop Protection Canada, Inc.*

**Mr. Peter Hansen**, *Canadian Aerial Applicators Association*

**Ms. Suzanne Beattie**, *Nu-Gro Corporation*

**Mr. Chris Warfield**, *Bayer CropScience Canada*

**Mr. Allan Brown**, *E. I. du Pont Canada Company*

**Ms. Francine Brunet**, *Pest Management Regulatory Agency*

**Ms. Kathy Stapleton**, *Pest Management Regulatory Agency*

**Mr. Stéphane Dupont**, *Biocontrol Network*

**Mr. John Worgan**, *Pest Management Regulatory Agency*

**Mr. Pierre Beauchamp**, *Pest Management Regulatory Agency*

**Dr. Connie Moase**, *Pest Management Regulatory Agency*

**Dr. Valerie Robertson**, *Pest Management Regulatory Agency*

**Dr. Ariff Ally**, *Pest Management Regulatory Agency*

**Dr. Chistopher P. Dufault**, *Pest Management Regulatory Agency*

**Mr. Brian Belliveau**, *Pest Management Regulatory Agency*

**Dr. Peter Delorme**, *Pest Management Regulatory Agency*

## Appendix B:

### List of Action Items

- PMRA to indicate to Agriculture and Agri-food Canada and Environment Canada that there is a continuing need for pesticide research.
- Include the reference to articles regarding the Agricultural Worker Study in the minutes to the meeting.
- Dr. Eric Young to discuss with PHAC the need for their involvement with the voluntary reporting of human health effects.

Appendix C:

The Honourable Ujjal Dosanjh  
Minister of Health  
Ottawa, Ontario K1A 0K9

Dear Mr. Dosanjh:

The Pest Management Advisory Council met in Ottawa on November 8-9th, 2005. The full meeting report and recommendations will follow at a later time, however the Council wanted to bring some important information to you as soon as possible. I am pleased to provide you with the results of a discussion and subsequent recommendations made by the Council regarding the need for increased funding and capacity around research and monitoring specifically linked to pesticides.

Recognizing that the relationship between environment and human health is significant, PMAC members were unanimous in the view that there is both an immediate and long term need to address issues around the funding of research relating to environment and health, specifically pertaining to pesticides.

It is recognized that certain uses of pesticides are of concern to Canadians. This is demonstrated through public opinion research, media attention and increased regulation at the municipal level. Despite this public concern, specific funding for pesticide research remains at a low level. There is a concern that future expertise in the area of pesticide science will be compromised as many researchers from both academia and government are retiring, leaving large gaps in this field.

It must be recognized that pesticide related science and issues are multi-disciplinary. As such, it requires an integrated approach with co-operation across funding bodies, the federal government and its agencies. Consequently, it will require time to establish and manage such an approach and PMAC members strongly urge the Minister to initiate such plans while ensuring that these plans are considered within the broad context of government priorities.

Therefore, PMAC recommends that the Minister discuss the following research needs with cabinet colleagues in other federal departments to ensure:

**Dedicated research funds be made available to enable this vision of environment and health research related to pesticide use to be realized ranging from basic to applied research.**

**Training opportunities be funded in all facets of environmental health and toxicology.**

**Enhanced and ongoing funding be made available for research under field conditions to**

**ensure that new pest control products successfully fit into, and cause minimum disruption of existing sustainable pest management programs.**

**A national pesticide use survey is conducted, at a minimum of every 3 years, to provide the necessary baseline data on where, when and how much pesticides are used in Canada.**

In addition to these longer term research needs, there are immediate opportunities to participate in the planning and funding of upcoming research projects. The Minister is strongly urged to take advantage of these windows of opportunity by providing support and funding for the following areas:

**Support funding for a national children's study in Canada with an environmental health component, including pesticides to complement the U.S. national children's study.**

**To ensure the scope of the Statistics Canada - Canadian Health Measures Survey include appropriate pesticide biomarkers. Biomarkers should be reviewed in conjunction with current pesticide information such as usage data, food residue data or other relevant information to ensure the most appropriate pesticide biomarkers are chosen.**

**To develop the scientific capacity that would allow interpretation of the biological significance of biomonitoring data that is obtained from such studies.**

The Council looks forward to hearing back from you on this very important topic of pesticide research and monitoring.

Yours sincerely,

Ambrose Hearn,  
Chair,  
Pest Management Advisory Council

cc: Dr. Karen Dodds, Executive Director, Pest Management Regulatory Agency  
Susan Fletcher, ADM, Healthy Environments and Consumer Safety Branch  
Dr. Mark Bisby, VP Research, Canadian Institute of Health Research