

May 3, 2022

The Honourable Robert Black  
Chair - Standing Senate Committee on Agriculture and Forestry  
Senate of Canada  
Ottawa, ON  
K1A 0A4

Via email: [agfo@sen.parl.gc.ca](mailto:agfo@sen.parl.gc.ca)

Dear Chair:

On behalf of the Canadian Consumer Specialty Products Association (CCSPA), thank you for the opportunity to provide a submission to the Standing Senate Committee on Agriculture and Forestry in support of amendments to the *Pest Control Products Act*, proposed within Part 6 of S-6, *An Act respecting regulatory modernization*.

CCSPA is a national trade association that represents 38 member companies across Canada that manufacture, process, package and distribute consumer, industrial and institutional specialty products, such as soaps and detergents, pest control products, aerosols, hard surface disinfectants, deodorizers and automotive chemicals. CCSPA has been an engaged member of the Pest Management Advisory Committee since 1998 and an active supporter of the Pest Management Regulatory Agency's (PMRA's) more recent transformative agenda. We continue to work to ensure that all programs and policies that govern our members products support sound science; due process and consultation; and effective communications to Canadians.

CCSPA is a strong advocate for the integration of risk-based frameworks into the Agency's overall management of pest control products. Such frameworks work to ensure that the PMRA can deliver the credible and effective regulatory regime needed to prevent unacceptable risks to human health and the environment while maintaining public confidence. The proposed amendments to the *Pest Control Products Act* (PCPA) support this overall objective, seeking to broaden the powers of the Minister to authorize pest control products of assessed low or well-characterized risk and provide an alternate approval pathway that is faster, lower cost and more reflective of the level of risk posed by such products than the existing pathways. The proposed amendments also introduce new Agency recall and reporting powers for authorized products.

Under the current PMRA framework, the process for exempting certain pest control products from registration is both inflexible and outdated. Further, it does not provide the Minister with the appropriate post-market oversight authority for pest control products that are eligible for exemption from

registration. The amendments to the PCPA proposed within S-6 seek to address these deficiencies, while also introducing new transparency and consultation obligations, including for the public, federal and provincial departments, and agencies whose interests and concerns may be affected by the authorization of certain products. While CCSPA supports enhanced transparency and public consultation, the Agency must be cognizant of the resources it has available to facilitate these engagement opportunities efficiently. To this end, we look forward to further detail on how the PMRA will manage consultations in a manner that balances meaningful stakeholder engagement with the need for an effective and responsive authorization process.

CCSPA also notes that the proposed amendments introduce conditions of authorization which are intended to be further specified via regulation. Should these proposed amendments be passed, CCSPA looks forward to working with the PMRA on a defined process or definition of “low risk” or “well characterized” as to ensure full transparency, predictability, and consistency in the authorization framework’s application, either through guidance or regulation.

The COVID-19 pandemic has presented new challenges and opportunities for government and industry alike and underscored the need for more agile and responsive regulatory mechanism to meet the needs of Canadians. The proposed amendments included within S-6 are a thoughtful approach to advancing this objective, towards appropriate and risk-based oversight under the PCPA.

Thank you again for the opportunity to provide comments to inform the Committee’s study of Bill S-6. CCSPA would be pleased to meet with the Committee to further discuss our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Coombs". The signature is fluid and cursive, written in a professional style.

Shannon Coombs  
President

cc Peter Brander, Executive Director, PMRA  
Jason Flint, Director General, PMRA  
Jordan Hancey, Director, PMRA  
Jamie Kippen, Chief of Staff, Office of the Honourable Jean-Yves Duclos  
Scott Bardsley, Director of Parliamentary Affairs, Office of the Honourable Mona Fortier