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File No.:864

May 9, 2022

Honourable Robert Black
Chair
Senate Committee on Agriculture and Forestry
The Senate of Canada
Ottawa, Ontario K1A 0A4
Sent by email to: robert.black@sen.parl.gc.ca

Ferda Simpson
Committee Clerk
Senate Committee on Agriculture and Forestry
The Senate of Canada
Ottawa, Ontario K1A 0A4
Sent by email to: AGFO@sen.parl.gc.ca

Dear Honorable Senator and Clerk:

Re: Bill S-6 –*An Act Respecting Regulatory Modernization; Part 6 – Pest Control Products Act*

Ecojustice is a national environmental law organization with offices across Canada. For more than 25 years we have gone to court to protect wilderness and wildlife, challenge industrial projects, and keep harmful chemicals out of the air, water, and ecosystems we all depend on. This submission is made on behalf of Ecojustice and not on behalf of any client organization.

Ecojustice respectfully requests that you amend Part 6 of Bill S-6 to remove sections 140-142 and 145 of Part 6 and defer changes to the *Pest Control Products Act* to ongoing public consultation processes. **We respectfully request to present to the committee this Thursday May 12.**

Health Canada is in the early stages of a formal consultation process on potential amendments to this Act. Moving forward with amendments to the *Pest Control Products Act* in Bill S-6 at this time would undermine ongoing consultation processes.

We are troubled that prior to the completion of these consultations Bill S-6 would fundamentally change the *Pest Control Products Act*. The authorization provisions in sections 140-142 would create a parallel approval scheme for pest control products that would undermine the core

scientifically-based process for pest control products registration in the Act. While in principle Ecojustice supports expansion of recall powers, the new recall provisions in section 145 of Part 6 of Bill S-6 are require significant refinement to ensure that the Minister retains the power to recall products where the risks of a product are not shown to be acceptable.

We respectfully request that the Committee amend Part 6 of Bill S-6 and remove sections 140-142 and 145 of Part 6 and defer changes to the *Pest Control Products Act* to the ongoing consultative process led by Health Canada.

Sincerely,

A handwritten signature in black ink, appearing to read 'L.B.', with a long horizontal flourish extending to the right.

Laura Bowman
Staff Lawyer

cc: Members of the committee of Agriculture and Forestry