

May 16, 2022

PreventCancerNow.ca

Standing Senate Committee on Agriculture and Forestry
The Senate of Canada
Email: agfo@sen.parl.gc.ca

Re: Section 6, Amendments to the *Pest Control Products Act* in Bill S-6

Prevent Cancer Now is a Canadian national organization, including scientific and medical experts focused on primary cancer prevention. We have a long history of involvement with pesticide assessment and science, making science-based submissions and participating in consultations.

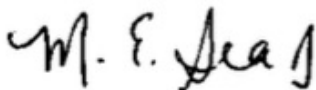
We are writing to support removal parts of Bill S-6 Section 6, introducing and supporting authorization of pesticides under the *Pest Control Products Act* (PCPA).

As a participant in the Stakeholder Steering Committee for the “Transformation” of the Pest Management Regulatory Agency (PMRA), we were surprised by news of the introduction of Bill S-6 shortly following a stakeholders’ meeting convened by the PMRA. There was no introduction or discussion of the proposed “authorization” option, and no consultation regarding this framework in Bill S-6. Indeed, the proposal is at odds with notions floated by the PMRA during previous meetings.

Prevent Cancer Now fully supports least-toxic strategies, and products if necessary, to protect human health, support resilient agro-ecology, promote healthy ecosystems and prevent pest problems. A fast-track process for products presumed to have lower inherent toxicity may be commercially alluring; however, the authorization of products using lower standards for scientific review, and no mandatory revisiting of the decision, will undermine the current process with its more rigorous requirements. We also note potential confusion because “authorization” is the very rigorous process for pesticides to gain market in the European Union.

Prevent Cancer Now is pleased to learn of support of Ministers for removal of Section 6, and we hope that the Standing Senate Committee on Agriculture and Forestry will do so during clause-by-clause examination of Bill S-6. We would be happy to present in person to the Committee if this would be of further assistance.

Sincerely,



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cc Honourable Stephen Guilbeault
Honourable Jean-Yves Duclos

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