

May 11, 2022

The Honourable Senator Robert Black
Chair, Standing Committee on Agriculture and Forestry
The Senate of Canada
Ottawa, ON K1A 0A4
Via Email: robert.black@sen.parl.gc.ca

Re: Bill S-6, 44th Parliament, Amendments to the *Pest Control Products Act*

Dear Senator Black:

This letter is to express CELA's support for the recent letter from the Minister of Health to you requesting that the proposed amendments to the *Pest Control Products Act* ("PCPA") contained in Part 6 of Bill S-6, *An Act respecting regulatory modernization*, be removed and, instead, that the proposed amendments be integrated into Health Canada's ongoing targeted review of the PCPA.

CELA is appreciative of the Minister of Health's response to concerns of environmental groups (reference is made to CELA's previous letter on this matter dated April 29, 2022) that the authorization scheme proposed by the amendments would not accomplish the intended goal of being clearly limited to low or very low-risk products without clear legislative intent and criteria. CELA agrees that the targeted review of the PCPA is a better and necessary forum for public consultation on, and consideration of, the proposed amendments.

CELA looks forward to providing input on the targeted review of the PCPA, particularly on enabling the appropriate use of low or very low risk pesticides (such as food products), in appropriate circumstances, and bolstering recall powers where needed.

Yours very truly,

CANADIAN ENVIRONMENTAL LAW ASSOCIATION



Theresa A. McClenaghan
Executive Director

Canadian Environmental Law Association

CC:

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