

Standing Senate Committee on National Finance
The Senate of Canada
Ottawa, ON
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This is a submission to the Standing Senate Committee on National Finances in relation to their study of Bill C-30.

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Standing Senate Committee on National Finance
The Senate of Canada
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May 28, 2026

Dear Committee Members:

Re: Amendments to the Pest Control Products Act in Bill C-30 and C-31

As scientists with extensive research expertise on pesticides and the environment, we are writing to encourage the government to reconsider amendments proposed to the *Pest Control Products Act* in the omnibus *Spring Economic Update 2026 Implementation Act* (Bill C-30) and *Budget 2025 Implementation Act, No. 2* (Bill C-31). We have reviewed the proposed changes and have the following concerns:

- ***Granting Cabinet authority to issue emergency orders to override the Minister of Health's science-based risk assessments to restrict the use of a pesticide, even when it is known to cause unacceptable human health and environmental harm.*** Currently, pesticide regulation is based on detailed risk assessments conducted through scientific review of available pesticide toxicity testing data for humans and non-target species, case reports of environmental or human health injuries, pesticide efficacy trials, and consideration of safer alternatives. Because of the enormous stakes involved in deliberately applying toxic substances to the environment, evidence must guide these decisions; however, the proposed change would compromise the scientific integrity of pesticide regulation in Canada by potentially disregarding this evidence even when the harmful impacts are clear. There is no scientific or other reasonable basis to have a regulatory decision overridden by Cabinet after Health Canada has conducted extensive reviews and makes decisions on the determination of pesticide product registration. We are concerned that this will lead to reduced public trust in the regulatory process and further erode scientific evidence-based decision-making.

- ***Requiring the Minister of Health to consider undefined “national economic security, regional economic security or national food security”, when making decisions about pesticides.*** There is no clarity in the proposal as to how “national economic, regional or food security” would be defined, nor is there any provision in the Pest Control Products Act to include such an evaluation. There is already a component of risk assessment that includes the valuation of a pesticide product for its efficacy. Pesticides are essentially “legal poisons” designed to kill pests that can also cause harm or death to a wide variety of non-target species, including humans and wildlife as well as species at risk. There is abundant evidence for short and long term harms for many pesticide active ingredients. Therefore, the Pest Control Products Act specifically requires that all available scientific data on the exposure and toxicity risks are considered and that these risks are considered “acceptable” when used according to label. When economics are used as a benchmark to allow registration, this is likely to be used as a mechanism by industry to influence regulatory decisions. There is already significant public concern about the degree of industry interference and involvement in pesticide regulation. In fact, under the 3-year “Transformation Agenda” initiated by the former PMRA (now the Pesticides Regulatory Directorate (PRD)), the agency worked hard to implement changes that would help reduce chemical industry bias and perceived interference. Therefore, this proposed change is not appropriate or required and would create additional regulatory burden, confusion, and industry interference in the already overloaded PRD at Health Canada. Further, from an economic standpoint, the proposed amendments may complicate Canada’s efforts to align its pesticide regulation with international partners, including the European Union. As Canada seeks to diversify its trading relationships and strengthen ties with Europe, maintaining a strong, science-based pesticide regulatory system is essential to this goal.
- ***Eliminating the mandatory 15-year cyclical re-evaluation of registered pesticides.*** Currently the cyclical re-evaluations are the only mechanism to ensure that pesticides, once registered, are comprehensively reviewed for their environmental and human health risks every 15 years. Research on pesticides and especially their non-target and interacting effects is time-consuming and ever-evolving based on new evidence, making regular review essential to harm reduction as conclusions on product safety may change over time as evidence becomes available. Health Canada has been working to implement “Continuous Oversight” – an approach that reviews pesticides on an ongoing manner. Reviewing data as it is available ensures that any new data that reveals novel or unexpected harms are

flagged in a timely manner. Regardless, the continuous oversight process is not well established and regular cyclical reviews remain essential as a deadline to address data gaps. Without the required 15-year re-evaluations as a backstop, we are concerned that continuous oversight will also be weakened, and potentially unacceptable risks could unintentionally be missed. This could have unintended consequences for the health and safety of humans and the environment as without any hard trigger, many potentially harmful compounds may unintentionally fly under the agency's radar.

The proposed PCPA amendments from Bills C-30 and C-31 fundamentally undermine science-based decision-making under the Act, which has been a cornerstone since its passage in 2002. Removing pesticide risk assessment powers from Health Canada scientists that are most familiar with the chemicals and their risks, by introducing non-specific undefined terms, softening data submission and review time limits would introduce an unnecessary and inappropriate level of discretion and increase industry control over regulatory decisions.

We call on the Government of Canada to recommit to and strengthen, not weaken, the PCPA, to protect human health and safety and the environment by regulating products used for the control of pests. Canada's pesticide regulatory system needs to be guided by the transparent scientific review and impartial evidence-informed decision-making. We urge the government to remove the PCPA amendments from Bills C-30 and C-31 and focus efforts on improving implementation of the PCPA.

Regards,

A Group of Concerned Scientists

Signatories [Green denotes approval via email]:

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cc. *Hon. François-Philippe Champagne, Minister of Finance*

Hon. Marjorie Michel, Minister of Health

Hon. Julie Dabrusin, Minister of Environment, Climate Change and Nature