



# TEAMALBERTA

## ADVANCING ALBERTA'S CROP SECTOR TO 2025 AND BEYOND

October 26, 2021

Minister Dreeshen  
Minister of Agriculture and Forestry  
Office of the Minister  
229 Legislature Building  
10800-97 Ave  
Edmonton, AB T5K 2B6  
[AF.minister@gov.ab.ca](mailto:AF.minister@gov.ab.ca)

Dear Minister Dreeshen,

Team Alberta, on behalf of the 17, 000 farmers we collectively represent across Alberta, would like to bring the following, concern to your attention.

On August 4, 2021, the Government of Canada, through the federal Ministers of Agriculture, Health and Environment made an [announcement](#) in which they called for a pause on all Maximum Residue Limit (MRL) increases, including glyphosate, until the spring of 2022. Further, they have called for a review and consultations of the *Pest Control Products Act (PCPA)* to increase transparency on how pesticides are being reviewed in Canada.

These proposed actions represent the first-ever political interference for non-science based purposes, by elected officials, into the stringent, world-class regulatory process, of Canada's Pest Management Regulatory Agency (PMRA), whose mandate is to make sound, science-based decisions on pesticides.

While the details are still unknown, farmers and agricultural stakeholders across Alberta and Canada are concerned by the implications of the announcement as well as the risk posed by political intervention into a science-based regulatory process and regulators' ability to make sound decisions. The agriculture sector depends on these innovations and having access to safe and efficient tools to protect their crops. This announcement represents an impediment to innovation and trade, both of which are critical to the growth of the agri-food sector as an economic driver.

**Alberta farmers call on you to request that the federal government and all provincial governments stand behind our countries long-standing commitment to science-based regulation to ensure that Alberta and Canadian farmers can continue to drive our economy.**

### **The pause on maximum residue limits (MRLs)**

Maximum residue levels (MRLs) are used as a trade facilitation mechanism, allowing nations to import and export products knowing that the products meet a safe international standard.

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MRL's are established as part of the assessment process prior to the registration of a pesticide. Health Canada must determine whether the consumption of the maximum amount of residues, that are expected to remain on food products when a pesticide is used according to label directions, will not be a concern to human health. This maximum amount of residues expected is then legally established as a MRL and is regulated under *the Pest Control Products Act (PCPA)*<sup>1</sup>.

It is critical to note that the science-based MRLs that Health Canada sets for each pesticide-crop combination are not meant to be a health and safety measure since MRLs are established at levels that are **significantly below actual safety thresholds for pesticides as related to human health**. They are a rules-based reflection of good agricultural practice/use and a trade facilitation mechanism, rather than an indication of food safety.

When harmonized between trading nations, MRLs allow agricultural commodities to move freely from country of production to the importing country. With more than 80 per cent of our agricultural commodities being exported, Canada's grain industry needs reliable and predictable access to foreign markets to maintain a healthy value chain. All members of the value chain benefit from open global trade and efforts promoting the use of Codex<sup>2</sup>. The potential for a trade disruption resulting from a missing or misaligned MRL can put the entire grain industry at risk, therefore, the harmonization of MRLs between nations should be a priority for all levels of government.

MRLs change on a regular basis for a number of reasons, including updates to how a pesticide is used or to align with international standards. It is a routine regulatory exercise that is normally completed at the request of a pesticide registrant. When it comes to the changes to the glyphosate MRL that led to the August 4 Ministerial announcement, Canada was proposing to align its existing MRL with internationally agreed upon Codex MRLs to facilitate global trade. Pausing MRL increases for arbitrary, non-science-based reasons poses a significant risk to Canadian agriculture and our government forfeits a leadership position in MRL harmonization and on promoting open and fair trade that the Canadian agricultural sector needs in order to secure global markets.

We support the Government of Canada's focus on increasing transparency in the regulatory process. When done right and not at the risk of agricultural trade, this could result in even more confidence in our regulators and even greater public trust of the agriculture industry overall.

### **The Pest Control Products Act**

The *Pest Control Products Act (PCPA)* provides the legal framework that enables Health Canada to make science-based, regulatory decisions on pesticides. In their announcement, the Ministers also called for a review and consultations on specific provisions of the *Act*, suggesting that legislative amendments are necessary to increase transparency on how pesticides are reviewed in Canada. The Government of Canada should consider increasing transparency through other means, such as improved communication on pesticide decisions, while respecting the science-based approach.

By publicly stating that certain provisions of the *PCPA* needs to be reviewed, the government is casting a doubt on the integrity of the Canadian pesticide legislative framework. We are concerned that such intervention, while perhaps for a justified objective of transparency, could undermine the public's trust in the regulatory system.

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<sup>1</sup> <https://www.canada.ca/en/health-canada/services/consumer-product-safety/pesticides-pest-management/public/protecting-your-health-environment/pesticides-food/maximum-residue-limits-pesticides.html>

<sup>2</sup> Codex Alimentarius facilitates international trade by harmonizing internationally adopted food standards including, but not limited to, pesticide residues.

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Alberta  
Barley



To ensure that Alberta farmers can continue to sustainably drive our economy and remain a competitive leader of global exports, we request the Government of Alberta to urge the federal government and provincial counterparts to stand behind Canada's science-based regulation and rules-based trade. We are aligned with farmers and value chain organizations across Canada with these recommendations that must be amplified to federal ministers:

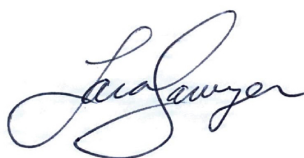
1. Reaffirm confidence in the science-based regulatory system and decision-making process for pesticides;
2. Recognize that added transparency and increased public trust can be achieved through other means, including improved communication, and not through changes to the *Act*; and,
3. Immediately un-pause all MRL increases, recognizing the importance of harmonized MRLs for Canadian agriculture exporters.

Thank you for your time in reviewing this information, in advance of the upcoming meeting of federal, provincial and territorial agriculture ministers. We hope there may be an opportunity to discuss this matter at that time. Please feel free to contact Shannon Sereda, Sr. Manager of Government Relations and Policy with the Alberta Wheat and Barley Commissions with any questions or concerns [ssereda@albertawheatbarley.com](mailto:ssereda@albertawheatbarley.com), (587) 899-5299

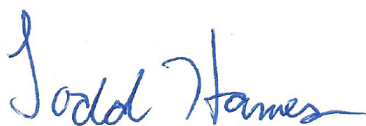
Sincerely,



Kevin Serfas  
Chair  
Alberta Canola Producers Commission



Tara Sawyer  
Chair  
Alberta Barley Commission



Todd Hames  
Chair  
Alberta Wheat Commission



Robert Semeniuk  
Chair  
Alberta Pulse Growers Commission

cc: Mr. Shannon Marchand, Deputy Minister, Alberta Agriculture and Forestry  
Mr. Jamie Curran, Assistant Deputy Minister, Alberta Agriculture and Forestry  
Mr. John Conrad, Assistant Deputy Minister, Alberta Agriculture and Forestry

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