



May 6th, 2024

Pest Management Regulatory Agency (PMRA)
Health Canada
2 Constellation Drive
Ottawa, Ontario K1A 0K9
Via email: pmra.publications-arla@hc-sc.gc.ca

Re: Feedback on Proposed Framework for Water Monitoring Programs in Canada

SaskCrops, comprised of SaskBarley, SaskCanola, SaskFlax, SaskOats, Saskatchewan Pulse Growers, and Sask Wheat, appreciates the opportunity to comment on the Pest Management Regulatory Agency's (PMRA) proposed framework for water monitoring programs.

SaskCrops represents over 24,000 grain, pulse, and oilseed growers in Saskatchewan. Its member commissions were established to invest farmer dollars in varietal development, agronomic research, and market development. The common goal of these organizations is to ensure that Saskatchewan farmers remain competitive and profitable. We support and advocate for science-based policy to support this competitiveness and profitability.

SaskCrops is strongly supportive of the PMRA's mandate to ensure the protection of human health and the environment. Canada's science-based regulatory system is among the best in the world, and farmers rely on Canada's regulators, including the PMRA, to maintain the confidence of Canadians and our international customers and to support the competitiveness of Canadian farmers. With the current spotlight on global food security, now more than ever it is vital for Canadian farmers to have access to safe and efficient tools to protect their crops and increase production. It is therefore critical that the federal government ensure there are adequate resources and supports available for the PMRA to continue to effectively and efficiently evaluate safe uses of crop protection products.

Data Availability for Risk Assessment and Risk Management Decisions

We appreciate the notion that accurate water monitoring data is essential to contribute to science-based risk assessment and risk management decisions. However, we note that the first objective of the water monitoring program describes improved mitigation techniques followed by beneficial management practices as responses to action. We feel that beneficial management practices are the most effective mitigation techniques. We recommend that beneficial management practices be emphasized as the first step of further action to prevent the movement of pesticide concentrations.





Data Transparency

We appreciate the PMRA's commitment to data transparency through open access to real-world water monitoring data. However, we recommend that the PMRA remove the raw and interpreted datasets, and instead provide one contextualized data set. To ensure that data, such as water monitoring data is not misunderstood, it is important that it be presented with the appropriate context (e.g., whether a detection is of concern or not). The importance of context is especially noted in the draft framework, "When reporting results and interpretation of data, it is important to provide context for any conclusions drawn". Therefore, the PMRA should focus solely on the online publication of contextualized data.

Regional Differences

We are pleased that there is acknowledgement within the framework of the importance of spatial, temporal, and regional differences in cropping systems and agricultural practices across Canada. Additionally, these differences directly relate to the importance and the need to contextualize data. Publishing the raw water monitoring data without regional or temporal context is likely to lead to misinterpretation.

Verification

It remains unclear in the document whether the proposed framework is a voluntary guide for designing and implementing a patchwork of water monitoring programs across Canada or rather if it is used with the goal of standardizing pre-existing programs. If this framework will become the new standard, it is important to consider how existing water monitoring programs will align within this new framework and any implications on existing programs. Additionally, if the goal is to standardize programs, the PMRA should consider how individual water monitoring projects will be verified to ensure that the methodology and subsequent data is standardized.

There is also a lack of guidance within the framework on who is best to facilitate sample collection. To further enhance sample integrity, the use of trained professionals with experience with these standard operating procedures and quality assurance/quality control protocols is encouraged. A trained professional could include someone with a Professional Agrologist (P.Ag) or Professional Biologist (P.Bio) designation, indicating a level of competency in this area and increased credibility with the public and government.

Continuous Oversight and Proportional Effort Policy

We recommend that further details be added to describe the future relationship and workings between the PMRA's new Continuous Oversight and Proportional Effort policies and a Water Monitoring Framework. It will be important to lay out in the framework how the continuous intake of new data, through such a program as a water monitoring program could help expedite product re-evaluations and approvals.



Water Monitoring Funding

Securing adequate and ongoing funding is necessary for a national water monitoring program's success. Water monitoring is a critical step to creating real-world data for PMRA decisions, which is key to providing growers with innovations in crop protection products. However, the entire process cannot operate effectively unless funding is consistent and predictable.

Conclusion

We remain supportive of the PMRA's National Water Monitoring Program for Pesticides, and the proposed Framework for Water Monitoring Programs in Canada will help to ensure that growers maintain access to safe, innovative, and effective crop protection products, while ensuring the protection of human health and the environment. Canadian farmers rely on regulators, including the PMRA, to maintain the confidence of Canadians and our international customers and to support the competitiveness of Canadian farmers. Therefore, it is important that this initiative be included in the core PMRA mandate, and that funding be adequate and ongoing as it is a program that benefits both Canadian agricultural producers and the Canadian public.

This is a critical time for agriculture, as Canada contributes to feeding the world amid growing food security concerns. Saskatchewan annual crop producers will continue to play a major role in this because of the scale and quality of their production for domestic and export markets. Innovation will continue to play a key role in this production including the need for safe and efficient tools to protect crops. SaskCrops continues to advocate for a science-based approach to regulatory decision-making.

Thank you for the opportunity to comment,

A handwritten signature in blue ink, appearing to read "Jill McDonald".

Jill McDonald
Executive Director, SaskBarley

A handwritten signature in blue ink, appearing to read "Tracy Broughton".

Tracy Broughton
Executive Director, SaskCanola & SaskFlax

A handwritten signature in blue ink, appearing to read "Shawna D. Mathieson".

Shawna Mathieson
Executive Director, SaskOats

A handwritten signature in blue ink, appearing to read "Carl Potts".

Carl Potts
Executive Director, SPG

A handwritten signature in blue ink, appearing to read "Blair Goldade".

Blair Goldade
Executive Director, Sask Wheat

