



Toll-Free:

519-837-1620

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www.christianfarmers.org



642 Woolwich Street,

Guelph ON, N1H 3Y2

December 20, 2017.

Dr. Richard Aucoin, Executive Director
Pest Management Regulatory Agency,
Health Canada,
2720 Riverside Drive,
A.L. 6607 D
Ottawa, ON
K1A 0K9

Dear Dr. Aucoin,

Re: Proposed Re-evaluation Decisions for Crop Protection Products

The Christian Farmers Federation of Ontario (CFFO) is an Accredited Farm Organization representing the interests of over 4,000 farm families in Ontario. Among our membership are many of the 400 farmers producing vegetables for processing in the province. The crops they produce include tomatoes, cucumbers, sweet corn, green peas, green and wax beans, beets, cabbage, carrots, cauliflower, lima beans, onions, peppers, pumpkins and squash for canning, freezing and pickling processors.

A significant number of recent re-evaluation decisions regarding crop protection products have in many cases fully cancelled or in fewer cases significantly restricted use of these products by Ontario farmers for producing vegetables for processing. These products include Linuron, Mancozeb, Metiram, Carbaryl, Ferbam, Ziram, Thiram, Chlorothalonil, Iprodione, Captan, and Imidacloprid. Considered cumulatively, the loss of so many products for protecting crops without suitable replacement products to take their place leaves producers vulnerable to pest, fungus and disease issues with limited ability to respond. Risks to Ontario's crops pose significant economic risk to both the producers and the processors in Ontario who depend on consistent and quality produce for their livelihoods.

Cumulative Economic Impact

The CFFO requests that Health Canada further investigate the cumulative impact (especially economic) of removing or restricting all of these products from use. Health Canada should also further consider possible appropriate use cases for agriculture that would ensure sufficient protection from the health and environmental risks identified, but not require a complete ban on use for some or all of these products.

Farmers work to produce safe and healthy food in a way that allows for efficient production, while also protecting the health of themselves and their workers, their

THE GENERAL FARM ORGANIZATION THAT IS ROOTED IN FAITH & GUIDED BY VALUES



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plants, soils, and the environment around them. Farmers depend on a variety of methods and tools, including various crop protection products, to help them control pest, fungus and disease problems that put their crops at risk.

Crop protection products need to be used responsibly. However, where there is a demonstrated need, and there is a significant economic benefit to farmers, greater consideration needs to be given to how best to balance selective use with any potential negative impacts.

Crop Loss and Resistance Risk

In order to effectively manage pest and disease problems, and in order to prevent the development of pest resistance, farmers need to have a variety of effective control tools at their disposal. The complete ban and significant restriction on use of so many of these control tools will significantly restrict farmers options for handling these problems. It could lead to situations where farmers are unable to control pest or disease problems, either from the lack of effective controls, or from the development of pest resistance from heavy reliance on a single method of control.

We also request that a transition time period be established which would allow for continued limited use of some of these products until alternatives to replace them can be properly tested and established as effective.

Market Competitiveness

This risk to the crops is further exacerbated by the economic risks posed by the fact that competing regions where these crops are also produced are not under the same restrictions on the use of these crop protection products.

The CFFO further requests that border controls be increased to ensure that imported foods brought into Canadian markets meet the same standards as Canadian produced foods, and are also not treated with these products.

Summary

Considering the value of these tools for agriculture, it would be worth further investigation to determine an effective use strategy for agriculture that would address the risks identified in these re-evaluation reports, while still allowing selective use of some of these products as tools for agricultural crop protection, at least until effective alternatives can be established. Further investigation is warranted to consider the cumulative impact of removing so many crop protection tools at once. Greater consideration needs to be given to how best to balance selective use with any potential negative impacts.



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We appreciate your consideration of our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Clarence Nywening".

Clarence Nywening, President
Christian Farmers Federation of Ontario

CC: Ginette Petitpas Taylor, Minister of Health
Lawrence MacAulay, Minister of Agriculture and Agri-Food