



Canadian MRL Update

2022 MRL Harmonization Workshop

San Francisco, May 25th, 2022

Background: Transformation Agenda

- Sustained media attention over the summer on certain proposed MRL changes:
 - Misunderstanding of MRLs and limited PMRA/HC responses resulted in an unexpected mediatic escalation
- Led to a ministerial announcement on August 4, 2021:
 - Pause on all MRL increases until spring 2022
 - Review of the PCPA to increase transparency and strengthen health and safety
 - Creation of an experts advisory committee
 - Additional resources to the PMRA
- First political intervention in a routine science-based regulatory process

Transformation Agenda – 4 Pillars

Targeted Review of the Pest Control Products Act (PCPA)

- Consultation ongoing until June 30th, 2022

Improved Transparency

- Plain language documents
- Increase access to data and information

Increased Use of Real-world Data and Independent Advice

- National Water Monitoring Framework
- Access to use information
- Scientific Advisory Committee

Modernized Pesticide Review Processes

- Program Renewal

Industry Concerns

- Transformation changes could negatively impact the Canadian agriculture sector by:
 - Jeopardizing science-based decision-making process
 - Reducing predictability and timeliness of decisions
 - Decreasing process efficiencies
 - Increasing unique Canadian registrants' obligations - unrelated to health and safety gains
 - Impacting public trust

Impact ability to bring innovative tools to Canada

Canadian Industry Aligned

- **Industry Strategic objectives:**
 - Protect the current science-based nature of pesticide regulations, independent of any political interventions
 - Ensure timely and predictable decisions on pesticide registrations and re-evaluations, protecting access to innovation for the Canadian ag industry

- **Opportunity to provide industry leadership:**
 - Demonstrate how the current regulatory system benefits the ag sector: access to innovation, competitiveness, sustainable ag practices, trade, etc.
 - Advocate for the importance of timely and predictable science-based decisions
 - Request that program renewal and water monitoring be prioritized given recognized benefits for both industry and PMRA
 - Propose approaches to increase transparency and public trust that are meaningful, cost-effective and can be done without legislative changes

- **Opening the PCPA:**
 - PCPA does not need to be open – the Act is fit for purpose
 - Risks overcome the benefits of re-opening the Act

PMRA Transformation Agenda - MRLs

- Unjustified pause on MRL increases still maintained:
 - Impact Canada's reputation as a science-based decision maker
 - Impact Canada's ability to promote science-based approach to pesticide regulations to trading partners
- PMRA consulting on potential approaches to MRLs:
 - Using new terminology: tolerance versus MRL
 - Greater recognition of foreign assessments
 - Use of Codex MRLs
 - Continuous oversight of MRLs
- Position:
 - Pause should be lifted immediately
 - Need for better and more timely public communication
 - Support use of Codex MRLs – need to operationalize so that registrants keep ability to register new uses

THANK YOU

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