

December 13, 2024

The Hon. Mark Holland,
P.C., M.P.
Minister of Health
House of Commons
Ottawa, Ontario
K1A 0A6

The Hon. Lawrence MacAulay,
P.C., M.P.
Minister of Agriculture and
Agri-Food
House of Commons
Ottawa, Ontario
K1A 0A6

The Hon. Anita Anand,
P.C., M.P.
President of the Treasury Board
Treasury Board of Canada
Ottawa, Ontario
K1A 0R5

RE: Request to delay publishing of the Health Canada proposal to update fees for pest control products in the Canada Gazette, Part I

The undersigned representatives from the Canadian agricultural sector request that the Government of Canada delay publishing Health Canada's proposal to update fees for pest control products (fee proposal) in the Canada Gazette, Part I (CGI) by at least 90 days. Delaying the CGI publishing for this proposal will allow for a more thorough and transparent consultation with the Canadian agricultural sector regarding the downstream impacts of Health Canada's fee proposal on access to innovation by Canadian growers.

The Canadian agricultural sector depends on predictable and timely access to safe and innovative pest control products to sustainably increase production in the face of global food insecurity challenges while ensuring Canadian growers remain competitive in a global market. While it is reasonable to review and update Canada's fee structure for pest control products, we share a growing concern that the magnitude of the proposed increase in annual fees (a 256% increase) and the overall framework of the proposal (including the fee-setting ratio) will disincentivize continued investment into pest control innovation in Canada, increase costs for growers, negatively impacting the sector's productivity, profitability, and competitiveness.

Many of the undersigned representatives from the Canadian agricultural sector were active participants in Health Canada's initial consultation on the fee proposal which closed on April 14, 2024. During this consultation and in the months following, we have continued to raise concerns and call for a more thorough analysis regarding the downstream impact this proposal could have on access to critical pest control innovation by Canadian growers. Unfortunately, our requests for additional engagement and more transparency have been denied by Health Canada's Pest Management Regulatory Agency (PMRA).

We have recently been made aware that Health Canada's fee proposal has been amended just weeks before it is to be published in CGI. The lack of transparency regarding the substance of these recent amendments to the proposal prevent us from properly assessing their impact. As such, the undersigned organizations formally request that the Government of Canada delay publishing the fee proposal in CGI by at least 90 days to allow for a more thorough and transparent consultation with the Canadian agricultural sector.

We remain committed partners in reviewing and updating the current *Pest Control Products Fees and Charges Regulations* and welcome an opportunity to discuss how an improved consultation approach, starting with postponing the CGI publishing, could help resolve our stated concerns.

Sincerely,



CC:

Lawrence Hanson – Deputy Minister, Agriculture and Agri-Food Canada
Greg Orencsak – Deputy Minister, Health Canada
Bill Matthews – Secretary, Treasury Board of Canada
John Hannaford - Clerk of the Privy Council (Canada)