

May 6<sup>th</sup>, 2024

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

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

We are writing to submit comments in response to the Pest Management Regulatory Agency's (PMRA) proposed framework for water monitoring programs. Water monitoring for pesticide residues plays a key role in providing real-world data for pesticide reviews and approvals to ensure Canadian grain growers have access to the newest and most innovative crop protection products for their operations.

As the national voice for Canada's grain farmers, Grain Growers of Canada (GGC) represents over 65,000 cereal, pulse, and oilseed producers through our 14 grower groups. Our members are trade-oriented, sustainable, and innovative. As a farmer-driven association for the grain industry, GGC advocates for federal policy that supports the competitiveness and profitability of grain growers across Canada.

### **Changes from the Previous Framework**

We are pleased to see several changes have been implemented since the previous water monitoring framework. Firstly, the added section regarding Canada's pesticide management and registration process is important context to include and its addition to the new framework is welcomed. Secondly, we are happy to see that the mention of "citizen science" has been removed from the revised framework and it is important that this continues to be excluded from the framework. Water monitoring should be done by qualified professionals via scientifically rigorous protocols to uphold the integrity of monitoring programs. Thirdly, we commend the added verbiage on landowner partnerships. These partnerships are important to develop a relationship founded on trust with landowners to ensure the success of water monitoring in bodies of water, such as wetlands located on private land. We recommend that responsible data management and privacy protection be added under objective five that explains the purpose of the framework, as these are key to building relationships with landowners.

### **Data Sources**

An impactful change that we propose to the framework is emphasizing the importance of beneficial management practices. Objective one of the water monitoring program describes different strategies that can be undertaken to reduce pesticide concentrations if the risk arises. This section describes mitigation techniques followed by beneficial management practices as responses to action. We recommend that beneficial management practices be the first step to prevent the movement of pesticide concentrations, as these initial steps will be more effective than rate reduction alone. In addition, when interpreting data, we recommend that the PMRA use a bell curve that eliminates

observations at both tails of the distribution to ensure that an extremely high or low observation does not skew the data set and subsequent interpretation of the data.

### **Data Transparency**

We appreciate the PMRA's commitment to data transparency under objective two that explains the purpose of the framework. However, we recommend that the PMRA remove raw and interpreted datasets from online publications. Instead, one contextualized data set should be provided, both from a PMRA resource and efficiency standpoint and because contextualized data is most helpful to understand and interpret. Another consideration within this section is to consider how this data can be shared publicly in a way that would not cause it to be misinterpreted or used in unintended ways. Pesticide usage can be a contentious topic and the PMRA should develop a prudent data sharing approach.

### **Verification**

It is 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 the latter is true, it is important to consider how existing water monitoring programs fit within this new framework and the implications on current programs. Additionally, if the goal is to standardize programs, the PMRA should consider how water monitoring projects will be verified to ensure that the data follows agreed upon approaches.

### **Continuous Oversight and Proportional Effort Policy**

We understand that the PMRA's proportional effort and continuous oversight policies are currently in consultation and phase-in processes, respectively. However, we recommend that further details be added that describe the relationship between the PMRA's continuous oversight and proportional effort policies and water monitoring. Considerations for how water monitoring data could help expedite product approvals would be valuable additions to the framework and overall PMRA policies.

### **Water Monitoring Funding**

Lastly, securing ongoing and permanent funding is necessary for a national water monitoring program's success. Water monitoring is crucial to supplying real-world data for PMRA decisions, which is key to providing growers with innovations in crop protection products. In addition, addressing operational issues like lab capacity and resource allocation are essential for the program's long-term effectiveness.

Sincerely,

Kyle Larkin  
Executive Director  
Grain Growers of Canada