

April 12th, 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 Regarding Proposed Fee Updates to Pest Control Products

We are writing today regarding our concerns with the proposed fee increases for pest control products, fearing its potential impact on producers' access to innovative crop protection products. 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.

Our primary concern relates to the anticipated deterrent in the pace of innovation for new crop protection products. The proposed fee hikes will increase annual product registration costs between \$2,000 and \$6,000, with minimal eligibility for small business registration. This change will undoubtedly compel life science companies to adjust their budgets, potentially leading to a reduction in research and development expenditures for new crop protection solutions. As a result, farmers may find themselves with weakened access to cutting-edge crop protection products tailored for the Canadian environment, placing them at a disadvantage vis-à-vis their US and other international counterparts. Finally, higher registration fees may be passed onto producers, ultimately adding to the cost of production.

A secondary concern is the possibility of fewer products being readily available for growers to utilize in the field. Given the unique characteristics of every grain farm and the variability of diseases and pests from field to field, growers rely on access to specialized pesticides to address the distinct needs of each field. However, under the proposed changes, the elimination of the minimum charge of \$114.88 and the imposition of a new annual charge of \$6,130 for most products could dissuade life science companies from maintaining smaller product registrations, which currently comprise 60% of all product registrations. This, in turn, would deprive growers of essential tools necessary for crop production.

Canadian grain growers must maintain access to the latest and most innovative crop protection tools to remain globally competitive. The PMRA's proposed fee setting ratio of 64% inadequately reflects the value of public benefits stemming from PMRA's regulatory efforts and the broader utilization of crop protection products. The conscientious application of these products is pivotal in enhancing agricultural productivity and profitability, ensuring food security and promoting environmental conservation. Therefore, we urge a re-evaluation of the proposed registration fee increases with a view to foster continued innovation in new products while ensuring the continued registration of existing products.

Thank you for considering our feedback through this consultation process.

Sincerely,

Kyle Larkin, Executive Director