

**GRAIN GROWERS
OF CANADA**



**LES PRODUCTEURS
DE GRAINS DU CANADA**

December 18th, 2009

Trish MacQuarrie
Director General
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Members:

Alberta Barley
Commission

Alberta Grain
Commission

Alberta Oat Rye &
Triticale Association

Alberta Pulse Growers

Alberta Winter Wheat
Producers Commission

Atlantic Grains Council

British Columbia Grain
Producers Association

Canadian Canola
Growers Association

Manitoba Corn Growers
Association

Oat and Barley Council
of Ontario

Prairie Oat Growers
Association

Western Barley
Growers Association

Western Canadian
Wheat Growers
Association

Dear Trish,

We at the Grain Growers are finding ourselves increasing being asked to defend our strong position on sound science, and it would assist us in being able to formulate answers if PMRA/Health Canada could answer the following questions.

At first glance, some of them may seem out of character for us, but the responses you provide will strengthen our ability to effectively communicate with the general public.

Does Health Canada assess every ingredient that goes into the pesticide or just the active ingredients?

Can manufacturers withhold information about what ingredients are in their products?

Are children more susceptible to negative effects from lawn pesticides, given their developing bodies and the way their play patterns put them in higher contact with chemical residues?

How valid are animal studies for predicting the effects these products will have on human beings?

Why doesn't PMRA take a precautionary approach on pesticides?

Has PMRA reviewed the Ontario College of Family Physician's report on pesticides and, if so, what actions did PMRA take as a result?

Why does Health Canada continue to approve chemical pesticides when there are many safer alternative products that exist?

Some groups indicate that there is a "growing body of evidence suggesting a connection between pesticides and cancer". What is Health Canada doing about this?

Also according to these groups, eight active ingredients commonly used on lawns and gardens targeted for reevaluation have not been completed and point to a 2003 CESD audit. When will these be completed and how safe are Canadians in the meantime?

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One advocacy group has repeatedly stated that, “studies have found that people who work with pesticides as part of their job are at higher risk than the average person of developing non-Hodgkin lymphoma and leukemia as well as prostate, kidney, brain and lung cancers”. Has Health Canada been made aware of these studies? If so, what conclusions were drawn?

The Grain Growers plan to be both strong supporters and a more public voice for sound science within our regulatory and decision making processes in 2010.

But, we also recognize that we need to more “receiver-orientated” in our communications than “grower-orientated”, if we are going to try and proactively shape public opinion. Hence we are trying to anticipate the challenges that will be thrown our way and increase our chances of “carrying the day in various debates and discussions.

On another issue, we sincerely appreciate the recent work done to bring in the new PPIP regulations and will be providing a number of positive comments on the balance that was struck between innovators and generics.

If you have any questions or concerns on either of the above points, we would be pleased to meet with you and PMRA at any time.

Sincerely,



Richard Phillips
Executive Director
Grain Growers of Canada