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June 5, 2009

Ms. Trish MacQuarrie
Director General, Health Canada
Policy, Communications and Regulatory Affairs Directorate

Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, Ontario
K1A 0K9

Dear Ms. MacQuarrie,

The Canadian Canola Growers Association and the Grain Growers of Canada are working together to enhance the profitability of and create opportunities for Canadian farmers. It is important to ensure Canada's regulatory system allows farmers access to a competitive market for crop protection products. We believe that the following recommendations on the Protection of Proprietary Interests in Pesticide Data (PPID) policy for improving and streamlining the registration process for generic pesticides would be integral to increasing our farmers in ensuring increased competitiveness.

Where crop protection products are still under patent protection, we support a system where the negotiation and arbitration process of generic registration begin in the last year or year and a half of protection, so the entire process is completed and the generic product is registered and ready for market by the last day of protection. This will ensure that farmers have access to the generic product, without delay, as soon as the patent expires.

In cases where crop protection products are already off-patent, we recommend that generic registrations be issued on the delivery of a formal offer of compensation and the generic company be allowed to go to market immediately, while the process of negotiation and arbitration of compensation is underway. This would be consistent and competitive with the U.S. model. In order to protect the interests of the innovator and ensure good-faith negotiations, we propose that a down-payment from the generic company be held in escrow before the generic is marketed. We are currently working on a formula to determine the amount to

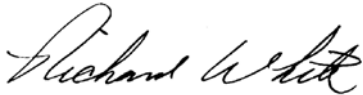
be held in escrow, and will be forwarding those recommendations to you in the near future.

Changes in regulations that affect agricultural producers should consider the impact on individual farmers. Those considerations should clearly address economic impact, regulatory burden, access to competitive products and impact on the competitiveness of Canadian farmers.

We support PMRA in its efforts to enhance domestic competition for crop protection products while ensuring the legitimate protection of proprietary interests in pesticide data. We believe that a change to the regulatory system for generic registration is important to ensure the competitiveness of Canada's farmers.

Thank you for considering our recommendations. We invite you to contact Rick White at (204)789-8810 or Richard Phillips at (613)233-9954 if you require further information or have any questions about our joint proposal.

Sincerely,

A handwritten signature in cursive script that reads "Richard White".

Rick White
General Manager
Canadian Canola Growers Association

A handwritten signature in cursive script that reads "Richard Phillips".

Richard Phillips
Executive Director
Grain Growers of Canada