



Standing Committee on Environment and Sustainable Development

Sixth Floor, 131 Queen Street
House of Commons
Ottawa ON K1A 0A6
Canada

Re: House of Commons Standing Committee on Environment and Sustainable Development is conducting a comprehensive study of the role of the federal government in protecting and managing Canada's freshwater resources.

1. Introductory information

a) Which issues related to protecting and managing freshwater does your organization work on?

- At Syngenta we offer innovative crop protection products, digital tools, expert agronomic advice, and support best management practices designed to help Canadian growers produce their best crops.
- Our crop protection products are thoroughly assessed for their potential to impact water quality prior to approval for market use and on an on-going basis. Notably:
 - In order for a crop protection (pest control) product to be approved for use in Canada, it must pass the rigorous safety standards of Health Canada's Pest Management Regulatory Agency (PMRA), which includes consideration of the impact of product(s) on both surface water and ground water.
 - The registered (approved) product label directions protect against unacceptable risks to human health and the environment, and when needed, outline safe use requirements to mitigate potential water quality impacts (e.g. spray buffer zones added to product labels to protect sensitive aquatic habitats).
- Advances in plant sciences allow growers to produce more food on less land and with lower inputs (i.e., fresh water, pesticides, fertilizers, fossil fuels), helping to ease the pressure on the world's water supply now and into the future.

2. Interaction and collaboration with federal departments and agencies

a) Does your organization interact with federal departments and/or agencies on freshwater issues? If so, on which issues and with which departments and/or agencies

- As a sustainable agricultural innovation and technology company and pest control product registrant in Canada, we primarily engage on water issues via the regulatory process under Health Canada's PMRA. As mentioned, the PMRA regulates pest control products in Canada under the authority of the *Pest Control Product Act*.
- The PMRA has one of the most rigorous scientific evaluation processes in the world with the primary mandate to prevent unacceptable risks to Canadians and the environment from the use pesticides. Before approving products for sale and use in Canada, the PMRA subjects pesticides to a comprehensive scientific review and risk assessment, which includes an assessment of the risk of transport into water bodies. Products are then continually assessed as part of a re-evaluation process to make sure they meet the latest scientific standards.
- Syngenta supports science and evidence-based regulations and the need for high-quality water information and monitoring data to support regulatory decision-making in Canada.

- In support of the pesticide registration process in Canada, Syngenta provides high-quality scientific studies and data to address the requirements set out by PMRA and statutorily mandated for product registration.
- Scientists from Environment and Climate Change Canada's Water Quality Monitoring and Surveillance program assess the presence of various pesticides and their levels in selected ecosystems.
- Syngenta has also answered to the PMRA and other federal departments (AAFC) via multi-stakeholder forums¹ to facilitate the generation of high-quality water monitoring data.

b) Do the specific freshwater issues targeted by your organization fit within the mandate of a given federal department and/or agency or do they relate to more than one department and/or agency? If more than one, have you been able to identify a lead department and/or agency with which to engage?

- As a sustainable agricultural innovation and technology company and pest control product registrant in Canada, we primarily engage on water issues via the regulatory process under Health Canada's PMRA.

c) Have you encountered notable successes in engaging with the federal government on freshwater issues? If so, please specify. If you have not had success in doing so, what in your opinion is the reason (e.g., no program available tailored to your needs, no identifiable service or unit within a department and/or agency with which to engage)?

- We believe in the necessity of a robust water monitoring system because we support evidence-based, regulatory decision making. For evidenced-based decisions to happen, regulators need access to more high-quality and robust water monitoring data that is collected by trusted, reliable sources.
- What is understood as "high quality data" should be determined via stakeholder engagement processes that produce agreement on a set of scientific and methodological protocols.
- Recently, we participated in a re-evaluation of our products by the PMRA. To ensure that high quality and holistic data sets were made available we worked with a trusted field cooperator and a public institution to monitor, collect and analyze water monitoring data. The data sets were collected over a three-year span and samples were pulled from a variety of sites.
- While we appreciate the opportunity to supply studies and data attained through a verifiable rigorous scientific methodology in support of the regulatory evaluation process, it was a costly process that added delays to an already-extended regulatory timeline.
- We believe that a routine water monitoring system would make more longitudinal data available and may alleviate some of the costs associated with the provision of supplementary data borne by industry. Such a system may then speed the process of evaluation. However, if such a system were to be implemented, it should not preclude the provision of supplementary data in relation to specific ingredients. It should only serve to increase the amount of data available to regulators.
- It is important that an adequate and regular/routine water monitoring system is both established and financially supported by the Government of Canada to ensure strong outcomes and robust

¹ The Environmental Monitoring Working Group (EMWG) of the Agriculture and Agri-Food Canada (AAFC) Multi-Stakeholder Forum on Neonicotinoids

data from all stakeholders.

**d) Do you foresee engaging with the new Canada Water Agency? If so, in what way?
What are your organization's expectations with respect to the Agency?**

- Syngenta supports those efforts already underway to expand the PMRA's capacity to evaluate risk to freshwater by establishing a dedicated national program to monitor the occurrence of pesticides in water. These efforts are spearheaded by CropLife Canada and Pest Management Advisory Council (PMAC) members.
- A PMRA-led national water monitoring program would allow the agency to have access to real-world data to inform, contextualize, and refine pesticide risk assessments. It would also allow PMRA to conduct trend analysis to understand the level of pesticides in Canadian waters over time. This information, if necessary, could be used to develop risk mitigation strategies to further prevent occurrences of pesticides in the water. It is critical that this program's oversight remains with PMRA, as the data produced should be integrated with and permit a scientifically sound risk assessment of all active ingredients on a regular basis.
- We encourage the Government of Canada to work closely with PMRA to understand how the PMRA-led program and the Canada Water Agency may evolve together to achieve a coherent understanding of freshwater roles and responsibilities in Canada.

3. Federal water legislation, policies and regulations

a) Does your organization interact with federal departments and/or agencies on policies, legislation, regulations, or funding programs related to freshwater? If so, please specify.

- In order for a crop protection (pest control) product to be approved for use in Canada, it must pass the rigorous safety standards of Health Canada's PMRA, which includes consideration of the impact of product(s) on both surface water and ground water. The PMRA's mandate falls under the Pest Control Products Act (PCPA).

b) Can you identify any current gaps in federal water legislation, policies, regulations, and/or initiatives, or in general across jurisdictions? If so, please specify.

- Growers should be supported by policies that allow them to access technologies that protect water resources while enhancing agricultural productivity.
- In the absence of a consistent, national program to monitor pesticide occurrences in water, the PMRA has defaulted to taking conservative approaches to risk assessments that often result in regulatory decisions that negatively impact the products grower have come to rely on. Growers are consistently faced with reduced use patterns, cancellations of uses and discontinuations of products.
- It is critical that federal policy demonstrate a commitment to high quality real-world data to guide regulatory decision making.

c) Do you feel the federal government could play a more effective role in protecting watersheds in Canada? If so, which watersheds and how?

- The Federal Government should continue to educate and encourage best management practices in support of Integrated Pest Management Plans and to offer transitional supports for farmers as they make any necessary changes to ensure compliance.

d) Are there areas of freshwater policy, legislation and/or regulation where you feel the federal government should play a greater role?

- Syngenta supports those efforts already underway to expand the PMRA's capacity to evaluate risk to freshwater by establishing a dedicated national program to monitor the occurrence of pesticides in water. These efforts are spearheaded by CropLife Canada and Pest Management Advisory Council (PMAC) members.

e) Are there areas of freshwater policy, legislation and/or regulation that you feel the federal government should vacate and leave to another level of government or to the private sector?

- We believe that the federal government should continue to play a role in water governance. However, it is critical to ensure that regulatory processes that assess risk are coordinated between and across jurisdictions to prevent unnecessary regulatory burden and duplication. In short, a product should not be subject to an assessment at both the provincial and federal level.
- Again, we believe that the PRMA has a history of regulating pesticide use and a familiarity with the quality of data required to arrive at defensible decisions. It is critical, however, that the PMRA receive increased funding to continue to demonstrate leadership in water monitoring and assessment as it pertains to pesticides.
- Going forward, the federal government should maintain or increase its support of existing programs to ensure their stability and provide high-level coordination to facilitate information sharing, to reduce regulatory duplication and to support access to and protection of water across the country.

f) Are you aware of instances where federal freshwater policy, legislation, regulations, and/or initiatives have clearly benefitted from your organization's input?

- Recently, we participated in a re-evaluation of our products by the PMRA. To ensure that high quality and holistic data sets were made available we worked with a trusted field cooperator and a public institution to monitor, collect and analyze water monitoring data. The data sets were collected over a three-year span and samples were pulled from a variety of sites.
- While we appreciate the opportunity to supply studies and data attained through a verifiable rigorous scientific methodology in support of the regulatory evaluation process, it was a costly process that added delays to an already-extended regulatory timeline.
- We believe that a routine water monitoring system would make more longitudinal data available and may alleviate some of the costs associated with the provision of supplementary data borne by industry. Such a system would support the efficiency of the evaluative process. However, a standardized national water monitoring system were to be implemented, it should not preclude the provision of supplementary data in relation to specific ingredients-it should only serve to increase the amount of data available to regulators.

4. Collection of information and data

a) Do you believe that there is sufficient data collected and made available publicly about freshwater in Canada?

- In Canada, water monitoring for pesticides is done by many jurisdictions and stakeholders in a manner that is insufficiently coordinated. This leaves regulators to rely on incomplete or non-standardized data to make decisions.

- Regulators would benefit from having access to more data and data sharing by all levels of government should be common practice and shared via one central repository.

b) Do you believe there should be improvement in freshwater-related data-sharing?

Please see above, certainly there is a need in improvement in freshwater- related data sharing between different provinces

- Yes. Data sharing by all levels of government should be common practice and shared via one central repository.

c) Is there any specific type of data or information you would like the federal government to provide to freshwater stakeholders?

- In addition to coordinated management, water monitoring data that is collected should be made available to registrants to ensure transparency, build confidence in its interpretation and the resulting regulatory decisions.
- All publicly released data should be accompanied by messaging that communicates public risk effectively by sharing the details on the methodology and analytical methods used (i.e., specification of the limits of detection). Robust ancillary information (such as land use, population, geology, weather, agricultural practices, etc.) should also accompany the data sets.

d) Has your organization experienced challenges obtaining well-organized data from the federal government on issues relating to freshwater?

- During our most recent review process, we were able to access data either directly via open source or indirectly via the PMRA representation process.
- There have been instances, however, where we were aware of the availability of data but unable to access it in a timely matter to support the routine re-evaluation of our products.
- The challenge in this particular case was that the monitoring data that was at first submitted as a part of the re-evaluation was not robust enough to conduct a risk assessment. Robustness is determined by frequency of sample collections, methodology and the statistically appropriate geographical distribution.
- The water monitoring system would benefit if data were collected and organized in a manner that allows for robustness.

e) Is the lack of standardized data or information across government jurisdictions a problem or challenge for your organization in accomplishing its objectives with respect to protecting and managing freshwater?

- Water data collection methodology varies by province. There is no clear/consistent data collection process between provinces. Some provinces have very detailed/frequency sampling regimes, whereas others less so.
- As such, regulators do not have access to robust datasets that provide the level of data necessary to inform their risk assessments, with the unfortunate consequence of creating unwarranted public concern.
- This could be improved if PMRA informs/directs water monitoring in a way that is of highest utility for their risk assessment intent in terms of pesticides.

5. International and business issues

a) Should Canada play a greater role internationally in helping find solutions, either through government and/or the private-sector involvement, to the challenge of global freshwater security?

- No answer

b) Do you feel Canadian private-sector companies, including financial institutions, can and should play a role internationally?

- No Answer

c) What role can the federal government play in better supporting freshwater-related academic research, R&D, businesses, products, and services?

- A water policy framework should consider how growers rely on innovations in plant science, crop protection products and water management systems to use less water and ensure that the industry and its experts are involved in all water policy discussions.