



June 27, 2023

Ruth Rancy
Director General
Policy and Operations Directorate
Pest Management Regulatory Agency
Health Canada
Government of Canada

Dear Ruth:

After careful consideration, I have decided to resign as co-chair and member of the Pesticide Management Regulatory Agency's Scientific Advisory Committee.

I appreciate the opportunity to serve with dedicated scientists on the PMRA's Scientific Advisory Committee and to work with professionals in the Pesticide Management Regulatory Agency (PMRA).

Before I accepted the role of co-chair of PMRA's Scientific Advisory Committee, I raised several concerns about the restrictive scope of the original terms of reference. The original terms, for example, indicated that the Scientific Advisory Committee could only respond to questions from PMRA. Manon asked me to trust that the revised terms would be acceptable. I agreed to serve as a co-chair for one year while the terms were being revised.

Unfortunately, the revised terms of reference were inadequate. If the scope of the terms of reference of the Scientific Advisory Committee is more restricted than the scope of the Pest Management Advisory Council's terms of reference – which includes industry representatives – I have little or no confidence that the Scientific Advisory Committee can help PMRA become more transparent or assure that Canadians are protected from toxic pesticides.

Should industry representatives – who have a clear and undeniable financial conflict of interest – be allowed to serve on the Pest Management Advisory Council? Absolutely not. Research conducted over the past 50 years has clearly shown that people with financial conflict of interest should not be allowed to serve on advisory committees of federal health agencies.

More personally troubling, I worry that the Scientific Advisory Committee – and my role as a co-chair – provides a false sense of security that the PMRA is protecting Canadians from toxic pesticides. Based on my experience over the past year, I cannot provide that assurance.

Most of my criticisms and questions are based on an obsolete regulatory system and apparent legal constraints.

Should the public have a say in how pesticides are managed and regulated? A recent survey of a sample of young Canadians raised intriguing questions about how pesticides should be regulated in a democratic society that purports to protect its citizens.

"When asked their opinion on how pesticides should be used, a 55 per cent majority of youth believe pesticides should be banned, while 25 per cent say they should be used only as a last resort under exceptional conditions. Sixteen per cent feel they should be used sparingly, while only four per cent want their use to be unrestricted."

The extensive discussions we had on maximum residue limits in the October 20th meeting implies that PMRA staff believes the key problem is that public doesn't understand how PMRA defines or calculates maximum residue limits. What if the assumptions about maximum residue limits fail to protect Canadians?

In discussing the regulatory review process, several members of the Scientific Advisory Committee asked to review pesticides like glyphosate or chlorpyrifos, including data from human studies. My preference was to use a pesticide, like chlorpyrifos, that has been thoroughly studied in human populations so we can review the original registration process, understand the assumptions that were made and evaluate those assumptions based on evidence gathered over the subsequent 20 or 30 years. That way we can learn about the registration scheme – when the pesticide was originally registered – and evaluate whether those assumptions were valid using data and studies conducted since the original registration.

My requests – which were amplified by other Scientific Advisory Committee members – were denied. We were politely told that it would be more informative to use a simple example. To be fair, legal considerations may have constrained PMRA staff from discussing contentious pesticides. Still, if legal constraints prohibit PMRA from discussing regulatory decisions – that is, they obstruct transparency – how can Canadians be assured they are being protected?

The PMRA wrote: "Pesticides are important in the production of food in Canada".

This statement assumes that all pesticides are necessary. Some scientists disagree. In 2013, UNICEF concluded we don't need synthetic pesticides to "feed the world". Should PMRA have a goal of minimizing the use of pesticides or simply making sure that they don't exceed maximum residue limits based on a series of assumptions formulated over 50 years ago?

How does PMRA address new biomonitoring studies of exposure to toxic pesticides, like glyphosate? New data from the MIREC Study found that two-thirds of pregnant women in Canada have detectable in their urine. I asked numerous times how PMRA uses new biomonitoring studies in their regulatory process. I never received an adequate response.

PMRA primarily relies on toxicological studies. Why does PMRA emphasize toxicological studies over epidemiologic studies? It is convenient to rely on toxicological studies because they conform to existing methods used by PMRA, but many regulatory decisions have been upheld by human studies.

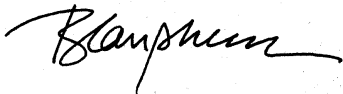
How does PMRA incorporate new epidemiologic studies showing harm when their models and maximum residue limits rely on toxicological data? Why, for example, did it take so long to restrict or ban the use of chlorpyrifos? These are questions I was not able to get answered.

Several members of the Scientific Advisory Committee were concerned with PMRA's overly confident statement of a particular pesticide: "No health effects". Coupled with Tim MacDonald's acknowledgement that only a few studies are available for some pesticides. How can PMRA be confident regulations are protective in the absence of data?

Regrettable substitution – replacing one toxic pesticide with another pesticide that is later shown to be toxic – has convinced many scientists that we can no longer continue to rely on an obsolete regulatory system that protects the pesticide industry more than it protects Canadians. How can PMRA staff be so confident that they are protecting Canadian citizens given the history of regrettable substitution?

Will the newly enacted "right to a healthy environment" require PMRA to become more transparent and protect Canadians from toxic pesticides? Will the law – which updates how toxic substances are assessed and includes a requirement to look for safer alternatives, and data on cumulative effects if combined with other substances – dictate the necessary changes? I am hopeful that way PMRA regulates pesticides will change with the newly enacted and still evolving Canadian Environmental Protection Act. It will, however, require an overhaul of how PMRA regulates pesticides.

Best regards,

A handwritten signature in black ink, appearing to read "B. Lanphear", written in a cursive style.

Bruce P. Lanphear, MD, MPH
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