David Suzuki Foundation

équiterre

February 1, 2015

Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
A.L. 6604-E2
Ottawa, ON K1A 0K9

To Whom It May Concern:

Re: Special Review of Quintozene: Proposed Decision for Consultation (REV2014-07)

The David Suzuki Foundation and Équiterre appreciate this opportunity to comment on the proposed decision in the special review of quintozene. Canadians and our environment face risks from exposure to quintozene that have been deemed unacceptable in Europe. We therefore welcomed the Pest Management Regulatory Agency's (PMRA) announcement on December 30, 2013, of a special review of pest control products containing this active ingredient, as required by s. 17(2) of the *Pest Control Products Act*. However, we are again concerned by the lack of rigour with which the Agency appears to have conducted this special review and the proposed decision to continue registration of quintozene, although end-use products containing this ingredient will be phased out in Canada by April 2015.

In our view, a special review should give thorough consideration to the concerns leading to a ban on the active ingredient in another country to assess whether the risks and value of the pest control product are acceptable for continued registration in Canada. This could include obtaining and analyzing relevant data and examining the PMRA's approach to risk assessment in light of alternatives (i.e., the approach in the country with a ban). A special review may also provide an opportunity to consider new information or emerging issues related to health and environmental risks of the subject pest control product, that may not have been available to or considered previously by PMRA or the country with a ban in place.

In the case of quintozene, the PMRA has not even evaluated available scientific information related to the aspects of concern – a minimal requirement for special review. Instead, REV2014-07 suggests, in essence, that special review is unnecessary at this time because end-use products containing quintozene are being phased out. This conclusion would be valid if the PMRA also cancelled registration of the active ingredient and remaining technical products containing quintozene.

However, the PMRA is proposing to continue these registrations on the basis that the two remaining quintozene products are not currently in use and therefore do not pose an exposure hazard. This is a

perversion of risk assessment logic. If the use of products containing quitozene may pose unacceptable risks, registration of these products and the active ingredient should be cancelled – regardless of whether the pesticide is currently in use or not.

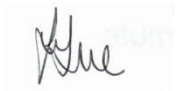
We recognize that the PMRA is proposing to conduct a health, environmental and value assessment of any new end-use product containing quintozene that may be proposed for registration in the future, and that this assessment may include evaluation of the aspects of concern identified in REV2014-07. However, this is a poor substitute for a more fulsome special review, given that the *Pest Control Products Act* does not require public consultation on decisions to register new products if the active ingredient is already registered. Punting evaluation of the aspects of concern to a potential future product registration decision amounts to an end-run around the consultation requirements for a special review.

We do not disagree that discontinuation of all end-use products containing quintozene later this year will eliminate environment and human health risks from this pesticide. **We urge the PMRA to follow through and cancel registration of the active ingredient and remaining technical products**, which in any case are no longer being used in Canada.

Finally, we note that quintozene has been prohibited in Switzerland since 1998, and in the European Union since 2000, but the PMRA did not initiate the legally required special review until December 30, 2013. In the future, we hope the PMRA will initiate special reviews of pest control products containing active ingredients banned in another OECD-member country through a systematic process that does not require non-governmental organizations to bring the ban to the PMRA's attention, and in a more timely fashion. For example, the PMRA initiating special reviews of affected pest control products of its own accord within six months of the passage of a ban would be a more reasonable timeline.

Thank you for considering these comments.

Sincerely,



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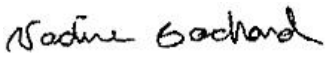

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