



March 27 2017

Pest Management Regulatory Agency Publications Section
Pest Management Regulatory Agency (PMRA)
Health Canada
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Ottawa, Ontario
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Sent via email: PMRA.publications@hc-sc.gc.ca

Re: PMRA Proposed Re-evaluation Decision for Imidacloprid (PRVD2016-20)

To Whom It May Concern:

CropLife America (CLA) appreciates the opportunity to provide comment on the Pest Management Regulatory Agency's (PMRA) proposed re-evaluation decision for imidacloprid. Established in 1933, CLA represents the developers, manufacturers, formulators and distributors of plant science solutions for agriculture and pest management in the United States. CLA's member companies produce, sell and distribute virtually all the vital and necessary crop protection and biotechnology products used by American farmers, ranchers and landowners.

Significant overlap of membership exists between CLA and CropLife Canada (CLC). Therefore, CropLife America's comments reflect concern over the potential conflict of such a re-evaluation process used by PMRA in this assessment of imidacloprid (and other pesticide ingredients) with the regulatory approach and decision processes of the US Environmental Protection Agency (EPA). CLA stands in strong support of the comments submitted by CLC. The US risk-based regulation of crop protection products provides for broad stakeholder input, which is essential to establishing risk and benefit conclusions. Such stakeholder input and engagement is essential to assurance of transparency, and risk-based regulatory decision making.

CLC asserts its support of the PMRA cyclical pesticide re-evaluation program. CLA underscores the importance of such re-evaluation with its support of EPA's 15-year program of registration review in the United States. The release of PMRA's decision on imidacloprid is not consistent with EPA's re-evaluation program, which generally includes significant scientific dialogue with stakeholders. PMRA has not adequately characterized the magnitude of the risk, or the risk-mitigation options that would be required to support a risk-mitigation strategy and a final decision, in the case of imidacloprid.

Representing the Crop Protection Industry

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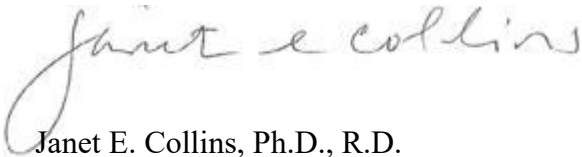
We share CLC's stated concern that PMRA's proposed decision is premature, not having engaged stakeholders on the outcome of its preliminary risk assessment. Furthermore, the EPA currently is accepting comments on its "Preliminary Aquatic Risk Assessment to Support the Registration Review of Imidacloprid" [Docket ID: [EPA-HQ-OPP-2008-0844-1086](#) which provides for significant stakeholder input. Consistent with EPA's approach to decision making, we support CLC's request that PMRA consider separating publication of a draft risk assessment from any proposed decision, to permit stakeholders, particularly registrants, an opportunity to contribute risk mitigation measures that would address any potential risk concerns.

We support the comments of CLC as well as the numerous comments submitted on behalf of various commodities (blueberries, cranberries, almonds, and others). We appreciate the opportunity to provide input on this important regulatory process, and support CLC's request that PMRA grant stakeholders sufficient time to address identified areas of concern, including data generation where the need is specifically identified.

Should you have any questions or wish to discuss this matter, please contact me directly by email (jcollins@croplifeamerica.org) or telephone (+1-202-833-4474).

Thank you for your consideration of these comments.

Respectfully,



Janet E. Collins, Ph.D., R.D.
Executive Vice President, Science and Regulatory Affairs

Cc: Maurice C. Allen, International Economist
USDA/FAS