



Pest Management Regulatory Agency (PMRA)
Health Canada
2 Constellation Drive
Ottawa, Ontario
Address Locator: 2608A
K1A 0K9

Submitted Via Consultation Portal

April 4, 2023

To Whom It May Concern:

RE: Consultation on methomyl, Proposed Maximum Residue Limit PMRL2023-03

On behalf of the Canadian Produce Marketing Association, we are pleased to provide comments to the Pest Management Regulatory Agency (PMRA) regarding the *Consultation on Methomyl, Proposed Maximum Residue Limit PMRL2023-03*.

About CPMA

Based in Ottawa, the Canadian Produce Marketing Association (CPMA) is a not-for-profit organization representing companies active in the marketing of fresh fruit and vegetables in Canada, from the farm gate to the dinner plate spanning the entire produce industry. The Association's members include major growers, shippers, packers, and marketers; importers and exporters; transportation and logistics firms; brokers, distributors, and wholesalers; retailers and foodservice distributors; and fresh cut operators and processors. Founded in 1925, CPMA is proud to represent over 850 domestic and international members who are responsible for 90% of fresh fruit and vegetable sales in Canada.

Comments

To begin, CPMA would like to reiterate the vital role that crop protection tools play in protecting our food and crops from invading weeds, insects, and disease. We also acknowledge that pesticides must be used within the guidelines of good agricultural practices, which consider the needs of environmental quality and human health, as well as agricultural stability and effective pest management. In Canada, the pesticide approval process used is one of the toughest in the world and meets or exceeds the health standards established by the World Health Organization.

CPMA would like to emphasize that the harmonization of Maximum Residue Limits (MRLs) between the United States and Canada remains essential for the Canadian produce sector, and therefore CPMA supports a joint registration approach for new applications and re-evaluations of existing MRLs. If an increase in the methomyl MRL is made for imported goods, a harmonized approach should be employed to ensure that Canadian producers have access to the same crop protection tools as producers in other countries; in this particular case, for head lettuce and leaf lettuce.

The harmonization of international standards, including pesticide regulation, products, and allowable residues, is essential to increasing market access and ensuring the continued sustainability of the

Canadian fresh fruit and vegetable industry. It is also important to note that consumer confidence in the safety of the food supply is eroded when jurisdictions have either different regulations, or if there is not sound science behind them. Consistent, evidence-based MRLs will serve to boost trade for producers while also ensuring a variety of healthy, fresh produce choices to continue to be available to consumers across North America.

Sincerely,

A handwritten signature in black ink, consisting of a stylized 'R' followed by a horizontal line.

Ron Lemaire
President
Canadian Produce Marketing Association