

Post-Market Pesticide Re-evaluation Review Stakeholder Engagement Sessions

Fall 2018

What Was Heard Report



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Executive Summary

Pesticides are regulated under the *Pest Control Products Act*, which is administered by Health Canada's Pest Management Regulatory Agency (PMRA). In the coming years, it is expected that the PMRA's Post-Market Pesticide Re-evaluation Program will face a significant increase in workload pressures. As part of the PMRA's ongoing efforts to increase the effectiveness and efficiency of its programs, in 2016 the PMRA introduced a number of improvements to post-market processes to streamline its work and eliminate duplication. However, the PMRA determined that a fulsome evaluation of the program was required to seek broader efficiencies to improve its overall **sustainability**.

The PMRA recognizes the importance of hearing the perspectives of a wide range of stakeholders as a key component of the review. As such, the PMRA set out to meet with stakeholders across the country to seek feedback on the current and future state of the re-evaluation program.

This report summarizes the stakeholder consultations that were conducted face-to-face at various locations across Canada in the fall of 2018, through webinars and through the collection of written submissions from stakeholders.

Participation in these engagement sessions was targeted towards stakeholders with knowledge of the current re-evaluation process. Stakeholders representing 140 associations and organizations, including participants from provincial, territorial and municipal governments, registrants, industry associations, growers and other user groups, non-governmental organizations, academia, and other regulatory partners, provided insightful comments to the PMRA during these sessions.

These consultations were designed to elicit comments and feedback on the current post-market pesticide re-evaluation program, including what is working well and areas for improvement. Feedback was received under the following four key themes:

Theme 1: Stakeholder Engagement and Transparency in Re-evaluations - including the timing and frequency of stakeholder engagement points throughout the pesticide re-evaluation process, the predictability of requirements, and transparency.

Theme 2: Initiation and Prioritization of Re-evaluations - particularly the timing and triggers to initiate a pesticide re-evaluation, including discussions on the 15 year cycle, risk-based approaches and prioritization of pesticides to be reviewed.

Theme 3: Scientific Assessment and Risk Management in Re-evaluations - increasing the predictability of data requirements and how data is being used to refine the risk assessment, as well as tools and opportunities to share available data and studies, and encouraging better understanding of the differences in use-patterns across the country.

Theme 4: Alternative Models for Re-evaluation - including increased stakeholder engagement, flexible risk-based approaches, enhanced post-market monitoring and surveillance of pesticides, socio-economic impacts of decisions in the risk management process, improved accountability of the registrant and better international alignment.

This report aims to reflect the summary of the ideas, comments and feedback that were raised during the stakeholder consultations. **It does not attempt to include every comment received, nor does it imply consensus on the part of all participants. It presents a summary of what was heard from input that was wide-ranging, broad-based and not always consistent. The views expressed are those of the participants in the consultation process and should not be seen as representative of either the PMRA or the Government of Canada positions or views.**

Background

Health Canada's Pest Management Regulatory Agency's mandate is to protect human health, safety and the environment by minimizing risks associated with pesticides, while providing Canadians access to the pest management tools they require for agriculture, forestry, industry, and personal use.

The PMRA regulates pesticides under the authority of the *Pest Control Products Act*. The Act requires that the PMRA initiates the re-evaluation of each pesticide at least every 15 years or sooner, to address changes in data requirements or new approaches to risk assessments. The policy that guides the re-evaluation program ensures that pesticides on the Canadian market continue to meet current health and environmental safety standards.

In addition to cyclical re-evaluations, the Act requires that a special review be conducted when new information provides reasonable grounds to believe that the health or environmental risks of the product are, or its value is, now longer acceptable, or when an Organisation for Economic Co-operation and Development (OECD) member country prohibits all uses of a pesticide for health or environmental reasons.

Any unacceptable risks identified through re-evaluations or special reviews requires the PMRA to initiate action to protect health or the environment, either by placing additional restrictions on the way the pesticide is allowed to be used or removing it from the market entirely.

The number of pesticide re-evaluations that the PMRA is required to initiate per the 15 year cyclical requirement is increasing relative to previous years. In the next 5 years the PMRA is required to initiate 145 new re-evaluations which are approximately 2.5 times the re-evaluations that were initiated in the previous 5 years. In addition to the increase in the number of re-evaluations required, the PMRA is seeing an increase in the scale and complexity of pesticide re-evaluations.

The Post-Market Re-evaluation Program Review

The PMRA is committed to continuous improvement and conducts periodical examination of its programs by leveraging internal and external audits and comprehensive reviews to find inefficiencies and eliminate duplication. Specific to the re-evaluation program, the PMRA previously conducted a review that evaluated the functionality of processes to maximize efficiencies, leading to improvements being implemented to the post-market program in 2016.

The PMRA is now conducting a fulsome review of its post-market pesticide program with a goal of achieving a more modern, efficient and sustainable re-evaluation program by considering broader, transformative changes. The Post-Market Re-evaluation Program Review (the Review) officially launched in September 2018 and is undertaking a comprehensive evaluation of additional efficiencies and improvements to the program.

Consultation Session Details

These sessions were held in the late fall of 2018 in locations across the country and by webinar. This provided opportunities for the PMRA to engage with and participate in significant discussions with key stakeholders. The PMRA was able to hold 17 stakeholder sessions and host two webinars.

The PMRA engaged directly with as many stakeholders as possible across Canada. This allowed the PMRA to collect information, ideas and diverse perspectives from stakeholders with a keen interest in, and knowledge of the current re-evaluation program. Stakeholder interest and engagement in these consultations were high and participants responded with interest, passion and appreciation for being included in the review process.

Stakeholder Engagement

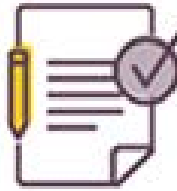
2 Webinars



17 Stakeholder Sessions



6 Written Submissions



At each consultation, stakeholders were reminded that protecting human health and the environment continues as the primary focus of the PMRA as it re-examines its Pesticide Re-evaluation Program.

The sessions were designed to encourage feedback on the current re-evaluation process in the form of break-out sessions or group discussions focussed on the four key themes below.

Summary of what was heard

General Themes

Through these sessions, the PMRA was seeking input from stakeholders to inform and guide the development of improvements to the Canadian pesticide re-evaluation program, including potential changes to the current process. Questions being asked of participants included, “what features do you see as important in a pesticide re-evaluation program, what is working well in the current model and what are some areas of improvement?”

Four themes were presented to participants during these sessions, which formed the basis for the probing questions and discussions. The themes and questions are found below:

Theme 1: Stakeholder Engagement and Transparency in Re-evaluations

How can stakeholders best contribute and provide input to the re-evaluation assessment?

Theme 2: Initiation and Prioritization of Re-evaluations

How should re-evaluations be scheduled and prioritized recognizing that some pesticides have more risks than others?

Theme 3: Scientific Assessment and Risk Management in Re-evaluations

How is scientific information considered in the re-evaluation assessment?

Theme 4: Alternative Models for Re-evaluation

Are there other models or processes for re-evaluation that the PMRA should consider for Canada?

Highlights

Key organizations from industry, other government departments, NGOs and organizations representing producers/manufacturers of pesticides and users of these products and self-identified members of the general public were invited to participate in consultation sessions held across Canada.



Without exception, session participants demonstrated a heightened interest in the PMRA’s processes and all participants offered candid recommendations and advice to the PMRA.

Below is the amalgamated feedback from the consultation sessions and written submissions under the four key themes.

Theme 1: Stakeholder Engagement and Transparency in Re-evaluations

During consultations this theme provided the most number of comments, feedback and suggestions for improvement. The majority of comments emphasized the need to increase opportunities for stakeholders to engage early in the re-evaluation process. Suggestions on how to enhance the predictability of information requirements and ideas on how to maximize the role of the registrant throughout the process were provided. Some stakeholders recommended earlier engagement and more frequent engagement throughout the re-evaluation process. The following is a summary of key comments and suggestions for improvements.

Better Timing and Increased Frequency of Stakeholder Engagement

- Stakeholders should be continuously engaged throughout the re-evaluation process.
- The PMRA should identify and communicate issues early in process to allow stakeholders sufficient time to explore solutions to these issues.
- Earlier engagement with registrants and growers would help the PMRA understand and confirm the use patterns before the risk assessment begins.
- Engagement should be flexible depending on the issues identified in the assessment – early engagement if issues are identified or no engagement if no issues identified.
- Too much engagement can be a burden for some stakeholders with competing demands.
- Growers are more difficult to engage during planting and harvesting seasons. Timing of November-April for feedback is preferred.

Enhanced Consultation Phase of the Re-evaluation Process

- The PMRA should engage stakeholders on a draft risk assessment prior to proposing risk mitigation measures in a proposed re-evaluation decision document.
- Publishing a proposed decision based on overly conservative assumptions generates unwarranted negative public perceptions that can make revising the decision difficult even with generation of more refined data.
- The current time frame for the consultation period (90-day window to comment) is too short to provide response. Stakeholders don't have sufficient time to hire experts to provide an independent and proper analysis of the proposal and then to generate new data.
- Instead of current heads-up briefing process before the proposed decision is released for comment, the PMRA should engage with affected stakeholders within the first 30 days of the consultation period after the documentation is published, providing a detailed presentation of the proposal.
- Face-to-face meetings are a productive way to engage with stakeholders.
- Engagement should target key groups instead of all stakeholders.
- Growers and/or pesticide users need to be more engaged than in current process.
- More provincial representatives should be engaging with growers.
- Confidential test data should be available for public inspection at all times.
- Current practice of allowing stakeholders to review scientific test data only in a Reading Room located in Ottawa is insufficient and different from other jurisdictions.
- Scientific test data deemed confidential by the PMRA is often accessible publically through other means.
- Adding additional consultation steps to process should be balanced with the need for timely decision making.

Clearer/Improved Documents & Communications

- Documents published by the PMRA need to be short, simple and in plain language.
- Some stakeholders often don't have the technical expertise or time to read scientific documents.
- All detailed scientific information should be available to stakeholders if required.
- The PMRA should make underlying scientific assessments available to be shared with stakeholders.
- Documents are difficult to find on the PMRA's website. The PMRA's website needs to be more user-friendly.

Theme 2: Initiation and Prioritization of Re-evaluations

Under this theme, session discussions explored how re-evaluations should be scheduled and prioritized recognizing that some pesticides have more risks than others. Participants expressed various opinions on the appropriate duration of a re-evaluation cycle including arguments for both shorter and longer cycles than the current 15-year requirement. Strong support emerged for a re-evaluation system that ensures resources for pesticides that present the greatest risk to human health and the environment. Participants in the consultations identified opportunities to prioritize pesticide re-evaluations based on risk and other factors.

Changes to Re-evaluation Cycles & Triggers

- Re-evaluation cycles should be variable based on risk or hazard.
- Within a re-evaluation cycle (15 years) there should be regular checks to ensure there are no issues developing (for example every 5 years).
- The PMRA should keep the time-based re-evaluation cycle requirement to ensure all pesticides are reviewed, as well as the current special review requirements.
- The re-evaluation cycle should be used to check if re-evaluation is required - not automatically trigger re-evaluation.

- The current requirement for re-evaluation at least every 15 years is too long for some stakeholders and too short for other stakeholders.
- Registrants should have a more pro-active role with responsibility for initiating re-evaluations in order to maintain their registrations.
- The requirement to initiate a special review if a pesticide is banned in another OECD country should be removed or modified so the Canadian context is considered.

A More Flexible Approach

- All pesticides do not merit to be treated in the same way. Substances with the highest risks should be prioritized for re-evaluation (in other words, exposure to hazards such as carcinogenicity, mutagenicity, reproductive toxicity, endocrine disruption, toxicity to invertebrates, environmental persistence and leaching, etc.).
- Inherently low risk pesticides should have different re-evaluation requirements or timelines or be exempt from re-evaluation completely.
- Newer chemistries should have a risk-based trigger for re-evaluations instead of the time-based cyclical re-evaluations.
- Academics and pesticide specialists should be included in identifying priority chemicals for re-evaluations.
- Re-evaluations of pesticides should be grouped.
- A significant increase in sales or use should prioritize a chemical for re-evaluation.
- Use a prioritization matrix like that developed for the Chemicals Management Plan (CMP) categorization activity.

Theme 3: Scientific Assessment and Risk Management in Re-Evaluations

Discussions under this theme focussed on how the PMRA considers scientific information in a re-evaluation assessment. Strong consensus emerged in the discussions on the importance of the PMRA obtaining the best and most complete scientific data and use information available on a pesticide, as was the importance of timely decision making. Many participants expressed a need for greater transparency on how scientific data is obtained, reviewed and incorporated into a re-evaluation assessment. Consultation participants expressed a need to increase the monitoring of pesticides in Canada to ensure that the PMRA re-evaluation assessments are based on real-world Canadian data. Consultation discussions highlighted various opportunities for the PMRA to consider in conducting and refining re-evaluation risk assessments. A number of participants emphasized the importance of the PMRA consulting publicly on a draft risk assessment to allow for a more fulsome discussion before the proposed re-evaluation decision is issued. Other participants expressed concern with adding steps to the re-evaluation process that may delay the final decision.

Availability and Quality of Scientific Data

- There is a need for better data to support re-evaluation decisions.
- Academics and the public should be able to provide data at the beginning of the re-evaluation process.
- Guidance should be shared regarding how data quality is evaluated by the PMRA and how lower quality data is used in assessments.
- The PMRA risk assessments should indicate the source/provider of all scientific data that is relied on.
- The PMRA should provide information regarding studies which were considered but rejected or not included in the assessment.
- The Federal programs that are currently in place to generate data to support the initial registration of minor use products should be extended to also maintain the scientific database as minor uses undergo re-evaluation.
- The PMRA assessments should include a comprehensive review of independent scientific data.

- The data list provided to registrants, outlining the additional data that the PMRA used in its review – but were not submitted by the registrant should be made available to all stakeholders during representation.
- Canada needs more comprehensive pesticide monitoring data.
- Canada needs a publically accessible national database of pesticide monitoring data.
- Pesticide monitoring data should include water as well as levels in food, levels in humans, and levels in the ecosystem.
- Canada needs a publically available list of studies reviewed by the PMRA, and the PMRA’s conclusions regarding acceptability and/or relevance.
- The PMRA should balance the opportunities for stakeholders to provide reduced-risk and increased-risk data.
- Digital infrastructure is available to support systematic reviews thereby increasing efficiency and transparency of the reviews.

Pesticide Use Information

- The PMRA should create a database of pesticide-use information.
- The PMRA should consider use of electronic pesticide spray records to inform risk assessments.
- Pesticide users and registrants need to collaborate on generating and submitting use data to the PMRA.
- Geographic differences and use patterns need to be better understood and incorporated into risk assessments.

Considerations for the PMRA Risk Assessment Process

- The PMRA risk assessments should take into consideration differences in the regional use of the pesticide, regional availability of alternatives, and differences in environmental factors.
- The PMRA should conduct separate consultations on the risk assessment and proposed decision.
- Separate consultation on risk assessment would not be beneficial without context of proposed decision.
- The PMRA should provide the scientific justifications for any new mitigation measures.
- The PMRA needs to establish a clear definition of what constitutes acceptable risk.
- Where risks are unacceptable, the PMRA risk assessments should clearly state what types of data would be required to refine risk assessments.
- The PMRA dietary risk assessments should be based on actual pesticide levels in food and not the maximum residue limit value.
- Canada needs more robust systems to ensure that pesticide residues in imported foods meet new maximum residue limit value requirements.
- The PMRA risk assessments should take into account chemical mixtures and the cumulative effects of exposure to different pesticides.
- The PMRA should provide scientific justification for any changes to data requirements or detection thresholds during the course of a re-evaluation.
- The PMRA risk assessments should consider the ability of an ecosystem to recover from the effects of a pesticide.
- The PMRA risk assessments should take into consideration vulnerable populations and lower socio-economic groups which may be more exposed to certain pesticides.
- The PMRA needs to ensure that label mitigation measures actually address risk issue and are followed.
- Guidance on how the PMRA conducts tiered assessments should be shared.

Theme 4: Alternative Models for Re-evaluation

The focus of these discussions provided stakeholders the opportunity to highlight what key features should be included as improvements to the current re-evaluation program. Many of the preceding suggestions under the previous themes were repeated, including enhancing stakeholder engagement and transparency as well as securing appropriate funding for the post-market program.

Increased Stakeholder Engagement

- Early and more flexible stakeholder engagement opportunities would better inform science assessment.
- More updated information should be available regarding how the PMRA conducts assessments and reviews data.
- Separate public consultations on draft risk assessment and proposed decision.
- Face-to-face meetings with stakeholders early in the review process.
- Results of the PMRA's scoping activity should be open for public consultation.
- The PMRA should use external multi-stakeholder panels for discussion of key issues.
- Opportunities to find an appropriate balance for consultation with stakeholders.
- An online portal should be used to allow confidential test data to be viewed.
- Use patterns used in risk assessments based on real-world use records.
- Stakeholders should be informed early of changes to risk assessments that impact proposed/final decisions.

A More Flexible Approach (Moving away from 'one-size fits all')

- A re-evaluation model should be flexible depending on the risk issues of the pesticide.
- Resources are prioritized based on the highest risks being reviewed first, followed by lower risk pesticides.
- The PMRA should consider a model where pesticides are fully re-evaluated one time 10-15 years after the initial registration and then rely only on special review provisions thereafter.
- Certain risk triggers should result in the temporary suspension of registration during the review or provide the ability to impose mitigation measures while the review is underway.
- Use of certain pesticides should require a prescription from an agronomist to verify the need for the application.
- Provincial authorities should have more discretion on the use of pesticides in their province.
- The PMRA should consider contracting out risk assessments to free up resources for managing issues.
- The PMRA should maintain independent, in-house capacity for risk assessments.
- More resources need to be allocated to the PMRA's re-evaluation program.

Impacts of Decisions

- Broaden PMRA assessments to consider both risks and benefits.
- In taking a re-evaluation decision, the PMRA should consider the economic, socio-economic and other implications, such as impact on resistance management, integrated pest management programs.
- Re-evaluations should include a risk vs. benefit assessment.
- The current re-evaluation criteria are appropriate (acceptability of risks to human health and the environment).
- Broader government priorities such as maintaining Canadian competitiveness should be part of the PMRA mandate.
- An external advisory group could help to determine the impacts of a re-evaluation decision.
- The PMRA should conduct comparative risk assessments between pesticides and possible alternatives.
- The PMRA should consider developing a transition strategy for users when pesticides are cancelled.

Strengthened Accountability of Registrants

- Registrants should be responsible for working with users to compile use information and submit it to the PMRA.
- Registrants should form a committee for each re-evaluation.
- Registrants should have responsibility for initiating the re-evaluations by submitting a new application including updated data package and risk assessments.
- Registrants should be required to conduct environmental monitoring of their products.
- Registrants should be more proactive in making pesticide test-data available for public review.
- The PMRA should be cautious that too many requirements on registrants that may deter registrations in Canada.

Enhanced International Collaboration

- The PMRA should look to increase work-sharing with the United States and other countries on pesticide re-evaluations.
- The PMRA's re-evaluation schedule should align with United States schedule to allow for joint re-evaluations.
- The PMRA should consider the mutual recognition of decisions from other countries with similar standards.
- Canada must maintain domestic capacity for, and sovereignty over, pesticide re-evaluations.
- The PMRA should use re-evaluations as an opportunity to align domestic maximum residue limit values with others internationally.
- The NAFTA Technical Working Group on Pesticides should be retained.
- The PMRA should have a pesticide working group with Europe.

Summary and Next Steps

"What Was Heard" from the stakeholder engagement sessions has afforded stakeholders opportunities for meaningful input into government decisions, and provided the PMRA with unique opportunities to actively listen and engage with stakeholders across Canada, noting their concerns and expectations around the post-market re-evaluation program.

This report is being shared with all participants and information provided will inform the development of improvements for future discussion with stakeholders. The PMRA will continue to gather information and develop recommendations *en route* to the improvement of a **sustainable** post-market review program that first and foremost continues to protect health and the environment, but is also efficient and streamlined from a stakeholder and regulator perspective.

Annex A List of Participants **

3M Canada
ADAMA Agricultural Solutions
Agricultural Alliance of New Brunswick (AANB)
Agricultural Producers Association of Saskatchewan (APAS)
Alberta Barley
Alberta Canola Producers Commission
Alberta Pulse Growers Commission
Alberta Wheat
Apple Grower and CHC
Arysta LifeScience
Association des producteurs maraîchers du Québec
Atlantic Grains Council
BASF Canada
Bayer Canada
Berry Growers of Ontario
Bradford Co-operative Storage Ltd.
British Columbia Blueberry Council
British Columbia Cherry Growers Association
British Columbia Fruit Growers Association
British Columbia Grain Producers Association
British Columbia Grape Growers Association
British Columbia Greenhouse Growers Association
British Columbia Potato Growers
British Columbia Raspberry Industry Development Council
British Columbia Tree Fruit Coop
British Columbia Vegetable Growers
Canada Grains Council
Canadian Association of Physicians for the Environment (CAPE)
Canadian Canola Growers Association
Canadian Consumer Specialty Products Association (CCSPA)
Canadian Environmental Law Association
Canadian Federation of Agriculture (CFA)
Canadian Horticultural Council
Canadian Paints and Coatings Association
Canadian Wildlife Federation
Canola Council of Canada
Centre de recherche sur les grains (CÉROM)
Centre de référence en agriculture et agroalimentaire Québec
Commission des normes, de l'équité, de la santé et de la sécurité du travail (CNESST)
Corteva AgriScience
CropLife Canada
David Suzuki Foundation
Dell Tech Laboratories Ltd.
Ecojustice
Équiterre
Fédération des apiculteurs du Québec (FAQ)
Fédération québécoise des producteurs de fruits et légumes de transformation (FQPFLT)
Flowers Canada
FMC Corporation
Forestry Nursery Association of British Columbia
Fraser Valley Cole Crop Growers Association
Friends of the Earth
General Public
Gestion Qualiterra
Gouvernement du Québec - Ministère d'Agriculture, Pêcheries et Alimentation (MAPAQ)
Gouvernement du Québec - Ministère de l'Environnement et de la Lutte contre les changements climatiques

Government of Alberta - Ministry of Agriculture and Forestry
 Government of Alberta - Ministry of Environment and Parks
 Government of British Columbia - Ministry of Agriculture
 Government of British Columbia - Ministry of Environment and Climate Change Strategy
 Government of Manitoba - Ministry of Agriculture
 Government of Manitoba - Ministry of Sustainable Development
 Government of New Brunswick - Department of Agriculture, Aquaculture and Fisheries
 Government of New Brunswick - Department of Environment and Local Government
 Government of Newfoundland and Labrador - Department of Fisheries and Land Resources
 Government of Newfoundland and Labrador - Department of Municipal Affairs and Environment
 Government of Nova Scotia - Department of Agriculture
 Government of Nova Scotia - Department of Environment
 Government of Ontario - Ministry of Agriculture, Food and Rural Affairs
 Government of Prince Edward Island - Department of Agriculture and Fisheries
 Government of Prince Edward Island - Department of Communities, Land and Environment
 Government of Saskatchewan - Ministry of Agriculture
 Gowan Canada
 Grain Farmers of Ontario
 Grain Growers of Canada
 Hemp Genetics International
 Industry Task Force II on 2,4-D Research Data
 Institut des sciences de l'environnement, UQAM
 Institut national de santé publique du Québec (INSPQ)
 Keystone Agricultural Producers
 Keystone Potato Producers Association (KPPA)
 La Coop fédérée
 La Financière agricole du Québec
 Landscape New Brunswick & Landscape Prince Edward Island
 Les producteurs de grains du Québec (PGQ)
 Les producteurs de pommes de terre du Québec (PPTQ)
 Les producteurs de pommes du Québec (PPQ)
 Les producteurs d'oignons du Québec
 L'union des producteurs agricoles (UPA)
 Manitoba Beekeepers' Association
 Manitoba Buckwheat Growers
 Manitoba Canola Growers
 Manitoba Grain Growers Association
 Manitoba Horticulture Productivity Enhancement Centre (MHPEC) Inc
 Manitoba Oat Growers Association
 Manitoba Pulse and Soybean Growers
 Nalco Water (an Ecolab Company)
 Nova Scotia Federation of Agriculture
 Nova Scotia Fruit Growers Association
 Nufarm Canada
 Ontario Apple Growers
 Ontario Beekeepers' Association (OBA)
 Ontario Fruit & Vegetable Growers Association
 Ontario Ginseng Growers Association
 Ontario Greenhouse Vegetable Growers
 Ontario Pesticides Advisory Committee (OPAC)
 Ontario Sugar Beet Growers Association
 Ontario Tender Fruit Growers
 Ordre des agronomes du Québec (OAQ)
 Organic Winery (Summergate)
 Peak of the Market
 Pioneer Canada (DuPont)
 Prairie Fruit Growers Association
 Premier Tech Home & Garden
 Prevent Cancer Now

Prince Edward Island Potato Board
Prince Edward Island Wild Blueberry Growers Association
Produits Chimiques Magnus Ltée.
Reckitt Benckiser
RWJ Viticulture Management
Safe Food Matters Inc.
Sani-Marc Inc.
Saskatchewan Association of Rural Municipalities (SARM)
Saskatchewan Canola
Saskatchewan Cattlemen's Association
Saskatchewan Flax Development Commission (SaskFlax)
Saskatchewan Forage Seed Development Commission
Saskatchewan Pulse Growers
Saskatchewan Seed Growers Association
Saskatchewan Water Security Agency (WSA)
Saskatchewan Wheat Development Commission
SC Johnson
Scotts Canada Ltd.
Syngenta Canada
Turf Producers
Valent Canada
Vegetable Growers Association of Manitoba (VGAM)
Western Barley Growers Association
Western Canada Turfgrass Association
Western Canadian Wheat Growers

** *Based on availability.*