



Mr. Peter Brander
Executive Director
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
Ottawa, ON K1A 0K9

E-mail: peter.brander@hc-sc.gc.ca

Dear Mr. Brander,

RE: Re-evaluation decision RVD2021-04 on lambda-cyhalothrin

On behalf of our respective associations representing Canadian livestock producers and processors, we write to convey our significant concern regarding Health Canada's re-evaluation decision RVD2021-04 on lambda-cyhalothrin and its associated end-use products. Specifically, we call for careful reconsideration regarding the decision to cancel the use of lambda-cyhalothrin for 'all feed uses'.

The Canadian livestock industry is a major consumer of crops and crop by-products, utilizing almost 30 million tonnes of feed annually (<https://www.anacan.org/feed-industry/>). Crops which are fed to livestock are often products which do not make the grade for human consumption or are by-products of processing. Livestock have the unique ability to upcycle lower quality crops and by-products into high quality protein, resulting in benefits such as increased economic return for the agriculture sector, increased food security for consumers and reduced waste in landfills.

Livestock producers are often challenged to secure feed sources for their animals due to events such as drought, flooding and supply chain disruptions. Our producers are resilient and innovative in finding solutions during times like these, however, regulations such as the one in question present a very significant challenge that can negatively impact the ability to secure feed sources for Canadian livestock.

Canadian agriculture benefits from effective and economical pest management options to mitigate the impact of insects, including those which are successfully managed by lambda-cyhalothrin such as grasshoppers, flea beetles and mites. Drought conditions in parts of Canada have been favourable for some of these species to thrive in 2021 and 2022, and there is concern over how pest populations might establish in 2023 and onward if there are unfounded restrictions on the responsible use of pesticides. The livestock industry depends on a readily available supply of feed products, so it is in our best interests to see the crop industry achieve successful production yields.

By restricting all feed uses of products exposed to lambda-cyhalothrin, the decision is effectively being made to exempt these crop products and by-products from being fed to livestock. Canada's crop handling and processing systems do not segregate commodities based on the end use (i.e. food or feed). Thereby, any crops which could potentially be exposed to lambda-cyhalothrin would instantly be

disqualified for potential use as a feed product, as there would be no guarantee from bulk suppliers regarding what chemical products had or had not been used on grain or other feed from mixed sources.

The livestock sector is equally concerned that Canada's ban on the use of lambda-cyhalothrin creates a regulatory misalignment with the U.S. that may create serious feed import issues and trade barriers.

We ask that PMRA reconsider the implications of this decision related to livestock feed products, and to seek additional expertise on this front. The livestock production and processing sector includes knowledgeable professionals who can advise on feed quality, meat quality, production assurance and trade implications, and we encourage consultation with these experts to help determine appropriate action on this issue. Finally, PMRA should take into account all data available from manufacturers, which would inform decision-making based in evidence and that assumes a competitiveness perspective. Environmental waste and food security lenses should also be applied to this decision.

This concern is an immediate priority for our industry as 2023 crops will be going in the ground soon and our producers need to be able to prepare for the potential loss of feed sources. Failure to modify this decision could be devastating for thousands of livestock producers across Canada, with ramifications rippling throughout the supply chain and ultimately impacting animal care as well as food security and affordability.

We would welcome the opportunity to meet to discuss our concerns in further detail and share sector expertise on this issue with PMRA. Thanking you in advance for your consideration of our concerns.

Sincerely



Janice Tranberg
President & CEO
National Cattle Feeders' Association



Stephen Heckbert
Executive Director
Canadian Pork Council



Chris White
President & CEO
Canadian Meat Council



Ryder Lee
General Manager
Canadian Cattle Association