



**Canadian
Cattle
Association**

October 18, 2023

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

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

Dear Mr. Brander,

As the industry makes its transition into the fall season, it is with a profound sense of urgency that we reach out to you on behalf of our respective associations representing Canadian livestock producers. We are gravely concerned about Health Canada's re-evaluation decision RVD2021-04 regarding *Lambda cyhalothrin* and its associated end-use products. This concern is amplified by the unsettling lack of progress on this matter.

This file has remained under review for over two years, and as we articulated in our letter dated February 9, 2023, we stressed the dire need and urgency for a re-evaluation of the decision to cancel the use of *Lambda cyhalothrin* for 'all feed uses.' It has come to our attention that this review remains incomplete and is unlikely to be ready in time for the November-December 2023 registration timeline, a necessity for the 2024 season re-label. We find this delay deeply disconcerting, especially considering the devastating impact that grasshopper populations had on the drought-stricken crops of western Canada this year.

With the looming El Niño conditions for 2024 and their predicted influence on drought and increasing grasshopper populations, the absence of a decision is nothing short of unacceptable. The warm and dry conditions typically associated with El Niño events create ideal circumstances for the rapid increase of grasshoppers. With limited precipitation and elevated temperatures, grasshoppers are poised to find abundant food sources and conducive breeding environments, posing a grave threat to agricultural crops, rangeland, and natural habitats.

Several parts of western Canada witnessed their crops being decimated by grasshoppers this year. While there are some alternative controls available, they are not effective against early populations, which is crucial for successful control. Late-season controls can only mitigate populations to some extent. Therefore, early control is imperative.

It is worth noting that the application for the approval of this product was submitted to the PMRA simultaneously with the EPA in the United States. While the US approved registration back in 2019, the PMRA is still in the process of approval. Given the existing agreements to streamline product approvals between the US and Canada, it raises the question of why American farmers can use this product while Canadian farmers are being penalized with delays and uncertainty.

The livestock industry relies on Canadian crops to feed their animals and simply cannot afford another year plagued by drought and grasshopper infestations. The re-evaluation must be expedited to accommodate the re-labeling deadline for this year. There is an overwhelming and desperate need for this product, and it is our firm belief that this issue must be the top priority for the PMRA.

We implore you to take swift and decisive action to ensure the timely re-evaluation of *Lambda cyhalothrin* for Canada's agriculture sector and the security of our food supply.

Sincerely,



Janice Tranberg
President & CEO
National Cattle Feeders'
Association



Chris White
President & CEO
Canadian Meat Council



Dennis Laycraft
Executive Vice President
Canadian Cattle Association



Stephen Heckbert
Executive Director
Canadian Pork Council