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National Farmers Union comments on the *Special Review of atrazine: Proposed Decision for Consultation. Re-evaluation Note REV2015-11*

The National Farmers Union (NFU) is Canada's largest voluntary direct membership farm organization representing family farmers from across the country in all sectors of agriculture. We believe that small and medium sized family farms should be the primary food producers in Canada. We work to promote a food system that is built on a foundation of financially viable family farms that produce high quality, healthy, safe food; encourage environmentally-sensitive practices that will protect our precious soil, water, biodiversity and other natural resources; and promote social and economic justice for food producers and all citizens.

The NFU calls for the precautionary principle to be applied in the regulation of farm chemicals to protect the long-term productivity of the soil and the safety and purity of the water supply. The *Pest Control Products Act*, Section 20, empowers the Minister to amend or rescind the registration of a pesticide based on the precautionary principle. The *Act's* definition of the precautionary principle is: "Where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent adverse health impact or environmental degradation."

The Discussion Document for this special review reveals that in the European Union, the maximum acceptable concentration for atrazine in groundwater is .1 parts per billion and the Canadian drinking water standard is 5 parts per billion. There is no standard for Canadian groundwater, however the Canadian Environmental Quality Guidelines environmental aquatic benchmark of concern for atrazine is 1.8 parts per billion.

Health Canada has determined that atrazine is inherently toxic to humans. Atrazine (including related triazines) was the 7th highest-selling herbicide in Canada in 2010, 8th highest in 2009, and 6th highest in 2008 with between 100,000 and 500,000 kilograms of active ingredients sold each year. It is registered for use in Canada on corn and sorghum only, however, it is also used on canola and to kill weeds on non-crop land. Atrazine is produced in Canada by BASF and Syngenta and sold to farmers under the brand names Laddok, Aatrex Liquid 480, Marksman, Primextra II Magnum, Frontier Max Plus, Lumax EZ, and Acuron. While glyphosate replaced some use of atrazine in corn after herbicide-resistant varieties were introduced in the late 1990s, atrazine is now being mixed with or applied in addition to glyphosate to kill weeds that have become glyphosate-resistant.

Environmental monitoring studies have found widespread atrazine contamination of water bodies. In the early 2000s atrazine was found in nearly 95% of Ontario sites and from 80 to 90% of Quebec sites at concentrations

below the Canadian drinking water standard, but in several cases, above the benchmark for environmental concern.

Atrazine is an endocrine disruptor. The endocrine system regulates the rate, timing and amount of hormones in humans and other organisms. When the endocrine system is disrupted by chemicals such as atrazine it can have significant long-term effects. Developing children and babies can experience life-long negative effects even from small amounts of endocrine disruptors due to the timing of their exposure. Atrazine is also associated with increased incidence of hormone-sensitive cancers, such as breast and prostate cancer, as well as with reproductive difficulties in men and women.

The Canadian Water and Wastewater Association has expressed concern regarding the cost and difficulty of removing pesticides such as atrazine from contaminated water. Its members would prefer to see effective prevention so that source water does not become contaminated. Rural residents, whose water is more likely to be affected by atrazine used on local farms and whose drinking water may be insufficiently treated, may be at higher risk than urban Canadians.

The PRMA's Proposed Special Review Decision for Atrazine, which would maintain the status quo is based on a risk management approach. It does not recognize that those taking the risk (people who drink water) are not the same people who obtain the reward (those who sell and use atrazine) and the people potentially harmed are not in a position to decide to take the risk, as they may not know whether their water contains atrazine, nor have access to alternative water supplies.

We believe there is sufficient evidence to warrant precautionary action to reduce the human health and ecosystem impacts of atrazine. We urge the Minister to reduce the maximum allowable concentration in drinking water and to establish an enforceable maximum allowable concentration no higher than 1.8 parts per billion of atrazine in groundwater and surface waters to better protect human health and aquatic life.

We urge the PMRA to implement effective monitoring and enforcement to improve compliance with existing regulations. We also urge Health Canada to work with Environment Canada and Agriculture and Agri-Food Canada to promote alternative, less toxic herbicides and non-chemical agriculture techniques for weed management. We urge federal and provincial governments to assist farmers in adopting such products and methods in order to reduce the quantity of inherently toxic agricultural chemicals such as atrazine being applied to our farmland.

*Respectfully submitted, February 12, 2016
by the National Farmers Union*