



**national
farmers
union** | **union
nationale
des fermiers**

Robert Pedde Building
2717 Wentz Avenue
Saskatoon, SK S7K 4B6

p: (306) 652-9465
f: (306) 664-6226
email: nfu@nfu.ca

March 21, 2023

Pest Management Regulatory Agency Publications Section
Pest Management Regulatory Agency (PMRA)
Health Canada
2 Constellation Drive
Ottawa, ON
K1A 0K9

E-mail: pmra.publications-arla@hc-sc.gc.ca

Re: Summary of PSRD2023-01: Proposed Special Review Decision of Atrazine and Its Associated End-use Products

The National Farmers Union (NFU) is pleased to participate in the Pest Management Regulatory Agency's public consultation on its ***Proposed Special Review Decision of Atrazine and Its Associated End-use Products***. The proposed decision would ban the incorporation of atrazine into granular fertilizers (fertilizer impregnation) in commercial fertilizer facilities; require a closed mixing/loading system when more than 85 kg of atrazine is used in a day; require a closed cab when applying more than 133 kg of atrazine in a day; update spray buffer zones on the label; update standard precautionary statements on the label, including statements to inform users how to reduce sprays drifting to nearby areas where people live; and add and update standard statements on the label restricting people from entering areas treated with atrazine.

Atrazine is an herbicide registered for use in Canada on corn, sorghum, and switchgrass 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, Converge 480, Frontier Max Plus, Lumax EZ, Acuron, and A22668.

Atrazine (including related triazines) was in the top 10 highest-selling herbicides in Canada from 2008 (when data was first published) up to 2015, and national sales continue to be over 500,000 kilograms of active ingredient annually as of 2020. 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.

Health Canada has determined that atrazine is inherently toxic to humans. 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.

Strong Communities. Sound Policies. Sustainable Farms.

Des communautés solidaires et des politiques sensées pour une agriculture durable.

nfu.ca

Given these risks, we support the PMRA in protecting human health. Farmers and farm workers must have a safe workplace that does not require them to sacrifice their health in order to make a living. For this reason, we support the move to improve occupational health and safety by no longer allowing atrazine to be mixed with granular fertilizers. If atrazine is used on-farm, farmers, farm workers, custom sprayers, and all others must have access to appropriate safety equipment, including closed mixing/loading systems and closed cabs.

We support the PMRA in protecting the environment. The NFU advocates for agroecology, which emphasizes how agricultural systems are inextricably linked with broader terrestrial, freshwater, and estuarine/marine systems. Spray buffer zones are one way to reduce the off-field impacts of atrazine. For this reason, we support the move to increase spray buffer zones between corn and switchgrass and sensitive terrestrial habitats from 10 to 15 metres. For this same reason, we oppose the move to decrease spray buffer zones between corn, switchgrass, and sorghum and freshwater and estuarine/marine habitats from 10 to 2-5 metres (depending on the depth of the water body).

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."

We continue to believe there is sufficient evidence to warrant precautionary action that further reduces the human health and environmental 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, based on the Canadian Environmental Quality Guidelines environmental aquatic benchmark of concern.

We also remain concerned about the impacts of atrazine on waterbodies including farm ponds and wetlands, particularly the context of ongoing wetland degradation and destruction in Canada. For example, atrazine can cause birth defects, reproductive tumors, and weight loss in amphibians as well as humans. Current uses of atrazine are resulting in both monitored and modeled results well in excess of levels that the literature has demonstrated may cause harm to amphibians and aquatic plants as well as harm to the aquatic community as a whole. We urge the PMRA to obtain and use further independent scientific evidence free of pesticide industry influence in order to reach a sound decision protecting both human and environmental health.

The NFU advocates for an integrated pest management approach to agriculture, in which pesticides can have a role but must be thoughtfully managed. We urge the PMRA to implement effective monitoring and enforcement to ensure a high level of compliance with regulations. We urge the federal government to ensure that the PMRA has adequate in-house capacity to independently assess the risks and efficacy of pesticides that it regulates and communicate those findings with the public. The PMRA must have access to scientific experts who do not have ties to pesticide companies.



We also urge Health Canada to work with Environment and Climate Change 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.

All of this respectfully submitted by

The National Farmers Union

The National Farmers Union (NFU) is Canada's largest voluntary direct membership farm organization representing family farmers and farm workers from across the country in all sectors of agriculture. 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.

