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Reply To

Or

**Grain Growers of Canada**  
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Friday August 20, 2004

The Honorable Michael Leavitt  
Administrator  
United States Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Wendy Sexsmith  
Executive Director  
Pest Management Regulatory Agency  
2720 Riverside Drive  
Ottawa, ON KIA OK9

Dear Executive Director Sexsmith and Administrator Leavitt:

Last August the National Association of Wheat Growers and the Grain Growers of Canada wrote you to express our support for harmonized regulatory systems for crop pesticides across the borders of our two countries. On behalf of farmers and crop protection registrants on both sides of the Canadian-U.S. border, we now write to further encourage the development of a seamless joint registration process for crop protection products in the United States and Canada.

We believe this approach will alleviate the concerns of producers on both sides of the border who want more equitable availability to crop protection products, and will simplify the registration process for manufacturers allowing them to complete reviews more quickly and economically

The response our grower organizations received last year from PMRA and EPA was a fair and thorough accounting of the progress that both agencies have made in the joint registration of pesticides. Working through the NAFTA Technical Working Group (TWG) on Pesticides you have accomplished a great deal toward harmonized regulatory processes in addition to the progress made in the actual joint registration of pesticide products. You correctly point out that this has been accomplished with the cooperation of registrants who make submissions to both countries at the same time.

There are, however, several remaining concerns regarding the current regulatory approval processes between Canada and the U.S.

1. Registration review times for new products or new uses of registered products;
2. The ability of the applicant to amend an application after submission;
3. Communications between the reviewers and applicants during the review process;
4. Dietary risk assessment procedures;
5. Procedures and timing for establishing maximum residue limits (MRL's) in connection with obtaining a product registration; and
6. Requirements for disclosure of active ingredients, the content of pesticide product labels and the process for amending pesticide product labels.

You may currently be addressing each of these issues through the Pesticide TWG process, and none seem particularly insurmountable, but we would appreciate an update on where you stand in resolving these issues.

In order to be effective, any system must provide an incentive for registrants to opt for joint rather than individual registrations. We believe that expedited reviews and lower combined registration fees, compared to pursuing two separate registrations would provide sufficient incentive for registrants to prefer the joint system.

We would appreciate any recommendations you may have to develop incentives so that the value of marketing a common product under a common NAFTA label in both Canada and the U.S.(and Mexico, where appropriate) outweighs the value of marketing common products with different labels.

Thank you for your consideration of our request and we look forward to continuing to work toward our common goals.

Alberta Barley Commission  
Atlantic Grains Council  
British Columbia Grain Producers Association  
Canadian Canola Growers Association  
Fédération des Producteurs de Cultures Commerciales du Québec  
Grain Growers of Canada  
Ontario Corn Producers Association  
Ontario Soybean Growers Association  
Ontario Wheat Producers Marketing Board  
Manitoba Corn Growers Association  
Western Canadian Wheat Growers Association

American Soybean Association  
National Association of Wheat Growers  
National Barley Growers Association  
National Corn Growers Association  
USDA Dry Pea and Lentil Council

CropLife America  
CropLife Canada