

**made to allow importation by individual users of farm chemicals.
The proposed regulatory changes must not jeopardize the health and
safety of Canadians and the Canadian environment. These changes
should be put in place for the 1988 crop year.**

A number of witnesses also pointed out the inconsistency of the policy that bans the use of certain farm chemicals that pose a potential threat to the health of Canadians with the policy permitting foodstuffs treated with these chemicals to enter the country. This inconsistency puts Canadian producers at a disadvantage with producers in other countries, particularly the United States, which export food to Canada, but which have access to these farm chemicals that offer more cost effective pest protection. In the words of the Keystone Agricultural Producers: "Canadian producers are denied access to a variety of potentially useful chemical formulations from other countries . . . supposedly because they do not meet the standards or requirements for registration in Canada, while the same formulations are allowed to reach Canadian consumers by virtue of their having been used in the production of food commodities which we import" (Issue 17:6, 31-3-87).

3.5 The Committee recommends that shipments of food which might contain farm chemical residues imported into Canada be accompanied by certificates signed by the importer stating the type of chemical used and the level of chemical residue present.

Canada's major foreign supplier of farm chemicals and foodstuffs is the United States and variations in the registration procedures in the two countries already pose a significant cost for Canadian farmers.

3.6 The Committee therefore recommends that a greater effort be made to reconcile the farm chemical registration procedures of the United States and Canada and other countries.

E. Removing Farm Chemicals from the Market

Several farm groups expressed concern about the removal of farm chemicals from the market. Although 2,4-D was the chemical most often referred to by western producers, the Ontario Corn Producers Association reminded the Committee that Alachlor had already been removed from sale. Both these chemicals have been widely used because of their effectiveness and relatively low cost. The use of other chemicals would be considerably more expensive. Also, as in the case of Alachlor, the removal of Lasso resulted in a Canadian monopoly situation for the manufacturer of the only major competitive product. Moreover, 2,4-D substitutes are all of higher cost. Witnesses stated that products should not be removed from the market without a public review and valid scientific data justifying the action.

The Ontario Corn Producers stated that the present provisions of the *Pest Control Products Act* for the withdrawal of products from the market do not serve the interests of the farmer; they do not make determination on the basis of risks relative to benefits. In making these assertions, farmers are not taking health concerns lightly. As the Committee was reminded, farmers also have families and are also consumers of chemically-treated foodstuffs.

The Committee believes that it is well understood by farmers that where the risk of keeping a product on the market is deemed to be greater than the benefit of its use, it must be removed from sale. Nevertheless, the Committee is concerned that agricultural chemicals currently used and suspected to be harmful to the health and safety of Canadians should not be prematurely removed from sale.