

Mr. L. A. MILLER (*First Vice-President, Canadian Agricultural Chemicals Association*): In the Shell organization, the Shell Oil Company in the United States is the manufacturer of a number of poisonous insecticidal products. We, in Canada, will produce those products and formulate them into the products which can be used by the Canadian farmer in the form of powder, dust, concentrates, or oil solutions, or something like that. In addition to our own basic chemical, we formulate and sell competitively with Dupont, Monsanto, or anybody else. We will also sell different basic products to formulators such as Dupont, Monsanto, or anyone else who in turn will formulate their own basic products and sell in competition to us. In addition to that, we can produce a basic product other than those in which Shell Oil in the United States is basic in, and we in turn will formulate those products.

I will give you the example of D.D.T. We can purchase basic D.D.T. on the open market, and sell it in competition to other members of this association. In addition to that aspect of our operation, we will formulate products for other companies who will place their label on that product. In other words, this is another way we have of getting more products onto the market. Many people who market these products are not in a position to formulate, so they must get someone who can formulate the basic product for them which they in turn can market.

Mr. MITCHELL: But you do retail under your own label?

Mr. MILLER: Yes, We have our own branded product.

Mr. MITCHELL: You could be manufacturer, jobber and retailer?

Mr. MILLER: Yes.

Mr. JORGENSEN: I would like to return to the point raised by Dr. Rynard. In this brief and others I believe it was indicated that if they are properly used according to the directions on the label, these pesticides are relatively safe. Is this the general idea?

Mr. SMITH: That is correct.

Mr. JORGENSEN: Could you tell me how many farmers using chemicals demonstrate abuse in the use of these chemicals? What farmer will use twice the amount he needs to use in order to control the pest? I know farmers fairly well. I think the experience is that the reverse is quite true; that is, they are not using too much of a chemical; the tendency is not to use enough.

Mr. SMITH: That is correct.

Mr. JORGENSEN: Where does the suggestion come in that the farmer is abusing the use of chemicals? I think, if you look for abuse, that you will find it in respect of persons like myself who have a small garden plot. I use it indiscriminately there. I do not bother to read the directions; but in the case of a farmer, he is careful to follow the instructions and not increase his cost any more than is necessary.

Mr. SMITH: The word "abuse" here is not intended to mean exactly what has been attributed to it. There are one or two points which perhaps need to be examined. It is not only the label which has the directions; in whichever province the person happens to live, the spray calendar will also have the directions. Very often on our label we have a direction not to use 14 days before harvest, and an abuse which very often occurs is that he may decide to use it seven days before harvest. The compound may be a rather persistent compound and have a longer residual action than others. If he is going to use a product 14 days within the date of harvest, he should not use this product. This is the abuse we are trying to bring out.