

May 26, 2026

The Honourable François-Philippe Champagne, P.C., M.P.
Minister of Finance
Department of Finance Canada
90 Elgin St
Ottawa, Ontario K1A 0G5

Dear Minister Champagne,

Re: Proposed changes to the *Pest Control Products Act* in Bills C-30 and C-31 are unwarranted, undemocratic and weaken protections for health and the environment.

As organizations concerned with protecting human health and the environment, and advocates for evidence-informed decision-making, we urge the government to reconsider amendments proposed to the *Pest Control Products Act* in the omnibus *Spring Economic Update 2026 Implementation Act* (Bill C-30) and *Budget 2025 Implementation Act, No. 2* (Bill C-31).

The PCPA preamble begins by recognizing that, “the availability and use of pest control products pose potential risks, both directly and indirectly, to the health, safety and well-being of individuals in Canada and to the environment.” A robust legislative framework for pesticide regulation is crucial to ensure effective oversight and prevent unacceptable risks.

The proposed amendments fundamentally undermine science-based decision-making under the PCPA, which has been the cornerstone of the Act since its passage in 2002. Lacking specificity and relying on undefined terms, they would introduce an unnecessary and inappropriate level of discretion and further politicize pesticide regulatory decisions.

These measures purportedly are intended to improve regulatory efficiency and address food security concerns — important issues — but a less rigorous pesticide regulatory regime could threaten national food security in the long run. As a package, the proposed amendments will require significant resources to implement at a time when budget cuts have greatly reduced Health Canada’s capacity for pesticide regulation.

Permitting use of pesticides despite unacceptable environmental risks

Of particular concern, provisions in Bill C-30 would give cabinet broad and lopsided authority to overturn a decision by the Minister of Health to deny an application for the emergency use of a pesticide, or to cancel the registration of a pesticide currently on the market, because environmental risks are unacceptable. Cabinet would be able to permit, by

order, the use of the environmentally harmful pesticide for up to six years, followed by continued use during a “phase-out” period.

The *Pest Control Products Regulations* already allow the Minister to register a pest control product for use in the “emergency control of a seriously detrimental infestation” — if the health and environmental risks of the pest control product and its value in addressing the emergency situation are acceptable. No convincing rationale has been given for enabling cabinet to circumvent the Act’s foundational requirements of ensuring acceptable health and environmental risks. The amendments fail to specify criteria, requirements or democratic safeguards to constrain this extraordinary power.

Needlessly complicating pesticide assessments

As well, Section 53 of Bill C-30 would change the mandate of the PCPA to require the Health Minister to consider “national economic security, regional economic security or national food security” when making decisions about pesticide registration. These terms are not defined in the Act, and the amendments do not specify requirements for how they will be considered. The Act already empowers the Minister to consider the social and economic impact of a pest control product when assessing the product’s value. Expanding economic analysis, as suggested in the Spring Economic Statement, will require additional departmental resources that are not currently available. We are concerned that this could lead to even longer delays in pesticide assessment with no clear benefit.

Ending mandatory post-market re-evaluations of pesticides

Section 282 of Bill C-31 proposes to replace the requirement for cyclical post-market re-evaluations of pesticides (currently required to be initiated every 15 years) with a more limited “assessment” of available information. Health Canada will only be required to initiate a comprehensive re-evaluation if the initial assessment indicates the risks to health or the environment have increased “significantly.” We are concerned that relevant health and environmental risks will go undetected because the cyclical re-evaluations themselves are the primary mechanism by which Health Canada obtains data on pesticide risks from registrants and other sources. The proposed “assessments” do not require this information gathering of up-to-date science, nor do they allow for public participation.

Recommendation: Remove PCPA amendments from Bills C-30 and C-31; recommit to the purpose of the PCPA.

The amendments proposed to the PCPA in Bills C-30 and C-31 represent the largest overhaul of Canada’s pesticide regulatory system in a generation and have no place in omnibus budget legislation. There has been no engagement with our organizations about these measures and no public consultation. Neither Health Canada’s Science Advisory

Group on Pesticide Regulation nor the Pest Management Advisory Committee were asked to provide advice.

We call on Canada to recommit to the primary purpose of the PCPA — to protect human health and safety and the environment by regulating products used for the control of pests. Canada's pesticide regulatory system should continue to be guided by the precautionary principle, transparent scientific review and impartial evidence-informed decision-making.

We urge the government to remove the PCPA amendments from Bills C-30 and C-31 and focus efforts on improving implementation of the PCPA.

Association pour la santé publique du Québec - Victimes des pesticides du Québec

Breast Cancer Action Quebec

Canadian Association of Physicians for the Environment (CAPE)

Canadian Biotechnology Action Network (CBAN)

Canadian Environmental Law Association

Canadian Partnership for Children's Health and the Environment

David Suzuki Foundation

Ecojustice

Environmental Defence

Équiterre

Evidence for Democracy

Fondation Rivières

Friends of the Earth Canada

National Farmers Union

Nature Canada

Prevent Cancer Now

Québec Environmental Law Centre (CQDE)

Safe Food Matters

Vigilance OGM

West Coast Environmental Law Association

cc. *Hon. Marjorie Michel, Minister of Health*

Hon. Julie Dabrusin, Minister of Environment, Climate Change and Nature

Members of the House of Commons Standing Committee on Finance

Members of the House of Commons Standing Committee on Environment and Sustainable Development

Members of the House of Commons Standing Committee on Health

Members of the Standing Senate Committee on National Finance