



House of Commons
CANADA

Standing Committee on Health

HEAL



NUMBER 073



1st SESSION



37th PARLIAMENT

EVIDENCE

Wednesday, May 1, 2002

—

Standing Committee on Health

Wednesday, May 1, 2002

• (1540)

[English]

The Chair (Ms. Bonnie Brown (Oakville, Lib.)): Good afternoon, ladies and gentlemen. It's my pleasure to call this meeting to order as we review Bill C-53.

We have guests this afternoon from the Canadian Environmental Law Association, the Sierra Club of Canada, and the World Wildlife Fund. We have until five o'clock to hear from these people.

We'll begin with a presentation by Theresa McClenaghan, who is counsel for the Canadian Environmental Law Association. Ms. McClenaghan.

Ms. Theresa McClenaghan (Counsel, Canadian Environmental Law Association): Thank you.

The Canadian Environmental Law Association is pleased to have an opportunity to speak to the Standing Committee on Health with respect to Bill C-53. We are pleased that the Minister of Health introduced Bill C-53, which in our view was long overdue.

In the year 2000 CELA published an in-depth report regarding children's health and standard-setting in Canada. One of our primary research questions was whether standard-setting in Canada is protective of children. We took a close look at pesticide law in a case study to that report. Essentially, our study concluded that environmental standard-setting, in general, was not protective of children, and in particular that the legislation supporting pesticide standard-setting was not protective of children.

Our analysis also found that even where good intentions occur and child-protective measures are included, the end result is often standards that are not protective. That results from compromises resulting from the lack of an overall precautionary approach and from the ability of the risk management exercise to, in the end result, dilute or eliminate what would otherwise be child-protective measures.

Bill C-53, in our view, would introduce some requirements that would legislate a level of protection of children in assessing pesticides. These would include the limited timeframe for pest control product approvals so that you would have some set date by which re-evaluations would have to occur, as well as the provisions for special reviews and the requirements for periodic re-evaluations. Another critical component of the bill is the requirement that all pest control products presently registered would have to be re-evaluated within a specified timeframe under the new provisions of the bill.

As well, putting the burden of proving that pest control products are acceptable on the applicant is an essential improvement in Bill C-53, and one that we fully support. However, we have suggested definitions of "acceptable risk", "unacceptable risk", and "harm" in our review of the bill in order to better define the basis on which decisions will be made.

CELA suggests to this committee that there is still room for substantial improvement to Bill C-53. We will focus the balance of our remarks on three areas that we think need attention and amendment before the bill is passed into law. These are, in summary, first, incorporation of the precautionary principle into all decisions made under the bill; secondly, a legislated mandate and provisions for risk reduction with respect to pest control products approved for use in Canada; and thirdly, improvements to the public participation, right to know, and access to information provisions of the bill.

We have prepared a chart with the amendments that we are suggesting and we have included it as an appendix to this brief.

Dealing first with the precautionary principle, we note that it's not included in the preamble or in most of the actual decisions to be made under the bill. A paradigm shift to invoke the precautionary principle in pest control product decision-making is essential to better protect human and environmental health. We would require regard to the precautionary principle for every pest control product decision, including new application, special review, or re-evaluation. We've also included a definition in the chart that was taken from the Standing Committee on Environment and Sustainable Development.

As well, I'd like to mention that CELA has prepared an in-depth document specifically on the precautionary principle in response to the Government of Canada's discussion document on the precautionary principle. Although it's not circulated today, I can deposit it with the clerk.

We advocate in that document even better formulations of the precautionary principle because of the movement forward in international law and practice even in the last few years. For example, I would specifically advocate the recent Lowell Center restatement of the Wingspread principle in terms of the definition.

Dealing with the issue of reduced risk from pesticides in Canada, we've suggested an addition to the mandate section that would explicitly provide for reduced reliance on, risk of, and use of pest control products. We've made suggestions in various sections to accomplish this mandate, including a definition for "formulant", adding formulants to the definitions of "pest control products", and requiring that where there are effective alternatives, only those pest control products that pose a lower risk of harm than the effective alternatives be approved for use in Canada.

We've appropriately amended all of the new application, re-evaluation, and special review sections in our suggestions.

Another suggestion is for reduction and eventual phase-out of non-essential use of pest control products, sometimes called cosmetic use. We've suggested new sections to provide for special registration rules for lawn and garden pesticides between now and 2004, and an end to new product registrations for lawn and garden pesticides after that date, unless the product is intended to protect public health or for normal agricultural use. We've made similar suggestions particular to uses intended for recreational purposes such as on parks, golf courses, and sports fields.

Furthermore, with respect to children in particular, we've suggested an amendment requiring the minister to ensure there's a reasonable certainty that no harm will result to infants and children from aggregate exposure to the pest control product. Another suggestion, borrowed from the *U.S. Food Quality Protection Act*, would require total infant and child diet studies and better monitoring methods. These and other child-protective measures that we've suggested for Bill C-53 would expand the current narrow focus on child-protective measures in the bill that relate only to home and school pesticide use. Child-protective measures need to be expanded to include exposure from their fathers' and mothers' occupational exposure, from diet, and so on.

Public participation, right to know, and access to information are critical components of the bill, and we've suggestions to improve these elements as well. We've suggested amending the bill to make it clear that the names and content of active substances, formulants, and contaminants, as well as results of tests to establish efficacy and harmlessness, would all be deemed not to be confidential business information and thus be available through the registry for public review.

We've also suggested certain minimum labelling requirements in the legislation, rather than in regulation, because of the overriding importance of some of the things that we suggest for labelling, including full ingredient information, poison control and treatment information, and other matters. Those would be intended to assist with health and safety protection, provide consumers with essential information to make informed decisions about use, and increase the chances of use in accordance with product design.

We've also suggested adding a national pesticide sales database and an adverse effects database to Bill C-53 to improve both data collection and study of pesticide use and effects.

In conclusion, we want to note that CELA has collaborated with the World Wildlife Fund for over two years on appropriate provisions for a new pest control products act, and many of the

suggestions we make you'll find to be perhaps in identical language to some suggestions they make. We've chosen today to focus on the precautionary principle, risk reduction, expedited review for risk reduction, public participation, and children's health.

We do endorse the World Wildlife Fund's brief as well, in particular the fact that they will be speaking further to additional definitions, for example, dealing with acceptable harm and value.

Thank you for your time today.

● (1545)

The Chair: Thank you very much, Ms. McClenaghan.

We'll move to the Sierra Club of Canada, now with Angela Rickman, who is the executive director of that organization.

Ms. Angela Rickman (Deputy Director, Sierra Club of Canada): I'm actually just the deputy director.

Thank you for allowing us to testify here today. The Sierra Club of Canada is a national environmental organization concerned with threats to the health and continued existence of our natural systems and all the varieties of life that depend on them. Through public education programs and collaborative efforts with educators on other non-governmental organizations, industry, and legislators, we strive to raise awareness of anthropogenic degradation of the environment, with the ultimate goal of reversing the effects of unsustainable activities.

We run a number of campaigns, including climate change, biodiversity, forests, biotechnology, trade and the environment, and last but not least, pesticides and toxics. Pesticides and toxics was actually one of the first campaigns we worked on at the national level and continues to be one of the most important we work on. We also are one of the founders of a coalition called the Campaign for Pesticide Reduction. World Wildlife Fund, Canadian Environmental Law Association, Canadian Labour Congress, the Canadian Association of Physicians for the Environment, and Citizens for Alternatives to Pesticides in Quebec are all members of the steering committee of that coalition. We have over 180 members across the country. These include activists and other organizations that work on pesticide issues.

Overall, we're very pleased to see the introduction of Bill C-53. We've been long advocating the introduction of amendments to the Pest Control Products Act, so we're happy to see that some of the ones we wanted have finally been introduced. However, we feel there are some improvements that are necessary to make the bill workable.

We're all reading from the same page, so some of these will be repetitions of what Theresa—and I'm sure other witnesses—have said, but bear with me.

The first thing we'd like to see is a fast-track approvals process for lower-risk alternatives. We need adequate review of the legislation. Right now, we're a little concerned, given the lack of time for this committee to adequately hear witnesses—the timeline being so short—and would like to see provision for a five-year review included in the bill so that we don't have to wait another 33 years for amendments.

We'd like to see the entrenchment of the precautionary principle, both as a guiding principle and as an operational force. Rather than just a focus on the registration of products in the Pest Control Products Act, we'd like to see an emphasis on alternatives and on processes for pest management. We feel the act is too focused on products.

Of course, the cosmetic ban is one of the things we've worked on long and hard, and it's very close to our heart. The minister has indicated it's not her jurisdiction to do, but that's not true. The PMRA can set what is on the label. Changing the label instructions can reduce certain uses, and “cosmetic” is one we feel would be good to protect children.

There needs to be a substitution principle. There should be a fast-track deregistration for more toxic alternatives, paired with a fast-track approval process for less toxic. If there is a more toxic substance and a less toxic alternative is registered, there should be a process for quickly deregistering the more toxic product.

Information on aggregate and cumulative exposure should be required for all registrations and re-evaluations, not just “when available”, as currently listed in the act. A statutory mandate should be given to the Pest Management Regulatory Agency, not just the delegation of responsibilities or obligations from the Minister of Health.

There's no clear definition currently of what constitutes confidential business information, and we'd like to see time limits for re-evaluations. Currently—and I'll get a little anecdotal—2,4-D has been under re-evaluation for close to two decades now. We currently have products registered that are known to disrupt the endocrine process in human and animal life. These chemicals mimic the natural hormones that turn on and off development. With these substances, it's only necessary to have a minute exposure at a critical point during development of a fetus to cause irreparable harm.

● (1550)

Symptoms of exposure to endocrine disrupters include reproductive anomalies, including but not limited to low sperm counts, reduced penis size, and others. Other effects are behavioural abnormalities, including increased aggression. Our knowledge of the endocrinal action of some chemicals has only developed over the last 15 years, but given the devastating possible effects of exposure to endocrine disrupters like 2,4-D, that should be sufficient grounds for a deregistration decision.

Health Canada has just published a study showing the presence of 2,4-D in the urine and semen of pesticide applicators. What are the effects of the presence of an endocrine disrupter in fluid so close to

conception? I don't know, and more frighteningly, neither does the department that's reviewing the registration of this product. The industry lobby will try to convince you that 2,4-D is harmless because it doesn't cause cancer. Well, the jury is still out on that one, though there is an association between uses of chlorophenoxy herbicides such as 2,4-D and non-Hodgkin's lymphoma, and we know it causes other health problems.

Now we're being exposed to toxic rain. Rain laced with 2,4-D, which is a common weed killer, is falling on people, wildlife, gardens, and farms in southern Alberta. Agriculture Canada says a study in the Lethbridge area in 1998 revealed high, unacceptable amounts of 2,4-D in rain. The herbicide was found in all 150 samples of rain collected between May 30 and August 17 in 1998 at eight Lethbridge-area locations, including the backyards of three city residences, a rural golf course, and a farm. The highest amount was found at a golf course, where the herbicide registered 5.1 parts per billion. The lowest amount was from rain collected in a residential backyard, with a reading of 1.6 parts per billion. The maximum level for aquatic life that's currently allowed is 4 parts per billion, so it exceeded it.

The tobacco industry claimed for decades that its products were harmless, and it took a long time before legislators acted to protect human health against the interests of this powerful lobby. It's easy to hide behind the years that may exist because of the interval between cause and effect, in this case between exposure and disease. You can choose not to smoke or not to frequent smoky bars to protect yourself from the ill effects of cigarette smoke. You cannot, however, protect yourself from exposure to pesticides if your neighbour chooses to spray them on his lawn, your municipality sprays them on its parks, the cafeteria staff in the parliamentary restaurant sprays them in the kitchen, or they're sprayed at your child's day care or summer camp. You don't even get a warning in most cases. You may be exposed a hundred times a day and not even know it.

And then there are inert ingredients. Currently, there are 4,789 ingredients that are legally permitted to be part of a pesticide's formulation without any requirement they be listed on the label. Not only are these ingredients not inert because often they include other active pesticides, benzene, formaldehyde, and other toxic chemicals, but they're secret, covered under confidential business information. This bill doesn't change that.

We have a number of other concerns, and they're all listed in the brief you'll be getting translated, but in the interests of time I'll wrap up here. I'd like to thank the committee for their interest in this issue and for allowing me to present our views today.

● (1555)

The Chair: Thank you, Ms. Rickman.

We'll now move on to the representative of the World Wildlife Fund Canada, who is Sara Dover, the policy adviser. Ms. Dover.

Ms. Sarah Dover (Policy Adviser, World Wildlife Fund Canada): Madam Chair and members of the committee, I would like to sincerely thank you for inviting World Wildlife Fund to appear as a witness on Bill C-53.

I apologize for bringing copies of our oral brief and written brief only in English. I have delivered them to the chair and she has indicated that copies will be circulated in both official languages in the days to come.

As many of you know, World Wildlife Fund has been active on this issue for years, and we are heavily invested in achieving improvements to the pesticide management system. Our investment is grounded through our mission to protect wildlife and our active programs on working land that develop and promote ecological farming practices.

The World Wildlife Fund appreciates the government's effort toward updating the 33-year-old *Pest Control Products Act*. There are elements in the legislation that indicate a clear resolve on the part of the government to improve the system of pesticide registration; however, a few key amendments will be needed in order to ensure the bill's effectiveness.

The five key areas of improvement are also enumerated in the WWF brief, and they include suggestions for specific language on amendments. We also work cooperatively with the Canadian Environmental Law Association and other organizations, and we endorse many or all of their legislative amendments, especially where they have made suggestions we would liked to have made but have been limited by time.

The five key areas of improvement include that all decisions regarding pesticides must be made with precaution. The precautionary principle has become an accepted tenet in international law, and Canada has committed to it in domestic legislation and on numerous occasions in international protocols.

Most strikingly, the precautionary principle is a cornerstone of the *Canadian Environmental Protection Act*, CEPA. In CEPA, the precautionary principle is present in the preamble as a broadly governing principle to the administration of the act and again in operational sections. In glaring contrast, the precautionary principle appears only once, by inference, in Bill C-53, and even then is only relegated to be applied at the discretion of the minister in cases of cancellation or amendment of a registration.

This is tantamount to having a more lenient justice system for the worst offenders. Surely all chemicals, from pesticides to industrial chemicals, should be managed with at least the same level of precaution. We should at least have the same standard of decision-making for pesticides as road salts. All substances should be subject to this same precaution.

Further, the precautionary principle is necessary to safeguard the children and the young of all species. Recognition that we are exposed to many pesticides from many sources challenges conventional pesticide regulation. It is unlikely that we will ever know all the effects of all the pesticides, of all the combinations, of

all the exposures. Therefore, a precautionary approach is crucial to ensure that Canadians' health and the environment are safeguarded.

Registration must favour lower-risk products and reduce reliance on pesticides overall. Stricter controls on pesticides are appropriate and absolutely essential for reducing the toxic pressures that pesticides pose to health and the environment. But cracking down on the nasty pesticides is only one side of the equation. Equally important and absolutely essential is to ramp up the introduction of lower-risk products, which are both less effective and less hazardous to health and the environment.

Bill C-53 must establish a transparent and rigorous process for registration and re-registration. The system must provide for public participation, effectively safeguard human health and the environment, and utilize the precautionary principle, while offering predictable and timely decision-making to registrants.

The only registrations that should enter the system by an alternative process are expedited review of lower-risk products. It is important that the term "expedited" actually mean "speedy". This is why we have recommended a timeline for decision-making of 12 months.

Expedited review of lower-risk products is truly key to relieving some of the pressure felt by Canadian farmers who are wanting to be more competitive on world markets, who are needing to reduce input costs and market goods to health-conscious consumers, and who are seeking to protect the health of farming families and the environment that they depend on for their lives and their livelihood. Simply put, if this bill won't work for farmers, it just simply won't work.

● (1600)

The inclusion of an expedited registration process for lower-risk alternatives in Bill C-53 has received support, as you've heard, from health, industry, environment, farm, and commodity groups. Reviews in Bill C-53 must consider a sufficient range of health and environmental impacts of pesticides. Bill C-53 has borrowed, albeit selectively, from the U.S. FQPA—*Food Quality Protection Act*—to address some of the new health issues and approaches to pesticide regulation, including aggregate and cumulative exposures, and threshold effects. Still, Bill C-53's efforts to protect infants and children are FQPA-light, and require strengthening to bring Canada up to par with FQPA and the progress made over the last six years in its implementation. Not only does this make sense for Canadians' health, but it will serve well in the context of NAFTA harmonization.

Meaningful public participation and access to information is essential. Provisions respecting public involvement in Bill C-53 need to ensure that the public is active in decision-making and has the ability to be reactive. Mechanisms are needed in the bill to ensure the public has a meaningful opportunity for involvement in the decision-making process regarding pesticide registrations and re-evaluations. The public's ability to engage will require making information available and specifying opportunities for the public to comment on proposed decisions, and initiate or challenge decisions.

Lastly, accountability mechanisms must be built into the law. Amendments to improve accountability include greater articulation of the function and composition of the public advisory committee.

Also, as in CEPA, the pesticide law should include a statutory requirement for periodic legislative review. For instance, within five years, measurable progress can be achieved on instituting measures that meet the legislated requirements to reduce risk from and reliance on pesticides, while protecting human health and the environment.

Lastly, I would encourage you, before the completion of your review, to ensure you've had the opportunity to hear from representatives from first nations, most particularly from aboriginal groups in the north who are affected.

We express our sincere gratitude to this committee for granting us an opportunity to present our concerns, ideas, and suggested amendments.

Thank you.

The Chair: Thank you, Ms. Dover.

We'll go to part two of the meeting now, where the members of Parliament question the witnesses.

We'll begin with Mr. Merrifield.

Mr. Rob Merrifield (Yellowhead, Canadian Alliance): I want to thank you for your presentations. They were very informative, and I think there are some worthy things to note.

One of the things I noted all of you suggesting is the importance of timeliness in approval of better products or the re-evaluation of products. I think Ms. Dover is the one who came up with 12 months as the goal. Can you tell me how that works with regard to harmonization with the United States? Are you aware of what's happening there, and would that harmonize with their evaluations and time limits?

Ms. Sarah Dover: The question of harmonization and timelines is a tricky one. It strikes to the challenges in the complicated intermarriage between policy and legislation. So in terms of the ability of World Wildlife Fund to advocate for specific timelines in and around joint reviews, which is what I think you're getting at, I can explain how we came to 12 months for expedited reviews. It was our analysis that it is taking PMRA approximately 14 to 17 months to complete similar types of reviews, so we've ambitiously offered them the timeline of 12 months.

•(1605)

Mr. Rob Merrifield: You don't know how that compares with the United States? You've never looked at how that compares with our partners to the south?

Ms. Sarah Dover: The other members of the WWF team may have looked at that particular issue and timeline. If it would be to your liking, I would be happy to get back to you.

Mr. Rob Merrifield: No, that's fine. I think we have the answers in other testimonies. The other witnesses suggest this similar timeline, and I'm wondering if the 12 months is what you're looking at as well, or do you have any suggestions?

Ms. Theresa McClenaghan: In terms of the brief by CELA, I'm not clear whether you also have the appendix with the clause-by-clause suggestions that we've made. If you do, we've proposed a new clause 8.1 dealing specifically with expedited registration of reduced-risk pesticides. This is for reduced risk. The wording for the clause we've proposed is adapted from the *U.S. Food Quality Protection Act*, where they do the same thing for reduced-risk pesticides.

One reason I say "adapted" instead of "mirrored" is because that act primarily deals with food—because it's the *Food Quality Protection Act*—and our act deals with a whole range of pesticides. We modified it accordingly.

Mr. Rob Merrifield: What you're saying is you've actually taken some of the amended words from the United States and put them into this legislation.

Ms. Theresa McClenaghan: Yes, and that's one example where it's almost identical. I've referenced section 250 of the *U.S. Food Quality Protection Act* for this one so that it can be compared directly. All they said on the timeline in that particular section, which I did mirror here, is that within one year of the coming into force of the section, the minister would develop the procedures for that expedited review. We at CELA didn't offer a specific timeline for the completion of the expedited reviews, but we would endorse World Wildlife Fund's submission on that—the point being that if it's to reduce risk, it needs to be a faster process than the existing normal track.

Ms. Angela Rickman: I agree.

Mr. Rob Merrifield: Okay, so all are saying the same thing.

The other thing is you mentioned the idea of public information and the changes in this bill with regard to PMRA's openness to the information coming forward on new pesticides coming onto the market. Is it appropriate enough in the bill? Do you see it as adequate, or to be changed somehow?

Ms. Angela Rickman: We're still missing the definition of "confidential business information", so it's not entirely clear. In some places it's better, because currently one of the things that is considered confidential business information is the amount of pesticide sold. For example, I couldn't find out how much pentachlorophenol was sold in Canada; it was considered confidential business information. With the new mandatory reporting on sales, that would be removed. But until we see a definition of "confidential business information" it's not entirely clear.

Mr. Rob Merrifield: Do you have any other comments on that? The bill does change it in a significant way.

Ms. Theresa McClenaghan: This is one thing. The proposed bill does offer a definition of “confidential business information”. It says it has to be information to which access can be refused under the *Access to Information Act*, and—there's an “and”—that meets the requirements of subclauses 43(4) and 43(5). In my interpretation, when you look at subclause 43(4) you see that it says the applicant has to have designated it and it has to be one of three things: manufacturing information, and so on.

In CELA's brief, we're satisfied with that as a definition of “confidential business information” initially, but we've proposed deleting subclause 43(5) in the bill and replacing it with one that says: “For greater certainty, names and contents of active substances, names and contents of formulae...” and so on, “...results of tests to establish efficacy and harmlessness, are all deemed not to be confidential business information.”

The reason for that is, on our review, we're not dissatisfied with the idea that there be protection to applicants for the manufacturing and quality control information, for the methods for determining composition, or for the monetary value of sales provided to the minister by them. We're saying we're not unhappy with that, but we want to ensure that the confidentiality provision is limited to those three things. That's the way I read the act right now, although I'm concerned that subclause 43(5) as is muddies the waters. I would rather see it replaced with one of the two formulations we've suggested, or both.

•(1610)

Ms. Sarah Dover: I think “confidential business information” is a key issue, but it's not the singular issue when it comes to availability of information that the public will require in order to be involved in a meaningful way. Let me suggest that, in a non-technical sense, what we need to get at with “confidential business information” is what information the applicants can give to us that won't jeopardize key components they require in order to go about doing their business.

We feel the definitions and the treatment of confidential business information in the act currently are so broad they will limit the kind of information they could offer to facilitate the public process. Understand that there are inherent protections already in place for intellectual property and trade secrets in the *Access to Information Act*, and there's nothing in this act that would prevent the development of regulation for intellectual property protection under NAFTA or WTO rules.

I also want to focus your attention here on the public register, because confidential business information should not be the be-all and end-all of the information available to the public. There needs to be monitoring information and reporting of adverse effects presented in such a way that it is digestible to the public. There also needs to be a meaningful “what now” in terms of procedures within the legislation that allow for public participation that is more than an information dissemination process.

Mr. Rob Merrifield: Theresa, you also mentioned that one of the recommendations is a change in the labelling. Are you saying the labelling on domestic pesticides is not appropriate for commercial, or both? I assume you're talking more about cosmetic pesticides, but could you clarify that?

Ms. Theresa McClenaghan: That's true, because we took a child-centred focus on it. A lot of the provisions we set out were from the point of view of child protection and consumer use. We are not suggesting there's a problem, in general, with commercial applicators following labels, or intended use. We don't think that's really a problem, but we think it is a problem at the consumer level. Urban use, in particular, often exceeds product designations. So that's one reason.

The other reason is because some of this information is necessary for people to just decide whether to use the product or not, like the content and the active ingredient in the formula. That is not presently required to be available on the labels. Other aspects of this list are on the labels. For instance, treatment information, by regulation, is supposed to be on the label, but we want the requirements elevated to the status of legislation.

We're not saying everything on this list isn't already in practice under regulation. There are some additional things in here, like ingredient listing, we'd like to see at a legislative level because of their importance to consumers for informed consent, appropriate use, and reduction of risk.

Mr. Rob Merrifield: Thank you.

The Chair: Mr. Bigras.

[*Translation*]

Mr. Bernard Bigras (Rosemont—Petite-Patrie, BQ): Thank you, Madam Chair. First off, welcome to the witnesses.

I'd like to focus on three points on which I agree substantially with you. The first issue is the re-evaluation of pesticides and the slow pace of this process. Also of some concern is the time it takes to go through the registration process and to find alternative solutions. I'm thinking here, among other things, about organic pesticides. Furthermore, the precautionary approach is virtually non-existent, except in one of the bill's provisions, when in fact it should be found in a number of the bill's clauses. I agree with you on that score.

My question is directed primarily to the Canadian Environmental Law Association. To my understanding, federal and provincial jurisdictions are as follows: federal legislation covers registration, marketing and labelling. At least, that's what I understand, based on what the PMRA is saying. I also understand that provinces are responsible for the sale, use and distribution of pesticide products.

First of all, where should the federal government be looking to step in, what areas should it withdraw from and where should the provinces be stepping in?

Secondly, what do you mean when you say that the bill should set criteria for pesticide use? These are my first two questions.

•(1615)

[English]

Ms. Theresa McClenaghan: The suggestions from the Canadian Environmental Law Association attempted to follow the existing division between the federal and provincial governments, in terms of legislative approach. All of our suggestions are about the pesticide registration system, which has been federal and remains federal under this bill.

When we make suggestions, for example, for a phase-out of new registrations for cosmetic or lawn and garden uses in 2004, it's a registration decision on the part of the federal government as to which uses they will allow. That's an appropriate decision on their part. We support, as we do in many places, the appropriate involvement of each level of government—federal, provincial, and municipal—in environmental matters and in this matter. But the federal government has jurisdiction over the registration decisions, so that's what we've addressed here.

[Translation]

Mr. Bernard Bigras: Often, public health suffers more than anything else from protracted legal battles. The municipality of Hudson is a case in point. In 1991, the municipality passed a bylaw. However, the Supreme Court did not deliver its final ruling until June 2001. It took the Supreme Court 10 whole years to rule on this case.

As far as pesticides are concerned, the best approach we could take would be, first, to improve the process of re-evaluating existing pesticides, while ensuring at the same time that the provinces adopt pesticide management codes, much like a focus group in Quebec recommended last October. Don't you agree? These codes would set standards for the sale, use and distribution of pesticides. Actions would be more complementary, and measures taken at the federal level in terms of registration and alternative solutions would be more effective. More stringent provincial standards governing pesticide sales and use as well as a management code might prove useful.

[English]

Ms. Theresa McClenaghan: We would agree with that, but we would also advocate stronger provincial protection in the spheres in which they've traditionally been involved. Of course there needs to be consistency among the levels, even though they might be acting in slightly different spheres.

[Translation]

Mr. Bernard Bigras: I'm interested in hearing your interpretation of the June 2001 Supreme Court decision which authorized the municipality of Hudson to pass by-laws under the province's *Cities and Towns Act*.

Do you recognize that pesticide use comes under municipal jurisdiction, even though municipalities are by-products of the provincial government? The Supreme Court recognized that provinces can act on this front and have full responsibility from a legal standpoint, given that municipalities are created by the provincial government.

[English]

Ms. Theresa McClenaghan: We were involved in that court case, representing 11 interveners on the Hudson, Quebec, bylaw. I

hope it's proper protocol to refer the committee to an opinion I prepared and posted on our website on whether Ontario municipalities will have the jurisdiction to pass pesticide bylaws under Ontario's brand-new municipal act, which was passed a couple of months ago. It comes into effect in January.

We made the intervention at the Supreme Court on behalf of the 11 interveners to say that Quebec's *Cities and Towns Act*, in its relevant general welfare health protection section, was very similar to other legislative provisions in provinces across the country, and their interpretation would then be very persuasive, in terms of the ability of municipalities in other provinces to act.

The court, in my opinion, agreed with us, and cited specific sections under many of those provinces' municipal legislation to say that was their understanding, as well. In my opinion, that court decision is extremely relevant to the role of municipalities. We support that role.

Furthermore, I agree they are subject to the enabling legislation their province sets for them, so that is an important consideration. In the suggestions we've made, we haven't actually proposed to change that aspect in any way.

•(1620)

[Translation]

Mr. Bernard Bigras: Thank you.

[English]

The Chair: Thank you, Mr. Bigras.

Mr. Speller.

Mr. Bob Speller (Haldimand—Norfolk—Brant, Lib.): Thank you very much, Madam Chair.

I want to thank the presenters this morning. Albeit you had to jam all of your thoughts into five minutes, we will have an opportunity to read what you have presented to us, at some point.

Theresa, in your report, under section 8, on registration for non-essential cosmetic use, you talk about normal agricultural use. You say:

“Without restricting the generality of the foregoing, non-essential means uses not intended to protect public health nor intended for normal agricultural use.”

Can you explain that? Does that mean just farmers, or does it mean people who use it in their gardens? What exactly do you mean there?

Ms. Theresa McClenaghan: No, we don't intend that to mean garden use. Above there, we said, “intended for lawn or garden use”, and we're using normal, everyday meanings of those terms. We haven't offered special definitions of “lawn” or “garden”, the point being that we don't assert that it's never appropriate to use pesticides in agriculture, for example, or for health protection.

We do assert, by way of a number of the other recommendations, that we need to work on reducing risk in all uses and that some things need extra attention, like the precautionary principle, and substituting reduced risk products when available. That would apply to everything, but for lawn and garden use and for recreational field use, parks and playing fields, we've singled those out in part because of the opportunity for children's exposure in those areas, and in part because of the fact that they're not necessary. It's an aesthetic. It's a cultural determination we've made that certain kinds of plants aren't welcome in our lawns and gardens, not because there's any health issue, nor any food issue with those uses. So that's the idea behind what we're getting at.

In terms of whether we might need further definitions around agriculture or normal agriculture, that may well be.

Mr. Bob Speller: Sure. But we don't intend it for normal agriculture—

Ms. Theresa McClenaghan: Right.

Mr. Bob Speller: —because there are different types of agriculture, obviously, and different levels.

Ms. Theresa McClenaghan: Yes, there are, but this is specifically singling out lawns, gardens, and playing fields and parks, recreational uses, for this suggested phase-out of new registrations and re-registrations.

Mr. Bob Speller: Okay.

Now, regarding your sales data registry, how would you see that work, exactly? Is it in dollars? Is it in quantity?

Ms. Theresa McClenaghan: We had envisaged that it would be by product and by municipality. There's an earlier section—I don't have the number at hand—that requires the applicants to report sales data to the minister, but there was no section that required the minister to then aggregate that information and make it public.

For example, we referenced CEC, the Mexico-U.S.-Canada NAFTA environmental cooperation. Sometimes action plans are developed for the three countries. For example, if you had an action plan for a pesticide and you wanted to be able to track Canada's response to that particular pesticide, right now we don't have the data for Canada to tell whether we're selling less of that pesticide or using it less in a particular area.

That's just one example of why you would want to be able to see, as well as for health evaluation, for predicting exposure. There are all kinds of reasons that it would be extremely useful.

So you're not offending the confidentiality provisions of the companies, because we're not asking for that information on a company basis, but you are aggregating it in a way that would be useful for those who study these issues to be able to use it.

Mr. Bob Speller: Ms. Dover, I appreciate the words you said with regard to lower-risk products. Certainly you'll get a lot of agreement within the agricultural community on that.

I'm wondering, have you joined together with groups such as the CFA to put a common front on this, or does this just happen to be a parallel position? And where would you agree or disagree with their position on this?

Ms. Sarah Dover: The WWF is very conscious in terms of what we advocate for and who it affects, and wanting to be open to feedback from those organizations. We have been in discussion on an informal basis with a number of associations in respect of revision to PCPA for quite a period of time, not the least of which are our partners at the agricultural level, those people we work in partnership with to develop IPM protocols.

In terms of the specific amendment, beyond a number of informal discussions, there simply hasn't been the time, because of the expedited review of this bill by the committee, to be able to come up with specific language. I struggle to imagine substantive differences in language, because most of us, frankly, are cribbing from FQPA. The only distinction is our addition of a timeline, and I'm not sure whether or not that would cause any controversy within respective associations.

● (1625)

Mr. Bob Speller: You're talking about a timeline?

Ms. Sarah Dover: I'm talking about a timeline for the completion of the reviews. The more we can guarantee consistency and transparency, basically the predictable planning of product cycles for companies, the easier it becomes for them to be planning the introduction of lower-risk pesticides into the markets.

We would be open to investigating those types of timelines for all kinds of decisions, but that was a much more complicated matter, so we felt that—

Mr. Bob Speller: Would you see that timeline legislated, or would you see it in regulations?

Ms. Sarah Dover: For all decisions?

Mr. Bob Speller: Yes.

Ms. Sarah Dover: We would be supportive of having timelines associated with all decisions. We've not made that recommendation, in part because of time limitations, in part because there is a compelling argument to be made that the management policy that PMRA has developed in association with those timelines could simply be given some kind of recognition similar to the recognition given to the toxic substance management policy.

Mr. Bob Speller: Thank you very much.

The Chair: Ms. Wasylycia-Leis.

Ms. Judy Wasylycia-Leis (Winnipeg North Centre, NDP): Thank you, Madam Chairperson.

I'd also like to thank the presenters for the three excellent presentations.

It seems to me from what you've said today and I think from what others have been telling us that if it came to one change we as a committee ought to push for, it would be the inclusion of the precautionary principle in this piece of legislation.

I guess my question is rather a rhetorical one, but I'd like you to try to answer it. Why are we at this point of trying to fight for something that fundamental in this law when in fact it was accomplished several years ago in the *Canadian Environmental Protection Act*? Why are we fighting for this all over again? I thought that was a watershed moment, and from here on in that would be a guiding principle for any similar legislation. Is it an oversight, do you think, or is it an indication of a shift in policy? Is perhaps the fact that there's a consultation process going on about the precautionary principle an indication of that kind of shift?

If you were there in 1999 for the *Canadian Environmental Protection Act*, what did you do to make that possible then, and what can you do now? That's one question.

The second question has to do with children's health, because you're all talking about that today. If there was one thing we were told from the minister when she introduced Bill C-53, it was that it would in fact protect children. Children would be the benchmark for the evaluation of the risk of pesticides.

What I'm hearing you say, especially you, Theresa, is that we've in fact been sold a bill of goods. The provisions in this bill are minimal when it comes to pursuing that idea and fairly skimpy when it comes to where children are covered and how in fact we look at aggregate exposure.

If all three of you could comment on those two areas, that would be great.

• (1630)

Ms. Theresa McClenaghan: Dealing with the second question first, I have to agree with you, regrettably, that it's skimpy in protecting children. While it's great progress to have children's protection mentioned in the bill, it is quite limited when you really read how it's being done. Even when compared to the *U.S. Food Quality Protection Act*—which is not perfect, with six years of experience under the act—it offers much less than what's provided for in that act.

We've thus made a few very specific suggestions to strengthen protection, including substituting reduced-risk products, and the precautionary principle, which I'll deal with in a minute, and so on. It looks like there are a lot of suggestions, because we have repeated the suggestions—initial evaluation, re-registration, and re-evaluation—every time it comes up in the bill.

If we want to truly say to our children that we have passed new pest control product legislation that will substantially improve the chances that they're being protected from harm, we have to make these changes to the bill. For me, as a lawyer reviewing the bill, to say to my children it's better the day after this bill passes than it is today, I think that would have to happen.

As for the question on the precautionary principle, my assumption—perhaps unsupported—is that because a consultation document is being circulated, there's caution in introducing the precautionary principle into new legislation at the same time. The one place where the precautionary principle is mentioned in the bill uses the CEPA or Rio formulation. Unfortunately, it's out of context. It's not really relevant to the decisions being made under the *Pest Control Products Act*.

Mr. Caccia's committee had a context that did relate to pest control products. We have that in our chart. I mentioned the consultation we did. I'll just refer to the fact that at pages 8 and 9 of that document—which I'll give to the clerk, if you do not already have it—we review several formulations of the precautionary principle under various international instruments. I'm only going to refer you to two—although there are many excellent examples, which would be much better than what we have in the proposed bill.

For example, the Cartagena Protocol on Biosafety stated:

“Lack of scientific certainty due to insufficient relevant scientific information...shall not prevent that Party from taking a decision, as appropriate, with regard to the import of the living modified organism in question...in order to avoid or minimize such potential adverse effects.”

So it's specifically tying the decision to the impact. The one-line Bergen formulation, from a much earlier time, going back to 1990, just says: “Environmental measures must anticipate, prevent, and attack the causes of environmental degradation”.

So we are saying that there are much, much better examples in international law, including examples signed by Canada. We can look to these for better guidance for this bill.

Ms. Sarah Dover: If I may, Madam Chair, I'd like to make three quick comments in respect of that.

In terms of having to choose one key amendment, I feel a bit like *Sophie's Choice*, because it certainly is fundamental that we add precautionary principle, but I feel as attached to expedited review for lower risk because of our strong relationships with farmers and our investment in IPM protocols. We need these products for the World Wildlife Fund to be successful in working land.

In terms of the precautionary principle, what's key about your question for the committee to underscore is that the ship had sailed on the precautionary principle when this argument was had over CEPA.

We need a consistent standard for all toxic chemicals, as opposed to having different standards for different contexts. So if there is a process of iteration of how the precautionary principle may apply to toxic chemicals, then let that apply equally to those chemicals that we know kill, versus those chemicals we're not even sure are toxic.

Keep in mind that the law is not a steady beast. It is evolving and living. Keep in mind, for example, what would happen to our law-making process if we waited for the conclusion of our treaty negotiations with first nations.

In terms of why the precautionary principle is so lame in Bill C-53, this bill attracted a certain amount of attention from DFAIT, and that was one of the reasons we waited so long. Certainly an argument I've heard in public circles is that there is a concern that inclusion of the precautionary principle in domestic environmental legislation could be construed to be a non-tariff barrier.

Firstly, I'd like to say that if it were to be a non-tariff barrier for pesticide legislation for chemicals that kill, that same argument would be true for all other industrial chemicals, as we've already established in CEPA.

Secondly, I would challenge you to consider what the true liability may actually be, given that a \$100 million liability has been plopped on the welcome mat at the door of the federal government through the Crompton suit, when the government tried to apply discretionary measures. So it's the presence of discretionary authorities, as opposed to a single standard—i.e., certainty, assurances that all products will be treated equally. The discretion is in fact what opened the door of the liability, as opposed to certainty.

• (1635)

The Chair: Thank you, Ms. Wasylcia-Leis.

Mr. Bachand.

[*Translation*]

Mr. André Bachand (Richmond—Arthabaska, PC): Thank you, Madam Chair.

The precautionary principle can be defined several different ways. However, in 2000, the Environment Committee requested that the precautionary principle be included in the legislation, along with a definition. Do you have a copy of that definition? Basically, it states the following:

“precautionary principle” means that appropriate preventive measures are to be taken, where there is reason to believe that a pest control product is likely to cause harm, even when there is no conclusive evidence to prove a causal relationship between the pest control product and its effects.

Unfortunately, I see you don't have a copy of that definition at hand, but basically, is this the kind of definition you're proposing for inclusion in the legislation?

[*English*]

Ms. Theresa McClenaghan: In fact the definition we did put in the document and advocate for is the one from Mr. Caccia's report. All I've done today is say that the world has moved since 2000. There are other formulations. There's the consultation document by the federal government. But we'd be quite happy with that one, absolutely.

[*Translation*]

Mr. André Bachand: Then, you would be satisfied with this definition. It would form a solid basis for incorporation of the precautionary principle.

[*English*]

Ms. Theresa McClenaghan: It would be far better than what's proposed in Bill C-53, even in the one place where it's mentioned.

[*Translation*]

Mr. André Bachand: I have another question. Why not suggest right now that the cosmetic use of pesticides be banned? Why the reluctance to ban pesticides?

[*English*]

Ms. Theresa McClenaghan: That would be nice.

I think it's mainly from the point of view of the need for evaluation, definitions, and public acceptance, a number of things that would have to happen.

Despite the wholesale change in public attitudes toward pesticides, we in our organization have been observing, even since we did the children's health study, that there still is quite a different culture in some places from those in others for cosmetic pesticides. Also, it would allow time for people to start to understand how they can still maintain their lawns and gardens.

We do single them out, saying that new ones should be approved only if they reduce risk treatment, even beyond what we say for the rest of the pesticides. So we are singling them out for special treatment in two ways: an immediate, even more stringent approval standard, and phase-out in two years.

Ms. Angela Rickman: For the record, we don't support waiting. We would support an immediate ban.

[*Translation*]

Mr. André Bachand: I have one final question. Earlier, Ms. Dover mentioned non-tariff barriers. Would these be non-tariff barriers according to WTO rules, or according to the rules of the NAFTA between Canada, Mexico and the United States? Do these concerns over a non-tariff barriers come from the WTO, or is it the result of our bipartite or tripartite agreements with other countries?

• (1640)

[*English*]

Ms. Sarah Dover: In that it is not my fear that the precautionary principle would be a non-tariff barrier, I'm not the best person to reflect that concern in a flattering way. My understanding from proponents of that view is that NAFTA and the WTO would both be relevant in terms of that concern.

Ms. Angela Rickman: The problem with chapter 11 isn't so much with what it does as the chill effect it has. Rather than test the waters or do something they fear they'll have to pay for later, governments are more likely to enact legislation that won't be controversial.

[*Translation*]

Mr. André Bachand: I just have one thing to say about this matter. There is indeed a difference between bipartite and tripartite agreements and a difference as far as the WTO is concerned. At the WTO level, I don't think we need to be concerned about the precautionary principle because Canada and Europe have come to some decisions regarding certain products that are well-known to me and the precautionary principle has even been successfully invoked by the WTO in a dispute between France and Canada on asbestos. However, a number of questions do indeed come to mind in terms of the NAFTA between Canada, the United States and Mexico. Problems with non-tariff barriers may indeed arise.

Therefore, you can always press the matter, but if a municipality can ban the use of a pesticide product for cosmetic purposes and the Supreme Court has recognized that it has the authority to do so, I don't see why Canada couldn't take similar action and inform other countries that it has adopted the precautionary principle.

Thank you, Madam Chair.

[English]

The Chair: Thank you, Mr. Bachand.

Mr. Hilstrom.

Mr. Howard Hilstrom (Selkirk—Interlake, Canadian Alliance): Thank you, Madam Chair.

I was going to ask about whether we're calling for a cosmetic ban totally or not. I'm not sure if the WWF had a chance to answer that. Are you calling for a total ban, or something more along the lines of the law association's position?

Ms. Sarah Dover: I'll be happy to answer that if I can say more than yes or no.

Mr. Howard Hilstrom: Say yes or no to a ban if you want.

Ms. Sarah Dover: The reason I'm being cheeky is that while on the one hand we are supportive of the notion that there is no acceptable risk to the health of our children or to the environment for cosmetic purposes, our work as the World Wildlife Fund is agriculturally based. We feel that the bold steps to get at the crux of the problem must be taken in an agricultural context, done in a manner that works for people who live and work on the land, and that if we are going to talk about really bold steps to get at pesticide reduction, then we're talking agriculture. That's our orientation. Understand my caution to be that while we're supportive, we don't want to be drawn into that debate directly or be seen to be bold proponents of it.

Mr. Howard Hilstrom: The Canadian Environmental Law Association, then, if there were a total ban.... In fact there is a total ban in some municipalities right now. The neighbouring municipality may be only inches away. The boundary is here, and if they're using pesticides inches away, does that one municipality have any tort law or anything that would allow them to sue that other municipality for having contamination come from that municipality into theirs? I don't need a long answer, but is that there?

•(1645)

Ms. Theresa McClenaghan: A private individual who is harmed by some substance, pesticide or otherwise, coming from a neighbour might have civil liability actions, but that's not the solution we advocate. But pesticides do cross boundaries, so...

Mr. Howard Hilstrom: That's why I wonder about one municipality doing it and the other one not doing it. Anyway, we'll leave that, because that's a long discussion.

I'd like to talk about the precautionary principle on your page one of definitions, where you say that precautionary principle means that appropriate preventative measures are to be taken, whatever. What do appropriate preventative measures specifically entail?

Ms. Theresa McClenaghan: The thing about the precautionary principle is that I think, as we said in the discussion paper that we submitted to the federal government, it's not a formula, it's a completely different way of thinking about how we make decisions. So it's not to say that the answer is appropriate measures shall always be refused the registration. In fact, maybe sometimes that would be appropriate because the worry about what the risk is is so great. But other times it might be the appropriate measure is whether we can do something to take away the thing that's causing that uncertainty or that risk to children.

Mr. Howard Hilstrom: I'm sorry to interrupt, but I know my time is short and your answers are fairly complete.

Let's talk about a specific then; let's talk specifically about 2,4-D, which I think is identified as an endocrine disrupter. How would the precautionary principle apply? It's a pesticide that is in widespread use and that you have identified as something. As it is an endocrine disrupter—which sounds pretty serious, and I understand a little bit about it—would the precautionary principle, if it were put into this bill, require that 2,4-D be immediately withdrawn from use in Canada?

Ms. Theresa McClenaghan: The way I'd like to answer that, and I'll be quick, is let's say that the science was showing uncertainty about whether it's an endocrine disrupter. I don't know, as I'm not a scientist, whether it is or isn't, but let's say it was showing uncertainty about that. Then I think the prudent precautionary response would be either prohibit it for certain uses that are causing the most exposure and the most risk, or prohibit it whatsoever if it's not even really essential to anything. So it's part of that decision-making. That's why I'm saying if that's being used primarily for aesthetic reasons, if we're finding it in the body burden of people, in fluids or tissue, and if scientists think it might be, then the prudent answer is let's not use it in that way any more.

Mr. Howard Hilstrom: We know there is a benefit to pesticides; otherwise they wouldn't be brought in. In analysing this in terms of the precautionary principle, would a minister have to look at the cost-benefit ratio? For instance, if you use 2,4-D and it will increase production or it will prevent the destruction of x amount of food production from a given field, so say 40% of the production of that field is there because there was 2,4-D used in the production of that grain, would a minister ever be able to decide whether it is of a greater benefit to society to have the acceptable injury to humans of one death per million when not having a food supply would cause five deaths per million? How would a minister work on that issue?

Ms. Theresa McClenaghan: There are two things I'd say. One is that right now the act does include value as something the minister can take into account. Secondly, in the way that risk assessment is carried out right now, that kind of a cost-benefit analysis is part of the traditional system that does take place. We're trying to improve the current system by adding things like reduced risk, substitution, and precautionary principle, to say that we have to not make decisions that are not going to be protective decisions. We can't make all our assumptions on the side of we aren't sure of the answer so we're going to allow the use. It should be the other way around.

In terms of agricultural use, we are not opposing agricultural use in this bill, but we are supporting reduced risk for agricultural use.

The Chair: Ms. Dover would like to comment.

Ms. Sarah Dover: I think 2,4-D is a good example, in that the re-evaluation was ordered in 1980 and is still outstanding. And it certainly is to no one's benefit, including the registrant, that the public is drifting in uncertainty as to what the government's position is on that particular product. But I think it raises an interesting question in terms of what are people on the land going to be provided by the government in order to be able to support a meaningful transition. And the laws are always poor public relations tools in which to describe overall programs.

We've made a comprehensive submission to the federal-provincial-territorial committee looking at the framework for agriculture, as well as a presentation to Mr. Speller's committee, seeking an ambitious program for transition of the landscape towards reduced reliance on pesticides. Yes, it's for health and environmental reasons, but it's more because the markets are demanding that. So Canada is in a situation now where we are dominated by old pesticides, which have been on the market a long time. The majority of the pesticides used have been registered since 1960.

What we need to do ambitiously is figure out how we transition farmers to be able to get into a modern age where they are competitive. One of the things that we need to do is to look at program elements, but there's also the ability in the legislation to phase out chemical—

• (1650)

Mr. Howard Hilstrom: Is there a substitute for 2,4-D?

Ms. Sarah Dover: Yes.

Mr. Howard Hilstrom: There is?

Ms. Sarah Dover: Yes.

Mr. Howard Hilstrom: Do you know the name of it?

Ms. Sarah Dover: It's not... The analogy is this. If I were a fitness instructor and you came to me and said, "I'm taking this weight-loss substance, what would you recommend as an alternative?"; I'd say, "How are you exercising? What are you eating?" Then we'd talk about what you might be buying as a product for that.

You've had the opportunity to meet with Rod MacRae, who does our ecological agriculture, and if you would like to speak with him specifically on that substance and the practices that could be used as an alternative, I'd be happy to arrange that.

Mr. Howard Hilstrom: Thank you, Madam Chair.

The Chair: Thank you, Mr. Hilstrom.

We have about nine minutes left, and we have Mr. Alcock, Ms. Wasylcia-Leis, and Mr. Bigras.

You have about three minutes, please, Mr. Alcock.

Mr. Reg Alcock (Winnipeg South, Lib.): Okay. I'll be very quick.

I've just been struggling with one piece of this. I am not a lawyer, so some of the connections here are a little bit lost on me. It's this issue of the precautionary principle. I've been playing with it, thinking if it were enshrined in driver licensing, would anybody be able to drive cars, given the number of people who cause accidents—or if it were in the *Elections Act*, would Mr. Hilstrom be able to run for office?

As I read it, it seems to be simply applied good practice. In a sense, you'd like to think that when somebody is dealing with a dangerous product, they are in fact being extra careful.

Is the effect in law not simply that, a sort of additional test? I guess I'm asking the lawyers. The way I read this, it's not an absolute ban. It's saying take a little more time, a little more care, think a little bit more before you proceed.

Ms. Theresa McClenaghan: I think that's exactly right. The law often uses the reasonable person standard. There's not an absolute answer that can be stated without looking at a particular circumstance.

Mr. Reg Alcock: But the passage of this would not then necessitate, the day after proclamation, that we withdraw all these products from the market. It would simply be an instruction to the minister and anyone in the department who was carrying this out to.... I would hope it would be this way to begin with, but it puts an additional burden on them to be extra careful in making these decisions and erring on the side of safety.

Ms. Angela Rickman: That's right. The way we look at it is that lack of absolute scientific certainty shouldn't prevent action. So you don't have to wait until you have absolute evidence that X causes Y before you can use all of the evidence that's pointing you in that direction to make the same decision.

Mr. Reg Alcock: The only other problem I have with that, and I asked the same question yesterday, although the group yesterday was perhaps a little more single-minded—I appreciate the balance in your presentations today, actually—is this issue of where one goes for scientific advice. We have tended to discredit scientists around a bunch of these issues for a long time, so it becomes almost impossible to find publicly acceptable sources of scientific advice on issues that are as highly charged as these. Also, there's this sense that you'll never get absolute certainty in areas like this.

Ms. Theresa McClenaghan: Can I briefly answer?

A fellow named Joel Tickner from Massachusetts used a very good term, which was that our decisions need to be science-informed when we're making decisions under the precautionary principle. It's not either/or; we've said that. We've added a definition. We've suggested that "scientifically based" includes regard for the precautionary principle. You include the weight of the evidence, you include science, and you include precaution.

The Chair: Thank you, Mr. Alcock.

Ms. Wasylcia-Leis.

Ms. Judy Wasylcia-Leis: Thank you, Madam Chairperson.

I would like to ask Angela Rickman the question I put to everyone, which is, if there were one thing—and I hate this idea of narrowing it down—one imperative that we should follow with respect to a change to this legislation, what would it be?

And I'll ask Angela this question, since it was the Sierra Club that actually took the lead in this country in following what's happening in the States with respect to Dursban, calling on the minister here to ban it. And it was probably rejoicing two years ago, or almost two years ago, when the Minister of Health actually announced a ban. What happened, and why is it still on the market?

Related to that is a question for everyone. You've probably been following this committee and seeing the difficulty we're having getting specific information from the PMRA about what has or has not been reviewed of the 400 or 500 existing pesticides. We're not getting an answer. What is the question we should be asking to get some information on this whole area of review and evaluation?

•(1655)

Ms. Angela Rickman: I guess it's good that we all get to pick our own one thing, because then perhaps we'll get three. The precautionary principle is important, but I think that the fast-track approvals process for less toxic alternatives, paired with the deregistration for more toxic alternatives, is really important.

I think we addressed the question of why the precautionary principle is not in it. It's primarily the fear of chapter 11 of NAFTA, mostly by people who aren't necessarily experts in the health or the environmental field either, but who tend to be better versed in trade issues. So I don't think that we should be letting trade bureaucrats write environmental and health regulations.

On Dursban, the Pest Management Regulatory Agency doesn't ban things generally; they let registration slip, or there are voluntary withdrawals, like CCA. It wasn't a ban on Dursban; it was a voluntary withdrawal by the manufacturer. And they had a period of time to take it off the market. I think that was by December 31, 2001. However, if municipalities had stores, they were allowed to use up what they had left. So it was a discontinuation of the sale, not of the use.

Ms. Judy Wasylycia-Leis: And the question to ask for both of you, do you?

Ms. Theresa McClenaghan: On the question about the number of chemicals reviewed or why they're not being reviewed faster, I don't know exactly the right question to ask them. In terms of speeding up the review, the answer would be the resources of the Pest Management Regulatory Agency and the need for the political will to establish mandated timelines. I think one of the issues is they do not have the resources they need to carry out these reviews for the number of substances and in the time we need them to do it.

Ms. Angela Rickman: Can I respond to something Mr. Alcock said about our discrediting scientists? I don't think that's true at all.

Mr. Reg Alcock: No. I didn't mean you as individuals.

The Chair: He meant society in general.

Mr. Reg Alcock: We've been in so many of these debates on stem cell research, GMOs, and evaluating issues like this. And the problem is we reference science as an objective decision-making point in a lot of what we do, but we increasingly have difficulty determining or validating science, because of all the values that roll around a bunch of these things. It's a question that rolls around in the back of my mind that we're destroying our belief in what is a legitimizing part of society. Anyway, that's an abstract argument.

Ms. Angela Rickman: Okay, because I was going to point out, as in the case of the *Endangered Species Act*, for example, that we think that scientists are better qualified to make decisions than politicians.

Mr. Reg Alcock: It really wasn't directed at you guys. I want you to understand that for sure.

Ms. Angela Rickman: Okay.

The Chair: I want to thank you very much for coming today and for your very thorough—

Ms. Judy Wasylycia-Leis: Sarah had one quick comment, I think.

Ms. Sarah Dover: Thank you very much.

The Chair: It's my pleasure.

Ms. Sarah Dover: I want to support the fact that the statutory responsibilities will flow from that accountability and internal funding for PMRA. In terms of information, I'd encourage you to look at the accessibility of the information amendments that we are offering, because while the public registry will remedy the situation that we don't know how many pesticides are registered on a year-by-year basis, that we don't know what their effects are, to some degree that information will be offered, but not necessarily in a meaningful way. The analogy here is what Bill C-53 offers is my going to an archive looking for a relative and being handed an old telephone book. So we need that information supplied to us in a comprehensive way and in a forum and through mechanisms where we can participate with it in a meaningful way.

And lastly, thank you so much for your review and having us here. I really want to underscore the necessity of wanting to come back in five years to have a similar conversation.

•(1700)

The Chair: On behalf of the committee, to all three ladies, thank you very much.

We will have a short pause while Mr. Caccia comes to the table.

•(1700)

_____ (Pause) _____

•(1705)

The Chair: Ladies and gentlemen, I'd like to call the meeting back to order, please. I'd also like to welcome our guest, Mr. Caccia, who is familiar to all the members of the committee and has some very well-educated and strong opinions about the environment and the role of pesticides in our society.

Mr. Caccia, I would invite you to begin.

Charles Caccia (Individual Presentation): It's a great honour, Madam Chair and colleagues of all parties, to appear before this distinguished committee. I thank you for this opportunity.

Without delay, let me jump into the subject matter and outline first the positive aspects of the bill. Number one, human health and the environment are now recognized as leading principles in the proposed legislation. Number two, in evaluating the health and environmental risks of a pesticide, a minister must from now on apply appropriate margins of safety for certain segments of the population and apply a margin of safety of ten times greater if a product is to be used around homes and schools.

In addition to that, in determining the maximum residue limits in foods, the proposed legislation will require the use of an additional safety factor of ten, which is in itself a phenomenal breakthrough. Other positive factors are the application of appropriate margins of safety for a certain segment of the population, the application of government policy in toxic substance management, the famous track one toxic substances under CEPA, and finally, the application of these policies through a certain section of CEPA.

There is another positive feature, and that is the WHMIS application, the WHMIS requirements, which are the result of some very intensive representations made by colleagues who are not here today, but who did appear before the environment committee when the pesticides report was studied, in particular the member for Ottawa West. Then there's the application of the precautionary principle, albeit in a very narrow way, in clause 20, and the re-evaluation of pesticides that are already out in the marketplace. The bill would provide for their revision every 15 years.

In addition to that, there is quite an interesting feature. When a pesticide is banned in an OECD country, a special review will be mandatory in Canada as well, and that is also a very good step. This is progress in every respect, and of course it can only be welcomed.

Let me briefly outline areas that need improvement as far as my experience goes, and the one we made in committee. I'm glad to recognize the presence of Madam Kraft Sloan, who is the vice-chair of our environment committee and who worked on the report very assiduously with all the others. Here you have several areas, and I will outline some of them for you.

One we felt very strongly about was the fact that the PMRA, the Pest Management Regulatory Agency, does not have a statutory mandate. It does not seem to be responsible as an agency to anybody, anywhere, except within the stream of the department. We thought that was not a sufficient degree of accountability.

The bill does not deal with the substitution principle, and therefore there is no requirement to deregister older pesticides once new ones are registered.

I mentioned the precautionary principle and its very narrow application. It would be better if it were at least in the preamble and applied more widely.

• (1710)

There is no definition of "acceptable" or "unacceptable risk", which was an item of lengthy examination in our committee. There is no requirement to take into account cumulative and aggregate exposure and effects. There is no room for independent scientific findings. As far as confidential business information is concerned, the treatment remains the same as in the 1969 legislation. The bill focuses on active ingredients of pesticides but not on other ingredients that could pose a threat to human health. Finally, there is a need for statistics on pesticides, though this may not be the proper subject matter for a legislative measure, which I'd be the first to admit.

As far as amendments are concerned, I'm taking the liberty of providing you, Madam Chair, and the members of this committee with possible amendments, beginning with the PMRA's role. You will find in the brief I've submitted, without my going into details, the amendments you might want to consider if you want to make the agency accountable, possibly to Parliament, or in a manner that would be more satisfactory than the present arrangement.

On the principles of the new act, I'm glad to report that the principle of giving absolute priority to the protection of health is recognized and that the principle of emphasizing the development of safer pest control products is also recognized in the act.

What is missing is the principle of the promotion of sustainable pest management strategies that seek to reduce and rely less on pesticides. Also missing is the principle relating to public information about pesticides and the risks associated. As to the lack of emphasis in Bill C-53 on the reduction of pesticide use and the lack of direct provision for educating the public, I can only bring these matters to your attention for your further examination.

One could also recommend amendments that the bill incorporate in clause 4 management strategies to reduce the use of, the risk of, and the reliance on pest control products and also an amendment, also in clause 4, that would ensure that pest control products are the object of the implementation of educational programs.

Now I come to the precautionary principle as an important item. This is, in other words, the principle that in essence says that you don't wait for a smoking gun to take an action that seems to be desirable, even if there is no final, ultimate scientific evidence. Much was written on the subject in the 1970s. It is a principle that was adopted first philosophically and then legislatively in many European countries. It is a subject matter, however, that is looked at with some suspicion by the business sector. It is recognized in the bill in clause 20. Nevertheless, it could be recognized in a broader manner.

• (1715)

In that respect, I would like to draw your attention to the experience we have had with lead in gasoline. The ban on lead in gasoline in the 1980s had already been proposed in the early 1930s, when the motor vehicle industry was beginning to expand, but there was not at that time ultimate scientific evidence available. Had the precautionary principle been applied at that time, the banning of lead in gasoline, which as you know has a negative impact on the development of children, would have taken place much sooner than the 1980s. This is why the precautionary principle, in a number of ways, has proven to be a useful legislative tool.

The substitution principle is one I would take the liberty of emphasizing, because there is no reference to it in the legislation, and it would be desirable that it be incorporated. I have taken the liberty of outlining an amendment to clause 2 in that respect.

On labelling, the bill focuses only on active ingredients, as I mentioned earlier, but not on other ingredients that could pose a threat to human health. Therefore, you will find on page 8 of the brief that I'm submitting language for clause 6 that might be useful.

Then we come to the sales and use of inventories. There again, in connection with clause 4, there is ample room for some amendments that would be helpful.

Let me then move swiftly on to the importance of stressing that when it comes to inventories, according to the OECD only Canada and the Slovak Republic do not collect data on pesticide sales and use inventories; the other 22 countries do have this type of information. You may recall, in 1999 I believe, the Commissioner of the Environment and Sustainable Development writing a full chapter on pesticides and indicating that Canada has no ability to measure amounts of pesticides used and released into the environment.

In that report, the commissioner also added that the data are “needed to monitor the risks to health, safety, and the environment and to measure the extent to which lower-risk pesticides and non-pesticide alternatives are being adopted.” I would bring this suggestion to the table, to say it would be desirable that the new act require registrants to provide the agency with their sales data on an ongoing basis and that pesticide sales inventories be made public, possibly on the electronic public registry of information.

In the environment committee we also recommended that the new act require the establishment of a national pesticide use inventory to track the use of designated pesticides. We recommended that the Pest Management Advisory Council be charged with the selection of the pesticides subject to mandatory reporting under this inventory—and that council is composed of people coming from various walks of life—and finally, that the pesticide use inventory be made public on the electronic public registry.

You may ask, why so much importance on data? The answer there is simply this: the data, on usage particularly, would be instrumental—it would be very helpful in making connections between exposure and harm to human health and possibly the environment.

• (1720)

Now, on confidential business information, may I refer you to what I'm told is an excellent report prepared by Dr. Hébert, which deserves to be mentioned and to be brought to your attention, particularly her conclusion, in which she recommends that the recommendations from the environment committee's report on confidential business analysis and test data should be acted upon.

“As a rule, disclosure of confidential business information and confidential test data would be highly restricted under the new legislation and the scope of the information that will be treated as confidential would be largely the same as the information currently under the Access to Information Act.”

I can tell you, the topic was discussed quite at length in committee, because it's a delicate item, of course, but the main consideration that was adopted by the committee was that there are certain situations where the public interest has to come ahead of private sector interests. In that respect, I think Madame Hébert has performed a very fine service in highlighting the issues and in arriving at helpful conclusions.

This bill has great potential. It is definitely an enormous improvement on the 1969 legislation. I would be inclined to say that it could take a strong stand to ensure a healthy and safe environment for Canadians—better than it is in its present form, because it does focus too heavily on product protection instead of promoting and encouraging a reduction in the use of or the reliance on and risks posed by pesticides. It is therefore my sincere hope that you will be able to address these shortcomings and that the points made here today will be useful.

Why do I put such importance on the question of making amendments? It's because it may be another 30 years before another opportunity will arise for our successors to make amendments to this bill. It is better to make amendments when we know where the shortcomings are, rather than relying on a future generation of

parliamentarians to do it for us. So there is here a golden opportunity that is knocking at the door.

The second reason for putting so much stress on this—and I will conclude with that remark, Madam Chair—is that there is not only our report here that has been produced on this subject; the subject has been the attention of a blue book, a purple book, and in 1999, as I mentioned earlier, a terrific examination and analysis and recommendation by the Commissioner of the Environment and Sustainable Development. So there is a convergence of tremendous amounts of intellectual capital that has taken place before you start this particular process. I think it is worth the time and the effort to consider the possibility of amendments in order to give Canadians the best possible bill.

Thank you for the opportunity.

The Chair: Thank you very much, Mr. Caccia.

We're particularly grateful that you took the time to look at this bill, considering the vast experience you have on matters concerning the environment and the study your committee did on pesticides. I am particularly grateful because you didn't just come and give us your thoughts in beautiful prose, but did a practical application of what you know in the suggestion of amendments. That's very helpful to us. So thank you very much.

I have a questioner in Mr. Merrifield.

Mr. Rob Merrifield: I want to thank you as well.

Particularly, one thing that we definitely agreed with is that this has been 33 years in coming, and we should be prepared to make the appropriate amendments to get it right, as right as we possibly can with the knowledge base that we have. So I appreciate your input as to some of the amendments, and we'll be looking at some amendments as well. I think there's a great interest in this piece of legislation, because hopefully it won't be another 33 years before we look at it again, as technology is moving so fast.

My question to you, though, is that we've heard from witness after witness that one of the biggest problems we have in this whole area is the PMRA and its inefficiency and its inability to deal with pesticides that have come onto the market or are coming onto the market. Why is it so difficult to address the inefficiencies and problems there—you as a member of a governing body that is directly responsible for that? Can you tell me where the problem is and how you would fix it?

• (1725)

Mr. Charles Caccia: If I could, I probably wouldn't be here.

We heard the same complaint, definitely. We were not able to put our finger on it except for the fact that we were told that the cuts in the funding, which were originally allocated for the implementation of the 1994 purple book, were so drastic that they made the operation of the agency less efficient, less capable of carrying out its mandate properly. It was pointed out that the fault or shortcoming was due to inadequate funds.

As you know, we undertook quite an exercise in deficit-cutting, and the department was also reduced in its capacity to function. That is probably the answer why that agency has been incapable of performing in the last six or seven years.

Mr. Rob Merrifield: So you're blaming the minister?

Mr. Charles Caccia: No. I'm blaming, if you like, the government for having cut the deficit—which you supported so vehemently.

Mr. Rob Merrifield: For a finance minister there is more than one way to cut that.

The Chair: In 1993 it was the main plank in their platform.

Mr. Rob Merrifield: You're saying it's a result of inappropriate funding for the department.

Mr. Charles Caccia: Inadequate funding, yes, because the purple book required—I'm speaking now from memory—an allocation of some \$36 million, and it was cut down by two-thirds. The agency knew that it had certain things to do. It had the mandate, but the mandate was not implemented as it should have been because of inadequate funding. That's my recollection.

You may want to call the PMRA before the committee yourself to examine that issue.

Mr. Rob Merrifield: We can get into a whole thing on the responsible use of dollars: we can talk about jets or our gun control bill. But we won't bother befogging the issue.

Thank you.

[Translation]

Ms. Yolande Thibeault (Saint-Lambert, Lib.): I have a brief question, Mr. Chairman. The bill makes no mention of pesticide use for cosmetic purposes. Do you feel this should be specifically mentioned in the bill?

Mr. Charles Caccia: I fully agree with you. As you know, our colleague Marlene Jennings tabled a bill that was unanimously endorsed at the last Liberal party convention. Naturally, the whole issue of the cosmetic use of pesticide is most likely the number one concern of Canadians.

You're aware of the minister's response when debate on second reading took place. He stated that this responsibility rested with the municipalities, but I think the federal government also bears some measure of responsibility. After all, a federal government agency is the one deciding whether or not a pesticide should be approved for use and for sale. We're talking then about a shared responsibility, not merely a municipal responsibility. This also means that as a committee, you need to decide if an amendment is warranted. That is the burning question.

• (1730)

Ms. Yolande Thibeault: Thank you.

[English]

The Chair: Madame Scherrer.

[Translation]

Ms. Hélène Scherrer (Louis-Hébert, Lib.): Thank you.

Mr. Caccia, earlier you talked about data collection. You stressed the importance of this, both in terms of Statistics Canada and the sale of pest control products and in terms of the adverse effects on people in contact with these pest control products. I think that's an excellent idea. Until such time as we have collected data, we won't be in a position to demonstrate that a problem does indeed exist. However,

some witnesses have told us that collecting data is a arduous process. Perhaps Dr. Castonguay will agree with that.

What kind of information are physicians being asked to supply? What kind of symptoms are they being asked to list? Coughs, breathing problems, skin disorders? We're not certain. How should we go about compiling a data bank which would show that people who use or live in close proximity to pesticides have experienced problems?

Mr. Charles Caccia: That's a very difficult question, albeit an important one. All I can say Madam Chair, in response to that question is that the committee should invite Dr. Fellegi, the Chief Statistician, to testify as to how such data is gathered. Let me point out that Dr. Fellegi is very interested in building up a data bank on pesticides and other substances, but that money is an issue. It's possible, but this is too technical a question for me to answer.

Ms. Hélène Scherrer: I have another, much simpler question for you. When you say the public needs to be informed, I would have to agree with you that people need to be made aware of these facts and encouraged to use organic rather than chemical pesticides.

Wouldn't you agree that we need to launch a public awareness campaign to hammer home to the public the fact that pesticides pose a health risk? I see the trucks roll through my neighbourhood and community on a regular basis. They aren't subject to any restrictions and a campaign seems to be under way to convince people that pesticides aren't as bad as all that. To convince people to think differently or to opt for another product, we need a campaign similar to the ones aimed at preventing smoking or drinking and driving. We need to shock people into reality. That's not happening now. There doesn't appear to be any desire to tell people the truth about the harmful effects of pesticides.

Is that because there is no real data available and because the risk of being accused of misleading the public is too great?

Mr. Charles Caccia: No. Some municipalities have shown considerable leadership, including the City of Toronto, the town of Hudson, Quebec and the municipality of Old Chelsea. Some municipalities have launched a public information campaign in the press and have boldly taken a stand on pesticide use. However, you're right to say that there is nothing stopping the Canadian government and Health Canada from launching a similar public education program.

• (1735)

Ms. Hélène Scherrer: Perhaps it's time we got started then.

Thank you, Madam Chair.

[English]

The Chair: Seeing no further questioners, it's my job to thank...

A voice: [Editor's Note: Inaudible]

The Chair: Well, we really shouldn't go on, because we don't have any opposition. We're not supposed to hear witnesses without the opposition. I just sort of stretched the rules at this point, for now about six minutes. So I don't think we should—

Mr. Reg Alcock: I can oppose for a while.

The Chair: No, I mean real opposition members, not pretend ones.

Mr. Reg Alcock: I'd be better than they are.

The Chair: The clerk reminded me at 5:30 that we had lost our... First of all, our meeting is supposed to be over; second, we have lost the right to hear witnesses. I just extended it a few minutes.

Mr. Bob Speller: I would challenge that, Madam Chair.

The Chair: Do you want to stay longer, Mr. Speller?

Mr. Bob Speller: No, no, I'm just saying if the opposition walks out it does not mean we can't hear witnesses.

The Chair: On behalf of the committee, I'd like to thank Mr. Caccia for coming and for giving us such a good brief, which we will use.

The meeting is adjourned.

MAIL  POSTE

Canada Post Corporation / Société canadienne des postes

Postage paid

Port payé

Lettermail

Poste-lettre

**1782711
Ottawa**

If undelivered, return COVER ONLY to:
Publishing and Depository Services
Public Works and Government Services Canada
Ottawa, Ontario K1A 0S5

*En cas de non-livraison,
retourner cette COUVERTURE SEULEMENT à :*
Les Éditions et Services de dépôt
Travaux publics et Services gouvernementaux Canada
Ottawa (Ontario) K1A 0S5

Published under the authority of the Speaker of
the House of Commons

SPEAKER'S PERMISSION

Reproduction of the proceedings of the House of Commons and its Committees, in whole or in part and in any medium, is hereby permitted provided that the reproduction is accurate and is not presented as official. This permission does not extend to reproduction, distribution or use for commercial purpose of financial gain. Reproduction or use outside this permission or without authorization may be treated as copyright infringement in accordance with the *Copyright Act*. Authorization may be obtained on written application to the Office of the Speaker of the House of Commons.

Reproduction in accordance with this permission does not constitute publication under the authority of the House of Commons. The absolute privilege that applies to the proceedings of the House of Commons does not extend to these permitted reproductions. Where a reproduction includes briefs to a Committee of the House of Commons, authorization for reproduction may be required from the authors in accordance with the *Copyright Act*.

Nothing in this permission abrogates or derogates from the privileges, powers, immunities and rights of the House of Commons and its Committees. For greater certainty, this permission does not affect the prohibition against impeaching or questioning the proceedings of the House of Commons in courts or otherwise. The House of Commons retains the right and privilege to find users in contempt of Parliament if a reproduction or use is not in accordance with this permission.

Additional copies may be obtained from: Publishing and
Depository Services
Public Works and Government Services Canada
Ottawa, Ontario K1A 0S5
Telephone: 613-941-5995 or 1-800-635-7943
Fax: 613-954-5779 or 1-800-565-7757
publications@tpsgc-pwgsc.gc.ca
http://publications.gc.ca

Also available on the Parliament of Canada Web Site at the
following address: <http://www.parl.gc.ca>

Publié en conformité de l'autorité
du Président de la Chambre des communes

PERMISSION DU PRÉSIDENT

Il est permis de reproduire les délibérations de la Chambre et de ses comités, en tout ou en partie, sur n'importe quel support, pourvu que la reproduction soit exacte et qu'elle ne soit pas présentée comme version officielle. Il n'est toutefois pas permis de reproduire, de distribuer ou d'utiliser les délibérations à des fins commerciales visant la réalisation d'un profit financier. Toute reproduction ou utilisation non permise ou non formellement autorisée peut être considérée comme une violation du droit d'auteur aux termes de la *Loi sur le droit d'auteur*. Une autorisation formelle peut être obtenue sur présentation d'une demande écrite au Bureau du Président de la Chambre.

La reproduction conforme à la présente permission ne constitue pas une publication sous l'autorité de la Chambre. Le privilège absolu qui s'applique aux délibérations de la Chambre ne s'étend pas aux reproductions permises. Lorsqu'une reproduction comprend des mémoires présentés à un comité de la Chambre, il peut être nécessaire d'obtenir de leurs auteurs l'autorisation de les reproduire, conformément à la *Loi sur le droit d'auteur*.

La présente permission ne porte pas atteinte aux privilèges, pouvoirs, immunités et droits de la Chambre et de ses comités. Il est entendu que cette permission ne touche pas l'interdiction de contester ou de mettre en cause les délibérations de la Chambre devant les tribunaux ou autrement. La Chambre conserve le droit et le privilège de déclarer l'utilisateur coupable d'outrage au Parlement lorsque la reproduction ou l'utilisation n'est pas conforme à la présente permission.

On peut obtenir des copies supplémentaires en écrivant à : Les
Éditions et Services de dépôt
Travaux publics et Services gouvernementaux Canada
Ottawa (Ontario) K1A 0S5
Téléphone : 613-941-5995 ou 1-800-635-7943
Télécopieur : 613-954-5779 ou 1-800-565-7757
publications@tpsgc-pwgsc.gc.ca
http://publications.gc.ca

Aussi disponible sur le site Web du Parlement du Canada à
l'adresse suivante : <http://www.parl.gc.ca>