



CPMA - ACGP

CANADIAN PEST MANAGEMENT ASSOCIATION
ASSOCIATION CANADIENNE DE LA GESTION PARASITAIRE

January 29, 2014

Publications
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
A.L. 6604-E2
Ottawa, Ontario K1A 0K9

Re: REV2013-18: Proposed Approach to Special Reviews – Consultation Document
Published December 30, 2013

Ladies and Gentlemen:

The Canadian Pest Management Association (CPMA) – the only national trade group for professional pest management companies – appreciates the opportunity to provide comments on the *Re-evaluation Note: REV2013-18: Proposed Approach to Special Reviews – Consultation Document*, published December 30, 2013.

Founded in 1943, CPMA's 400 member companies manage structural pests, such as rodents, including rats and mice; ants; bed bugs; stored product pests; cockroaches; mosquitoes; spiders; stinging insects; termites and other wood destroying pests. Through our mission, we engage in the protection of public health and structure in countless commercial, residential and institutional settings every day.

The professional pest management industry in Canada applauds the Agency for being transparent about the reasons for and steps taken to conduct a post-market special review. As a critical user of pest management products we would like to make the following suggestion.

Under Step 2 – Announcement of Special Review - found on page 4, we would request PMRA include consultation with the association (or other such group) that represents producers (distributors) and applicators using the product(s) proposed for special review. This consultation could be used to provide additional information to the Agency, like typical use patterns and application amounts, which are generally not known by the registrant or federal/provincial government departments and agencies.

We respectfully make this request because many of the manufactures make decisions to support (provide information relating to the aspect(s) of concern in the special review) based on a cost/benefit analysis. We are concerned, that by not requesting input from distributors and applicators, a disadvantage could be brought upon certain industries, especially minor use industries, like professional pest management through the loss of products that are critical to the structural pest management industry.

Therefore, we respectfully request the Pest Management Regulatory Agency (PMRA) contact the association, or other such entity representing the users of affected product(s), when a special review is undertaken. This will ensure special reviews that are transparent and provide benefits all Canadians. Please do not hesitate to contact us (Dominique Stumpf, dstumpf@pestworld.org, 571-244-0376).

Sincere regards,

Dominique Stumpf
Executive Director
Canadian Pest Management Association