



April 25, 2025

Jordan Hancey  
Director  
Policy and Regulatory Affairs Division  
Pest Management Regulatory Agency  
Health Canada  
2 Constellation Drive  
Ottawa, Ontario, K1A 0K9

Via e-mail: [jordan.hancey@hc-sc.gc.ca](mailto:jordan.hancey@hc-sc.gc.ca)

Dear Mr. Hancey

***Subject: Regulatory Proposal PRO2025-01, Pre-consultation – Proposed amendments to the Pest Control Products Regulations (product exemptions)***

On behalf of the Biological Products Industry Alliance (BPIA), thank you for the opportunity to engage in the Pest Management Regulatory Agency's (PMRA) consultation on Regulatory Proposal PRO2025-01, Pre-consultation – Proposed amendments to the Pest Control Products Regulations (product exemptions).

BPIA promotes the responsible development of safe and effective biological products including biopesticides, biostimulants, and biofertilizers as beneficial tools for commercial agriculture, forestry, golf courses, home gardens, horticulture, ornamentals, public health, and more through education, outreach, and advocacy activities at the state, federal, and international levels. Our members provide solutions that benefit growers, consumers, and the environment.

BPIA represents over 175 member companies internationally that manufacture, process, package and distribute fertilizers, supplements and pesticides.

Our purpose is to ensure the efficient operation of the Canadian regulatory process for the benefit of both regulated parties and the regulatory agency. BPIA routinely engages with key regulators at USEPA, USDA, Canada's PMRA, and the states including the California DPR.

BPIA is pleased to see that PRO2025-01 proposes to amend item 2 of Schedule 2 of the Pest Control Products Regulations to authorize supplements in a manner identical to fertilizers.

However, BPIA would like to request an extension to submit comments on PRO2025-01. We understand that the information session for stakeholders, partners, and the public, originally scheduled for March 20, 2025, was postponed due to the Federal Election.

BPIA requests that the deadline for submitting comments be extended to 30 days after the rescheduled PRO2025-01 information session. While BPIA is generally supportive of the proposed amendments to item 2 of Schedule 2 of the PCPA, we seek clarifications regarding the exact wording of the proposed change, the current mechanism for fertilizers/pesticides, and how this could work for supplements/pesticides. We also want to understand the limitations of the proposed change.

We hope that the PRO2025-01 information session will clarify these issues and help inform any comments that BPIA will submit on PRO2025-01.

Sincerely,

A handwritten signature in black ink that reads "Keith J. Jones". The signature is written in a cursive style with a large initial "K".

Keith J. Jones  
Executive Director

cc: Glenn Murray, A/National Manager, Fertilizer Safety Assessment Unit, CFIA;  
Janice Asato, Senior Global Regulatory Affairs Manager, Certis Biologicals; and Joe  
McCarthy, Principal Regulatory Consultant, TSG Consulting Co-Chairs BPIA Canadian  
Committee