



**Recommendation 1:** That *Bill C-30* omit amendments to the *Excise Act* that are proposed to reduce taxes on alcohol.

**Recommendation 2:** That the government refer the *Pest Control Products Act* to the Standing Committee on Health for its long overdue section 80.1 statutory review to consider to ensure decisions are:

- based on the best available evidence,
- transparent,
- supported by robust, written conflict-of-interest safeguards,
- aimed to quantitatively reduce risk, and
- supported by clearer operational guidance from Parliament on key regulatory concepts.



**TO:** Hon. Karina Gould, PC, MP, Chair

May 22, 2026

**AND TO:** Danielle Widmer, Clerk

Standing Committee on Finance

Sixth Floor, 131 Queen Street

House of Commons, Ottawa ON K1A 0A6

By upload to: <https://www.ourcommons.ca/committee-participation/en/submit-brief/fina/13385942>

**Re: Comments on the Bill C-30, Spring Economic Update 2026 Implementation Act, particularly concerning**

**(A) affordability for low-income Canadians,**

**(B) alcohol tax reduction impact on health, and**

**(C) silence on the years-overdue statute-mandated Parliamentary review of the Pest Control Products Act needed to address serious problems with regulatory oversight**

The Centre for Health Science and Law is non-profit public interest advocacy organization focusing on health protection law reform and law enforcement, especially in relation to food, alcohol, toxic chemicals, and the social, commercial and legal determinants of healthy life expectancy.

**A. There is scant attention to poverty and affordability despite frequent stated concern.**

There seems to be broad, cross-party recognition that affordability, especially of food and shelter, continue to be pressing matters for many Canadians. [While Parliament committed to reducing the rate of poverty by half from the 2015 rates by 2030](#), not only have poverty rates been steadily rising since the worst of COVID-19 but, even if Canada meets that slow-paced goal, there will still be 3 million people living in poverty in 2030. The repeated use of the term “national food security” in *Bill C-30* gives no comfort to low-income Canadians who suffer from material household food security. There is much more to do on this front and we will have more to say long before the fall *Budget Plan* and *Budget Implementation Act* are published.

**PO Box 4880, Station E, Ottawa, Ontario K1S 5J1 Canada**

## **B. Reduction in alcohol taxes will increase shortage of revenue in relation to government costs of alcohol consumption.**

*Bill C-30* proposes to halve domestic beer excise taxes and continue to de-index alcohol from actual inflation adjustments (capped to 2% rises). This will almost certainly lead to rising alcohol consumption, along with all of the associated health and social costs. Research from the Canadian Institute for Substance Use Research found that the [annual societal costs of alcohol consumption exceeded the amount of excise and value added tax revenue by \\$3.7 billion](#) in 2014. *Bill C-30* will grow that deficit for two more years.

## **C. Proposed amendments to delegate new emergency powers under the *Pest Control Products Act* appear oblivious to serious ongoing concern about the adequacy of health- and environmental protection in the implementation of the *Act*.**

Approximately one-fifth of *Bill C-30* proposes amendments to the *Pest Control Products Act* to address emergencies, however, these new powers are proposed to be given to Health Canada, a department with a worrisome track record on decision-making.

### **1. There are numerous authoritative signs that pesticide regulation is not functioning in the public interest or consistent with the mandate from Parliament.**

In any case, two fundamental concerns with Health Canada's regulation of pesticides include the:

- **Apparently pro-industry bias of the regulatory body:** Health Canada appears to be impaired by an institutional cultural bias in favour of the regulated companies.
- **Egregious delay in a statute-mandate review of the *Pest Control Products Act*:** [Subsection 80.1\(1\)](#) obliges Parliament to conduct a review of the *Act* every seven years [starting June 28, 2006](#); the [first review was commenced a year and a half late](#) (December 9, 2014). The second review was supposed to commence either June 28, 2020, or December 9, 2021, making the launch of the second Parliamentary review already 4.5 to 6 years overdue.

#### **a) Findings of Canadian and US Courts**

One way courts ensure that they accord an appropriate amount of deference to legislatures and the executive, is rigorously vetting experts and testing evidence of using the adversarial process in open court. Because the Minister relies nearly exclusively on “seller sponsored” studies and takes a dim view of research published in peer-reviewed journals, court processes for weighing evidence may be more reliable (see below).

The scientific evaluation of glyphosate—Canada's biggest selling pesticide—has been challenged repeatedly in the courts, culminating in decisions in which:

- the Federal Court of Appeal ruled that the [Minister of Health made an unreasonable decision to dismiss a call for the appointment of an independent scientific review panel](#) that it should reconsider in light of seven instructions from the Court;

- the [Federal Court ordered the Minister to provide within six months, “an intelligible explanation,”](#) of how it weighs the [Friends of the Earth’s] 61 studies finding harm and
- an [Ontario Superior Court certified a class proceeding against a major seller of glyphosate, Bayer-Monsanto,](#) claiming more than \$1.2 billion in compensation for cancer caused by risks of glyphosate that the company did not disclose to users. Since 2018, more than a [dozen class action and mass tort lawsuits against Bayer-Monsanto concerning glyphosate have been filed in Canadian courts](#)

In June 2022, the US Supreme Court [rejected a petition from Bayer-Monsanto to quash a multi-million-dollar court-ordered damage claim](#) for cancer-stricken user of the pesticide glyphosate on the argument that the federal government approval of glyphosate rendered state duty-to-warn laws inoperative. In April 2026, the US Supreme Court heard oral arguments in an appeal from Bayer’s Monsanto repeating claims that the Court had rejected in 2022 in a similar matter (see [docket](#) and [transcript](#)).

In June 2022, a U.S. federal [Circuit Appeals Court declared unlawful the U.S. Environmental Protection Agency’s re-approval of glyphosate due to “serious errors” in its scientific assessment of the pesticide’s harm to human health and the environment,](#) a review that it conducted in collaboration with Health Canada.

**b. Health Canada reapproved a pesticide without any evidence about human health risk.**

In 2020, Health Canada re-approved the pesticide Chlorpyrifos for 15 years without conducting a human health evaluation, evidently because the US Environmental Protection Agency had approved it during the first Trump administration. Several months later, [Health Canada cancelled its approval](#) after the Biden administration banned it in 2021, at which time it revealed that the applicant failed to provide *any* human health safety, data but acknowledged peer-reviewed evidence indicating harm to children’s brain tissue and cognitive function.

**c. The Chair of Health’s Canada’s scientific advisory committee resigned.**

In 2023, the co-chair of the Pest Control Products Scientific Advisory Committee resigned from his post [citing Health Canada’s pro-industry bias, its refusal to share pesticide application packages, and insistence on limiting the scope](#) of topics about which the government would consider expert advice. The resignation was covered extensively by mainstream news media, including, the [Toronto Star](#), [CBC](#), [Global](#), [CTV](#), [Le Devoir](#), [La Press](#), [Radio Canada](#), etc. That resignation and Health Canada’s decision to appoint a replacement without addressing any of the systemic or cultural changes within Health Canada do not inspire confidence. Furthermore, one-thirds of the appointees to the [Advisory Committee](#) are junior professors without tenure.

**2. A public-interest-oriented review of the *Pest Control Products Act* would consider recommendations of statutory reforms and other remedies to address the following:**

Several factors should be considered in a Parliamentary review of the *Pest Control Products Act* that have been raised repeatedly in a so-called [“Targeted Review” of the \*Pest Control Products\*](#)

[Act](#) hosted by Health Canada (see CHSL's [2022](#) and [2023](#) comments), but not addressed in the *Bill C-30* amendments.

**a) Base regulatory oversight on the best available evidence**

- i. **Mandate systematic reviews of published peer-reviewed science** with stipulated search terms and protocols for weighing and reporting findings.
- ii. **Clarify that statute-mandated estimates of exposure to pesticides in food require using recent Canadian food consumption data** (not outdated US consumption data).
- iii. **Implement mechanisms for continuously tracking published scientific evidence of risk.** The [regulation-mandated reporting of adverse incidents published in scientific studies](#) yielded only 18 reports on glyphosate while more than 22,751 studies (as of today) mentioning glyphosate were published according to [ScienceDirect](#)
- iv. **Oblige the minister/PMRA to keep apprised of Canadian and foreign litigation** related to the public health, the environment, and the effectiveness of pesticides and to report implications for Canadian regulatory status.
- v. **Mandate the publication of an OECD/EU regulatory status tracker updated monthly, especially the Act stipulates that pesticide bans in OECD countries can trigger special reviews by Health Canada.** (Health Canada could publish the [Pesticide Action Network list of banned pesticides](#) and correct any errors or omissions in the Canadian entries. Of the 460 pesticides in the PAN list, the EU either banned or had not approved 383 pesticides; Canada has banned only 29.
- vi. **Require companies to provide test data in spreadsheets to facilitate quantitative analysis by experts, not paper format or PDF files** that would require readers to, essentially, retype data into data files to check the math of the applicant companies; and
- vii. **Better collect, share and consider food and water residue monitoring data and monitoring bioaccumulation effects.**

**b) Establish effective conflict-of-interest safeguards in the statute.** [Health Canada explained why its approach to assessing the safety evidence relies disproportionately on what the regulator characterized as “seller sponsored studies.”](#) Health Canada's explained:

***1.1.14 Use of Independent Scientific Studies Comment***

*A number of comments stated that the PMRA...review of glyphosate, appeared to consider only “seller sponsored science...Studies conducted by academic laboratories often have lower statistical power due to the use of fewer animals, investigate far fewer toxicological endpoints, and lack sufficient detail in their published form.*

However, a [joint statement of 93 scientists characterized the difference in approaches of the WHO's International Agency for Research on Cancer and the and the European Food Safety Authority](#) as follows.

*IARC reviews only publicly available data...In the [Renewal Assessment Report], almost no weight is given to studies from the published literature and there is an over-reliance on non-publicly available industry-provided studies using a limited set of assays that define the minimum data necessary for the marketing of a pesticide.”*

The PMRA commissioned a [public opinion poll of 2,206 Canadians](#) in 2023 that found that:

- only 35% of respondents believed that PMRA even considers industry data in approving pesticides; and
- “nearly all [focus group] participants were against the involvement of pesticide companies in the pesticide regulation process, given their ‘vested interest.’”

### c. **Transparency**

- Ensure applications follow the EU principle of open by default, and sealed or redacted only when necessary.**
- Be transparent about public consultations and decision records.** Mandate notification of all pesticide consultations through [the Health Canada’s Consultation and Stakeholder Information Management System](#) (with a consultation periods proportionate to the complexity, docket volume (typically 30,000 pages), public interest significance of the file).
- Reconcile Health Canada's access to information policy and justify limits, avoiding non-disclosure agreements enforced by [criminal sanctions and disclosed only following lengthy to examine documents that have already been stripped of "confidential business information."](#)**
- Prohibit companies from co-mingling confidential business information with other files.** This leads Health Canada restricting access to nearly all information.
- Report pesticide sales data in the normal sense of the word.** Sales data for all pesticides should be proactively published on Health Canada’s website with sales per pesticide, not released only on request and not expressed as wide ranges (e.g., <50,000 kg and >1,000,000 kg per year).

### c) **Embed risk-reduction in regulatory decisions and practices, beyond rhetoric.**

- Reduce risk by 50%.** Canada agreed to [reduce harmful pesticide and toxic highly hazardous chemical risk by 50% by 2030](#) as urged by the United Nations [Convention on Biological Diversity COP15 commitment](#).
- Reconcile PMRA’s approach to product labelling with risk-reduction.** Reconcile the fact that the [2015-2019 enforcement statistics indicate that 72% \(47 of 65\) monetary penalties for breaches of the pest control act and regulations](#) were for failure to follow label instructions conveyed in "labels" that often range from 100-200 pages long, signifying failures in label notifications.
- Reconcile risk reduction with extremely light penalties for non-compliance.** According to PMRA’s annual report, 99% of enforcement actions were addressed by

warning letters, rather than financial penalties commensurate with the harm, risk of harm and need for preventative denunciation.

- d) **Embed robust regulation in clearer guidance in the Act, especially defining key concepts in legislation.** Include working definitions of key terms in the *Pest Control Products Act* itself such as:
- a. "precautionary principle," (especially to operationalize the triggering conditions which are currently highly discretionary and prone to abuse);
  - b. "scientifically founded doubt,"
  - c. "health risks," and
  - d. "scientifically based approach."

Respectfully submitted,



Bill Jeffery, BA, LLB, MA