



November 23, 2023

Dear Protected Agriculture Grower:

Please find below information related to the new Protected Agriculture Stewardship program required for purchasing crop protection products, coming into effect January 1st, 2024.

The [2016 Proposed Re-evaluation Decision by the Pest Management Regulatory Agency \(PMRA\) \(PRVD2016-20\) for Imidacloprid](#) raised water quality concerns related to greenhouse product use. During the re-evaluation it was noted that while growers consistently adhere to all label requirements, there are still incidents where inadvertent leaks and cross connections lead to the loss of product to surface water sources. As a result, a group of impacted stakeholders agreed to work towards the development of a credible protected agriculture pesticide lifecycle stewardship program to reduce the risk of product loss to the environment and avoid potential product deregistration. This approach focuses on adherence to a national standard, entitled the [Protected Agriculture Stewardship](#) (PAS) program, that supports compliance with registered pesticide label directions and the mitigation of risks associated with crop protection tools, fostering the health and safety of people and the environment.

Through consultation with impacted stakeholders there have been many changes made to the PAS program over the course of 2023. Many of these changes were made in recognition of concerns brought forward from the grower community. We, in the crop protection industry, have worked to ensure your concerns were heard and that any program delivered is achievable and minimizes burden on growers, while still meeting our collective responsibility to minimize the risk of pollution arising from the use of crop protection tools. We are committed to continuous improvement and look forward to further updates to the program as additional learnings emerge from its implementation.

To ensure expectations are clear, we are providing you with the following guidance regarding program timelines and rationale. For information regarding the origins and scope of the program, please see the attached backgrounder. We have also engaged with ag-retail and are providing them with information on the requirements of the program.

We urge all growers to pursue registration under the program as soon as possible. This will ensure there is no disruption to product access after January 1, 2024. Any questions related to PAS can be directed to the program's dedicated email address (PAS.NGAP@croplife.ca) or to the Agriculture Warehousing Standards Association (manager@awsa.ca) who oversees operational delivery.

Program Focus

The focus of the program is reducing the risk of crop protection products entering the environment through surface water discharges, in alignment with current label requirements.



Registration

In order to access crop protection products for use in greenhouse operations in 2024, all growers should be registered under the program by December 31st, 2023.

This applies to both Category 1 (closed loop) and Category 2 (open) systems. This administrative step is easy to complete and only takes a few minutes. The registration form can be found [here](#).

Certification

Upon registration, Category 1 operators will be provided with a temporary certificate that expires **June 30, 2024**. Operators will need to complete certification before this date to continue to be eligible to purchase PCP products labelled for greenhouse use.

Upon registration, Category 2 operators will be directed to an online declaration form that confirms they are outside of the scope of Category 1. The resulting waiver will be emailed to the operator. This can be printed and provided to your retailer to facilitate purchase.

Further details can be found in the attached Path to Certification document.

Minimum Requirements for Certification

For Category 1 operations requiring certification, only section C of the standard is required to obtain basic certification. There are four protocols which cover assessment, monitoring, maintenance, and emergency response related to the closed recirculation system. Additional completion of sections A, B, D and E will result in a Certificate of Excellence (COE). These additional protocols represent industry best practices and, in some instances, are legal requirements.

Program Flexibility

The program has always, and will always, have a mechanism through which individual circumstances can be considered. A Technical Committee formed of growers, crop protection industry, auditors, qualified persons and provincial government extension staff has been established to review any requests for flexibility. This process can be used to review alternative water assessment methodologies, requests for equivalency with other audited programs and site-specific characteristics which should be considered in assessing compliance with the program. A request for consideration should be made to manager@awsa.ca if flexibility is required.

Risk management

CropLife Canada takes a risk-based approach to developing stewardship programs. In this instance, inadvertent pollution risk was identified with the use of crop protection products in closed-recirculation systems. Hence, the focus of the program is on operations that have the ability to apply crop protection products through a closed recirculation system. This risk categorization applies whether the operator chooses to make use of this option or not.