

To: Peter Chan,
Director General, Health Canada, Pest Management Regulatory Agency - peter.chan@canada.ca
Date: Thursday, July 25, 2019
Cc: Dr Marcos Alvarez marcos.alvarez@canada.ca, Ms Reem Barakat reem.Barakat@Canada.ca, Mrs Nathalie Doré nathalie.dore@canada.ca, Mr Paul Enwerekowe paul.enwerekowe@canada.ca, Mr Alan Schlachter [schlachtera@croplife.ca](mailto:schlachter@croplife.ca)

Subject: Codex Committee on Pesticide Residue, MRL for glyphosate

Mr. Chan,

I write this email to you, as your name is mentioned in the document from Codex Alimentarius as the leader of the delegation from Canada that attended the recently concluded 51st session of the Codex Committee on Pesticide Residue, conducted in Macao special administrative region of China in April 2019. The letter deals with rising levels of MRL accepted as safe by both the Canadian Government and the Codex Committee, for various pesticides, but in particular, about glyphosate. This letter is also copied to the other attendees from Canada.

As an introduction, I would mention that I am a Canadian citizen and a retired engineer that was born in India. I had, some years ago during the Harper regime, tried to get Health Canada to get engaged in testing of foods for glyphosate, or at least set up some labs that would test foods for glyphosate in Canada, so the public could spend money out of their own pocket to test how toxic Canadian foods had gotten, if the Government was uninterested. At the time, Canadian labs accessible to the public would only test glyphosate in water and soil. The Harper government initially did not bother to respond to my letter. Then MP Alex Atamanenko took up my case and brought the topic to the floor of the parliament, demanding that the health minister, Ms Rona Ambrose, answered me.

Subsequently, the Canadian Government did influence some labs to get accredited to test various foods for glyphosate and did initiate a large project to test thousands of food samples for measuring residues of glyphosate and AMPA. I obtained a copy of all results through an access to information act appeal to CFIA, analysed the data and published a book on Amazon titled "Poison Foods of North America". The book shows that CFIA tests indicate seed based crops grown in North America to contain significantly higher levels of glyphosate, and therefore, in my judgment, constituted the most toxic foods on earth. Also, within North America, Canadian crops contained measurably more glyphosate than even US grown crops, making Canada the epicentre of toxic foods on earth, when it comes to glyphosate contamination.

I warned the Government of India early in 2018 to be wary of imported lentils from Canada because of high level of contamination from glyphosate - a molecule that was not approved by India for use in agriculture. This resulted in the issue being discussed in the Indian parliament before the minister of food and the Food Safety Standard Authority of India issuing a directive to test all imported lentils for glyphosate.

In March this year, an English language magazine published in India, "Agriculture World", with over 10 million in circulation, Published a lead story authored by me, titled "Glyphosate, a slow moving horror". I am told some 3,000 copies of that issue had been taken by attendees from India, to distribute among other Codex Committee attendees in Macao, China in April this year, which was also attended by you. Perhaps you saw a copy of the magazine and read the article.

Now, I write this letter to ask you a few questions.

1) Proof of safety of glyphosate

The Canadian Government has not released the safety test raw data and report received by it back in the 1970s, which was submitted by Monsanto, to prove that glyphosate was safe.

I have a separate running case with Health Canada, demanding a copy of all those pages, or be informed in writing that I, a Canadian citizen, do not have the right to see them. I have been assured that I have the right to the documents. However, the government has been dragging its feet for years.

My question to you is - can you help expedite the process, using your position and influence, to release all those hitherto hidden documents and raw data, that are supposed to prove to Canadians that glyphosate did not and does not harm higher animals such as mammals?

2) Periodic raising of Maximum residue Limit (MRL)

Canada has been raising the MRL for glyphosate for individual crops over the years. While one can see the current MRL in various crops from Government published document, I have been trying to obtain a table that shows when MRLs for each crop was raised, from what level to what level, and on which date.

My intension has been to ask the Government for evidence that on each instance, it actually verified that the raised MRL levels were safe. I have reason to suspect that the Government has seen no such data, and has been raising the MRL because earlier limits were already crossed or about to be crossed. In other words, I suspect the Government has been protecting the industry in continuously increasing toxicity levels in foods without any proof that it was safe at any level.

I request you to send me this table of raising of MRLs for glyphosate, so I can seek more information on procedure followed when those limits were raised.

3) I refer to comments submitted by the National Health Federation (NHF) to the Codex Committee (CRD28, April 2019) about establishing the Maximum levels of pesticide residue in food and feed (CX/PR 19/51/5). This 4 page comment, attached as a file to this letter, stresses how the Codex Committee on Pesticide Residue (CCPR) has been lagging in solid science and is becoming increasingly out of touch with consumer demands and the marketplace, particularly with regard to glyphosate.

My question to you is - can you offer a response to this comments by NHF from the point of view not so much of the Codex Committee, but of PMRA and the Canadian Government, which too, like the Codex, has been raising MRL for glyphosate and appears also to be lacking solid science and being out of touch with reality.

Please note, this letter may be shared with the public, to encourage residents to start asking more questions on deteriorating food safety and resultant rise in ill health and destruction of biodiversity in Canada.

Thanking you



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