



The Honourable Ginette Petitpas Taylor,
Minister of Health
House of Commons
Ottawa, Ontario

December 17, 2018

Dear Minister Petitpas Taylor,

We are writing to express our deep concerns over the ethical and scientific standards at Health Canada, as illustrated in the case of Canada's highest volume pesticide, the herbicide glyphosate.

On April 28, 2017, Health Canada's Pest Management Regulatory Agency [announced its approval](#) for the continued sale and use of products containing glyphosate for another fifteen years. As part of the review process, Canadians had the right to file Notices of Objection within sixty days of the decision. Eight Notices of Objection were filed by June 27, 2017 on behalf of seven environmental organisations (Équiterre, David Suzuki Foundation, Canadian Association of Physicians for the Environment, Environmental Defence, Prevent Cancer Now, Safe Food Matters Inc. and Friends of the Earth), as well as by seven individuals.*

Compelling evidence was submitted in the Notices of Objection, that Health Canada's review was scientifically deficient; relied overwhelmingly on non-published, internal reports by companies with a financial benefit to gain from the decision, including Monsanto; omitted an extensive volume of critical, up-to-date, independent studies and lacked credibility.

Evidence was also submitted that Health Canada's process was tainted by scientific and ethical malfeasance.

We are extremely disturbed that for the past year and a half Health Canada has responded with silence to these objections.

Massive scale of glyphosate use

Glyphosate use in Canada dwarfs that of any other pesticide. Glyphosate based herbicides represent 56% of all pesticides used in agriculture in Canada. Since 2008, more than 25 million kilograms have been sold annually, placing glyphosate in its own category in Government of Canada sales reports. No precise data is presented to indicate trends. All other herbicide sales are below 5 million kilograms annually; [many much lower](#).

One hundred and thirty-eight glyphosate containing products are sold for domestic or commercial application in Canada. With multiple applications of glyphosate possible through the season, from pre-seeding to pre-harvest desiccation, glyphosate is in Canadian grains and many other foods. This pre-harvest desiccation application contributes to the fact that nearly 30% of the 3,188 samples analyzed by the Canadian Food Inspection Agency (CFIA) were contaminated. Specifically, 31.7% of cereals and 30.7% of food for infants, a particularly vulnerable population, contained glyphosate residues (CFIA, 2017).

Scientific malfeasance

Scientific studies underlie protection of environmental and public health, yet the Monsanto papers revealed that key glyphosate studies, central to Health Canada's determination that it poses acceptable risks, were fundamentally tainted. Dr. Christopher Portier has detailed to the [European Parliament](#) how re-interpretation of animal studies erased finding of cancers, and evidence brought to light in the Dewayne Lee Johnson trial (called the Monsanto papers) revealed extensive scientific malfeasance and deception. In addition, documentation was submitted to Health Canada from the International Agency for Research on Cancer (IARC), in which IARC provided evidence to validate its finding that glyphosate is a probable carcinogen for humans and provided evidence showing that Monsanto's attacks on IARC were deceptive and without substance.

Authors of a [series of five articles](#) published in September 2016 in Critical Reviews in Toxicology, presenting evidence favourable to glyphosate, have been asked to provide complete, correct disclosure statements. To date, three of the five sets of authors have reached consensus and updated disclosures of potential conflicts of interest. In an Expression of Concern published online on September 26, 2018, the journal editors caution, "When reading the articles, we recommend that readers take this context into account."

Six Notices of Objection submitted evidence of scientific misconduct and unethical behaviour that contaminated Health Canada's review process. Each of these six Notices of Objection called on Health Canada to hold a new, independent, transparent review.

On October 29, 2018, Ecojustice, on behalf of the Canadian Association of Physicians for the Environment, Environmental Defence, Équiterre, the David Suzuki Foundation and Prevent Cancer Now, expressed these same concerns regarding misconduct, stating that it is imperative that you establish an independent, transparent review panel.

Health Canada's failure to uphold ethical standards

We applauded when Prime Minister Trudeau specifically instructed all cabinet ministers, in their mandate letters, that each minister is responsible for ensuring that her/his department is managed in keeping with the highest ethical standards and with complete integrity. “Creating the culture of integrity and accountability that allows us to earn and keep the trust of Canadians will require constant attention and ongoing commitment,” each Minister was told.

We are gravely concerned that the conduct of your Ministry, in our opinion, violates these instructions and undermines the trust of Canadians.

Health Canada was specifically asked to provide its Code of Ethical Conduct. Health Canada has not, to date, provided its Code nor confirmed whether one exists.

For the past year and a half, Health Canada has responded with silence to these grave concerns and documented evidence of ethical misconduct, thus demonstrating an apparent absence of ethical standards and an absence of accountability.

We therefore call on Health Canada to demonstrate commitment to the promised “highest ethical standards” and “a culture of integrity and accountability,” and to establish an independent, transparent review panel on glyphosate.

In this way, you can demonstrate ethical and scientific leadership, and that Health Canada is working to regain and retain the trust of Canadians.

We would be happy to meet with you to discuss these important issues and look forward to receiving your response.

Sincerely,



Kathleen Ruff, Director, RightOnCanada.ca, on behalf of:

Beatrice Olivastri, CEO, Friends of the Earth Canada

Meg Sears, Chair, Prevent Cancer Now

Mary Lou McDonald, President, Safe Food Matters Inc.

Josette Wier, MD

David Bowering, MD

Louise Vandelac, PhD, Professor, Department of Sociology and Institute for Environmental Sciences, Université du Québec à Montréal

Marie-Hélène Bacon, PhD, Chercheure et coordonnatrice du CREPPA, chercheure associée au CINBIOSE et à l'ISS, Université du Québec à Montréal

Judith Quinn, BScN

*** Notices of Objection submitted to Health Canada's Pest Management Regulatory Agency:**

- 1) Notice of Objection 2843 submitted by Dr. Josette Wier and Dr. David Bowering
- 2) Notice of Objection 2975 submitted by John Balatinecz, PhD
- 3) Notice of Objection 3015 submitted by Friends of the Earth
- 4) Notice of Objection 045 submitted by Kathleen Ruff, Director, RightOnCanada.ca
- 5) Notice of Objection 3047 submitted by Mary Lou McDonald, President, Safe Food Matters
- 6) Notice of Objection 3055 submitted by Équiterre, David Suzuki Foundation, Canadian Association of Physicians for the Environment, Environmental Defence and Prevent Cancer Now.
- 7) Notice of Objection 3101 submitted by Louise Vandelac, Ph.D, Professor, Department of Sociology and Institute for Environmental Sciences, Université du Québec à Montréal and Marie Hélène Bacon, Ph.D, Chercheure associée, CREPPAGRETESS, Université du Québec à Montréal
- 8) Notice of Objection 3155 submitted by Judith Quinn, BScN