



18 September 2015

Dr. Richard Aucoin
Executive Director
Health Canada
Pest Management Regulatory Agency
2720 Riverside Drive Ottawa
Ontario K1A 0K9

Dear Dr. Aucoin,

The Canadian Pest Management Association (CPMA), the only national trade group for professional pest management companies, respectfully requests an extension of 120 days to submit comments and or objections to the *Aluminum/Magnesium Phosphide and Phosphine Gas Re-evaluation Decision* (RVD2015-03), published 27 August 2015.

Founded in 1943, CPMA's 400 member companies manage structural pests, such as rodents, ants, bed bugs, stored product pests, cockroaches, mosquitoes, spiders, stinging insects, termites and other wood destroying pests. Through our mission, we engage in the protection of public health and structures in countless commercial, residential and intuitional settings every day.

In addition to an extension of the comment period, CPMA is requesting a formal consultation period of not less than 120 days to allow stakeholders to gather data and communicate concerns regarding the negative impact that the proposed Re-evaluation Decision will have. CPMA had a previously scheduled meeting with PMRA during which we intended to discuss this issue. However this meeting has been postponed until 10 November, 2015 because of the Federal election. This date occurs after the published comment period has concluded.

The label changes proposed in the Re-evaluation Decision would drastically impact fumigation services, in many cases making them impossible to perform, which would result in severe impacts on agriculture, food safety, public health, and international trade.

Since no user group is likely more affected by PMRA's proposed Re-evaluation Decision as the professional pest management industry, we feel an extension is appropriate so that the industry can more thoroughly review the decision, generate data on the impact of the decision and consult with CPMA member companies. Compiling the information necessary to submit substantive comments by 26 October is impossible.



CPMA - ACGP

CANADIAN PEST MANAGEMENT ASSOCIATION
ASSOCIATION CANADIENNE DE LA GESTION PARASITAIRE

Therefore, we appreciate your attention and prompt response to this request for an extension to the deadline for submitting comments and objections.

To discuss this request, we can be contacted by phone at (866) 630-2762 or email at dstumpf@pestworld.org.

Sincerely,

Dominique M. Stumpf CAE, CMP
Executive Director

Cc The Honourable Rona Ambrose MP, Minister of Health
The Honourable Gerry Ritz, Minister of Agriculture and Agri-Food