The Consumer Choice Center welcomes the opportunity to comment on the Pest Management Regulatory Agency's Consultation on Permitting Pesticide Application by Remotely Piloted Aircraft Systems (RPAS) for Products Currently Registered for Aerial Application, Regulatory Proposal PRO2026-01. We support the proposal to allow remotely piloted aircraft systems, commonly known as drones, to apply pesticides that are already registered for aerial use. This proposal represents a pragmatic and forward-looking step that would enable Canadian farmers to adopt modern agricultural technologies that improve efficiency, reduce waste, and enhance safety for both workers and the environment, while also benefiting consumers through lower costs and greater agricultural productivity.

Agriculture has long relied on innovation to increase yields while reducing inputs and environmental impact. Drone technology is a clear example of such innovation. Compared with traditional aerial spraying using manned aircraft or ground-based equipment, drones can apply crop protection products with a much higher degree of precision. Advanced sensors, GPS mapping, and automated flight systems allow drones to target specific areas of a field, minimizing overspray and reducing the total volume of pesticides required. This precision agriculture approach allows farmers to apply only what is necessary and exactly where it is needed. As a result, permitting drone-based pesticide application can contribute directly to the reduction of overall chemical use while maintaining or improving crop health and productivity.

Drones also offer meaningful advantages in reducing exposure to pesticides for agricultural workers. Traditional spraying methods often require workers to operate equipment in close proximity to the chemicals being applied or to work in recently treated areas. Drone-based application allows operators to manage spraying from a safe distance, significantly lowering the likelihood of direct exposure. In many cases, drones can also access terrain that would otherwise require workers to traverse difficult or hazardous areas. By reducing the need for workers to enter fields during or immediately after spraying operations, RPAS technology can strengthen occupational safety practices across the agricultural sector.

Another important benefit is the ability of drones to operate in conditions where traditional equipment is less effective. For example, drones can be used in wet fields where heavy ground equipment might damage crops or compact soil. They can also reach irregularly shaped plots, orchards, vineyards, and steep terrain more easily than conventional machinery. Even on large-scale farms, drones can complement existing equipment by treating specific problem areas without requiring full-field spraying. The flexibility offered by RPAS systems allows farmers to respond more quickly and accurately to pest pressures, potentially preventing crop losses while minimizing unnecessary applications.

The economic implications for consumers are also significant. More efficient pesticide application means that farmers can reduce input costs associated with crop protection.

Precision spraying decreases wasted product, reduces fuel consumption, and allows for faster treatment of fields when pest outbreaks occur. These savings can help stabilize production costs in a time when farmers face rising expenses for labor, fuel, and agricultural inputs. When agricultural production becomes more efficient, those benefits are ultimately passed down the supply chain, contributing to more stable and affordable food prices for consumers. In this way, modernizing regulations to permit RPAS-based pesticide application aligns with the broader public interest in maintaining a resilient and affordable food supply.

Allowing the use of drones for aerial pesticide application would also help foster technological innovation and investment in Canada's agricultural sector. Agricultural technology companies are rapidly developing new drone platforms, application systems, and data-driven crop management tools. A clear regulatory pathway that permits RPAS pesticide application will encourage these innovators to develop products and services specifically tailored to Canadian conditions. This will support the growth of a domestic agri-tech ecosystem, create opportunities for entrepreneurs and service providers, and give Canadian farmers access to cutting-edge tools that are already emerging in other parts of the world.

Canada has historically been a leader in agricultural productivity, yet in the field of agricultural drone use it risks falling behind other jurisdictions that are moving more quickly to integrate these technologies into farming practices. While some countries have already created regulatory frameworks that enable widespread agricultural drone use, Canadian farmers and innovators still face uncertainty that can slow adoption. Regulatory Proposal PRO2026-01 is therefore an important opportunity to ensure that Canada keeps pace with global technological developments rather than reacting after the fact.

International developments highlight both the urgency and the opportunity for Canada to move forward. In the European Union, the regulatory framework technically includes a general restriction on aerial pesticide application. However, in practice many EU member states have implemented exemptions that allow drone spraying in specific circumstances, particularly in regions with difficult terrain such as vineyards, orchards, or mountainous agricultural areas. This patchwork approach has led to a gradual expansion of drone use across the EU, despite the existence of a nominal ban at the supranational level. The European experience demonstrates that the practical benefits of drone spraying are widely recognized by policymakers and farmers alike, even in regulatory environments that are initially cautious.

Canada is in a position to take a more coherent and proactive approach. Unlike many European countries with fragmented agricultural landscapes, Canada is characterized by vast farms and large agricultural regions. These structural differences mean that the potential efficiency gains from drone technology may be even greater in Canada than in smaller-scale farming systems.

On large fields typical of the Prairie provinces, drones can provide targeted treatment in areas affected by pests without requiring a farmer to mobilize large ground sprayers or aircraft for the entire acreage. This capability can significantly reduce operational costs and increase responsiveness during critical periods of the growing season.

Moreover, Canada's geography and climate present unique challenges that modern technology can help address. Weather windows for pesticide application can be narrow in many regions. Drone technology allows farmers to respond quickly when those windows open, deploying multiple units simultaneously if needed to treat fields in a timely manner. Faster response times can prevent pest outbreaks from spreading and reduce the need for heavier chemical applications later. The integration of drone systems with digital mapping and crop monitoring tools can also support more data-driven pest management strategies, aligning with the broader goals of sustainable agriculture.

It is also important to emphasize that the proposal under consultation does not involve introducing new pesticide products or lowering existing safety standards. Rather, it would allow products already registered for aerial application to be applied using a new delivery method that offers greater control and accuracy. As such, the regulatory framework can maintain rigorous safety assessments while recognizing the operational advantages of modern application technologies. Ensuring that the regulatory process reflects technological advances helps maintain both public confidence and regulatory relevance.

Adopting a regulatory framework that allows RPAS-based pesticide application would also help level the playing field for Canadian farmers competing in global markets. Agricultural producers operate in an increasingly competitive environment where access to modern tools can make the difference between profitability and financial strain. If farmers in other countries are able to deploy drone technology to reduce costs and improve efficiency, Canadian producers should not be placed at a disadvantage due to outdated regulatory barriers. Facilitating responsible adoption of agricultural drones will help Canadian farmers remain competitive while continuing to meet high safety and environmental standards.

From the perspective of consumers, policies that enable innovation in agriculture contribute directly to food security and affordability. As climate change, geopolitical instability, and supply chain disruptions continue to place pressure on global food systems, improving the efficiency and resilience of domestic agricultural production becomes increasingly important. Technologies that allow farmers to use fewer inputs while maintaining yields are essential components of a modern agricultural strategy. Drone-based pesticide application represents one such technology, offering practical improvements that benefit producers, workers, and consumers alike.

For these reasons, the Consumer Choice Center supports the direction outlined in Regulatory Proposal PRO2026-01 and encourages the Pest Management Regulatory Agency to move forward with permitting pesticide application using remotely piloted aircraft systems for products already registered for aerial use. Establishing a clear and workable framework will allow Canadian agriculture to embrace precision technologies that reduce chemical use, protect workers, lower production costs, and strengthen Canada's position as an agricultural innovator.