September 09, 2024

Via Electronic Mail

Pest Management Regulatory Agency
Health Canada / Government of Canada

pmra.innovation-arla@hc-sc.gc.ca

SUBJECT: Online e-Index builder - version 3.3

Dear Sir or Madam:

By way of introduction, the Biological Products Industry Alliance (BPIA) promotes the responsible development of safe and effective biological products including biopesticides, biostimulants, and biofertilizers. These beneficial tools are used in a variety of settings in Canada, including commercial agriculture, forestry, golfcourses, home gardens, horticulture, and ornamentals. BPIA also supports public health through education, outreach, and advocacy activities at the state, federal and international levels. BPIA's membership includes both large and small producers of biological products used extensively by Canadian growers.

In addition to the reply sent to the Pest Management Regulatory Agency (PMRA) on November 9, 2023, via email and subsequent discussion with Simon Eden-Walker on November 24, 2024, BPIA members were told to identify issues that we believe need to be addressed by the PMRA prior to finalizing this new version of the e-Index builder. Although designed in part as an enhanced interface for users, our members that are working to adapt to this new version are finding numerous challenges and ask that the PMRA consider the following issues.

- Internet access to utilize the new online e-Index is required.

- The initial e-Index Builder-Build Package landing page is large. By minimizing the screen to enable the information to be captured on one screen it is no longer legible.

- The fields appear very large on the computer screen and require scrolling for each DACO entry.

- The summaries of entries are not visible in real time. The program requires the user to toggle between the "Build a Package" icon and the "View Package" icon.

- In the View Package icon, limited information is visible, (Name of the Entry, DACO Number, File Name and Validation Status); to see all of the fields that have been completed requires opening the entry. The option to view all entries in the historical horizontal format, now appears per DACO entry in a vertical format. When opening one entry, the information for that entry takes up the entire computer screen allowing for only one complete entry to be viewed at a time.

- While PMRA has indicated that the large white space on either side of the screen is so that that webpage is compatible with phones and tablets, we challenge that it needs to be phone and table compatible. We cannot see anyone trying to complete and e-Index with a phone or tablet. Generally, it is not a user friendly or efficient layout, it does take 50-100% more time to complete than the JAVA builder. We would prefer a single View Package page that would allow us to populate the required fields for each document instead of separate build and view pages.

- e-Index file size limit has been substantially reduced.

- Connect to server issues. A member has had an index well below the 100 MB limit, that would not connect to the server and create an e-Index or PRZ. PMRA Innovation had no solution or fixes, and the member ended up using the JAVA builder.

- Each action requires more steps and validation than the current e-Index.

- Some sections now require more mandatory information.

- Existing e-Indexes now require additional steps to view the summary table of the e-Index.

- When the window or tab is closed or the click back option is used on the browser, any changes are lost. There are no alerts or warning popups about closing the window or leaving the page.

- When creating a file and immediately creating a PRZ for submission, the program does not automatically create a xml file therefore if you fail to save the xml file you must start from scratch.

- Cross reference no longer includes a field or option to use the submission number. Some historical submissions do not have a PMRA Document number.

- There have also been server issues when exporting to create the PRZ, which may take a couple of attempts to work.

- When uploading existing xml files created with the JAVA builder into the new e-Index builder and data noted as "Owned by a 3rd party" is not preserved, "Owned by a 3rd Party" will be checked as "No".

- There is no ability to cite by submission number which is extremely important for historical submissions where PMRA Doc Numbers are not available.

Thank you for your attention to this important matter. Should you have any questions about the foregoing, please feel free to contact me.

Sincerely,

Keith J. Jones
Executive Director