



**KEYSTONE
AGRICULTURAL
PRODUCERS**

March 23, 2026

Pesticide Application by Drones

Keystone Agricultural Producers (KAP) is Manitoba's general farm policy organization, providing a unified voice for farmers on issues that affect agriculture. KAP represents and promotes the interests of all Manitoba farmers and 18 commodity associations.

The PMRA is proposing changes to its drone policy. Allowing pesticide application by drones provides many advantages for Manitoba farmers: (1) Drone use eliminates soil compaction and allows access to inaccessible areas (i.e., too wet). (2) The drone's propellers can drive pesticides deep into a crop canopy thereby providing better coverage. (3) Research shows that drones use less water and pesticides while performing spot treatments that focus on pest-infested areas. Although drones will not replace fixed-wing aircraft spraying or ground application equipment, allowing drone spraying provides another option to manage pests. KAP fully supports allowing drones for pesticide spraying and is pleased to respond to the PMRA regarding its proposed changes with a few observations.

First observation: farmers mix pesticides in their ground sprayers, and the same farmers operate their ground sprayers. The PMRA proposes that two individuals be present for mixing and operating a drone—one person mixes while another person operates the drone. Why would drone spraying require different rules? Since many drones are lightweight and can be handled by one person, it is highly likely that some farmers will be operating drones solo. What risks exist if the same farmer fills a drone container and operates the drone? A pilot operating a fixed-wing aircraft and a drone operator have significantly different risks. Even the PMRA states that occupational exposure with drones "is unlikely to be higher than with conventional equipment." And the PMRA explains that "data assessed to date demonstrate that spray drift from RPAS is more similar to ground application equipment than that arising from conventional aircraft." These statements indicate that more research is required to further understand risk and spray drift. As more data become available, the PMRA should revise its drone spraying policy.

Second observation: spray drones often have touchscreen interfaces that will be inoperable if chemical-resistant gloves are required for all activities (as stated in the PMRA document). KAP supports safe pesticide handling and application, and PPE rules must reflect risk. Drafting a PPE policy for drone use must use logic, address known risks, and reflect current farm practices.

Thank you for providing the opportunity to comment on the pesticide application by drones consultation. If you have any questions about this document, please contact KAP policy manager, Neil Van Overloop, at neil.vanoverloop@kap.ca.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Colin Hornby', with a large, stylized loop at the bottom.

Colin Hornby

General Manager, Keystone Agricultural Producers Inc.