



NAFTA Technical Working Group on Pesticides
Grupo de Trabajo Técnico del TLCAN sobre Plaguicidas
Groupe de travail technique de l'ALENA sur les pesticides

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Dear Industry Working Group Co-Chairs:

We are writing to follow up on a proposal submitted by the NAFTA Industry Working Group (IWG) entitled "Systematization of Pesticide Residue Field Trial Data Waiver Submissions". As requested by the IWG, the Executive Board of the NAFTA Technical Working Group on Pesticides (TWG) discussed this proposal at its last meeting held in June 2004. At that time, the TWG confirmed that both the U.S. and Canada already have regulatory provisions in place which allow registrants to seek data waivers in accordance with domestic requirements. Mexico is just beginning to develop its regulations on this topic. Consequently, the Executive Board decided that a new project on NAFTA data waivers was not warranted.

Specifically, in the United States, issues related to residue chemistry would be brought forward to the Chemistry Science Advisory Committee (CHEMSAC) for consideration. Issues related to occupational and residential exposure issues would be brought forward to the OPP Exposure Science Advisory Committee (EXPOSAC) for consideration.

In Canada, science based waiver requests related to waiving required data would be brought forward to the appropriate Science Division for consideration. The PMRA scientists and

managers consider the validity and acceptability of these waiver requests during the submission review process.

As needed, both the U.S. and Canada will share information on their domestic processes as Mexico develops its regulations on this topic.

The TWG appreciates your interest in data waivers and our respective TWG government representatives would be open to further discussion as part of an informal side-bar meeting at the upcoming stakeholder session in Merida.

We encourage the IWG to continue its efforts to identify critical issues of importance in the harmonization of pesticides regulations among the NAFTA countries.

We look forward to your participation at the next TWG stakeholder meeting scheduled for December 2nd in Merida, Mexico.

Sincerely,

/s/

Cathleen McInerney Barnes,
On behalf of the NAFTA Secretariat and Executive Board