

Importation of Pest Control Products Solely for Manufacturing and Export - Proposed Program and Pilot Project

The purpose of this document is to provide the public and other interested parties with an opportunity to comment, prior to implementation, on a proposed program for the "importation of pest control products solely for manufacturing and export" and to describe a pilot project that will allow for the testing of this program.

This document is published under the authority of the Interdepartmental Executive Committee on Pest Management which represents the departments of Agriculture and Agri-Food, Health, Environment, and Natural Resources.

(publié aussi en français)

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This bulletin is published by the Information Division of the Plant Industry Directorate. For further information, please contact:

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K1A 0K9

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Background

The final report of the Pesticide Registration Review (PRR), entitled "Recommendations for a Revised Federal Pest Management System", released in 1990, contained a recommendation regarding the importation into Canada of unregistered pest control products, solely for manufacturing and export, for use in other countries.

Specifically, the PRR final report stated:

"Subject to...international obligations and Canadian legislation protecting human health, safety and the environment, a company may manufacture, import or formulate an unregistered pest control product for sale in other countries if the product is registered in the U.S. or the EEC...All the provisions of CEPA, WHMIS, the Transportation of Dangerous Goods Act (TDGA) and other relevant legislation will apply."

This recommendation was intended to increase the competitiveness of Canadian pesticide manufacturers in the North American and global economies. The government accepted the recommendation as part of its revised pesticide regulatory system.

An interdepartmental technical working group was established by the four federal departments responsible for pesticide regulation: Agriculture and Agri-Food Canada (AAFC), Environment Canada (EC), Health Canada (HC) and Natural Resources Canada (NRCan), with support from the Pest Management Secretariat. The working group was charged with the responsibility of developing procedures and information requirements to implement this aspect of the PRR recommendations.

The **Importation for Manufacturing and Export Program (IMEP)** outlined in this document was developed by the working group over the last year with input from a broad cross-section of stakeholders. The list of those consulted included the Canadian Interim Pest Management Advisory Council, the Standing Federal/Provincial/Territorial Committee on Pest Management, the Crop Protection Institute, the Canadian Manufacturers of Chemical Specialties, Transport Canada and three pesticide manufacturing companies who each submitted a "pilot" candidate to test the program.

Rather than fully implementing the PRR recommendation at this time, a decision was made to issue this Discussion Document detailing the features of the program for public comment. At the same time, a pilot project is being initiated to register those products that meet the requirements specified in this document, for a period expiring December 31, 1995. For the purposes of the pilot IMEP project, the export of finished products will be limited to the United States only.

This method of public consultation, coupled with the pilot project, should maximize the amount of feedback and experience necessary to successfully implement this component of the revised pesticide regulatory system.

Process

Interested and affected parties (organizations or persons) wishing to comment on the IMEP proposal are invited to do so in writing within 60 days of this document's publication date. Please direct all comments to:

Importation for Manufacturing and Export Program (IMEP)
Plant Industry Directorate
Agriculture and Agri-Food Canada
59 Camelot Drive
Nepean, Ontario
K1A 0Y9

All comments, as well as the pilot project results, will be taken under consideration for the drafting of a final Regulatory Directive and full implementation of the program targeted for 1995.

Regulatory Authority

Pesticides are regulated under the authority of the *Pest Control Products Act (PCP Act)*, administered by Agriculture and Agri-Food Canada in partnership with Health Canada, Environment Canada and Natural Resources Canada (Canadian Forest Service).

The *PCP Act* describes a control product as “*any product, device, organism, substance or thing that is manufactured, represented, sold or used as a means for directly or indirectly controlling preventing, destroying, mitigating, attracting or repelling any pest, and includes: (a) any compound or substance that enhances or modifies, or is intended to enhance or modify, the physical or chemical characteristics of a control product to which it is added; and (b) any active ingredient used for the manufacture of a control product*”.

Every control product used in the manufacture (e.g., formulating, repackaging, repouring, etc.) of control products as well as those that are imported into, or used in Canada must be registered under the *PCP Act*.

The focus of regulatory activity under the *PCP Act* regarding the manufacture of control products has been limited to certain specific aspects such as the purity of the technical active ingredient and quality control aspects of the formulated product, i.e., issues related to the quality of the product as it is to be used for the pest control purposes specified on the label.

The broader aspects of manufacture, transportation and storage for all potentially toxic products, including all pesticides, are covered by other federal and provincial laws. These aspects include occupational safety and health in the facilities where the products are being manufactured, conditions of transport for both the starting materials and the formulated products, etc. (Appendix 1 provides a representative list of the relevant provincial legislation and responsible departments).

Attempts have not been made to regulate these activities under the *PCP Act* for pesticide products used domestically since this would entail the kind of duplication of effort and overlap that governments are working to avoid. For pesticide products imported solely for manufacturing and export, it is proposed that the systems in place be used to the maximum to provide the safeguards needed. These systems are described in the following paragraphs.

International trade is regulated under the domestic laws of the countries involved in such trade and under a number of international agreements. Many of the potential risks associated with the import action of pest control products used exclusively for manufacturing into products for export are effectively regulated under these other laws and agreements.

This document outlines a procedure to be followed by companies wanting to register pest control products to be imported into Canada for manufacturing into finished products destined exclusively for export markets.

The information requirements for registering this type of product under the *PCP Act*, supported by all four responsible federal departments, have been adapted to focus on specific matters which are not adequately regulated under other applicable laws or international agreements. The information specified in this document must accompany all submissions for registration.

A pre-requisite for registration of pest control products imported solely for manufacturing and export will be compliance with other federal and provincial laws controlling the importation, manufacturing, transportation and storage of manufacturing-use products. For chemical pesticides, it is also necessary that the imported product be approved for sale or registered in the U.S. or in an EU or OECD country. EU (European Union) is the new body which replaces the EEC (European Economic Community). It is the responsibility of the applicant/registrant to obtain all necessary approvals and to comply with all legislated requirements pertaining to the import, transportation, manufacture and storage of the products under consideration.

Pest control products, for which registration has been previously suspended, cancelled or voluntarily withdrawn in Canada because of health and safety or environmental impact concerns, or pest control products which have been previously assessed for registration and found to be unacceptable, are not eligible for IMEP.

Relevant Legislation

Pest Control Products Act and Regulations

The *PCP Act* regulates products used for the control of pests and the organic functions of plants and animals. Section 5(1) of the *PCP Act* states that: “*No person shall sell in or import into Canada any control product unless the product (a) has been registered as prescribed; (b) conforms to prescribed standards; and (c) is packaged and labelled as prescribed.*”

The *Regulations* made pursuant to the *PCP Act* describe the information requirements and procedures for registering pest control products. Included in the information requirements are product specifications, a proposed label and “*information that will allow[determination] of the safety, merit and value*” of the product in question.

Article 9(2)(a) of the *Regulations* specifies data requirements that include “*results of scientific investigation respecting:*

- (i) *the effectiveness of the control product for its intended purposes;*
- (ii) *the safety of the control product to persons occupationally exposed to it when it is manufactured, stored, displayed, distributed or used;*
- (iii) *the safety of the control product to the host plant, animal or article in relation to which it is to be used;*

- (iv) *the effects of the control product on representative species of non-target organisms relative to the intended use of the control product and its residues;*
- (v) *the degree of persistence, retention and movement of the control product and its residues;*
- (vi) *suitable methods of analysis for detecting the active ingredient and measuring the specifications of the control product;*
- (vii) *suitable methods of analysis for detecting significant amounts of the control product, including its residues in food, feed and the environment under practical conditions of use;*
- (viii) *suitable methods for the detoxification or neutralization of the control product in soil, water, air or on articles;*
- (ix) *suitable methods for the disposal of the control product and its empty packages;*
- (x) *the stability of the control product under practical conditions of storage and display;
and*
- (xi) *the compatibility of the control product with other control products with which it is recommended or likely to be mixed.”*

These data are specified for the complete and comprehensive assessment of pest control products to be used in Canada. Since the potential hazards associated with importation solely for manufacturing and export would be mainly occupational exposure, disposal and accidental spills, many of these information requirements are not necessary to adequately assess this type of product. Specifically, information pertaining to parts (i) effectiveness, (iii), safety to host plants, etc., and (xi) compatibility, would not be needed.

While occupational exposure during pesticide *use* is assessed for registration decisions, *PCP Regulation* 9(2)(a)(ii), as currently interpreted, does not require information on occupational exposure to pesticides during manufacturing. The safety of workers in manufacturing plants for all products including pesticides is a provincial/territorial responsibility, and worker exposure is addressed by provisions in other legislation including the *Hazardous Products Act* and Provincial Occupational Health and Safety Acts.

Information required to review an application to register a pest control product under the IMEP is specified in Appendix 2. For example, requirements for information on product chemistry, i.e., methods of analysis and specifications (vi) and stability (x) do not differ from those for conventional chemical pest control products. Similarly, methods for detoxification or neutralization (viii) persistence and residues (v), and disposal (ix) are also required from the registrant.

With respect to effects on non-target organisms (iv), the *Regulation* specifies that such data be “relative to the intended use of the control product and its residues.” Our interpretation is that this provision would not apply to a product destined exclusively for export since it has no intended use in Canada. However, information **is** required on the effects of such a product on a representative sample of organisms that might be exposed to it and/or its residues during the course of, or as a result of, transportation, manufacturing and/or storage in Canada.

Currently, Appendix 2 refers only to “chemical” pest control products. Information regarding other product categories may be added in the future.

Transportation of Dangerous Goods Act

The purpose of the *Transportation of Dangerous Goods Act (TDG Act)*, administered by Transport Canada, is to promote public safety surrounding the transportation of dangerous goods. It sets out regulations concerning handling, packaging, safety procedures, safety standards and shipping documents. All registered pest control products, including those registered under the IMEP proposal, are considered “active materials” and are subject to the provisions of this *Act*.

Imported “active material,” depending on the country of origin, would be transported under one of three sets of regulations, namely the *International Maritime Organization Dangerous Goods Code (IMDG Code)*, *International Civil Aviation Organization (ICAO) Technical Instructions*, or the *U.S. DOT Regulations*, known as *49 CFR*. All three of these sets of regulations are recognized by, and referenced in, *TDG Regulations* for purposes of harmonization.

Exported formulated products, depending on the country of destination, could be transported under the *IMDG Code*, *ICAO Technical Instructions*, or the provision which allows *TDG Regulations* to be accepted for importation into the United States. In both the Canadian and the American reciprocity provisions there are minor variations which are applicable. These are common knowledge in the pesticide industry, as the provisions have been in place since 1985.

Labelling requirements specific to the *TDG Act* should not be a part of the principal or secondary display panel of the pest control product label (see Appendix 3). This additional information should be placed instead on the shipping boxes. When there is no choice but to place the information on the product container, there must be a clear, graphic separation from the pest control product label. In addition, the TDG information should be identified as a requirement under the *TDG Act*, e.g., by placing “*Transportation of Dangerous Goods Act Classification*” above the required TDG symbol or wording.

Canadian Environmental Protection Act

This *Act*, administered by Environment Canada, provides the federal government with authority to ensure that no new substance will be introduced into Canada without an assessment to determine its risk to human health or the environment. Compounds regulated under the authority of the *PCP Act* are excluded from the provisions of the *Canadian Environmental Protection Act (CEPA)*.

Hazardous Products Act

The *Hazardous Products Act (HPA)* and the related *Controlled Products Regulations*, administered by Health Canada, outline the requirements for product classification and for the supplier under the Workplace Hazardous Material Information System (WHMIS). WHMIS is designed to protect those potentially exposed to chemicals during manufacturing.

Under WHMIS, a supplier is required to classify products and provide material safety data sheets (MSDSs) and labelling for those products classified as controlled products. A “supplier” is a person who is a manufacturer, processor or packager of a controlled product or a person who, in the course of business, imports or sells controlled products. An employer is required to provide MSDSs and labels and to ensure adequate training for workers. Provincial, territorial and federal occupational safety and health legislation (i.e., the Canada Labour Code) is complementary to the *HPA*.

Fisheries Act

The *Fisheries Act* provides for the protection of the fishery resource. Section 36.3 of the *Fisheries Act*, administered by Environment Canada, prohibits the deposit, in water frequented by fish, of substances which are deleterious to fish, or fish habitat, or to man’s use of fish. The prohibition also applies to the deposit of deleterious substances in any place under any conditions where these substances, or any other deleterious substances that result from the deposit, may enter any such water.

Plants that manufacture products solely for export are subject to the same Section 36.3 prohibitions as any other pesticide formulating plants in Canada.

Provincial Legislation

Most provincial/territorial governments have in place broad environmental legislative provisions for: the protection of surface waters, particularly with respect to manufacturing effluent; storage, transportation and disposal of hazardous products; and other aspects of manufacturing. In addition, Provincial Occupational Health and Safety Acts are designed to protect those potentially exposed to hazardous products during manufacturing. A representative list of Provincial Statutes and the responsible Provincial Department is shown in Appendix 1.

It is the responsibility of a registrant and/or manufacturer of a control product to ensure that all necessary provincial/territorial approvals have also been obtained.

Applicable Legislation and Guidelines of the Importing Countries

Products exported from Canada must be acceptable to the receiving country. Most developed countries have regulations controlling the import and use of pest control products. For example, the United States Environmental Protection Agency has requirements for registering foreign manufacturing plants and products as a prerequisite for importation of pest control products. The Canadian exporter is responsible for obtaining the necessary approvals to allow the export of a finished product into the destination country.

Procedure and Information Requirements

Applicants wanting to register a pest control product for importation into Canada solely for manufacturing and export should submit an application to the Plant Industry Directorate, Agriculture and Agri-Food Canada, consisting of the following:

1. a covering letter briefly outlining the intent of the submission;
2. a completed and signed Application for New and Amended Registration Form (AGR 1170);
3. a completed and signed Product Specification Form (AGR 1168) for the product to be imported;
4. the appropriate fee (that is, for an active ingredient not previously assessed or evaluated, or an active ingredient from a source not previously assessed or evaluated, is CAN \$3,000.00. Otherwise, the fee is CAN \$300.00);
5. three (3) copies of a proposed, draft, manufacturing-use label (refer to Appendix 3 for a model label);
6. if the applicant is not the manufacturer of a technical active ingredient under consideration, a letter confirming the source of supply from the manufacturer of the technical active ingredient; and
7. three (3) copies of the information outlined in Appendix 2.

NOTE: Appendix 5 contains a checklist of submission requirements for ease in interpretation and submission preparation.

Once the application and supporting documentation is received by the Plant Industry Directorate, a submission file will be opened and the applicant will be informed of the submission control number. The submission will be assessed by the Plant Industry Directorate and, to verify hazard statements on the labels, by Health Canada. Environment Canada will be sent a copy of the submission and supporting documentation for their information.

The application must include all required information without cross-referencing other submissions. The Plant Industry Directorate will endeavour to review the application and notify the applicant of its registration decision within 60 days of receipt. If the application is acceptable, the registration number, approved draft label, and registration certificate will be issued. If the application is not approved, a letter explaining the decision will be sent to the applicant, who can either provide supplementary information or withdraw the submission.

Amendments

The registrant of any control product is responsible for informing the Plant Industry Directorate of any changes to the product register or of any changes to the regulatory status of the exported product in the country of destination (especially if the exported product label is affected) or of any significant findings relating to the health and environmental safety of the product in any country. It may be necessary to reevaluate the status of a product registered under IMEP at any time, in which case, the registrant may be required to submit a formal amendment application with supplementary information.

The registration period for this special IMEP use will be five (5) years and is renewable. In order to amend or renew the registration, registrants must submit an Application for New and Amended Registration accompanied by any information that amends what already exists on the control product register.

Prior Notification (Export Notices)

Companies exporting products under IMEP are required to notify importing countries in advance that the products in question have been assessed in Canada only for manufacturing and export purposes and not for local or domestic use. This prior notice should make clear that Canada has not assessed environmental or health safety relating to the product's proposed use in the importing country.

Export notices must contain all the information set out in Appendix 4 and be sent by telex, facsimile or registered airmail within 24 hours after an offer for export of the product has been accepted by the country of destination. All importing countries have designated a national authority responsible for receiving export notices. Names and addresses of these authorities are published under the authority of the *Canadian Environmental Protection Act* in the *Canada Gazette* (Part 1, December 14, 1991. Department of the Environment. *List of Toxic Substances Authorities*).

As proof of compliance, a copy of the export notice shall be sent simultaneously to the Director, Information Division, Plant Industry Directorate, Agriculture and Agri-Food Canada, Ottawa, Ontario, K1A 0Y9, the designated Canadian National Authority for pesticides.

Prior notification is required for every shipment of a product. As well, each shipment should be accompanied by an MSDS, as defined in the *Hazardous Products Act*.

Pilot Project

During the development of IMEP, three international manufacturers of pesticide active ingredients each submitted an application to test the feasibility of the program. The companies and their respective proposed products are:

- Hoechst Canada Inc. - Tralomethrin Manufacturing Product
- Miles Inc. - Technical Cylathrin Insecticide
- Sumitomo Chemical Co. Ltd. - Gokilaht Technical (cyphenothrin)

Once this discussion document is released, any of the three above-mentioned products meeting the criteria outlined in this document will be given a registration ending December 31, 1995. This registration is conditional upon the understanding that the export of the finished product be restricted to the United States.

This pilot project will provide valuable information on IMEP criteria and feasibility. This information, together with general comments received on the IMEP proposal, will be considered prior to IMEP's general implementation, targeted for later in 1995.

A Representative List of Relevant Provincial Legislation and Responsible Departments*

*Note: This is a representative list only. It is the responsibility of the applicant/registrant to obtain all necessary approvals prior to importing the pest control product for manufacturing use.

ALBERTA

Alberta Occupational Health and Safety 10709 Jasper Avenue 5th Floor, Donsdale Place Edmonton, Alberta T5J 3N3	General Inquiries FAX WHMIS	(403) 427-2320 (403) 427-5698 (403) 427-2687
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BRITISH COLUMBIA

Responsibility for occupational health and safety in British Columbia belongs chiefly to the Workers' Compensation Board.

Workers' Compensation Board of
 British Columbia
 6951 Westminster Highway
 Richmond, British Columbia
 V7C 1C6

Mailing Address:

Workers' Compensation Board Box 5350 Vancouver, British Columbia V6B 5L5	General Inquiries FAX WHMIS	(604) 273-2266 (604) 279-7409 (604) 273-2266
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MANITOBA

Workplace Safety and Health Manitoba Labour 1000 - 330 St. Mary Avenue Winnipeg, Manitoba R3C 3Z5	General Inquiries Toll-free WHMIS	(204) 945-3446 1-800-282-8069 (204) 945-3603
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NEW BRUNSWICK

Occupational Health and Safety Commission P.O. Box 6000 Fredericton, New Brunswick E3B 5H1	General Inquiries Toll-free WHMIS	(506) 453-2467 1-800-442-9776 (506) 453-2467
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NEWFOUNDLAND

Occupational Health and Safety Division	General Inquiries	(709) 729-2721
Department of Employment and Labour Relations	FAX	(709) 729-6639
Confederation Building	Toll-free	1-800-563-5471
P.O. Box 8700	WHMIS	(709) 729-5548
St. John's, Newfoundland		
A1B 4J6		

NOVA SCOTIA

Occupational Health and Safety	General Inquiries	(902) 424-8400
Department of Labour	FAX	(902) 424-3239
5151 Terminal Road, 6th Floor	Toll-free	1-800-424-8603
P.O. Box 697	WHMIS	(902) 424-5402
Halifax, Nova Scotia		
B3J 2T8		

ONTARIO

Occupational Health and Safety Division	General Inquiries	(416) 326-7744
Ministry of Labour	FAX	(416) 326-7745
400 University Avenue, 9th Floor	WHMIS (London)	(519) 439-3231
Toronto, Ontario		
M7A 1T7		

PRINCE EDWARD ISLAND

Occupational Health and Safety Division	General Inquiries	(902) 368-5470
Department of Provincial Affairs and Attorney General	FAX	(902) 368-5526
31 Gordon Drive	WHMIS	(902) 368-5470
P.O. Box 2000		
Sherwood, Prince Edward Island		
C1A 7N8		

QUÉBEC**Santé et sécurité des travailleurs**

Commission de la santé et de la sécurité au travail du Québec	Informations générales	(514) 873-7545
1199, rue de Bleury	Télécopieur	(514) 864-2912
C.P. 6056, succursale A	Service du répertoire toxicologique (<i>SIMDUT</i>)	(514) 873-6374
Montréal (Québec)		
H3C 4E1		

Transport des matières dangereuses

Ministère des Transports	Téléphone	(418) 643-2235
Division du transport des matières dangereuses	Télécopieur	(418) 644-9072
700, boul. René-Lévesque est		
Place Hauteville, 23 ^e étage		
Québec (Québec)		
G1R 5H1		

Environnement (procédé industriel, entreposage, gestion des déchets)

Ministère de l'Environnement	Informations générales	(418) 643-6071
3900, rue de Marly	Application réglementaire	(514) 873-3636
Sainte-Foy (Québec)	Télécopieur	(514) 873-5662
G1X 4E4		

SASKATCHEWAN
Occupational Health and Safety Act

Occupational Health and Safety Branch	General Inquiries	(306) 787-4496
Department of Human Resources, Labour and Employment	Toll-free	1-800-567-7233
1870 Albert Street	WHMIS	(306) 787-4496
Regina, Saskatchewan		
S4P 3V7		

Environmental Management and Protection Act

Air and Land Protection Branch	General Inquiries	(306) 787-6185
Environment and Resource Management	FAX	(306) 787-0197
3085 Albert Street		
Regina, Saskatchewan		
S4S 0B1		

Dangerous Goods Transportation Act

Regulation and Safety Branch	General Inquiries	(306) 787-5527
Highways and Transportation	FAX	(306) 787-8610
1855 Victoria Avenue		
Regina, Saskatchewan		
S4P 3V5		

SASKATCHEWAN (continued)

Pest Control Products (Saskatchewan) Act

Sustainable Production Branch	General Inquiries	(306) 787-4662
Agriculture and Food	FAX	(306) 787-0428
3085 Albert Street		
Regina, Saskatchewan		
S4S 0B1		

NORTHWEST TERRITORIES

Department of Safety and Public Services	General Inquiries	(403) 873-7468
Government of the Northwest Territories	FAX	(403) 873-0117
P.O. Box 1320	WHMIS	(403) 873-7468
Yellowknife, Northwest Territories		
X1A 2L9		

YUKON

Department of Justice	General Inquiries	(403) 667-5450
P.O. Box 2703	FAX	(403) 667-3609
Whitehorse, Yukon	Toll-free	1-800-661-0408
Y1A 2C6	WHMIS	(403) 667-5450

Information Requirements for a Chemical Pest Control Product Registered Under the Importation for Manufacturing and Export Program (IMEP)

1. A complete Material Safety Data Sheet (MSDS), as defined in the *Hazardous Products Act*, for the material to be imported.
2. Recommended precautions and emergency measures, including personal protective equipment, leak and spill clean-up procedures, handling procedures, storage requirements and first aid measures (MSDS may be cited).
3. The identification of other government agencies, either foreign or within Canada, that have been or will be notified of the importation and manufacture of the control product, and the purpose of such notification.
4. An estimate of the quantity of product to be imported on a per annum basis.
5. The following specifications for each technical active ingredient and/or manufacturing concentrate, as appropriate. (The numbering system follows that of Appendix 1 of Regulatory Directive Dir93-02.)
 - 2.1 Name and Office Address of the Basic Manufacturer of each technical active ingredient
 - 2.2 Date of Specifications
 - 2.3 Trade Name
 - 2.4 Common Name: ISO or CSA common names in CSA standard CAN/CSA-Z143
 - 2.5 Chemical Name: Chemical Abstracts and IUPAC, if available
 - 2.6 Chemical Abstracts Registry Number
 - 2.7 Structural Formula: also includes Wiswesser line notation, if available, for the active (a linear representation of the structural configuration)
 - 2.8 Empirical Formula
 - 2.9 Molecular Weight
 - 2.10 Canadian Patent Status: number, date issued and expiry date
 - 2.11 Name and Address of Manufacturing Plant of each technical active ingredient

2.15 Analytical Data and Methodology:

Specific analytical methodology (such as GC or HPLC with MS detection or other appropriate techniques) used to precisely identify and determine the level of the active ingredient in the product should be submitted. Methods should be validated using standards. Validation data should be included with the submission. This should include chromatograms of a sample formulation and of a blank (placebo) formulation to demonstrate absence of interference.

2.16.1 Chemical and Physical Properties of each Pure Active:

- Melting Point or range (for solids)
- Boiling Point (for liquids)
- Solvent Solubility (representative polar and non-polar solvents) (g/100 g)

2.16.2 Chemical and Physical Properties of the imported material:

- Colour
- Odour
- Physical State
- Density or Specific Gravity
- Viscosity
- Vapour Pressure at 20°C
- Stability (Oxidation and Thermal)

6. Samples: A 2.5 g analytical reference standard of each active ingredient in the imported product. Please send samples directly to:

Evaluation Unit
Pesticide Laboratory
Agriculture and Agri-Food Canada
Plant Products Building
No. 22, Central Experimental Farm
Ottawa, Ontario
K1A 0C6

7. The following environmental chemistry and toxicity data (The numbering system follows that in Regulatory Directive Dir93-01.):

- 6.2.1.1 Vapour Pressure
- 6.2.1.2 Hydrolysis
- 6.2.1.4 Solubility in Water
- 6.2.1.5 Octanol-Water Partition Coefficient
- 6.2.2.1 Adsorption/Desorption Measurements
- 6.2.4 Analytical Methodology (Soil, Water)
- 6.2.3.1 Biotransformation in Soil

- 7.2.2 Toxicity to Fish (Rainbow Trout) (summary only)
- 7.3.7 Toxicity to *Daphnia magna* (summary only)

8. The following mammalian toxicity data (complete studies) (The numbering system follows that in Regulative Directive Dir93-01.):
- 3.2.2 Acute Oral
 - 3.2.3 Acute Dermal
 - 3.2.4 Acute Inhalation
 - 3.2.5 Primary Eye Irritation
 - 3.2.6 Primary Dermal Irritation
 - 3.2.7 Dermal Sensitization
9. The following information regarding the Canadian manufacturer and the product to be exported:
- (1) Name and address of the Canadian Manufacturing Plant;
 - (2) Letter of support from the Canadian manufacturer;
 - (3) Draft label of the product to be exported (when available);
 - (4) MSDS for exported product (when available); and
 - (5) Product Specification form for exported product (when available).
10. Information indicating that the imported product is approved for sale or registered in the United States in a EU country.

**Draft Label for a Pest Control Product
Registered Under the Importation
Solely for Manufacturing and Export Program (IMEP)**

PRODUCT NAME

FOR MANUFACTURING USE ONLY

Precautionary Symbols and Warnings

READ THE LABEL BEFORE USING

GUARANTEE: Common Name(s) or Chemical Name(s) X%

REGISTRATION NUMBER xxxxxxxx PEST CONTROL PRODUCTS ACT

Net Contents _____ kg

Registrant's
Name and Address
Telephone No.: _____

Formulator's
Name and Address
(if different from registrant)
Telephone No.: _____

DIRECTIONS FOR USE

To be used only in the manufacture (formulating, repackaging, repouring) of a pest control product solely for export from Canada. Read Technical Bulletin for formulating details.

PRECAUTIONS:

ENVIRONMENTAL HAZARDS:

FIRST AID: If on skin; if in eyes; if ingested; etc.

TOXICOLOGICAL INFORMATION:

STORAGE:

DISPOSAL:

Canadian manufacturers should dispose of unwanted active ingredients and containers in accordance with municipal or provincial regulations. For additional details and clean up of spills, contact the provincial regulatory agencies.

NOTICE TO USER:

This product is to be used only in accordance with the directions on this label. It is an offence, under the *Pest Control Products Act*, to use a control product under unsafe conditions.

**Prior Notification of Export:
Information required in an export notice
for pest control products under the Importation
for Manufacturing and Export Program (IMEP)**

1. Exporting Country.
2. Name and address of exporter.
3. Names of the pest control product and active ingredient.
4. Chemical Abstracts Service (CAS) registry number for the active ingredient, where applicable.
5. Importing Country.
6. Name and address of the Designated National Authority in the importing country that will receive the export notice (as specified in the List of Toxic Substances Authorities compiled pursuant to subsection 42(2) of the *Canadian Environmental Protection Act*).
7. Review status in Canada. The export notice should state: "The products in question have been assessed in Canada for manufacturing and export purposes only, and not for local or domestic use. Canada has not assessed environmental or safety of the product based on the proposed use in the importing country.
8. Name and address of the Designated National Authority for pesticides in Canada: Director, Information Division, Plant Industry Directorate, Agriculture and Agri-Food Canada, Ottawa, Ontario K1A 0Y9.
9. Intended use or uses of the pest control product as specified by the importer.
10. Quantity of the pest control product in the shipment being exported to the importing country.
11. Name, title and address of the person providing the information contained in the export notice.
12. Date on which the export notice is prepared.

**Submitted for Registration Under the
Importation of Pest Control Products Solely for
Manufacturing and Export Program (IMEP)**

Information Check List for Chemical Products

Information	Submitted	Received	Comments
1. General			
- Cover Letter			
- Application Form			
- Product Spec. Form			
- Fee			
- Draft Label			
- Letter of Confirmation			
- Material Safety Data Sheet for Imported Product			
- Precautions and Emergency Measures			
- Government Agencies Contacted			
- Quantity of Product Imported			
- Approval/registration in U.S. or EU			
2. Product Chemistry: Specifications			
- Basic Manufacturer			
- Specification Date			
- Trade Name			
- Common Name			
- Chemical Name			
- Chemical Abstracts Registry Number			
- Structural Formula			
- Empirical Formula			
- Molecular Weight			
- Canadian Patent Status			

Information	Submitted	Received	Comments
2. Product Chemistry (cont'd): Chemical and Physical Properties			
- Name and Address of Manufacturing Plant			
- Analytical Methodology			
- Melting Point			
- Boiling Point			
- Solvent Solubility			
- Colour			
- Odour			
- Physical State			
- Density or Specific Gravity			
- Viscosity			
- Vapour Pressure			
- Stability			
- Sample(s) of active ingredient(s)			
3. Environmental Chemistry & Toxicity			
- Vapour pressure			
- Hydrolysis			
- Solubility in Water			
- Octanol-Water Partition Coefficient			
- Adsorption/ Desorption Measurements			
- Analytical Methodology (Soil, Water)			
- Biotransformation in Soil			
- Toxicity to Fish (Rainbow trout)			
- Toxicity to <i>Daphnia magna</i>			

Information	Submitted	Received	Comments
4. Mammalian Toxicity Data			
- Acute Oral			
- Acute Dermal			
- Acute Inhalation			
- Primary Eye Irritation			
- Primary Dermal Irritation			
- Dermal Sensitization			
5. Canadian Manufacturer			
- Name, Address of Canadian Manufacturing Plant			
- Letter of Support From Manufacturer			
- Draft Label for the Product to be Exported			
- Specification Form			
- MSDS for Exported Product			