



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

Filename: JR0600FE

PROJECT SHEET

SUBCOMMITTEE: Joint Review of Chemical Pesticides

PROJECT TITLE: **Improved Coordination of Reregistration, Food Quality Protection Act (FQPA) and Re-evaluation Process**

PROJECT TEAM: US EPA - Tom Myers (co-lead)
PMRA - John Worgan (co-lead)

INITIATION: Ongoing

UPDATE: October 30, 2003

GOAL: To identify common re-evaluation/reregistration initiatives and opportunities for work sharing and increased efficiency, focussing on chemical groups most affected by the *U.S. Food Quality Protection Act* (FQPA). Currently the focus of the work is on the organophosphate and carbamate insecticides.

PROJECT DESCRIPTION:

On an ongoing basis to seek ways in which to continue to improve coordination of the reregistration process including communication, scheduling, and work/information sharing.

MILESTONES:

The *Federal Insecticide, Fungicide and Rodenticide Act* (FIFRA), as amended by the Food Quality Protection Act (FQPA) establishes the schedule for reregistration in the United States. The FQPA also requires that all tolerances (Maximum Residue Limits or MRLs in Canada) and exemptions from tolerances be reassessed by August 2006. Based on an assessment of those pesticides which appear to be of highest concern, the U.S. Environmental Protection Agency (EPA) has divided the chemicals for tolerance reassessment into three priority groups. Tolerance reassessment and reregistration of the organophosphate pesticides, as well as some other selected pesticides are receiving highest priority. EPA and the U.S. Department of Agriculture have established a new advisory group to ensure the broadest possible public involvement in the implementation of FQPA, including tolerance reassessment for the organophosphates.

The Canadian Pest Management Regulatory Agency (PMRA) committed to initiate a new re-evaluation process in the fall of 1998, with a target time of seven years for completion of the reevaluation of all older pesticides and associated MRLs. This schedule was established on the basis of making maximum use of international reviews of data, and will provide more opportunities to harmonize MRLs as much as practicable. A system for prioritizing the activities for re-evaluation will, therefore, be largely driven by re-evaluations done by other countries, particularly those who are members of the Organisation for Economic Co-operation and Development (OECD) Pesticide Forum, such as the U.S.

Milestones to date include:

- Provision of information by PMRA to EPA on a survey of use rates, and data supporting them, for certain individual organophosphate insecticides, the results of which indicated that there could be possibilities for rate reduction of some uses.
- A survey of the reregistration schedules of other countries, e.g., European Union and OECD countries to locate reviews from those countries. Ongoing
- A mutual understanding of processes.
- Identification of opportunities to work together on approaches, e.g., aggregate exposures, consultation with users. Ongoing in Canada and the U.S., and cumulative risk assessment.
- Opportunities for sharing work on actual reviews, e.g., 2,4-D, MCPA, resmethrin. Ongoing
- PMRA attendance at the Committee to Advise on Reassessment and Transition (CARAT).
- Record of Understanding developed between U.S. and Canada commits to ongoing cooperation with respect to FQPA.
- Monthly conference calls between EPA and PMRA staff to exchange information and keep abreast of developments

BACKGROUND / RATIONALE:

Joint reviews and work sharing activities have tended to focus on newer pest control products. As a result of discussion among members of the NAFTA TWG, it was concluded that reregistration (review of older compounds) would benefit from a similar approach. A well defined process for coordinating reregistration and sharing information on currently registered products is needed, especially with respect to the potential impacts on Canada and Mexico of the implementation of the FQPA.

The FQPA requires EPA to examine the aggregate risks of individual pesticides as well as the cumulative risks of chemical groups with a common mechanism of action. In accordance with the necessity to look at the more risky pesticides first, focus was initially placed on reevaluation of the organophosphates, carbamates, and B2 carcinogens. Re-evaluation is expanding to include other groups of compounds.

The reevaluation of the organophosphates under FQPA may result in changes in the uses and associated

tolerances of these chemicals, and thus, has the potential to affect trade with NAFTA partners. As a result, it is important that the U.S., Canada and Mexico work closely together to ensure that the best possible information is used in making decisions and that all groups are kept fully informed throughout the reevaluation process.

WORK PLAN

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GOAL	ACTIVITIES	TIME FRAME
<p>1. Share experience of reviewing labels of selected Organophosphates</p> <ul style="list-style-type: none"> • Canada contracted a review of whether efficacy data existed which would allow a refinement of the uses of certain organophosphates and, therefore, a lowering of label rates. There are indications that such action is likely possible but only a small amount of relevant data are available. • Canada is currently preparing consolidated summaries of Canadian label uses of all organophosphates, to be used as the basis for establishing the final use standard and carrying out label changes and improvements. 	<ul style="list-style-type: none"> • The PMRA to forward information to EPA. • Results supplied to EPA, as available. 	<ul style="list-style-type: none"> • Complete. • Label summaries for malathion, azinphos-methyl, ethion, naled, phorate and terbufos have been forwarded to the Biological and Economic Assessment Division (BEAD) by the PMRA. Similar label summaries are available for all of the organophosphates currently registered for use in Canada.
<p>2. Identify Priority Candidates:</p> <ul style="list-style-type: none"> • Organophosphates, carbamates, B2 carcinogens 	<ul style="list-style-type: none"> • Scheduling of tolerance reassessment under FQPA and reregistration schedules. 	<ul style="list-style-type: none"> • Complete, identification of other candidates ongoing

GOAL	ACTIVITIES	TIME FRAME
<p>3. <i>Communicate progress on, and to the extent possible, involve NAFTA partners in tolerance reassessment.</i></p> <ul style="list-style-type: none"> • Canada will be notifying user organizations to be prepared to indicate important uses of the organophosphates and carbamates. Information to be shared with EPA. 	<p>Develop a communication strategy for NAFTA partners, explore avenues for their participation in the tolerance reassessment.</p> <ul style="list-style-type: none"> • Conduct monthly EPA/PMRA conference calls to discuss reregistration issues • The PMRA to develop consultation document and send to users. • Compile information received and provide to EPA. • Canadian participation in EPA working groups e.g. aggregate exposures, user consultation is being implemented • PMRA attendance at CARAT meetings 	<p>Ongoing: Meeting held between PMRA and US EPA co-chairs on February 17, 1998 to explore possibilities.</p> <ul style="list-style-type: none"> • Ongoing (Initiated August 2002) • Consultation held in July 1998. • Use/usage information supplied by provinces fall 1998. Analyzed by PMRA. • PMRA is keeping abreast of changes that are ongoing at EPA as a result of FQPA. PMRA is actively participating with EPA in certain areas, e.g., residential exposure to achieve harmonized approaches. The PMRA is supportive of the proposed policy and methodology changes occurring at EPA and will continue to examine their applicability to the Canadian context and will comment as the occasion arises. • Ongoing

GOAL	ACTIVITIES	TIME FRAME
	<ul style="list-style-type: none">• Opportunities for work sharing identification of the active ingredients that Canada would review, are being explored	<ul style="list-style-type: none">• Ongoing