



# Re-evaluation Decision Document

RRD2004-04

## Re-evaluation of Terbufos

The purpose of this Re-evaluation Decision Document (RRD) is to notify registrants, pesticide regulatory officials and the Canadian public that the re-evaluation of terbufos is now complete. Based on a review of the available information, the Pest Management Regulatory Agency (PMRA) has determined that all uses of terbufos, except with sugar beets, are to be phased out.

This RRD summarizes the comment made to the PMRA in response to the Proposed Acceptability for Continuing Registration document [PACR2003-02, \*Re-evaluation of Terbufos\*](#), published on 24 January 2003. This document also provides the PMRA's response to this comment and presents the regulatory decisions resulting from the re-evaluation of terbufos.

*(publié aussi en français)*

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## 1.0 Introduction

The re-evaluation of the active ingredient terbufos, an insecticide manufactured by BASF Canada Inc., and the associated end-use products for use on canola, corn, mustard, rutabagas and sugar beets has been completed by the PMRA.

## 2.0 Background

In June 1999, the PMRA announced<sup>1</sup> that organophosphate active ingredients, including terbufos, were subject to re-evaluation under authority of Section 19 of the Pest Control Products (PCP) Regulations. The purpose of this RRD is to notify registrants, pesticide regulatory officials and the Canadian public that the re-evaluation of terbufos is now complete.

The PMRA published [PACR2003-02, \*Re-evaluation of Terbufos\*](#), on 24 January 2003 for consultation on the proposed regulatory decision for terbufos. The PMRA received one comment from a growers' association regarding PACR2003-02. This RRD summarizes this comment and the PMRA's response (Appendix I). This document also presents the regulatory decisions resulting from the re-evaluation of terbufos.

## 3.0 Regulatory decision

The PMRA reviewed the comment received and has concluded that no changes are required to the proposed regulatory decision in [PACR2003-02](#). The PMRA has concluded that the use of terbufos and its associated end-use products in accordance with the label directions does entail an unacceptable risk of harm to the environment pursuant to Section 20 of the PCP Regulations. Therefore, the use of terbufos and associated end-use products on canola and mustard will be phased out by 30 June 2004, and uses on corn and rutabagas will be phased out by 31 December 2004. The PMRA is prepared to accept continued registration for use on sugar beets until 31 December 2006. Identified risks to workers from using terbufos on sugar beets can be effectively mitigated by ensuring engineering controls and requirements regarding additional personal protective equipment and clothing are implemented.

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<sup>1</sup> Re-evaluation Document [REV99-01, \*Re-evaluation of Organophosphate Pesticides\*](#).

### **3.1 Counter 5-G Soil Insecticide (canola and mustard)**

In light of the identified risks to the environment from Counter 5-G Soil Insecticide (Registration No. 17037, *Pest Control Products Act* [PCPA]) and worker risk concerns associated with open mixing and loading, the PMRA has determined that all uses of this product are to be phased out. The registrant, BASF Canada Inc., has accepted this decision and has discontinued sale of Counter 5-G Soil Insecticide with terms and conditions as follows:

- (1) Last date of sale of Counter 5-G by the registrant: 30 June 2003
- (2) Last date of sale of Counter 5-G by retailers, wholesalers or seed blenders: 31 May 2004
- (3) Last date for use of Counter 5-G by users and growers: 30 June 2004

The registration of Counter 5-G Insecticide will be cancelled on 30 June 2004. Disposal of remaining Counter 5-G Insecticide following cancellation of the registration would be at the owner's expense.

### **3.2 Counter 15-G Lock'n Load Soil Insecticide Granular (corn, rutabaga, sugar beet)**

#### **3.2.1 Corn and rutabaga**

In light of the identified risks to the environment from Counter 15-G Lock'n Load Soil Insecticide Granular (Registration No. 15268, PCPA), uses on corn and rutabaga are to be phased out according to the following schedule:

- (1) Last date of sale by the registrant of Counter 15-G labelled for uses on corn and rutabaga: 31 December 2003
- (2) Last date for sale by distributors or retailers of Counter 15-G labelled for uses on corn and rutabaga: 1 May 2004
- (3) Last date for use of Counter 15-G on corn and rutabaga by users and growers: 31 December 2004

The registrant, BASF Canada Inc., has agreed to remove corn and rutabaga uses from the label of Counter 15-G Lock'n Load Soil Insecticide Granular.

### 3.2.2 Sugar beets

While an alternative to terbufos (i.e., carbofuran) is registered for use on sugar beets in Western Canada for the control of sugar beet root maggots, none are registered across Canada for the control of wireworms and sugar beet root maggots on sugar beets. Use of terbufos on sugar beet across Canada is limited (500 ha), with the majority of this use occurring in Eastern Canada. In light of these considerations, the PMRA has determined that continued registration of Counter 15-G for use on sugar beets is acceptable for now. In 2006, this decision will be revisited based on the extent of use of Counter 15-G and the availability of control alternatives.

Based on the assessments of terbufos, the label for Counter 15-G is to be revised as described in Appendix I of [PACR2003-02](#). The registrant has agreed to amend the label accordingly.

Growers are encouraged to work with registrants and the PMRA to facilitate transition to alternatives.

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## Appendix I      Comment and response

The PMRA received one comment from a rutabaga growers' association in Ontario concerning [PACR2003-02, \*Re-evaluation of Terbufos\*](#), the contents of which and the response are summarized below.

### **Comment on value – alternatives**

Growers expressed concern that other than terbufos, the only registered product for the control of cabbage maggot on rutabaga was chlorpyrifos. Since chlorpyrifos was also under re-evaluation, they anticipated that this active ingredient could be phased out, leaving no products registered for the control of cabbage maggot on rutabaga.

### **PMRA response**

As part of the re-evaluation of chlorpyrifos, the PMRA published [PACR2003-03, \*Phase 2 of the Re-evaluation of Chlorpyrifos\*](#), on 18 March 2003. In this document, the PMRA proposes that continued registration of uses of chlorpyrifos for the control of cabbage maggot on rutabaga is acceptable.