## Re-evaluation Decision Document

RRD2005-02

# 10,10'-oxybis(phenoxarsine)

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 10,10'-oxybis(phenoxarsine) is now complete.

The Pest Management Regulatory Agency (PMRA) has determined that 10,10'-oxybis(phenoxarsine) is acceptable for continued registration provided that the proposed mitigation measures are adopted. Additional data requirements are identified.

This RRD includes the comment made to the PMRA in response to the Proposed Acceptability for Continuing Registration (PACR) document <u>PACR2004-14</u>, *Re-evaluation of 10,10'-oxybis(phenoxarsine)*, published on 4 June 2004. This document also provides the PMRA's response to the comment and the regulatory decisions resulting from the re-evaluation of 10,10'-oxybis(phenoxarsine).

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#### 1.0 Introduction

The re-evaluation of the available information for the active ingredient 10,10'-oxybis(phenoxarsine) and its associated uses as a material preservative in vinyl manufactured products has been completed by the PMRA.

## 2.0 Background

The purpose of this RRD is to notify registrants, pesticide regulatory officials and the Canadian public that the re-evaluation of 10,10'-oxybis(phenoxarsine) is now complete.

On 4 June 2004, the PMRA published PACR2004-14, *Re-evaluation of 10,10'-oxybis(phenoxarsine)*, for consultation on the proposed regulatory decision for 10,10'-oxybis(phenoxarsine). One comment was received from the registrant concerning this PACR.

This RRD summarizes this comments and the PMRA's response as well as outlines the regulatory decision resulting from the re-evaluation of 10,10'-oxybis(phenoxarsine).

### 3.0 Regulatory decision

The PMRA has reviewed the comment received in response to the proposed regulatory decision for 10,10'-oxybis(phenoxarsine) (Appendix I) and has concluded that this comment did not result in any substantive change to the regulatory decision as described in PACR2004-14.

The PMRA has determined that 10,10'-oxybis(phenoxarsine) is acceptable for continuing registration provided that the mitigation measures specified in the PACR are implemented.

The registrants will be informed by letter of the specific requirements affecting their product registrations and the regulatory options available to comply with this decision.

## Appendix I Comments and responses to PACR 2004-14

The PMRA has consolidated and summarized the comment received in response to PACR2004-14 and provides a response as outlined below.

#### Comment concerning chemistry—inorganic arsenic contamination:

This comment is related to the label revisions proposed in Section 4.0 of the PACR.

The registrant, Rohm and Haas Canada Inc., previously submitted data to the PMRA showing that inorganic arsenic contamination is possible but unlikely. Subsequent data submitted to the PMRA showed that inorganic arsenic is not present as an impurity. In response to the 10,10'-oxybis(phenoxarsine) PACR, Rohm and Haas Canada Inc. initiated additional studies with preliminary results showing no detections of arsenic in a sample of 10,10'-oxybis(phenoxarsine).

10,10'-oxybis(phenoxarsine) has very good thermal stability and its arsenic carbon bond is very stable at plastic processing conditions.

#### **Response:**

Based on the PMRA review of the manufacturing process, it was concluded that contamination of 10,10'-oxybis(phenoxarsine) with inorganic arsenics as an impurity is very unlikely.

The information included in the comment from Rohm and Haas Canada Inc. suggests that the release of arsenic during the manufacture of plastic products is unlikely. However, data must be submitted to support this conclusion. This data can be submitted as part of the requirements listed in Section 5.0 of the PACR.

Until such data have been received and reviewed, the PMRA will require a label statement regarding potential release of arsenic during use of 10,10'-oxybis(phenoxarsine).