Pest Management Regulatory Agency
Teleconference on Canada's Pesticide Re-Evaluation Process
Tuesday, November 15, 2005 1:00 to 2:00

1. Introduction from the Chair John Worgan, PMRA

   The Chair welcomed everyone and a roundtable of introductions was made.

2. John Worgan introduced PMRA's proposal regarding transitional active ingredients under re-evaluation.

   The term "transition" refers to the transition from the existing Pest Control Products Act (PCPA) to the new PCPA. There are two types of transitional active ingredients:

   1) Those for which the consultation document (PACR) is published under the existing PCPA and the decision document (RRD) will be published under the new PCPA, and

   2) Those for which the reevaluation has been split into 2 phases and the first phase of re-evaluation has been done (e.g. 2,4D turf) under the existing PCPA while the second phase (e.g. 2, 4D agricultural uses) will be completed under the new PCPA.

   The issue relates to the transparency provisions of the new PCPA. Under the new Act, the PMRA is required to put evaluation reports, confidential test data and other prescribed information (as specified in Section 42 of the new Act) into the Register if the final reevaluation decision made under the new Act. If the final decision is made under the existing PCPA, these transparency requirements do not apply.

   Assuming the new PCPA is be implemented early 2006, there will be approximately 17 type 1 transitional active ingredients.

   The PMRA is proposing to make the final decision after the new PCPA comes into force for those transitional active ingredients, for which potential health and/or environmental concerns have been raised or for which a significant number of comments have been received on the consultation document. In this way, the stakeholders will have an opportunity to review the evaluation reports and inspect confidential test data for these active ingredients if they wish to do so.

However, in order to ensure continued progress of the re-evaluation program, the PMRA will publish the final decision documents before the new Act is implemented for the following transitional active ingredients:

- those re-evaluated under Program 1
- those for which no significant health or environmental issues were identified
- those for which no significant comments were received during the public consultation,

For the above mentioned type 2 actives such as 2,4-D, MCPA, dicamba and atrazine, the PACR for the first phase has been published. A re-evaluation Note (REV Note) will be published after this first phase of the re-evaluation to update the status and to implement interim mitigation measures on those uses covered during the first phase. The final decision (RRD) will cover both phases (e.g. turf and agricultural uses for 2,4D) and will be published when the second phase reevaluation is completed. Only one RRD for each active ingredient will be published, whether the reevaluation is split or not. The new PCPA transparency requirements will be met when the final decision is made, i.e., when the RRD for the whole active is published. Therefore, evaluation reports and confidential test data for the active will be put in the Register when final decision is made.

In case the implementation of the new PCPA is delayed, the list of transitional actives may change, but the proposed approach will remain the same.

3. John Worgan introduced PMRA's proposal regarding the generic data requirements for Program 1 re-evaluations

Currently, for program 1, the registrants of technical active ingredients are typically required to submit the following data within 24 months of finalization of the reevaluation decision document:

1) all data (as it relates to Canadian use pattern) submitted to the USEPA in response to the US data call-in prior to the US re-registration, and USEPA DERs;

2) all data (as it relates to Canadian use pattern) which was required by the USEPA as a condition of re-registration;

3) a commitment and schedule to address Canadian requirements that are not addressed through submission of the data outlined above as per PMRA DACOs based on the USC the active ingredient is registered for.

The PMRA is proposing to remove the above generic data requirements under Program 1 for the following reasons:

1) These data were not going to be scheduled for review until new submissions or special review/future re-evaluations. When necessary to support use expansion, minor use, MRL or special review, the data will be requested at that point.

2) The approach by which the Program 1 reevaluation is conducted and upon which the stakeholders agreed, as published in REV Note 2001-03, did not include this generic data requirement.

3) These data have not been directly used by the PMRA and the reevaluation decisions have not been directly based on these data. The Program 1 is designed to base re-evaluation decisions primarily on foreign reviews such as USEPA RED.

This removal of generic data requirement does not include specific data identified in PACR/RRD such as drinking water monitoring studies, chemistry data, or ecotoxicity data needed for buffer zone calculations. These data will still be required and, once they are received, will be scheduled for review.

4. Comments from stakeholders on the above two proposals

The comments received were positive and no major concerns were identified. Some clarifications were requested and provided. The Chair suggested a 2 week period to allow stakeholders time to provide further comment. Comments to be sent to chair by December 1, 2005.