Update: Low Risk Pest Control Products

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- Recommended:
 - Criteria to identify low risk products
 - Tiered approach to data requirements
 - More concerns identified, more data required
 - Requirements to assess value
 - Expedited timelines
 - Specific timelines would depend on the Tier
 - Factors to consider in selecting regulatory options (i.e., register or schedule)
 - Minimum fees
 - Clear guidance be developed and a possible pilot project following consultation on guidance





- Clarified criteria
 - Necessary criteria one modification
 - Low inherent toxicity or minimal exposure
 - Other considerations:
 - Substance widely available for other uses
 - Long history of safe use
 - Common food or food stuff
 - Non-toxic mode of action
 - Unlikely to cause resistance





- Proposed details for Tiered evaluation and submission process, including timelines
 - Presubmission consultation step important to determine:
 - Eligibility for low risk stream
 - Data requirements / Tier
 - Timelines: consistent with or shorter than USA





- Analyzed approaches and lessons learned from other jurisdictions
 - USA, EU, Australia
 - Current focus: Biochemical Pesticide Proposed Rule (Fed. Reg. March 8, DFR Part 158)





- Gained experience in evaluating non conventional, low risk pesticides and in applying different regulatory approaches
 - Registration
 - Sodium chloride, potassium bicarbonate
 - Interim, non registration route (eventual scheduling?)
 - Barley straw, mineral oil, oxalic acid
 - Pheromone traps and baits
- Need more feedback from applicants on benefits of different routes





Current Status and Next Steps

- Guidance document has been drafted and is being discussed internally and with EPA
- July Aug: PMAC Working Group Review
- > Fall: Publish for public comment
- In the meantime:
 - a tiered approach has already been implemented re risk and value data requirements and evaluations
 - some pesticides are being exempted from registration until guidance finalized



