

HEALTH CANADA DECISION MAKING

HEALTH PROTECTION BRANCH APPROACH TO RISK ASSESSMENT - RISK MANAGEMENT DECISION MAKING

HIGH LEVEL

DEFINED STEPS AND STRUCTURE TO DECISION MAKING

VARIOUS COMPONENTS
INTERELATIONSHIP AMONG COMPONENTS

BASIC STEPS AND PRINCIPLES APPLY TO RISK ASSESSMENT - RISK MANAGEMENT FOR MANY SITUATIONS INCLUDING CHEMICALS

RISK ASSESSMENT AND RISK MANAGEMENT IN THE PMRA

DOCUMENT - DESCRIBES RISK ASSESSMENT AND RISK MANAGEMENT STEPS/COMPONENTS FOR PESTICIDES

BY NECESSITY - PROGRAM SPECIFIC
REGULATORY ASPECTS OF PCP ACT AND
FDA SETS THE PARAMETERS FOR WHAT IS
DONE

ACTS SET FLEXIBILITY WE HAVE - CONSULTATION

RISK ASSESSMENT AND RISK MANAGEMENT IN THE PMRA

DESCRIBES OUR FRAMEWORK BASED ON EXAMPLE OF A TYPICAL NEW CHEMICAL ACTIVE INGREDIENT

RECOGNIZE

NOT A SOP WITH DETAILED PROCESS DESCRIPTIONS FOR EVERYTHING

MANY DECISIONS NOT AS COMPLEX AS FOR NEW ACTIVE

- Formulation amendments
- Modification of existing registrations; another pest or crop

REFERENCES - TO OTHER DOCUMENT; TSMP POLICY, DATA REQUIREMENTS

APPLIES TO ALL CHEMICAL PRODUCTS UNDER RE-EVALUATION

WITH MODIFICATION - SPECIFIC SITUATIONS

- MICROBIAL PESTICIDES
- PHEROMONES

DECISION FRAMEWORK OF PMRA

Decision Steps	Components			
Identification of Issue and Context	Initiation of Assessment and Management of Risk Request for Registration Re-evaluation New Monitoring Results			
	Risk to Health Risk to the Environment Value			
Assessment of Risk and Value	Hazard Identification Dose Response Assessment Exposure Assessment Risk Characterization Efficacy Economics/ Competitiveness Sustainability			
Management of Risk	Identification and Analysis of Options Selection of a Risk Management Strategy			
Management of Nick	Implementation of the Strategy			
Monitoring and Evaluation of Results	Enforcement and Compliance Special Surveys Maintaining a Modern Supporting Data Base			

IDENTIFICATION OF ISSUE AND CONTEXT

COMPONENT: INITIATION OF ASSESSMENT AND MANAGEMENT OF RISK

REQUEST FROM REGISTRANT

RE-EVALUATION

NEW MONITORING

ASSESSMENT OF RISK AND VALUE

COMPONENTS:						
HEALTH	RISK	ENVIRONMENTA RISK	AL VALUE			
	Hazard	identification	-	Eff cac		
	Dose re	sponse assessme	ent Econo	omi		
				Con eti ive		
	Exposur	e assessment				
		ability aracterization				

MANAGEMENT OF RISK

COMPONENTS:

IDENTIFICATION, ANALYSIS OF OPTIONS

SELECTION OF RISK MANAGEMENT STRATEGY

IMPLEMENTATION OF STRATEGY

MANAGEMENT OF RISK

POINT OF CONVERGENCE OF ALL ACTIVITIES

COLLECTIVE DETERMINATION OF ACCEPTABILITY

Chemistry - contaminants, quality,

analytical

methodologies

Health risks

Environmental risks

Efficacy and value

Consistency - other Federal policies/Acts

international agreements

Decision Step 4.

MONITORING AND EVALUATION OF RESULTS

COMPONENTS:

ENFORCEMENT AND COMPLIANCE

ROUTINE AND SPECIAL SURVEYS

MAINTAINING A MODERN AND SUPPORTING DATA BASE

CONSULTATION

EVOLVED FROM NO PUBLIC PARTICIPATION

PUBLIC INPUT NOW MORE REGULAR
PRDDs, Regulatory Notes, Committees EMAC, PMAC and FPT

CURRENT PCPA POSES A CHALLENGE -

Submission information is confidential

Require Registrant permission for disclosure

- other agencies, negative decisions, public

DOCUMENT DESCRIBES EXISTING
CONSULTATION PROCESS - expect this to
change in near future

AMENDMENT TO LEGISLATION - will expand ability to consult

RISK ASSESSMENT AND RISK MANAGEMENT AT PMRA

PROCESS STEPS DESCRIBED SEQUENTIALLY

ACTUALLY - HIGHLY ITERATIVE

- MANY TASKS CONDUCTED IN PARALLEL
- MANY FEED BACK LOOPS

USUALLY - RISK MANAGEMENT OPTIONS PROMPT RE-CALCULATION OF RISKS UNDER NEW MITIGATION CONDITIONS

INTERNATIONAL CONTEXT

APPROACH TO RISK ASSESSMENT AND RISK MANAGEMENT

LONG HISTORY - REGULATORY AGENCIES
MUST MAKE WITH PRE-MARKET DECISIONS

APPROACH EVOLVED INTERNATIONALLY IN CONSISTENT MANNER FOR VARIOUS REGULATED SITUATIONS

Food additives

Pharmaceuticals

BASIC SCIENTIFIC PRINCIPLES AND PRACTICES FOR PESTICIDES ARE SIMILAR

INTERNATIONAL PROCEDURES FOR RISK ASSESSMENT AND RISK MANAGEMENT ALSO HARMONIZED

PMRA APPROACH FOR PESTICIDES CONSISTENT WITH THAT OF OTHER MAJOR
REGULATORY AGENCIES IN WORLD

CONCLUSION

SCIENTIFIC APPROACHES WILL CONTINUE TO EVOLVE

- cumulative risk
- aggregation of exposure
- better methods to detect endocrine disruption

APPROACH TO RISK ASSESSMENT AND RISK MANAGEMENT WILL ALSO EVOLVE

PMRA APPROACH TO RISK ASSESSMENT AND RISK MANAGEMENT OF PESTICIDES WILL KEEP PACE WITH SCIENTIFIC ADVANCEMENT

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