



Agriculture
Canada

Canada

Food Production
and Inspection Branch
Pesticides Directorate

Direction générale,
Production et inspection des aliments
Direction des pesticides

Note to CAPCO

C91-04

LABELLING REQUIREMENTS FOR PESTICIDES EXPORTED FROM THE U.S. TO CANADA

This Note is intended to provide clarification for registrants, provincial authorities and other interested parties concerning U.S. labelling requirements for pesticides exported from the U.S. to Canada.

The Environmental Protection Agency (EPA) has recently tightened U.S. labelling requirements for exported pesticide products. The policy, based on a stricter interpretation of Section 17 of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), requires that:

- ! the composition and labelling of an export product must be identical to a product registered in the U.S., or
- ! the statement "not registered for use in the U.S.A." must appear on the product labelling.

Application of this American labelling policy has affected the shipment by registrants of some products from the U.S. to Canada. Several firms have recently brought this situation to the attention of the Pesticides Directorate.

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This bulletin is published by the Pesticide Information Division of the Pesticides Directorate. For further information, please contact:

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Pesticides Directorate officials have met with EPA counterparts to ensure that Canadian labelling integrity is maintained while, at the same time, American export labelling requirements are met. In summary, the outcome of the discussion was the understanding that:

- ! Canadian product labels will not be altered in any way to meet U.S. export labelling requirements;
- ! U.S. labels, or any labelling that is acceptable to EPA, may accompany the shipping document or be placed on the outside of the shipping pallet; or
- ! the wording "not registered for use in the United States of America" may be placed on the shipping document or the outside of the shipping pallet.

In this way, the requirements and responsibilities of both regulatory systems will be met without compromise.

Please direct any inquiries on this matter to Dr. F.Y. Chang, Issues, Planning and Priorities Division (613) 993-4544.

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