Pest Management Regulatory Agency
Agence de réglementation de la lutte antiparasitaire

Re-evaluation Decision Document RRD2006-04

Terbacil

The purpose of this Re-evaluation Decision Document (RRD) is to notify registrants, pesticide regulatory officials and the Canadian public that Health Canada's Pest Management Regulatory Agency (PMRA) has re-evaluated the active ingredient terbacil and its associated uses as a herbicide on terrestrial food crops.

On 30 June 2005, Proposed Acceptability for Continuing Registration document PACR2005-04, *Re-evaluation of Terbacil*, was published for consultation. The PMRA has reviewed the comments received and provides a response in Appendix I of this RRD. These comments did not result in any changes to the regulatory decision as described in PACR2005-04.

The PMRA has determined that this active ingredient is acceptable for continuing registration. Mitigation measures to further protect workers and the environment are specified in PACR2005-04. The registrants have been informed by letter of the specific requirements, including additional confirmatory data requirements, affecting their product registrations and the regulatory options available to comply with this decision.

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Publications
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
A.L. 6605C
Ottawa, Ontario
K1A 0K9

Internet: pmra_publications@hc-sc.gc.ca
www.pmra-arla.gc.ca
Information Service:
1 800 267-6315 or (613) 736-3799
Facsimile: (613) 736-3758

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Appendix I Comments to PACR2005-04 and Responses

1.0 Comment Regarding Amendment of Canadian Label

It is suggested the Canadian label for Sinbar be amended to include the additional weeds that are listed on the American label and to extend the use on raspberries (caneberries) to all Canadian provinces, as this use is currently registered in British Columbia only.

Response
The registrant or the users of Sinbar may apply to amend the Canadian label to add uses, regions and pests.

2.0 Comment Regarding ASAE Spray Droplet Classification

The American Society of Agricultural Engineers (ASAE) droplet size classification system is too technical for applicators and should not be put on labels. It is suggested that a result-based approach on labels plus a separate guideline document, or a more applicator-friendly wording such as specification of nozzle types or droplet size ranges be included on labels.

Response
Indicating the spray droplet size range would be more technical than indicating the ASAE category. The spray quality classification schemes of the ASAE and the British Crop Protection Council are the principle international classification schemes used by nozzle manufacturers to determine the average droplet size for a given nozzle under certain operating conditions. Information on ASAE nozzle classification is available from all nozzle manufacturers and is easily accessible to any applicator through company brochures, on-line user manuals and by telephone operator assistance. The technical wording used on the product label guarantees that applicators knowledgeable about their equipment can safely apply the product.

The PMRA is currently in the process of drafting a Best Management Practices (BMP) booklet to accompany product labels with buffer zone requirements and will take into consideration ASAE restrictions and other information related to spray equipment. The BMP booklet is expected to be available to stakeholders for review by the end of March 2006.

3.0 Comment Regarding Buffer Zones under Different Water Depths and Effectiveness of Various Types of Cones and Shields

The PMRA was asked to explain where the water depth should be measured, what is the rationale for distances, and which type of cones and shields the label statement referred to because there are many different types and they are not equally effective.

Response
The water depths in the buffer zone table are intended for average water depths. It is the PMRA's understanding that many growers/applicators have some knowledge of aquatic systems within and outside the treatment area. As such, the PMRA has indicated the depths as fairly broad categories (i.e., < 1 m, 1–3 m and > 3 m); however, grower/applicators must use judgement, based on their knowledge of near-field and in-field aquatic systems, to determine the appropriate buffer zone to observe.

Providing the different buffer zone distances based on the water depths of the aquatic habitats offers the applicator more flexibility than a "one-size-fits-all" buffer zone. The decreasing buffer zone distances reflect the decreased risk as the depth of water increases.

The PMRA agrees that various types of shrouds and cones have different drift reducing capacities. The PMRA adopted the results of an analysis on shrouds and cones conducted by Agriculture and Agri-Food Canada, which indicates that the rough estimates of reduction in spray drift for shrouds and cones are 70% and 30%, respectively.

4.0 Comment Regarding Buffer Zones for Terrestrial Habitats

Buffer zones for terrestrial habitats are too large for many growers, and the re-evaluation document does not include newer drift reduction technologies (such as air induction or low drift nozzles) that would allow growers to apply terbacil close to sensitive habitats.

Response
Buffer zones are required only if sensitive habitats are downwind from the point of application. Buffer zones are, therefore, not required when sensitive habitats are upwind from the application area.

The PMRA recognizes that recent improvements in spray application technology have resulted in a number of low drift nozzles that are being used in the field. However, the PMRA has not yet been able to review drift reduction data for low drift nozzles and is not able to provide buffer zone modifiers for their use at this time.

On 2 November 2005, the PMRA published Regulatory Proposal PRO2005-06, *Agricultural Buffer Zones Strategy Proposal*, for public consultation on buffer zone reduction strategies based on meteorological and equipment factors, allowing growers to reduce their buffer zones at their site. In addition, the PMRA intends to examine the effectiveness of using low drift nozzles in its buffer zone strategy.