

Proposed Registration Decision PRD2021-03

# **Fluazaindolizine and Salibro Nematicide**



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# **Overview**

# <span id="page-4-1"></span><span id="page-4-0"></span>**Proposed registration decision for fluazaindolizine and Salibro Nematicide**

Health Canada's Pest Management Regulatory Agency (PMRA), under the authority of the *[Pest](http://laws.justice.gc.ca/eng/acts/P-9.01/)  [Control Products Act](http://laws.justice.gc.ca/eng/acts/P-9.01/)*, is proposing registration for the sale and use of Reklemel Technical and Salibro Nematicide, containing the technical grade active ingredient fluazaindolizine, to control root-knot nematodes in tuberous and corm vegetables (Crop Subgroup 1C), carrot, cucurbit vegetables (Crop Group 9) and fruiting vegetables (Crop Group 8-09).

An evaluation of available scientific information found that, under the approved conditions of use, the health and environmental risks and the value of the pest control products are acceptable.

This Overview describes the key points of the evaluation, while the Science evaluation provides detailed technical information on the human health, environmental and value assessments of fluazaindolizine and Salibro Nematicide.

# <span id="page-4-2"></span>**What does Health Canada consider when making a registration decision?**

The key objective of the *Pest Control Products Act* is to prevent unacceptable risks to people and the environment from the use of pest control products. Health or environmental risk is considered acceptable<sup>[1](#page-4-3)</sup> if there is reasonable certainty that no harm to human health, future generations or the environment will result from use or exposure to the product under its proposed conditions of registration. The Act also requires that products have value<sup>[2](#page-4-4)</sup> when used according to the label directions. Conditions of registration may include special precautionary measures on the product label to further reduce risk.

To reach its decisions, the PMRA applies modern, rigorous risk-assessment methods and policies. These methods consider the unique characteristics of sensitive subpopulations in humans (for example, children) as well as organisms in the environment. These methods and policies also consider the nature of the effects observed and the uncertainties when predicting the impact of pesticides. For more information on how the Health Canada regulates pesticides, the assessment process and risk-reduction programs, please visit the Pesticides section of the Canada.ca website at Canada.ca/pesticides.

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<span id="page-4-3"></span><sup>1</sup> "Acceptable risks" as defined by subsection 2(2) of the *Pest Control Products Act.*

<span id="page-4-4"></span><sup>&</sup>lt;sup>2</sup> "Value" as defined by subsection 2(1) of the *Pest Control Products Act*: "the product's actual or potential contribution to pest management, taking into account its conditions or proposed conditions of registration, and includes the product's (a) efficacy; (b) effect on host organisms in connection with which it is intended to be used; and (c) health, safety and environmental benefits and social and economic impact."

Before making a final registration decision on fluazaindolizine and Salibro Nematicide, Health Canada's PMRA will consider any comments received from the public in response to this consultation document.<sup>[3](#page-5-2)</sup> Health Canada will then publish a Registration Decision<sup>[4](#page-5-3)</sup> on fluazaindolizine and Salibro Nematicide, which will include the decision, the reasons for it, a summary of comments received on the proposed registration decision and Health Canada's response to these comments.

For more details on the information presented in this Overview, please refer to the Science Evaluation of this consultation document.

# <span id="page-5-0"></span>**What is fluazaindolizine?**

Fluazaindolizine is a nematicide that protects vegetable crops from root-knot nematodes, which induce galls on roots, stunt plants and cause yield losses. Fluazaindolizine results in paralysis of root-knot nematodes followed by mortality.

# <span id="page-5-1"></span>**Health considerations**

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# **Can approved uses of fluazaindolizine affect human health?**

#### **Salibro Nematicide, containing fluazaindolizine, is unlikely to affect your health when used according to label directions.**

Potential exposure to fluazaindolizine may occur through the diet (food and drinking water), when handling and applying the end-use products, or when coming into contact with treated surfaces. When assessing health risks, two key factors are considered: the levels at which no health effects occur and the levels to which people may be exposed. The dose levels used to assess risks are selected to protect the most sensitive human population (for example, children and nursing mothers). As such, sex and gender are taken into account in the risk assessment. Only uses for which the exposure is well below levels that cause no effects in animal testing are considered acceptable for registration.

Toxicology studies in laboratory animals describe potential health effects from varying levels of exposure to a chemical and identify the dose level at which no effects are observed. The health effects noted in animals occur at dose levels more than 100-times higher (and often much higher) than levels to which humans are normally exposed when pesticide products are used according to label directions.

In laboratory animals, the technical grade active ingredient fluazaindolizine was of low acute toxicity via the dermal and inhalation routes of exposure. It was minimally irritating the skin, and did not cause an allergic skin reaction.

<span id="page-5-2"></span><sup>3</sup> "Consultation statement" as required by subsection 28(2) of the *Pest Control Products Act*.

<span id="page-5-3"></span><sup>4</sup> "Decision statement" as required by subsection 28(5) of the *Pest Control Products Act*.

Fluazaindolizine was of moderate acute toxicity via the oral route of exposure and mildly irritating to the eyes; consequently, the signal word "WARNING" and hazard statements "POISON" and "EYE IRRITANT" are required on the label.

The acute toxicity of the end-use product Salibro Nematicide containing fluazaindolizine was low via the oral, dermal and inhalation routes of exposure. It was minimally irritating to the eyes and skin, and did not cause an allergic skin reaction.

Registrant-supplied short- and long-term (lifetime) animal toxicity tests, as well as information from the published scientific literature, were assessed for the potential of fluazaindolizine to cause neurotoxicity, immunotoxicity, chronic toxicity, cancer, reproductive and developmental toxicity, and various other effects. The most sensitive endpoints for risk assessment were effects on the kidney, adrenal glands and liver. There was no evidence of increased sensitivity of the young compared to adult animals. The risk assessment protects against the effects noted above and other potential effects by ensuring that the level of exposure to humans is well below the lowest dose at which these effects occurred in animal tests.

#### **Residues in food and drinking water**

#### **Dietary risks from food and drinking water are not of health concern.**

Aggregate dietary intake estimates (food plus drinking water) revealed that the general population and all infants, the subpopulation which would ingest the most fluazaindolizine relative to body weight, are expected to be exposed to less than 30% of the acute reference dose. Based on these estimates, the acute dietary risk from fluazaindolizine is not of health concern for all population subgroups.

Aggregate dietary intake estimates (food plus drinking water) revealed that the general population and all infants, the subpopulation which would ingest the most fluazaindolizine relative to body weight, are expected to be exposed to less than 74% of the acceptable daily intake. Based on these estimates, the chronic dietary risk from fluazaindolizine is not of health concern for all population subgroups.

The *Food and Drugs Act* prohibits the sale of adulterated food, that is, food containing a pesticide residue that exceeds the established maximum residue limit (MRL). Pesticide MRLs are established for *Food and Drugs Act* purposes through the evaluation of scientific data under the *Pest Control Products Act.* Food containing a pesticide residue that does not exceed the established MRL does not pose an unacceptable health risk.

Residue trials conducted throughout Canada (and the United States) using fluazaindolizine on the primary crops of carrots, potatoes (Crop Subgroup 1C), fruiting vegetables (Crop Group 8-09), and cucurbit vegetables (Crop Group 9) and field accumulation trials (limited and extended) conducted in various North American and European regions on several crops/crop groups are acceptable. The MRLs for this active ingredient can be found in the Science evaluation section of this Consultation Document.

#### **Risks in residential and other non-occupational environments**

A residential risk assessment was not required since the product is not a domestic class product and is not permitted for use in residential areas.

#### **Occupational risks from handling Salibro Nematicide**

#### **Occupational risks are not of concern when Salibro Nematicide is used according to the proposed label directions, which include protective measures.**

Farmers and custom applicators who mix, load or apply Salibro Nematicide can come in direct contact with fluazaindolizine on the skin and through inhalation. In addition, there is the potential for workers to be exposed during postapplication activities when they come in direct contact with Salibro Nematicide residues in treated soil and when moving irrigation lines during or after chemigation. Therefore, the label specifies that anyone mixing, loading and applying Salibro Nematicide must wear a long-sleeved shirt, long pants, chemical-resistant gloves, socks and shoes. Gloves are not required during application while in a closed cab. In addition, for chemigation application, workers are required to wear personal protective equipment as defined in the personal protective equipment (PPE) section of the label for mixers/loaders/applicators when making adjustments or repairs on the chemigation system when this product is in the irrigation water. The label also requires that workers not enter treated fields for twelve (12) hours after application. Taking into consideration these label statements, the number of applications and the expectation of the exposure period for handlers and workers, risks to these individuals are not a concern.

For bystanders, exposure is expected to be negligible. Therefore, health risks to bystanders are not of concern.

# <span id="page-7-0"></span>**Environmental considerations**

#### **What happens when fluazaindolizine is introduced into the environment?**

#### **When used according to label directions, environmental risks associated with fluazaindolizine and its associated end-use product are acceptable.**

Fluazaindolizine enters the environment when Salibro Nematicide is used to control nematodes in labelled crops. Fluazaindolizine is broken down by microorganisms in the environment. On land, fluazaindolizine and its transformation products may move through soil and reach groundwater. Fluazaindolizine is not expected to be found in air or to travel long distances in the atmosphere from where it is applied. It is also not expected to accumulate in the tissues of plants or animals.

When used according to label directions, the risks from fluazaindolizine to terrestrial and aquatic organisms are acceptable. A precautionary label statement to inform users of the potential for leaching will be required.

# <span id="page-8-0"></span>**Value considerations**

#### **What is the value of Salibro Nematicide?**

**Fluazaindolizine is the active ingredient in Salibro Nematicide. The registration of Salibro Nematicide will provide Canadian vegetable growers with a new product to manage rootknot nematodes, which can cause serious crop and economic losses.** 

Salibro Nematicide is applied to soil or by chemigation to protect tuberous and corm vegetables (Crop Subgroup 1C), cucurbit vegetables (Crop Group 9), fruiting vegetables (Crop Group 8-09) and carrots from root damage caused by parasitic root-knot nematodes.

# <span id="page-8-1"></span>**Measures to minimize risk**

Labels of registered pesticide products include specific instructions for use. Directions include risk-reduction measures to protect human and environmental health. These directions must be followed by law.

The key risk-reduction measures being proposed on the label of Reklemel Technical Nematicide, and Salibro Nematicide to address the potential risks identified in this assessment are as follows.

#### <span id="page-8-2"></span>**Key risk-reduction measures**

#### **Human health**

Because users may come into direct contact with Salibro Nematicide on the skin and through inhalation, anyone mixing, loading and applying Salibro Nematicide must wear a long-sleeved shirt, long pants, chemical-resistant gloves, socks and shoes. Chemical-resistant gloves are not required during application while in a closed cab. For chemigation application, workers are required to wear personal protective equipment as defined in the PPE section of the label for mixers/loaders/applicators when making adjustments or repairs on the chemigation system when this product is in the irrigation water.

In addition, standard label statements to protect against drift during application was added to the label. For postapplication re-entry activities, workers must not enter into treated areas during the restricted-entry interval (REI) of 12 hours.

#### **Environment**

A label statement to inform users of the potential for leaching, and to provide mitigation measures to reduce leaching.

# <span id="page-9-0"></span>**Additional information being requested**

Since this technical product is manufactured only at pilot scale before registration, five-batch data representing commercial-scale production will be required as postmarket information after registration.

# <span id="page-9-1"></span>**Next steps**

Before making a final registration decision on fluazaindolizine and Salibro Nematicide, Health Canada's PMRA will consider any comments received from the public in response to this consultation document. Health Canada will accept written comments on this proposal up to 45 days from the date of publication of this document. Please note that, to comply with Canada's international trade obligations, consultation on the proposed MRLs will also be conducted internationally via a notification to the World Trade Organization. Please forward all comments to Publications (contact information on the cover page of this document). Health Canada will then publish a Registration Decision, which will include its decision, the reasons for it, a summary of comments received on the proposed decision and Health Canada's response to these comments.

# <span id="page-9-2"></span>**Other information**

When the Health Canada makes its registration decision, it will publish a Registration Decision on fluazaindolizine and Salibro Nematicide (based on the Science evaluation of this consultation document). In addition, the test data referenced in this consultation document will be available for public inspection, upon application, in the PMRA's Reading Room (located in Ottawa).

# **Science evaluation**

# <span id="page-10-0"></span>**Fluazaindolizine**

# <span id="page-10-1"></span>**1.0 The active ingredient, its properties and uses**

#### <span id="page-10-2"></span>**1.1 Identity of the active ingredient**



**Chemical name**

- **1. International Union**  8-chloro-*N*-[(2-chloro-5-methoxyphenyl)sulfonyl]-6 **of Pure and Applied** (trifluoromethyl)imidazo[1, 2-α]pyridine-2-carboxamide **Chemistry (IUPAC)**
- **2. Chemical Abstracts**  8-chloro-*N*-[(2-chloro-5-methoxyphenyl)sulfonyl]-6- **Service (CAS)** (trifluoromethyl)imidazo[1, 2-α]pyridine-2-carboxamide

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-CH<sub>3</sub>



**Purity of the active ingredient** 97.3%

#### <span id="page-10-3"></span>**1.2 Physical and chemical properties of the active ingredient and end-use product**

#### **Technical product—Reklemel Technical**





# **End-use product—Salibro Nematicide**





# <span id="page-12-0"></span>**1.3 Directions for use**

Salibro Nematicide is applied as a soil treatment prior to planting or at planting of tuberous and corm vegetables (Crop Subgroup 1C), fruiting vegetables (Crop Group 8-09), cucurbit vegetables (Crop Group 9), and carrots. Salibro Nematicide may be applied pre-plant incorporated, broadcast followed by soil incorporation, in-furrow (tuberous and corm vegetables only), or by chemigation (fruiting vegetables and cucurbit vegetables only) prior to or at planting. Salibro Nematicide is applied at rates of 1.12–2.24 L product/ha to cucurbit vegetables and 2.24–4.48 L product/ha to all other labelled crops. Chemigation treatments during the crop season may be made at 0.56–1.12 L to cucurbit vegetables or at 1.12–2.24 L product/ha to all other labelled crops, where Salibro Nematicide was applied prior to or at planting or where the soil was treated with a fumigant prior to planting.

# <span id="page-12-1"></span>**1.4 Mode of action**

Fluazaindolizine is taken up by root-knot nematodes from water in the soil, which causes them to become immobile 24 to 48 hours after treatment. As a result, they are unable to feed on plant roots and eventually die. This represents a novel mode of action against root-knot plant parasitic nematodes, but the actual mechanism of action of fluazaindolizine is unknown.

# <span id="page-12-2"></span>**2.0 Methods of analysis**

# <span id="page-12-3"></span>**2.1 Methods for analysis of the active ingredient**

The methods provided for the analysis of the active ingredient and impurities in the technical product have been validated and assessed to be acceptable.

# <span id="page-12-4"></span>**2.2 Method for formulation analysis**

The method provided for the analysis of the active ingredient in the formulation has been validated and assessed to be acceptable for use as an enforcement analytical method.

# <span id="page-12-5"></span>**2.3 Methods for residue analysis**

High performance liquid chromatography methods with tandem mass spectrometric detection (HPLC-MS/MS; DuPont-33861 and DuPont-47054 in plant matrices and DuPont-39226 and Charles River AV.225144.02 in animal matrices) were developed and proposed for data gathering and enforcement purposes. These methods fulfilled the requirements with regards to specificity, accuracy and precision at the respective method limits of quantitation. In general, acceptable average recoveries (70–120%) were obtained in plant and animal matrices. The

proposed enforcement methods were successfully validated in plant and animal matrices by an independent laboratory. Adequate extraction efficiencies were demonstrated using radiolabelled samples from the soybean plant metabolism (soybean hay and seeds), and from the confined crop rotation studies (wheat hay, radish roots, and mature spinach) analyzed with the enforcement method. Extraction solvents used in the method for animal matrices were similar to those used in the livestock metabolism studies; thus, further demonstration of extraction efficiency with radiolabelled animal matrices was not required for the enforcement method.

Methods for residue analysis are summarized in Appendix I, Table 1.

# <span id="page-13-0"></span>**3.0 Impact on human and animal health**

# <span id="page-13-1"></span>**3.1 Toxicology summary**

Fluazaindolizine, also identified as Reklemel Technical (brand name) or DPX-Q8U80 (code name), is a sulfonamide nematicide. Its pesticidal mode of action is not known, although it is expected to protect against plant parasitic nematode damage by rendering nematodes immobile and unable to feed on plant roots.

A detailed review of the toxicological database for fluazaindolizine was conducted. The database is complete, consisting of the full array of toxicity studies currently required for hazard assessment purposes. Additional studies conducted with fluazaindolizine included an in vitro study investigating the comparative metabolism by mouse, rat, rabbit, dog and human hepatocytes as well as studies assessing potential hormonal perturbation. Several studies conducted with various transformation products of fluazaindolizine were also available for review, including acute oral toxicity studies, repeat-dose oral toxicity studies, developmental and reproductive toxicity studies, and genotoxicity studies. The required studies in the fluazaindolizine database were carried out in accordance with currently accepted international testing protocols and Good Laboratory Practices. The scientific quality of the data is high and the database is considered adequate to characterize the potential health hazards associated with fluazaindolizine.

Metabolism and toxicokinetic studies were conducted in rats via the oral route. In these studies, fluazaindolizine was carbon  $(C)^{14}$ -radiolabelled on the phenyl ring ([Ph- $^{14}C$ ]fluazaindolizine) or the imidazopyridine ([IP-2-<sup>14</sup>C]fluazaindolizine) portion of the molecule. Fluazaindolizine was rapidly absorbed and widely distributed to tissues following single low- or high-dose gavage administration, with plasma elimination half-lives of 8–13 hours. Following oral administration of both radiolabels to bile duct-cannulated rats, the total absorption was 44% to 59% of the administered dose, based on the recovery in the bile, urine, cage wash, plasma, red blood cells and carcass at 48 hours postdosing.

The highest levels of radioactivity at 1-24 hours postdosing were generally observed in the plasma, followed by the liver, the urinary bladder, the pituitary, and the kidneys with the [IP-2-  $^{14}$ C] label or the [Ph- $^{14}$ C] label.

The highest levels of radioactivity at 168 hours postdosing were in liver, red blood cells and skin with the  $[IP-2-{}^{14}C]$  label, and were in pituitary, liver, skin and adrenal glands with the  $[Ph-{}^{14}C]$ label. Concentrations of radioactivity in tissues were generally slightly greater in females than in males.

Radioactivity was readily excreted within 48–72 hours of administration of a single dose. There was a slightly higher proportion of radioactivity excreted via the feces when compared to the amount excreted via the urine. Results from bile duct-cannulated rats suggested that biliary excretion accounted for a small fraction of the eliminated radioactivity when compared to the excretion via feces and urine. The levels of radioactivity in feces, urine and bile appeared to be similar between the high- and low-dose groups with both radiolabels and between sexes.

Tissue distribution and excretion measurements were also conducted after repeated oral administration via gavage of non-radiolabelled test material to rats for 14 days followed by a single gavage dose of the  $[Ph^{-14}C]$  labelled test material. Findings were similar to those observed in single-dosing experiments.

Fluazaindolizine was partially metabolised in the rat with no significant sex differences identified. Following single gavage dosing with a low or high dose of  $C^{14}$ -radiolabelled test material, unchanged fluazaindolizine was the major component in urine, feces, and cage wash extracts. In urine, IN-QEK31 and a sulphate conjugate of IN-A5760 were the most prominent metabolites. Other metabolites in urine included IN-UHD20, IN-REG72, a glucuronide conjugate of IN-A5760, IN-A5760, and IN-F4106. In feces, IN-UHD20 and IN-REG72 were most prominent. Other metabolites in feces included IN-QEK31.

The metabolic pathway of fluazaindolizine in the rat was proposed based on metabolites identified in the tissues, bile, urine and feces. The primary biotransformation pathways of fluazaindolizine involved O-demethylation, hydroxylation of the phenyl ring and hydrolysis of the amide bond. The metabolite IN-UHD20 was formed via direct hydroxylation of the phenyl ring of fluazaindolizine. Fluazaindolizine and IN-UHD20 underwent O-demethylation to form IN-REG72 and IN-UHD21, respectively. Direct hydrolysis of fluazaindolizine, IN-REG72 or IN-UHD20 produced metabolites IN-F4106 and IN-A5760, which contained only the phenyl ring, and IN-QEK31, which contained the imidazopyridine moiety. The identities of metabolites that were sufficiently characterized are presented in Appendix I, Table 3.

Supplemental pilot studies examining the rate of metabolism and elimination were also conducted in rats and mice that were administered a single gavage dose of [Ph- <sup>14</sup>C] fluazaindolizine or [IP-5,8a-<sup>14</sup>C] fluazaindolizine. Highest residues of radioactivity were detected in the liver of both species at 168 hours postdosing. Excretion was slightly faster in mice than rats.

In a non-guideline comparative in vitro metabolism study, the extent to which hepatocytes from mice, rats, rabbits, dogs, and humans metabolized [Ph-<sup>14</sup>C]fluazaindolizine and [IP-5,8a- $14$ C]fluazaindolizine was investigated. Metabolism was observed in all tested species with the highest rates observed in human hepatocytes followed by mouse, rat, rabbit and dog.

The toxicokinetics of fluazaindolizine was also investigated in a supplemental study where female rats were gavage dosed with unlabelled test material for 14 days. The results of this study suggested that steady state plasma concentrations were achieved within the first few days of dosing, and that preferential partitioning into fat was not observed with repeated oral exposure.

Plasma concentrations of non-radiolabelled fluazaindolizine and a number if its metabolites were measured in select repeat-dose oral toxicity studies conducted in mice, rats, and dogs. Fluazaindolizine levels increased with increasing dose levels, in a mostly dose-proportional manner, and were generally higher in female animals. Fluazaindolizine was detected at much higher concentrations than any of the measured metabolites. Among the identified metabolites, the highest concentrations were measured for IN-UHD20, IN-REG72, IN-QEK31, and IN-F4106 in mice, IN-QEK31, IN-F4106, IN-REG72, REG72-OH, and Q8U80-OH in rats, and IN-QEK31 and IN-F4106 in dogs.

In acute toxicity testing, fluazaindolizine was of moderate acute toxicity to rats via the oral route of exposure, and was of low acute toxicity to rats via the dermal and inhalation routes of exposure. It was non- to mildly irritating to the eyes and non- to minimally irritating to the skin of rabbits. Fluazaindolizine demonstrated negative results for skin sensitization in guinea pigs using the Maximization test protocol, and in mice in a supplemental local lymph node assay.

The end-use product Salibro Nematicide, containing fluazaindolizine, was of low acute toxicity to rats via the oral, dermal, and inhalation routes of exposure; was minimally irritating to the eyes and skin of rabbits; and tested negative for skin sensitization in mice using the local lymph node assay.

Repeat-dose dietary toxicity studies with fluazaindolizine were available in mice, rats, and dogs. In these studies, which involved short-term to long-term testing, the most sensitive species, based on the evaluated toxicology endpoints, appeared to be the dog, followed very closely by the rat and then the mouse. The kidney was the primary target tissue following repeated oral dosing in mice and rats. Kidney toxicity in these species was evidenced by increased organ weight, kidney infarctions, hypertrophy, hyperplasia, fibrosis, necrosis, pyelonephritis, pyelitis, dilation, mineralization, discolouration and abnormal shape of the organ. In dogs, the liver and the adrenal were the primary target tissues following repeat oral dosing. Liver toxicity was evidenced by increased organ weight, single cell necrosis, vacuolation, and increased metabolic enzymes, while adrenal toxicity was evidenced by increased organ weight and corticomedullary pigmentation. Other common findings in the database included decreased body weight and effects on hematology parameters (reductions in red blood cell parameters in particular) in mice, rats and dogs, with dogs also exhibiting hemopoiesis of the liver, spleen and bone marrow. Affected clinical chemistry parameters included altered cholesterol levels and elevated serum alanine aminotransferase in particular, and changes in urinalysis parameters, such as decreased specific gravity and protein levels, and increased volume, were also observed. Following chronic dietary dosing in mice, effects on the pituitary gland (cysts), lymph nodes (plasmacytosis, inflammation), salivary gland (atrophy), and pancreas (mononuclear cell infiltration), along with an increase in the degree of amyloidosis of several tissues, were noted. In the long-term dietary study in rats, additional tissues affected included the nasal cavity (eosinophilic globules), stomach (hyperplasia, erosion), and uterus (metaplasia).

There was evidence to suggest that there was a slight increase in toxicity with extended duration of dosing in the rat and dog studies. In rats, kidney hyperplasia was observed at lower dose levels in the 24-month dietary chronic toxicity/oncogenicity study when compared to studies of shorter duration. Additionally in rats, a number of renal findings were only observed after lifetime dosing in the 24-month dietary study, such as kidney cysts, kidney interstitial fibrosis, and kidney papilla necrosis. In the dog, there were also a number of findings observed at lower dose levels in the 12-month dietary study when compared to studies of shorter duration, such as changes in the liver/gallbladder and adrenal weight. Additionally in dogs, there were findings only observed in the 12-month study, such as adrenal corticomedullary pigmentation.

In a supplemental 28-day dermal toxicity study in rats, there was no indication of systemic toxicity up to the limit dose of testing, although it should be noted the study was deemed supplemental since the test compound was only applied to a relatively small skin surface area. A request to waive the requirement for a repeat-exposure inhalation toxicity study was submitted for fluazaindolizine. The waiver request was supported for the proposed uses on the basis of the low volatility and low acute inhalation toxicity of fluazaindolizine, as well as the magnitude of the margins of exposure obtained for the inhalation exposure scenarios when oral endpoints were used in the risk assessment.

There was no treatment-related effect on neurotoxicity parameters that were assessed as part of the subchronic 90-day dietary study in rats, which included functional observations and measurements, motor activity testing, and neuropathology evaluation. In an acute neurotoxicity study in rats conducted via oral gavage, there were slight decreases in motor activity, in terms of duration of movement and ambulatory activity counts, as well as a decrease in habituation to the testing environment. This decreased activity was only observed in males on the day of dosing. Given the lack of other neurotoxicity-related findings in the database, the results of the acute neurotoxicity study were not considered to be an indication of selective neurotoxicity.

In a 28-day dietary immunotoxicity study in rats dosed with fluazaindolizine, there was no treatment-related effect on antibody response. There was no evidence of immune system dysregulation noted in this study, or in other studies in the fluazaindolizine database.

The potential for fluazaindolizine to impact reproductive performance was assessed in rats in both 1- and 2-generation dietary reproductive toxicity studies. In the 1-generation reproductive toxicity study, kidney hyperplasia was observed in parental animals of both sexes, with additional effects on the kidney and urinary bladder observed at a higher dose level in parental females.

No treatment-related effects were noted in weanling offspring. In offspring that were maintained on study into adulthood, similar effects on the kidney were noted at dose levels comparable to those causing effects in the parental generation.

In the 2-generation dietary reproductive toxicity study, the systemic toxicity observed in parental animals was generally consistent with findings reported in other repeat-dose dietary studies in rats, and included hyperplasia, dilation, and deformity of the kidney, as well as chronic progressive nephropathy. There were no effects on reproductive performance or in tissues of the

reproductive system, with the exception of inflammation of the prostate gland. At the same dose level at which F1 parental males exhibited renal hyperplasia, there were effects noted in F2 pups such as mucosal hyperplasia in the kidneys, ureters, and urinary bladder, as well as mucosal hyperplasia of the urethra and cystitis of the urinary bladder. Similar findings were observed in F1 pups and F1 maternal animals at the next higher dose level. The findings identified in the 1 generation and 2-generation reproductive toxicity studies in rats suggested that there was no increased sensitivity of the young animal when compared to the adult animal.

Developmental toxicity studies were conducted via oral gavage in rats and rabbits. In both species, maternal toxicity was noted at the same dose level at which developmental effects were noted. Developmental toxicity in the rat was evidenced by an increased incidence of short cervical ribs (classified as a variation) and decreased fetal weight, while developmental toxicity in the rabbit was evidenced by increased incidences of small gallbladders and sternebrae with thread-like attachments (classified as a variation). A slight increase in the number of abortions was observed at the high-dose level relative to controls. However, these abortions occurred after maternal animals lost a significant amount of body weight. Single incidences of abortion in the control and mid-dose groups were also observed after significant body weight loss in maternal animals. The relationship to treatment for the minimal increase in abortions at the high-dose level (three litters) was therefore considered equivocal. The findings identified in the developmental toxicity studies suggested that there was no increased sensitivity of the young animal when compared to the adult animal.

A series of three supplemental studies were conducted to investigate the potential for fluazaindolizine to cause hormonal perturbations. In an in vitro steroidogenesis assay conducted in human adrenocortical carcinoma cells, decreases in testosterone and estradiol were observed but only at the highest concentration tested, which, as per the guidelines for this assay, was considered an equivocal result for the inhibition of steroid biosynthesis. In a 3-day gavage uterotrophic assay in ovariectomized female rats, there were no treatment-related effects indicative of estrogen agonism. In a 15-day gavage study conducted in intact male rats, a number of hormones were measured. However, the assessment of hormonal alteration was difficult to interpret given small sample sizes and large inter- and intra-group variability, as well as excessive toxicity at the highest dose level. In this assay, treatment-related effects included reductions in epididymal and testes weights, and elevations in hepatic aromatase activity.

Although there were effects noted in some of these studies, they were likely not specific to the endocrine system given the lack of confirmatory findings in the available guideline toxicity studies. Notably, there were no reproductive effects noted in the 2-generation dietary reproductive toxicity study, which assessed vaginal patency, preputial separation, sperm parameters, and estrous cycle parameters.

Fluazaindolizine was negative for genotoxicity in several studies, including bacterial reverse mutation assays in *S. Typhimurium* and E. *coli*, an in vitro forward mutation assay in Chinese hamster ovary cells, in vivo micronucleus assays in mice, and a supplemental 14-day gavage study in rats.

A positive response was observed in the in vitro chromosomal aberration assay with human peripheral blood lymphocytes in the presence and absence of metabolic activation. Based on the weight of evidence, fluazaindolizine is considered negative overall for genotoxic potential.

There were no treatment-related tumours in an 18-month dietary oncogenicity study conducted in mice or in a 24-month chronic toxicity/oncogenicity study in rats. Given the lack of evidence of tumorigenicity in the database, a cancer risk assessment was not required.

A number of toxicity studies were provided for nine fluazaindolizine metabolites identified as potentially contributing to residues in the diet or drinking water: IN-A5760, IN-F4106, IN-QEK31, IN-REG72, IN-QZY47, IN-TMQ01, IN-TQD54, IN-UJV12, and IN-VM862. Of these, IN-A5760, IN-F4106, IN-QEK31, and IN-REG72 were also identified as metabolites formed in the rat, mouse and dog, while IN-QZY47, IN-TMQ01, IN-TQD54, IN-UJV12, and IN-VM862 were identified as unique transformation products in crop matrices, livestock, or environmental media.

In acute oral toxicity testing in rats, IN-QEK31 was found to be of slight toxicity, and metabolites IN-F4106, IN-QZY47, IN-TMQ01, IN-TQD54, and IN-UVJ12 were determined to be of low toxicity.

In vitro chromosomal aberration assays using human peripheral blood lymphocytes produced negative results for IN-REG72, IN-QZY47, IN-TMQ01, IN-TQD54, and IN-VM862, while IN-A5760, IN-F4106, IN-QEK31, and IN-UJV12 tested positive. IN-UJV12 tested positive in a bacterial reverse mutation assay using a high purity test material, and tested negative in the same assay using a lower purity test material. Bacterial reverse mutation assays yielded negative results for IN-A5760, IN-F4106, IN-QEK31, IN-REG72, IN-QZY47, IN-TMQ01, IN-TQD54, and IN-VM862. In vitro forward mutation assays using Chinese hamster ovary cells were negative for IN-A5760, IN-F4106, IN-QEK31, IN-QZY47, IN-UJV12, and IN-VM862. In vivo micronucleus assays in mice were negative for IN-A5760, IN-F4106, IN-QEK31, IN-REG72, and IN-UJV12. IN-QZY47 was also negative for unscheduled DNA synthesis in hepatocytes collected from rats following oral gavage dosing. Metabolites IN-A5760, IN-F4106, IN-QEK31, and IN-UJV12 tested positive in the chromosomal aberration assays; however, there were also negative results for each of these metabolites in the micronucleus assays, tempering concerns regarding the positive findings in the chromosomal aberration assays. Overall, there was no genotoxicity concern for any of the tested metabolites.

Repeat-dose dietary toxicity studies in rats of 28 days duration were conducted with IN-QZY47 and IN-TMQ01, and 90-day dietary toxicity studies were provided for IN-F4106 and IN-QEK31. For IN-VM862, a 90-day gavage toxicity study in rats was provided. The effects from these studies were compared with those observed in the toxicity studies with fluazaindolizine. IN-QZY47, IN-TMQ01, IN-F4106, and IN-QEK31 produced toxic effects at similar dose levels, and targeted similar tissues (liver, kidney, urinary bladder), as fluazaindolizine. IN-VM862 produced toxic effects at lower dose levels than fluazaindolizine, and targeted the liver and lymph nodes in addition to the kidney. It should be highlighted that the IN-VM862 study was administered via gavage while the fluazaindolizine study was administered via the diet, which slightly confounds the comparison to fluazaindolizine.

Reproductive and developmental toxicity screening studies, conducted via the diet in rats, were provided for IN-F4106 and IN-QEK31. For both compounds, the parental animals exhibited effects on the kidney at the same dose level at which decreased offspring body weights occurred. Effects on reproductive toxicity were not noted in these studies. The findings and effect levels observed in parental animals were similar to those in the 1-generation reproductive toxicity study in rats with fluazaindolizine, which identified the kidney as the target organ in parents, and did not identify reproductive or offspring effects.

A 2-generation reproductive toxicity study was provided for IN-F4106. Decreased body weight was observed in offspring at the same dose level that resulted in reduced body weight in parental animals. Reproductive toxicity was not noted in this study. The parental and offspring effect levels were similar to those in the 2-generation reproductive toxicity study in rats conducted with fluazaindolizine. However, it should be noted that the liver, kidney and urinary bladder were not examined microscopically in the parental animals in the 2-generation reproductive toxicity study with IN-F4106, resulting in some uncertainty as to the true magnitude of the parental effect level. Furthermore, the kidneys and urinary bladders of offspring were examined microscopically in the 2-generation study conducted with fluazaindolizine, and histopathology of these tissues formed the basis of the point of departure for offspring toxicity in that study. A similar assessment was not conducted in the 2-generation study with IN-F4106, and although not part of the standard protocol for reproductive toxicity studies, the lack of histological examination of these tissues results in uncertainty regarding the offspring effect level as well. However, when considering the results from the 90-day dietary toxicity study in rats using IN-F4106, in which the liver, kidney and urinary bladder were examined microscopically in adult animals, coupled with the fact that offspring were not more sensitive than the adult animal to kidney pathology in the 2-generation study with fluazaindolizine, it is unlikely that the lack of similar investigations in the 2-generation reproductive toxicity study with IN-F4106 would have a significant impact on the points of departure.

Developmental toxicity studies in rats, conducted via gavage, were provided for IN-F4106 and IN-QEK31. For IN-F4106, fetal body weight was decreased at a dose level that did not result in any toxicity to maternal animals, suggesting an increased sensitivity of the young.

In addition, effects on maternal and fetal body weight were observed at dose levels lower than those causing toxicity in the developmental toxicity study in rats with fluazaindolizine. For IN-QEK31, there were no adverse maternal or developmental effects at similar dose levels as those used in the developmental toxicity study with fluazaindolizine.

For metabolites IN-A5760, IN-QEK31, IN-REG72, IN-QZY47, IN-TMQ01, IN-TQD54, and IN-UJV12, the available information did not suggest higher toxicity than fluazaindolizine, although there was insufficient information to conclude that these metabolites were less toxic than fluazaindolizine. Metabolites IN-A5760, IN-QEK31, IN-REG72, IN-QZY47, IN-TMQ01, IN-TQD54, and IN-UJV12 were therefore considered to be of equal toxicity to fluazaindolizine for risk assessment purposes. The available evidence suggests that metabolites IN-F4106 and IN-VM862 are more toxic than fluazaindolizine. However, the toxicokinetic studies with fluazaindolizine showed that IN-F4106 is a significant metabolite detected in the liver and kidney of rats, and the repeat-dose dietary studies with fluazaindolizine identified IN-F4106 as a

metabolite in plasma of rats, mice, and dogs. These data suggest that the formation of IN-F4106 in laboratory animals dosed with fluazaindolizine could have contributed to the toxic effects noted in the fluazaindolizine database, tempering the concern for the lower points of departure observed in some studies with IN-F4106. Additionally, the points of departure for IN-F4106 converted to parent equivalents, on a molecular weight basis, are comparable to those for the parent compound. Therefore, using the reference doses for the parent compound for assessing risks from dietary exposure to IN-F4106 is considered to be protective of any potential toxic effects from exposure to IN-F4106. Metabolite IN-VM862 was not identified as a metabolite of the rat, mouse or dog or in plant matrices, but is a suspected environmental degradate that may be found in drinking water. Water modelling results indicated that IN-VM862 contributed very little (<0.5%) to the overall drinking water concentration. Given this information, the toxicological reference values selected for fluazaindolizine are considered protective of potential effects from IN-VM862.

A change to the manufacturing process for fluazaindolizine was implemented following the development of the toxicology database in order to improve process safety. As a result, additional acute toxicity and genotoxicity studies were conducted with a batch of test material produced with the revised manufacturing process in order to compare to the toxicity of batches produced via the two processes. These studies produced similar results to the studies using the test material from the original manufacturing process. Additional quantitative structure activity analysis and physiologically based pharmacokinetic modelling data were provided for various impurities produced by the two processes. Overall, a comparison of the impurity profiles between the various batches used in the toxicity studies, as well as a batch considered representative of the commercial production process, did not identify any toxicological concerns. Based on the collective information, it was concluded that the batches of fluazaindolizine obtained from either manufacturing process were considered toxicologically equivalent, and thus the toxicology studies conducted with the test material produced using the original manufacturing process were considered acceptable to support registration of the technical grade active ingredient.

The identification of select metabolites of fluazaindolizine is presented in Appendix I, Table 3. Results of the toxicology studies conducted on laboratory animals with end-use products of fluazaindolizine, technical fluazaindolizine, and its metabolites are summarized in Appendix I, Tables 4, 5 and 6 respectively. The toxicology reference values for use in the human health risk assessment are summarized in Appendix I, Table 7.

# <span id="page-21-0"></span>**3.1.1** *Pest Control Products Act* **hazard characterization**

For assessing risks from potential residues in food or from products used in or around homes or schools, the *Pest Control Products Act* requires the application of an additional 10-fold factor to threshold effects to take into account completeness of the data with respect to the exposure of, and toxicity to, infants and children, and potential prenatal and postnatal toxicity. A different factor may be determined to be appropriate on the basis of reliable scientific data.<sup>[5](#page-21-1)</sup>

With respect to the completeness of the toxicity database as it pertains to the toxicity to infants and children, the database contains the full complement of required studies, including gavage developmental toxicity studies in rats and rabbits, and dietary 1-generation and 2-generation reproductive toxicity studies in rats.

With respect to potential prenatal and postnatal toxicity, there was no indication of increased sensitivity of fetuses or offspring compared to parental animals in the developmental or reproductive toxicity studies. In the 1-generation rat reproductive toxicity study, no treatmentrelated effects were noted in offspring that were maintained on study up to weaning. There were numerous kidney pathology findings observed in adult F1 offspring, namely, dilation, discolouration, cysts, hyperplasia of transitional epithelium, pyelitis, pyelonephritis, and ulceration of the epithelial surface; these effects occurred in the presence of parental toxicity. In the 2-generation rat reproductive toxicity study, mucosal hyperplasia of kidneys, ureters, urinary bladders, and urethras, as well as cystitis of urinary bladders were observed in offspring at weaning; these effects also occurred in the presence of parental toxicity. In the developmental toxicity study in rats, short cervical ribs and decreased body weight were observed in fetuses, whereas in the developmental toxicity study in rabbits, fetal variations of sternebrae with threadlike attachment and small gallbladders were noted. These developmental effects occurred in the presence of maternal toxicity. A slight, equivocal increase in the number of abortions was also observed in the rabbit. These abortions occurred toward the end of the dosing period and at the same dose level that caused mortality, body weight loss, and renal pathology in maternal animals.

Overall, the database is adequate for determining the sensitivity of the young. There is a low level of concern for sensitivity of the young as effects in the young are well-characterized and occurred in the presence of maternal toxicity. In the rabbit developmental toxicity study, a minimal increase in abortions occurred at the high-dose level following significant body weight loss. A similar pattern of body weight loss led to single incidences of abortion in other dose groups. Based on the overall weight of evidence, there was a low level of concern for the equivocal increase in abortions in rabbits. Therefore, on the basis of this information, the *Pest Control Products Act* factor (PCPA) factor was reduced to onefold.

 $\overline{a}$ 

<span id="page-21-1"></span><sup>5</sup> SPN2008-01. *The Application of Uncertainty Factors and the Pest Control Products Act Factor in the Human Health Risk Assessment of Pesticides*.

# <span id="page-22-0"></span>**3.2 Acute reference dose (ARfD)**

To estimate acute dietary risk, the NOAEL of 125 mg/kg bw from the acute neurotoxicity study in rats was selected for risk assessment. At the LOAEL of 450 mg/kg bw, effects on motor activity were observed in males on the day of dosing, in the form of shorter duration of movement and decreased ambulatory activity counts as well as reduced habituation to the testing environment. These effects were the result of a single exposure and are therefore relevant to an acute risk assessment. Standard uncertainty factors of 10-fold for interspecies extrapolation and 10-fold for intraspecies variability were applied. As discussed in the *Pest Control Products Act* Hazard Characterization section, the PCPA factor was reduced to 1-fold. The composite assessment factor (CAF) is thus 100.

The ARfD is calculated according to the following formula:

 $ARfD = NOAEL = 125$  mg/kg bw = 1.3 mg/kg bw of fluazaindolizine CAF 100

# <span id="page-22-1"></span>**3.3 Acceptable daily intake (ADI)**

To estimate risk following repeated dietary exposure, the NOAEL of 17 mg/kg bw/day from the 1-year dietary toxicity study in the dog was selected. At the LOAEL of 36 mg/kg bw/day, there were decreases in body weight and bodyweight gain in females, increased weight of liver and adrenal gland in both sexes, histopathology of the liver in males (pigmented hepatocytes) and adrenal gland in females (corticomedullary pigmentation), as well as alterations in several clinical chemistry parameters suggestive of liver damage. This study provides the lowest NOAEL in the database. Standard uncertainty factors of 10-fold for interspecies extrapolation and 10-fold for intraspecies variability were applied. As discussed in the *Pest Control Products Act* Hazard Characterization section, the PCPA factor was reduced to onefold. The CAF is thus 100.

The ADI is calculated according to the following formula:

$$
ADI = \frac{NOAEL}{CAF} = \frac{17 \text{ mg/kg bw/day}}{100} = 0.2 \text{ mg/kg bw/day of fluxzaindolizine}
$$

The ADI provides a margin of 600 to the dose level at which increased abortions were observed in the developmental toxicity study in rabbits.

The ADI provides a margin of 110 to the dose level at which decreased fetal body weights were observed in the developmental toxicity study in rats using the IN-F4106 metabolite.

#### **Cancer assessment**

There was no evidence of tumorigenicity; therefore, a cancer risk assessment is not necessary.

# <span id="page-23-0"></span>**3.4 Occupational and residential risk assessment**

#### <span id="page-23-1"></span>**3.4.1 Toxicological reference values**

#### **Short-, and intermediate-term dermal and inhalation**

For short- and intermediate-term dermal and inhalation occupational exposures, the NOAEL of 20 mg/kg bw/day from the 90-day dietary toxicity study in dogs was selected for risk assessment. Limitations in the available short-term dermal toxicity study and the lack of a repeat-exposure inhalation toxicity study necessitated the use of an oral study for dermal and inhalation risk assessments. At the LOAEL of 59 mg/kg bw/day in the 90-day dog study, there were histopathology effects noted in the liver, spleen and Peyer's patch. Additionally at the LOAEL, altered clinical chemistry parameters, such as decreased cholesterol and albumin, and liver enzyme induction were observed.

The target margin of exposure (MOE) is 100, which includes uncertainty factors of 10-fold for interspecies extrapolation and 10-fold for intraspecies variability. The selection of this study is protective of all populations, including nursing infants and the unborn children of exposed female workers.

#### **Aggregate toxicology reference values**

Aggregate exposure is the total exposure to a single pesticide that may occur from dietary (food and drinking water), residential and other non-occupational sources, and from all known or plausible exposure routes (oral, dermal and inhalation). For the active ingredient fluazaindolizine, the aggregate assessment consisted of combining food and drinking water exposure only, since residential exposure is not expected. The most relevant toxicology endpoints and assessment factors for acute and chronic oral aggregate exposure are the same as those selected for the ARfD (see Section 3.2) and ADI (see Section 3.3), respectively.

Occupational exposure to fluazaindolizine is expected to be via the dermal and inhalation routes for mixers, loaders and applicators, and through the dermal route for postapplication workers. The exposure duration is expected to be short- to intermediate-term.

# **3.4.1.1 Dermal absorption**

An in vivo dermal absorption study in rats and in vitro dermal absorption study in rats and humans were reviewed. Together these studies are referred to as a "triple pack". For the in vivo study, the limitations were considered minor and not expected to affect the confidence of the dermal absorption value.

The coefficient of variation (CV) was <25% for all monitoring periods and for the low dose, a 1% dermal absorption value was obtained which includes skin bound residues. The vehicle used for this study was a blank formulation of the end-use product, which contains water as the primary diluent and is diluted with water prior to application in the field.

For the in vitro rat and human studies, the CVs were  $>25\%$  for both low and high doses. In general, CVs greater than 25% in animals reduce the confidence in the study results and the triple pack approach. In humans, higher  $CVs (>25%)$  are expected given that there is higher variability in human subjects when compared to laboratory animals. Given that the receptor fluid used was ethanol, the rat and human in vitro absorption values of 21% and 5%, respectively, were considered to be conservative and likely to overestimate absorption of a water-based formulation. As per the OECD (2011) guidance notes on dermal absorption, the use of an organic solvent as a vehicle can jeopardize the integrity of the skin, which increases absorption. Specifically, ethanol can enhance solubility in the vehicle and the *stratum corneum* (OECD, 2011).

The use of the in vitro and in vivo data in the triple pack approach resulted in a ratio of animal in vitro to in vivo dermal absorption which was significantly greater than  $1 \pm 0.5$  (calculated ratio was 21). Based on this, the in vitro rat dermal absorption value does not approximate the rat in vivo dermal absorption value and therefore the human in vitro dermal absorption value will not approximate the human in vivo dermal absorption value. This is largely based on the differences in vehicle and receptor fluid used in the in vivo and in vitro studies, respectively. Due to this, it was considered more appropriate to estimate the dermal absorption value from the rat in vivo study alone at the 144 hour time period (1%) for use in the risk assessment of fluazaindolizine.

# <span id="page-24-0"></span>**3.4.2 Occupational exposure and risk**

# **3.4.2.1 Mixer/loader/applicator exposure and risk assessment**

Individuals have potential for exposure to Salibro Nematicide during mixing, loading and application. Dermal and inhalation exposure estimates for workers were generated from the Agricultural Handlers Exposure Task Force (AHETF) database.

Exposure to workers mixing, loading and applying Salibro Nematicide is expected to be short- to intermediate-term in duration and to occur primarily by the dermal and inhalation routes. Exposure was estimated using the maximum application rate of 2.24 kg a.i/ha for soil-directed applications and the adult bodyweight of 80 kg. The default area treated per day (ATPD) value for large field crops (360 ha/day) was used for tuberous and corm vegetables, which includes potatoes. For groundboom application to small field crops and chemigation application, the applicant provided maximum ATPD values of 40 ha/day and 182 ha/day, respectively. As these ATPD values are higher than default values, they were used for the risk assessment. The risk assessment is based on mixer/loader/applicator (M/L/A) using open cab groundboom application for pre-plant treatments (pre-plant incorporated, broadcast followed by soil incorporation or infurrow) and mixer/loader (M/L) only for chemigation as there is no application involved.

The application rate for chemigation is based on the highest rate for fruiting vegetables, therefore, the resulting MOE will not underestimate the risks for all other crops. The exposure estimates are based on mixers/loaders/applicators wearing long-sleeved shirt, long pants, chemical-resistant gloves, socks and shoes.

Chemical-specific data for assessing human exposures during pesticide handling activities were not submitted.

Dermal exposure was estimated by coupling the unit exposure values with the amount of product handled per day and the dermal absorption value. Inhalation exposure was estimated by coupling the unit exposure values with the amount of product handled per day with 100% inhalation absorption. Exposure was normalized to mg/kg bw/day by using 80 kg adult body weight.

Exposure estimates were compared to the toxicology reference values (no observed adverse effects levels) to obtain the MOE; the target MOE is 100. Calculated MOEs were greater than the target MOE of 100 therefore, there are no health risks of concern.





 $ATPD = Area$  treated per day;  $MOE = Margin$  of exposure

<sup>1</sup> Total unit exposure values from AHETF. These were obtained by adjusting dermal unit exposure values for 1% dermal absorption then combining with inhalation unit exposure values.

<sup>2</sup> Default area treated per day for tuberous and corm vegetables; Area treated per day provided by applicant for the other crops <sup>3</sup> Exposure = (Total Unit Exposure × ATPD × Rate) / (80 kg bw × 1000 µg/mg)

 $4$  Based on NOAEL = 20 mg/kg bw/day; MOE = NOAEL/Exposure

#### **3.4.2.2 Exposure and risk assessment for workers entering treated areas**

When Salibro Nematicide is incorporated into the soil prior to planting, applied broadcast and then incorporated in the soil or applied in-furrow and then covered with soil, exposure to postapplication workers is expected to be minimal as any contact with the treated soil is expected to be negligible.

However, there is the potential for workers to be exposed to fluazaindolizine during and after chemigation application when it is applied through irrigation lines. Salibro Nematicide can be applied through an irrigation system which is set up as fixed, periodically moved, or self moving. As there can be up to four (4) chemigation applications per season, irrigation lines may have to be moved throughout the field during or between applications, depending on the irrigation capacity of the farm. As such, the postapplication worker moving the irrigation lines may be exposed to residues on the irrigation pipes and treated soil around where the pipes are laid in the field. As Salibro Nematicide is typically applied early in the season, with no need for application to maturing crops, foliage will unlikely be present when Salibro Nematicide is applied via chemigation. In addition, it is not indicated on the label that this will be applied to transplants at planting, which further reduces the likelihood that foliage will be present during chemigation application.

Therefore, a postapplication dermal risk assessment for workers moving the irrigation lines and contacting treated soil was required. Dermal exposure was estimated by using a modified version of the dermal exposure equation for soil contact from the USEPA Risk Assessment Guidance for Superfund (RAGS) (USEPA, 2004). One of the key input values of the model: the adherence factor, or the amount of soil transferred to the skin over a given period of time (or event), was obtained from a study monitoring pipe laying activities in "wet" soil. Even though this study was not carried out in a commercial agricultural setting, this study and resulting adherence factor are still considered applicable to the proposed use of Salibro Nematicide when applied via chemigation. In the study, volunteers were given a plastic pipe and fittings, a trowel, and a plan of the desired piping layout. Activity proceeded for a fixed time interval of 15, 30, or 45 minutes. Individuals who completed the layout before the end of the time interval removed the pipe and began again. All subjects wore short sleeves and short pants.

The modified soil contact model is represented by the equation:

Dermal Exposure (mg/kg bw/day) = 
$$
\frac{C_{\text{soil}} \times AF \times CF \times DA_{\text{soil}} \times SA \times Events}{BW}
$$

The concentration of fluazaindolizine in soil  $(C_{soil})$  on the day of application (mg a.i. /kg soil) was estimated using the maximum rate for soil application in field conditions (in other words, chemigation postplant for tuberous and corm vegetables and carrots; chemigation pre-/at-plant for cucurbit and fruiting vegetables) and the assumption that 100% of the applied fluazaindolizine was located within the uppermost 1 cm of soil. This is the same approach as that outlined in the USEPA Residential SOPs (USEPA, 2012, section 3.2.5). This is considered to be a conservative assumption for Salibro Nematicide as it needs to translocate through the soil to the full depth of the root to effectively control nematodes.

For the adherence factor (AF) of soil to skin (mg/cm<sup>2</sup>-event), a value of 0.630 mg/cm<sup>2</sup>-event for pipe layers in wet soil (geometric mean) from the RAGS guidance document (USEPA, 2004) was used. This value was reported per event and weighted for body part surface area. A conversion factor (CF) was applied to convert mg soil to kg soil  $(1 \times 10^{-6} \text{ kg/mg})$ .

The dermal absorption (DAsoil) of fluazaindolizine in soil was assumed to be equivalent to the dermal absorption from a liquid (1%). This may likely overestimate exposure as dermal absorption from solids is usually lower than that from liquids (PMRA Dermal Absorption Memo, 2012).

For the surface area (SA) of the parts of the body that could be exposed to fluazaindolizine in soil, a value of 3300 cm<sup>2</sup> for the surface area of hands, forearms and head from the RAGS guidance document (USEPA, 2004) was used (based on a worker wearing short-sleeved shirt and long pants). While this is an older value, it will be used as it is representative of adults of both sexes over the age of 18 years. The adult body surface areas have been updated and are reported in the USEPA Exposure Factors Handbook (2011); however, these are not combined for both sexes and are representative of males and females over the age of 21.

The events (number of exposure events per workday day) is assumed to be 1, as specifically recommended by USEPA RAGS guidance document. This recommendation is based on the assumption that after a period of work and exposure to soil, a "threshold" soil loading is achieved where no appreciable amount of soil continues to accumulate on the skin due to movement, abrasion, rubbing, etc. Given the conservatisms in the risk calculation already in place (for example, use of a liquid dermal absorption value for soil, using a high-end adherence factor, and the assumed concentration of fluazaindolizine in the soil), the use of 1 event, as recommended in the RAGS, would still result in a conservative risk assessment for this scenario. Body weight used was 80 kg.

Exposure estimates were compared to the toxicological reference values to obtain the margin of exposure (MOE); the target MOE is 100. Calculated MOEs were greater than the target MOE of 100 therefore, there are no health risks of concern.



#### **Table 3.4.2.2.1 Postapplication dermal exposure estimates and MOE**

<sup>a</sup> Volume of soil in a 1 ha surface area at 1 cm depth is  $1.0 \times 10^8$  cm<sup>3</sup>. Assume a density of 1.5 g soil /cm<sup>3</sup> (typical soil density), then there is  $1.5 \times 10^8$  g soil/ha. At the applied maximum rates of 1.12 kg a.i/ha (tuberous and corm vegetables; carrot and cucurbit vegetables) and 2.24 kg a.i/ha (fruiting vegetables); the concentration of fluazaindolizine in soil is 7.5 mg a.i/kg soil and 14.9 mg a.i/kg soil, respectively. By assuming all of the product is retained in the upper most 1 cm of soil the concentration is over estimated.

b USEPA superfund guidance document (USEPA, 2004).

<sup>c</sup> Surface area of exposed skin (head, hands, forearms). Value from USEPA RAGS guidance document (USEPA, 2004).

<sup>d</sup> Dermal exposure (mg/kg bw/day) = Refer to model described in text above.

e Based on a NOAEL of 20 mg/kg bw/day; MOE = NOAEL/Exposure

# <span id="page-28-0"></span>**3.4.3 Residential exposure and risk assessment**

# **3.4.3.1 Handler exposure and risk**

As Salibro Nematicide is proposed as a commercial marketing class product, a residential handler risk assessment is not required.

#### **3.4.3.2 Postapplication exposure and risk**

Salibro Nematicide is not proposed for use in residential areas. As such, a postapplication residential risk assessment is not required.

#### **3.4.3.3 Bystander exposure and risk**

Bystander exposure is expected to be negligible since the potential for drift is expected to be minimal. Application is limited to agricultural crops only when there is low risk of drift to areas of human habitation or activity such as houses, cottages, schools and recreational areas, taking into consideration wind speed, wind direction, temperature, application equipment and sprayer settings.

#### <span id="page-28-1"></span>**3.5 Food residues exposure assessment**

#### <span id="page-28-2"></span>**3.5.1 Concentrations in drinking water**

A Level 1 drinking water assessment was conducted using conservative assumptions with respect to environmental fate, application rate and timing, and geographic scenario. Level 1 estimated environmental concentrations (EECs) are conservative values intended to screen out pesticides that are not expected to pose any concern related to drinking water. EECs of fluazaindolizine in drinking water sources (groundwater and surface water) were calculated using the Pesticide in Water Calculator (PWC) version 1.52. Groundwater EECs were calculated for several scenarios representing different regions of Canada by simulating leaching through a layered soil profile into shallow groundwater over time. All scenarios for the groundwater modelling were run for 100 years. Only the highest groundwater EECs from these scenarios are reported. EECs in surface water were calculated by simulating pesticide runoff and drift from a treated field into a small reservoir, and considered the subsequent degradation of fluazaindolizine within that waterbody. EECs for surface water were calculated based on a single standard scenario modelled for 50 years. The use pattern selected for the modelling was a single application of 2240 g a.i./ha in order to encompass both the highest single and yearly application rates. A uniform distribution of the pesticide within a soil layer of 0–10 cm for surface water and 0–15 cm for groundwater was assumed.

The modelling was conducted using a parent-daughter-granddaughter approach given the fluazaindolizine transformation pathway (Figure 1). The parent group (P) includes fluazaindolizine, IN-UGA22 and IN-REG72. From the parent group, the degradation pathway splits into two parts, which were modelled separately. One part consists of IN-QEK31 (defined as the first daughter compound, D1), which can be further transformed into IN-VM862 (defined as the granddaughter GD1). The other part of the split includes IN-F4106 and IN-A5760, which were combined together as another daughter (D2) because they can be converted from one to the other. Major fate inputs for the P, D, and GD groups are summarized in Tables 3.5.1.1 and 3.5.1.2. Modelling was conducted both with and without IN-VM862 to understand its contribution to the overall EEC. Level 1 EECs, expressed as parent equivalent, are reported in Table 3.5.1.3.

Details of water modelling inputs and calculations are available upon request.



**Figure 1**: Components of the P-D-GD modelling





 $\frac{a}{a}$  Sorption studies were available for [FZI,](http://pmra-pw1.hc-sc.gc.ca:7777/ePRS/dox_web.v?p_ukid=3113801) [IN-A5760,](http://pmra-pw1.hc-sc.gc.ca:7777/ePRS/dox_web.v?p_ukid=3113802) [IN-QEK31,](http://pmra-pw1.hc-sc.gc.ca:7777/ePRS/dox_web.v?p_ukid=3113803) [IN-REG72,](http://pmra-pw1.hc-sc.gc.ca:7777/ePRS/dox_web.v?p_ukid=3113804) [IN-VM862](http://pmra-pw1.hc-sc.gc.ca:7777/ePRS/dox_web.v?p_ukid=3113809) and [IN-F4106.](http://pmra-pw1.hc-sc.gc.ca:7777/ePRS/dox_web.v?p_ukid=3113848_) Kd values derived from these studies significantly correlate with soil organic carbon for all the chemicals except IN-QEK31. Koc was thus used for the modelling. In the absence of experimental data for IN-UGA22, KOCWIN(2.0) of EPISuite was used

<sup>b</sup> The molecular weight of P was used for D1, GD1 and D2 so that modelling results are expressed as parent mass equivalent concentrations.

	<b>Half-life</b>				<b>Transformation faction</b>		
<b>Test system</b>	P	D <sub>1</sub>	GD1	D2	P to D1	$\mathbf{D1}$ to GD1	P to D <sub>2</sub>
Phototransformation in sterile natural water <sup>a</sup>							
Irradiated sterile natural water	1.7	1.8	$NA^b$	6.9	0.1	0 <sup>b</sup>	0.1
Biotransformation in aerobic soil <sup>c</sup>							
<b>Sassafras</b>	11.5	34.4	22.4	215.4	0.7	1.0	0.8
Nambsheim	34.2	12.1	29.3	68.4	0.7	1.0	0.6
Speyer 2.2	9.2	44.6	3.8	476.6	1.0	0.5	1.0
Thessaloniki	51.2	109.5	12.0	285.9	0.6	0.7	1.0
Graffignana	13.8	122.2	11.4	192.9	0.9	1.0	1.0
Lleida	52.2	35.7	17.7	101.4	0.7	0.8	0.8
Biotransformation in aerobic water/sediment (whole system) <sup>d</sup>							
<b>Swiss Lake</b> water-sediment	115.7	218.9	7.4	$1.22E + 08$	0.3	1.0	0.4
Calwich Abbey water-sediment	262.1	94.0	4.8	157.9	0.7	0.9	0.7
Biotransformation in anaerobic water/sediment (whole system) <sup>d</sup>							
<b>Swiss Lake</b> water-sediment	51.5	3.9	677772	$3.57E + 08$	0.4	0.9	0.2
Calwich Abbey water-sediment	23.5	$6.72E + 07$	$NA^b$	$3.14E+10$	0.024	0 <sup>b</sup>	0.1

**Table 3.5.1.2 Transformation parameters** 

<sup>a</sup> From a 10-d experiment with sterile natural water at pH 8 irradiated with summer equivalent light b Transformation half-lives cannot be derived and transformation fractions of zero were used in the modelling due to no detection of GD1 in these experiments.

c Based on experiments conducted with six natural soils. The other seven soils on which transformation tests were conducted were not included in the fitting because GD1 was not detected in those experiments. Due to the large variability in the transformation kinetics among the experiments, each of the six aerobic soil transformation datasets were used as the model input to calculate EECs for P, D1, GD1 and D2.

<sup>d</sup> Based on experiments using two sediment samples. Each of the two datasets were used as the model input to calculate EECs for P, D1, GD1 and D2.

Additional Note: No significant hydrolysis of FZI occurred at pH 7 over the 30-d experimental period, and therefore, hydrolysis was not considered in the modelling.

#### **Table 3.5.1.3 EECs (in µg a.i./L) for the drinking water risk assessment of fluazaindolizine**



<sup>1</sup> 90<sup>th</sup> percentile of daily concentrations

 $2^{\circ}$  90<sup>th</sup> percentile of 365-day moving average concentrations

 $3$  90<sup>th</sup> percentile of the highest 1-day average concentration from each year

- $^{4}$  90<sup>th</sup> percentile of yearly average concentrations
- <sup>5</sup> Average of all yearly average concentrations
- $\frac{6}{7}$  Includes IN-VM862
- Does not include IN-VM862

#### <span id="page-31-0"></span>**3.5.2 Residues in plant and animal foodstuffs**

The residue definition for enforcement in plant products and for risk assessment and enforcement animal commodities is fluazaindolizine. The residue definition for risk assessment in plant products is the sum of the posthydrolysis products, IN-A5760, IN-F4106, IN-QEK31, IN-QZY47, IN-RSU03, IN-UNS90, IN-UJV12, expressed as parent equivalents. The data gathering/enforcement analytical method is valid for the quantitation of fluazaindolizine residues in crop and livestock matrices. The residues of fluazaindolizine are stable in representative matrices from five commodity categories [high water (tomatoes), high oil (soybeans), high protein (dry pea seeds), high starch (wheat grain) and high acid content (oranges)] for up to 24 months, except for high water (34 months) when stored at -20 °C. Therefore, fluazaindolizine residues are considered stable in all frozen crop matrices and processed crop fractions for up to 24 months, except for high water commodities (34 months). Fluazaindolizine residues did not concentrate in any of the processed commodities for human consumption. Quantifiable residues are not expected to occur in poultry matrices with the current use pattern. Adequate feeding studies were carried out to assess the anticipated residues in ruminant matrices resulting from the current uses. Crop field trials conducted throughout Canada (and the United States) using an enduse product containing fluazaindolizine at approved rates in or on carrots, potatoes (Crop Subgroup1C), fruiting vegetables (Crop Group 8-09), and cucurbit vegetables (Crop Group 9) are sufficient to support the proposed maximum residue limits. Field accumulation studies (limited and extended) were conducted in various North American and European regions on several crops/crop groups. The data are adequate to recommend MRLs for selected field rotational crops at a 14-day plant-back interval. For all other crops, a plantback interval of 365 days must be followed.

# <span id="page-31-1"></span>**3.5.3 Dietary risk assessment**

Acute and chronic (non-cancer) dietary risk assessments were conducted using the Dietary Exposure Evaluation Model (DEEM–FCID™).

# **3.5.3.1 Acute dietary exposure results and characterization**

The following criteria were applied to the acute analysis for fluazaindolizine based on the sum of the posthydrolysis products, IN-A5760, IN-F4106, IN-QEK31, IN-QZY47, IN-RSU03, IN-UNS90, IN-UJV12, expressed as parent equivalents (residue definition for dietary exposure assessment): 100% crop treated, default and experimental processing factors (where available), recommended MRLs in/on animal commodities, North American and/or European HAFT residue values from crop field trials and field accumulation trials. The acute dietary exposure from all supported fluazaindolizine food uses (alone) for the total population, including infants and children, and all representative population subgroups is less than 7% of the acute reference dose (ARfD), based on the 95<sup>th</sup> percentile (deterministic). Aggregate exposure from food and drinking water is considered acceptable.

The PMRA estimates that acute dietary exposure to fluazaindolizine equivalents from food and drinking water is 10% (0.126 mg/kg bw) of the ARfD for the total population. The highest exposure and risk estimate is for all infants at 30% (0.383 mg/kg bw) of the ARfD.

# **3.5.3.2 Chronic dietary exposure results and characterization**

The following criteria were applied to the refined chronic non-cancer analysis for fluazaindolizine based on the sum of the posthydrolysis products, IN-A5760, IN-F4106, IN-QEK31, IN-QZY47, IN-RSU03, IN-UNS90, IN-UJV12, expressed as parent equivalents (residue definition for dietary exposure assessment): 100% crop treated, default and experimental processing factors (where available), recommended MRLs in/on animal commodities, North American and/or European median residue values from crop field trials and field accumulation trials. The chronic dietary exposure from all supported fluazaindolizine food uses (alone) for the total population, including infants and children, and all representative population subgroups is less than 2% of the acceptable daily intake (ADI). Aggregate exposure from food and drinking water is considered acceptable. The PMRA estimates that chronic dietary exposure to fluazaindolizine equivalents from food and drinking water is 20% (0.040 mg/kg bw/day) of the ADI for the total population. The highest exposure and risk estimate is for all infants at 74% (0.147 mg/kg bw/day) of the ADI.

# <span id="page-32-0"></span>**3.5.4 Aggregate exposure and risk**

The aggregate risk for fluazaindolizine consists of exposure from food and drinking water sources only; there are no residential uses.

# <span id="page-32-1"></span>**3.5.5 Maximum residue limits**



# **Table 3.5.5.1 Recommended maximum residue limits**



Maximum Residue Limits (MRLs) are proposed for each commodity included in the listed crop groupings in accordance with the [Residue Chemistry Crop Groups](https://www.canada.ca/en/health-canada/services/consumer-product-safety/pesticides-pest-management/public/protecting-your-health-environment/pesticides-food/residue-chemistry-crop-groups.html) webpage in the Pesticides section of Canada.ca.

For additional information on MRLs in terms of the international situation and trade implications, refer to Appendix II.

The nature of the residues in animal and plant matrices, analytical methodologies, field trial data, and acute and chronic dietary risk estimates are summarized in Appendix I, Tables 2, 8 and 9.

#### <span id="page-33-0"></span>**3.6 Cumulative assessment**

The *Pest Control Products Act* requires that Health Canada's PMRA consider the cumulative exposure to pest control products with a common mechanism of toxicity. Accordingly, an assessment of potential common mechanisms of toxicity with other pesticides was undertaken for fluazaindolizine.

Fluazaindolizine is a nematicide that belongs to the sulfonamide chemical class, although its pesticidal mode of action is not known. There is a group of herbicides commonly known as the triazolopyrimidine sulfonanilides that are structurally similar to fluazaindolizine. The triazolopyrimidine sulfonamides class of pesticides includes florasulam, cloransulam-methyl, flumetsulam, and pyroxsulam, which are registered for use in Canada, as well as diclosulam, penoxsulam, and metosulam, which are registered for use in the United States or Europe. With the exception of pyroxsulam, all members of this group of herbicides cause effects on the kidney in repeat-dose animal toxicity studies. The common areas of the kidney that have been shown to be a target include the renal tubules and collecting ducts of various species of animals. Some of the specific effects noted include inflammation, vacuolation, degeneration/regeneration and necrosis in the renal tubules, and hypertrophy and hyperplasia in the collecting ducts.

Fluazaindolizine shares structural similarities with triazolopyrimidine sulfonanilides, and toxicity studies conducted with fluazaindolizine consistently identified the kidney as a target organ across various species. Some of the specific renal effects noted in fluazaindolizine studies included infarctions, hypertrophy (tubular cells in the collecting ducts and medulla), hyperplasia (transitional cells, urothelial cells, and mucosal cells), fibrosis (interstitial cells), necrosis (papilla cells), dilation (renal pelvis and medullary tubules), and mineralization.

Although adequate data is not available to establish the key events in the pathway that lead to the effects in the specific regions of the kidney, there is sufficient information to demonstrate a consistent pattern of kidney effects across this structurally-related group of compounds. The possibility that fluazaindolizine acts through a similar mode of action as the triazolopyrimidine sulfonanilides herbicides could not be excluded. Based on the available information, it is plausible that fluazaindolizine, florasulam, cloransulam-methyl, flumetsulam, diclosulam, penoxsulam, and metosulam share a common mode of action for kidney toxicity, and thus were considered at this time to form a common assessment group. Therefore, a cumulative risk assessment was undertaken, which considered the following information:

- Toxicology reference values selected for these active ingredients by Health Canada, the United States Environmental Protection Agency (USEPA) and/or the European Food Safety Authority (EFSA) indicated relatively low toxicity (ADI of 0.05 to 1.0 mg/kg bw/day for all active ingredients).
- For florasulam, cloransulam-methyl and flumetsulam, which are registered for use in Canada, there are no domestic-class end-use products and the commercial-class products are registered for use on cereals, soybeans and field corn. For fluazaindolizine, there is one proposed commercial-class product for use on tuberous and corm vegetables, carrot, fruiting vegetables, and cucurbit vegetables. Therefore, there are no registered uses that could lead to residential exposure.
- Based on the use patterns, cumulative risk could result from co-exposure to fluazaindolizine, florasulam, cloransulam-methyl and flumetsulam through food and drinking water, and diclosulam, penoxsulam and metosulam through imported commodities.
- For the triazolopyrimidine sulfonanilide herbicides, low residue levels, mostly non-detectable or non-quantifiable, were found in the available crop field trials, consistent with early-season treatment and relatively low use rates of these herbicides (for example, florasulam is applied once early in the growing season with maximum application rates of 2.5–5 g a.i./ha).
- For the triazolopyrimidine sulfonanilide herbicides, single chemical dietary exposure assessments have been conducted by Health Canada, USEPA and EFSA, using conservative residue inputs (for example, maximum residue levels, 100% crop treated, default processing factors, conservative drinking water modelling). All assessments indicated low dietary exposure (less than 10% of the ADI, with exposure estimates <1% of the ADI for many of these herbicides).
- For fluazaindolizine, the estimated risks from chronic dietary exposure ranged from 14% to 74% of the ADI for the various sub-populations assessed. These risks would be reduced further (by approximately 1.5-fold) if using a point of departure for the common effect of kidney toxicity.

Based on the above, Health Canada has concluded that the cumulative risks from potential coexposure to fluazaindolizine and the triazolopyrimidine sulfonalilides through food and drinking water are acceptable.

# <span id="page-35-0"></span>**3.7 Health incident reports**

Fluazaindolizine is a new active ingredient pending registration for use in Canada, and as of 4 May 2020, no human or domestic animal incident reports had been submitted to the PMRA.

# <span id="page-35-1"></span>**4.0 Impact on the environment**

#### <span id="page-35-2"></span>**4.1 Fate and behaviour in the environment**

#### **Terrestrial environment:**

Fluazaindolizine is expected to be stable to hydrolysis and phototransformation on soil.

Fluazaindolizine is biotransformed by microbial activity in soil, producing four major transformation products (TPs): IN-F4106, IN-QEK31, IN-A5760 and IN-VM862. Under laboratory conditions, fluazaindolizine is classified as non-persistent to persistent in aerobic soil, depending on the soil type. Degradation of fluazaindolizine is slower under anaerobic soil conditions, but follows the same pathway as for aerobic soil. Laboratory studies showed that IN-A5760 is non-persistent to moderately persistent, IN-F4106 is persistent, and IN-QEK31 is slightly persistent to persistent in various types of aerobic soils. Data on the biotransformation of IN-VM862 in soil were not available due to its volatility; however, as noted in the air section below, it is expected to exhibit lower volatility in the field. Carryover of fluazaindolizine residues to the following season is not expected as the field studies showed that <8.5% of the applied amount remained in soil after one year.

Fluazaindolizine and its TPs are expected to be mobile in soil based on their  $K_{\rm oc}$  values, the criteria of Cohen et al*.* (1984), and their groundwater ubiquity scores, and were observed to reach depths of 70-90 cm in field studies. As such, a precautionary label statement to address the potential for fluazaindolizine to leach through soil is required.

#### **Aquatic environment:**

Fluazaindolizine is water-soluble. In aerobic and anaerobic aquatic biotransformation studies, <10% of applied fluazaindolizine partitioned to the sediment in test systems. Fluazaindolizine undergoes microbial biotransformation in both water and sediment phases. In water-sediment systems, fluazaindolizine is classified as non-persistent to moderately persistent, and biotransforms into three major TPs: IN-REG72, IN-A5760 and IN-QEK31. Data on the biotransformation of the major TPs in aquatic systems were not available.

Fluazaindolizine is expected to undergo rapid aqueous phototransformation, with representative half-lives (summer sunlight equivalents at 30 to 50°N) of 2.2, 2.5 and 3.3 days at pH 4, pH 9 and sterile natural water (pH 7.3), respectively. The aqueous phototransformation of fluazaindolizine produces several major TPs at various pH values (2-chloro-5-methoxybenzenesulfonic acid, IN-F4106, IN-UGA22, IN-QEK31, and an unidentified compound with a retention time of  $\sim$ 31.5 minutes).
### **Air:**

Fluazaindolizine and its TPs, with the exception of IN-VM862, have low vapour pressures and low Henry's Law constants, which indicate a low potential for volatilization from moist soil and water. IN-VM862 has intermediate to high volatility based on its vapour pressure; however, IN-VM862 is very soluble in water, and it is not expected to be volatile from a water surface or moist soil based on the Henry's Law constant. IN-VM862 is therefore expected to exhibit lower volatility in the field in the presence of water, including soil moisture. Some binding of IN-VM862 to soil was observed during soil biotransformation studies using fluazaindolizine as the test compound. Long-range atmospheric transport is unlikely to occur.

A summary of the major TPs is provided in Appendix I, Table 10. The environmental fate parameters for fluazaindolizine and its TPs are provided in Appendix 1, Table 11.

### **4.2 Environmental risk characterization**

The environmental risk assessment integrates environmental exposure and ecotoxicology information to estimate the potential for adverse effects to non-target species. This integration is achieved by comparing estimated environmental concentrations (EECs) in various environmental media (food, water, soil and air) with the concentrations at which adverse effects occur. The EECs are estimated using standard models, which take into consideration application rate(s), and chemical and environmental fate properties, including the dissipation of the pesticide between applications. Ecotoxicology information includes acute and chronic toxicity data for organisms (invertebrates, vertebrates and plants) from both terrestrial and aquatic habitats.

Environmental toxicity data are summarized in Appendix I, Table 12. Toxicity endpoints used in risk assessments are adjusted to account for potential differences in species sensitivity as well as varying protection goals (in other words, protection at the community, population, or individual level). The magnitude of the uncertainty factor depends on the group of organisms being evaluated (for example, 10 for fish, 2 for aquatic invertebrates, 1 for bees and other beneficial arthropods). The difference in the value of the uncertainty factor reflects, in part, the ability of organisms at a certain trophic level (i.e., feeding position in a food chain) to withstand, or recover from, a stressor at the level of the population. For characterizing acute risk, acute toxicity values (for example,  $LC_{50}$ ,  $LD_{50}$ , and  $EC_{50}$ ) are divided by an uncertainty factor. When assessing chronic risk, a no observed effect concentration (NOEC) is used and an uncertainty factor is not applied.

Initially, a screening level risk assessment is performed to identify specific uses that do not pose a risk to non-target organisms, and groups of organisms for which there may be a potential risk. The screening level risk assessment uses simple methods, conservative exposure scenarios (for example, direct application at a maximum cumulative application rate) and sensitive toxicity endpoints. A risk quotient (RQ) is calculated by dividing the EEC by an appropriate toxicity value  $(RQ = EEC/toxicity endpoint)$ , and is then compared to the level of concern (LOC). If the screening level RQ is below the LOC, the risk is considered negligible and no further risk characterization is necessary. If the screening level RQ is equal to, or greater than the LOC, a refined risk assessment is performed to further characterize the risk. A refined assessment takes

into consideration more realistic exposure scenarios (such as drift to non-target habitats) and might consider different toxicity endpoints. Refinements may include further characterization of risk based on exposure modelling, monitoring data, results from field or mesocosm studies, and probabilistic risk assessment methods. Refinements to the risk assessment may continue until the risk is adequately characterized or no further refinements are possible.

Environmental toxicology studies were conducted with fluazaindolizine, as well as several major TPs, depending on the organism. In addition, some studies were conducted with the end-use product, DPX-Q8U80 500 g/L SC, which has the same guarantee (500 g/L) as the proposed enduse product Salibro Nematicide. The toxicity endpoints and uncertainty factors used in the risk assessment are presented in Appendix I, Table 13.

### **4.2.1 Risks to terrestrial organisms**

Fluazaindolizine is not applied as a foliar spray to crops. It is proposed for use via pre-plant soil incorporated, pre-plant broadcast application followed by soil incorporation, as an in-furrow soil treatment, or via chemigation (pre-plant, at plant or postplant). For optimum performance, fluazaindolizine is applied directly to the root zone of the plant. All applications must be immediately incorporated into the soil to a depth of at least 10 cm.

Terrestrial organisms, such as earthworms, bees and other beneficial arthropods, birds, wild mammals and terrestrial vascular plants may be exposed to fluazaindolizine through direct contact with spray or spray drift, contact with sprayed surfaces or from ingestion of contaminated food. A risk assessment of fluazaindolizine and its end-use product, Salibro Nematicide, was undertaken based on available toxicity data for earthworms, bees and other beneficial arthropods, birds, wild mammals, and terrestrial plants.

The screening level risk assessment for terrestrial organisms is shown in Appendix I, Table 14. At the screening level, the EEC for fluazaindolizine in soil was calculated based on a direct overspray, considering the maximum rate of one application of 2240 g a.i./ha. Soil EECs were converted from g a.i./ha to mg a.i./kg soil using the assumption that fluazaindolizine was homogeneously mixed in the top 15 cm soil layer with a soil bulk density of 1.5  $g/cm<sup>3</sup>$ . EECs for major TPs were conservatively calculated assuming 100% conversion of the parent on a molar basis.

To calculate the EEC on plant surfaces in the field after a direct spray, the maximum single application rate was considered. Non-target terrestrial organisms can also be exposed to fluazaindolizine via spray drift. The amount of spray drift depends on the type of equipment used, the size of the spray droplets, as well as the type of crop. To calculate off-field EECs, spray drift factors were applied to the in-field EECs. The spray drift factor is defined as the maximum percentage of spray drift deposition at one metre downwind from the point of application. For fluazaindolizine, application using a field sprayer with a medium spray droplets (as specified on the label), with a corresponding spray drift factor of 6%, was considered.

### **Earthworms**

The chronic toxicity of fluazaindolizine, its TPs, and the end-use product, DPX-Q8U80 500 g/L SC, to earthworms (*Eisenia fetida*) were determined in laboratory studies. The results were compared to the screening level soil EECs. The resulting  $RQs$  ( $\leq 0.15$ ) did not exceed the LOC of 1 (Appendix I, Table 14). As such, risks to earthworms from the use of fluazaindolizine are negligible.

### **Beneficial arthropods**

Beneficial arthropods could be exposed to fluazaindolizine immediately after application infield, as well as off-field via spray drift. Toxicity tests for beneficial arthropods were conducted with the end-use product, DPX-Q8U80 500 g/L SC. The screening level risk assessment for beneficial arthropods is shown in Appendix I, Table 14.

For ground-dwelling predatory arthropods (in other words, the predatory mite, *Hypoaspis aculeifer*), the soil EEC for fluazaindolizine (1.00 mg a.i./kg) was used to estimate exposure. The  $RQ$  ( $< 0.002$ ) did not exceed the LOC. As such, risks to ground-dwelling arthropods from the use of fluazaindolizine are negligible.

For foliar-dwelling arthropods (in other words, the predatory mite, *Typhlodromus pyri*, and the parasitic arthropod, *Aphidius rhopalosiphi*), the maximum single application rate (2240 g a.i./ha) was used to estimate in-field exposure. No adverse effects on survival or reproduction were observed at the highest concentration tested (1000 g a.i./ha) in the toxicity studies for *T. pyri* and *A. rhopalosiphi*. The in-field RQs (<2.24) marginally exceeded the LOC of 2 because the maximum application rate exceeds the highest concentration tested in the toxicity tests. As noted above, fluazaindolizine is applied directly to the root zone of the plant and all applications must be immediately incorporated into the soil to a depth of at least 10 cm. As such, exposure of infield foliar-dwelling arthropods would be limited. Given that the RQ is less than 2.24, that there were no adverse effects observed in the toxicity tests, and that exposure would be limited, risks to foliar-dwelling arthropods are considered to be negligible. These organisms may also be exposed to fluazaindolizine via spray drift off-field when applied with a field sprayer pre-plant. The off-field RQs (<0.13) did not exceed the LOC. As such, risks to off-field beneficial arthropods from the use of fluazaindolizine are negligible.

#### **Bees**

Foraging bees could be exposed to fluazaindolizine spray droplets during pre-plant application with a field sprayer or through the ingestion of pollen and nectar contaminated with fluazaindolizine (oral exposure). Additionally, bee brood may be exposed to fluazaindolizine if foraging bees bring contaminated pollen and nectar back to the hive. For the screening level risk assessment, it was conservatively assumed that fluazaindolizine is systemic, although it is not expected to move through plants to the pollen and nectar.

### **Contact exposure**

In the screening level risk assessment, the estimated contact exposure for bees is compared to the toxicity endpoints (expressed in µg a.i./bee) derived from laboratory studies. As such, a conversion of the application rate from kg a.i./ha to µg a.i./bee is required. Contact toxicity studies are available for exposure of adult bees to fluazaindolizine, its end-use product (DPX-Q8U80 500 g/L SC), and its major TPs, IN-F4106 and IN-QEK31. The RQs ( $\leq 0.03$ ) for contact exposure did not exceed the LOC of 0.4. As such, risks to adult bees from contact exposure to fluazaindolizine, its end-use product and TPs are negligible (Appendix I, Table 14).

### **Oral exposure**

In the screening level risk assessment, the estimated oral exposure for bees is compared to toxicity endpoints (expressed in µg a.i./bee) derived from laboratory studies. As such, a conversion of the application rate from kg a.i./ha to µg a.i./bee is required. Oral exposure toxicity studies for adult and larval bees are available for fluazaindolizine, its end-use product DPX-Q8U80 500 g/L SC (toxicity study for adult bees only), and its major TPs, IN-F4106 and IN-QEK31.

As noted above, fluazaindolizine is not applied as a foliar spray to crops. Pre-plant and at-plant application is proposed at 1120 to 2240 g a.i./ha (the maximum seasonal rate). Postplant chemigation is used as a supplemental treatment, and is applied at a rate that is two to four times lower than the maximum rate (560 to 1120 g a.i./ha vs. 2240 g a.i./ha). For optimum performance, fluazaindolizine is applied directly to the root zone of the plant. All applications must be immediately incorporated into the soil to a depth of at least 10 cm. Fluazaindolizine is not systemic and is not expected to move through plants to the pollen and nectar.

In the submitted semi-field studies, fluazaindolizine applied at a rate of 1000 g a.i./ha as an infurrow soil treatment at planting, or via drip irrigation at night during the bloom of lacy phacelia (*Phacelia tanacetifolia*), caused no adverse effects to honeybee colonies. No residues of fluazaindolizine or its TPs were detected in any of the nectar or pollen samples collected from treated plots. Given the above, oral exposure of bees to fluazaindolizine and its TPs is expected to be limited.

The screening level risk assessment evaluated risks to bees from oral exposure to fluazaindolizine applied as a soil treatment at the maximum single application rate (in other words, 2240 g a.i./ha). The RQs  $(\leq 0.13)$  for adult and larval bees exposed to fluazaindolizine and its TPs as a soil treatment were below the LOCs of 0.4 (acute) and 1 (chronic) (Appendix I, Table 14). As such, risks to bees from the use of fluazaindolizine as a soil treatment are negligible.

#### **Terrestrial vertebrates**

On an acute oral basis, fluazaindolizine is considered to be slightly toxic to practically non-toxic to birds, and slightly toxic to mammals. A screening level risk assessment was conducted to evaluate the acute and reproductive risk to birds and mammals from the use of fluazaindolizine.

To assess the risk to birds and mammals, the estimated concentration of fluazaindolizine on various food items was used to determine the amount of pesticide in the diet (the estimated daily exposure (EDE)). Exposure is dependent on the body weight of the organism, and the amount and type of food consumed. As such, a set of generic body weights was used to represent a range of species (20, 100, and 1000 g for birds and 15, 35, and 1000 g for mammals) and specialized feeding guilds (in other words, herbivore, frugivore, insectivore and granivore) were considered for each category of animal weights.

The screening level risk assessment evaluated a conservative exposure scenario based on:

- The maximum fluazaindolizine residue concentrations in food items;
- A diet that is composed entirely (100%) of a particular dietary item; and,
- The feeding guild assumed to have the highest exposure for each animal weight category.

If a concern was identified at the screening level (in other words,  $RQ > LOC$ ), the risk was then further characterized.

### **Birds**

The screening level risk assessment assumed that birds could be exposed to fluazaindolizine via the consumption of contaminated food items. Acute oral exposure and reproductive effects were evaluated. The RQs for acute oral exposure  $(\leq 0.91)$  were below the LOC of 1 for all bird size classes, indicating that risks from short term exposure to contaminated items are negligible.

The RQs for reproductive effects in all bird size classes exceeded the LOC of 1 when considering the on-field maximum residue concentrations on food items (RQs 1.80 to 3.57; Appendix I, Table 15).

To further characterize the reproductive risk for birds, the assessment was expanded to include all relevant food guilds. The concentrations of fluazaindolizine on food items were based on both on-field and off-field mean and maximum residue values. The RQs for reproductive effects in small and medium sized insectivorous birds still exceeded the LOC based on the on-field mean residue concentrations (RQs 2.46 and 1.92, respectively). Risks to birds off-field were negligible  $(RQs \le 0.15)$ . Given that the on-field RQs marginally exceeded the LOC, the risk assessment from on-field exposure was further refined (Appendix I, Table 16).

The screening level risk assessment considered the no-observed effects dose (NOED) from the northern bobwhite reproductive study. Reproductive risks to small and medium birds on-field were further refined by considering the lowest-observed effects dose (LOED) from the bobwhite study. The LOED corresponded to a slight reduction in the number of 14-day old surviving hatchlings at the highest concentration tested (89% hatchling survival in the 1250 mg a.i./kg feed treatment compared to 96% in control). The LOED was determined to be 101.7 mg a.i./kg bw/day. When considering the LOED, the on-field RQs for small insectivorous birds (maximum and mean nomogram residues) and medium insectivorous birds (maximum nomogram residues only) marginally exceeded the LOC ( $RQs = 1.24$  to 1.79) (Appendix I, Table 17).

For the assessment, it was assumed that 100% of the diet was composed of contaminated food items, and that residues of fluazaindolizine on insects were equivalent to those on sprayed plants with a similar surface area to volume ratio. Small and medium insectivorous birds may dig in the soil for insects; however, it is highly unlikely that they would consume a diet composed 100% of insects contaminated by fluazaindolizine over a long period of time. Feed reduction/aversion was observed in the dietary toxicity studies using the mallard and the zebra finch.

This indicates that birds may preferentially avoid fluazaindolizine treated food items in the wild, reducing potential exposure. Given this, the probability that adverse reproductive effects would occur following exposure to fluazaindolizine residues on food items is considered low, and risks to birds are considered negligible.

### **Wild mammals**

The screening level risk assessment (Appendix I, Table 15) assumed that wild mammals could be exposed to fluazaindolizine via the consumption of contaminated food items. Acute oral exposure and reproductive effects were evaluated. The RQs for acute oral exposure (RQs of  $\langle 1.12 \text{ to } \langle 2.16 \rangle$  marginally exceeded the LOC of 1 for all size classes when considering the onfield maximum residue concentrations on food items. The RQs for reproductive effects in all mammal size classes were below the LOC of 1 (RQs of 0.29 to 0.56), indicating that reproductive risks are negligible.

Since the LOCs for acute oral exposure were exceeded, the risk was further characterized by expanding the assessment to include all relevant food guilds and to consider both on-field and off-field mean and maximum residue values (Appendix I, Table 16). The acute oral RQs for small insectivorous mammals ( $RO$  <1.12), and medium and large herbivores ( $ROS$  of <1.07 to <2.16) exceeded the LOC based on the maximum on-field residue concentrations. However, the RQs for these feeding guilds were below the LOC when considering the mean on-field residue concentrations (RQs of  $\langle 0.35 \rangle$  to  $\langle 0.77 \rangle$ ). Risks to wild mammals off-field were negligible (RQs  $< 0.13$ ).

It is considered unlikely that 100% of the diet of mammals would be composed of food items contaminated with fluazaindolizine. As noted above, fluazaindolizine is applied directly to the root zone of the plant for optimal performance, must immediately be soil incorporated after application, and is not systemic. As such, the concentration of fluazaindolizine in food items is expected to be limited. Risks to wild mammals are considered to be negligible given that the RQs based on mean on-field residue concentration and off-field exposure were below the LOC.

### **Terrestrial plants**

The vegetative vigour and seedling emergence toxicity tests showed no adverse effects to plants at 2000 g a.i./ha, the highest application rate tested, with the exception of a 9% reduction in the shoot height of oat at 2000 g a.i./ha. The highest rate tested in these studies was below the maximum proposed annual application rate of 2240 g a.i./ha. The RQs of <1.12 for vegetative vigour and seedling emergence marginally exceeded the LOC of 1 given that the maximum proposed application rate exceeds the highest rate tested in the toxicity tests. The off-field RQs

 $( $0.07$ ), considering 6% spray drift deposition at one metre downward from the site of$ application, were below the LOC. Considering that limited adverse effects were observed at the highest rate tested, and that the LOC was not exceeded for off field drift, adverse effects to nontarget terrestrial plants are not expected at the proposed application rate. The risks associated with the use of fluazaindolizine to non-target plants are acceptable.

# **4.2.2 Risks to aquatic organisms**

Aquatic organisms, such as invertebrates, fish, amphibians and aquatic plants can be exposed to fluazaindolizine if spray drift or runoff enter an aquatic habitat. For the screening level risk assessment, EECs in surface water were calculated considering a direct overspray of fluazaindolizine at the maximum single application rate of 2240 g a.i./ha. EECs for major TPs were conservatively calculated assuming 100% conversion of the parent on a molar basis. Water bodies of two different depths were evaluated: an EEC in surface water of 15-cm depth was used to determine risk to amphibians while an EEC at 80-cm depth was used to evaluate risks to all other aquatic organisms.

Fluazaindolizine is classified as practically non-toxic to freshwater invertebrates, practically nontoxic to slightly toxic to marine invertebrates and freshwater/marine fish, and slightly toxic to freshwater/marine algae and freshwater vascular plants (Appendix I, Table 12). The toxicity of the end-use product differed from that of the technical product for freshwater invertebrates (slightly toxic) and freshwater algae (moderately toxic). Based on the available data, the major TPs have a similar toxicity to aquatic organisms as fluazaindolizine. No mortality or overt signs of toxicity were observed in the acute toxicity tests using the Eastern oyster, rainbow trout, bluegill sunfish or sheepshead minnow.

Risks to aquatic organisms from exposure to a direct overspray of fluazaindolizine at the maximum application rate are negligible ( $RQs \le 0.49$ ; Appendix I, Table 18). Exposure of aquatic organisms to spray drift and runoff would be lower than for a direct overspray. As such, calculation of risks from spray drift or runoff were not required.

### **4.2.3 Environmental incident reports**

Fluazaindolizine is a new active ingredient pending registration for use in Canada, and as of 4 May 2020, no environmental incident reports have been submitted to the PMRA.

# **5.0 Value**

Fluazaindolizine is a new conventional active ingredient for the management of root-knot nematodes on vegetable crops in Canada. There are a limited number of products registered in Canada for the control or suppression of plant parasitic nematodes, including root-knot nematodes on vegetable crops. Fluazaindolizine is primarily active on parasitic root-knot nematodes.

The availability of Salibro Nematicide will provide Canadian vegetable growers with a new mode of action and a new nematicide for use on tuberous and corm vegetables (Crop Subgroup 1C), cucurbit vegetables (Crop Group 9), fruiting vegetables (Crop Group 8-09) and carrots to manage root-knot nematodes that cause significant economic losses to vegetable growers.

Efficacy data from 17 field trials and scientific rationales demonstrated that Salibro Nematicide can be expected to control or suppress root-knot nematodes on multiple vegetable crops. As no phytotoxicity or crop injury was reported in any of the submitted studies conducted at application rates equal to or greater than rates proposed for registration, application of Salibro Nematicide is not expected to result in crop injury.

Details of the supported uses are summarized in Appendix I, Table 20.

# **6.0 Pest control product policy considerations**

### **6.1 Toxic substances management policy considerations**

The *Toxic Substances Management Policy* (TSMP) is a federal government policy developed to provide direction on the management of substances of concern that are released into the environment. The TSMP calls for the virtual elimination of Track 1 substances, in other words, those that meet all four criteria outlined in the policy: persistent (in air, soil, water and/or sediment), bio-accumulative, primarily a result of human activity and toxic as defined by the *Canadian Environmental Protection Act*. The *Pest Control Products Act* requires that the TSMP be given effect in evaluating the risks of a product.

During the review process, fluazaindolizine and its TPs were assessed in accordance with the PMRA Regulatory Directive DIR99-03<sup>[6](#page-43-0)</sup> and evaluated against the Track 1 criteria. The PMRA has reached the conclusion that Reklemel Technical (containing fluazaindolizine) and its TPs do not meet all of the TSMP Track 1 criteria.

Please refer to Table 19 for further information on the TSMP assessment.

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### **6.2 Formulants and contaminants of health or environmental concern**

During the review process, contaminants in the active ingredient as well as formulants and contaminants in the end-use products are compared against Parts 1 and 3 of the *List of Pest Control Product Formulants and Contaminants of Health or Environmental Concern*. [7](#page-43-1)

<span id="page-43-0"></span><sup>6</sup> DIR99-03, *The Pest Management Regulatory Agency's Strategy for Implementing the Toxic Substances Management Policy*

<span id="page-43-1"></span><sup>7</sup> SI/2005-114, last amended on 24 June 2020. See Justice Laws website, Consolidated Regulations, *List of Pest Control Product Formulants and Contaminants of Health or Environmental Concern.*

The list is used as described in the PMRA Notice of Intent NOI2005-01<sup>[8](#page-44-0)</sup> and is based on existing policies and regulations, including the *Toxic Substance Management Policy* and *Formulants Policy*, [9](#page-44-1) and taking into consideration the *Ozone-Depleting Substance Regulations*, 1998, of the *Canadian Environmental Protection Act* (substances designated under the *Montreal Protocol*).

The PMRA has reached the conclusion that Reklemel Technical (containing fluazaindolizine) does not contain any formulants or other contaminants identified in the *List of Pest Control Product Formulants and Contaminants of Health or Environmental Concern*. However, its enduse product, Salibro Nematicide, contains as a component, the preservative 1, 2 benzisothiazolin-3-one at significantly less than 0.1%, which contains low levels of polychlorinated dibenzodioxins and furans (TSMP Track 1). The use of this preservative in pest control products at a maximum of 0.1% was reassessed by the PMRA in 2012 and found to be acceptable because dioxin and furan levels are low and being managed as outlined in the PMRA Regulatory Directive DIR99-03 for the implementation of TSMP. The Agency position at this time is that no further action is required.

The use of formulants in registered pest control products is assessed on an ongoing basis through PMRA formulant initiatives and Regulatory Directive DIR2006-02.

# **7.0 Proposed regulatory decision**

Health Canada's Pest Management Regulatory Agency (PMRA), under the authority of the Pest Control Products Act, is proposing registration for the sale and use of Reklemel Technical Nematicide, and Salibro Nematicide, containing the technical grade active ingredient fluazaindolizine, to control root-knot nematodes in tuberous and corm vegetables (Crop Subgroup 1C), carrot, cucurbit vegetables (Crop Group 9) and fruiting vegetables (Crop Group 8-09).

An evaluation of available scientific information found that, under the approved conditions of use, the health and environmental risks and the value of the pest control products are acceptable.

### **Additional information being requested**

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Since this technical product is manufactured only at pilot scale before registration, five-batch data representing commercial-scale production will be required as postmarket information after registration.

<span id="page-44-0"></span><sup>8</sup> PMRA's Science Policy Note SPN2020-01, *Policy on the List of Pest Control Product Formulants and Contaminants of Health or Environmental Concern* under paragraph 43(5)(b) of the *Pest Control Products Act*.

<span id="page-44-1"></span><sup>9</sup> DIR2006-02, *Formulants Policy and Implementation Guidance Document.*

# **List of abbreviations**









# **Appendix I Tables and figures**





## **Table 2 Residue analysis**





2Method proposed as enforcement method which involves hydrolysis step to convert free and conjugated metabolites of fluazaindolizine to seven core metabolites; therefore does not quantify fluazaindolizine per se.

<sup>3</sup>Method based on the enforcement method. Also subjected to independent method validation to assess its acceptability as a suitable enforcement method for the quantitation of the parent and the seven core metabolites posthydrolysis.



# **Table 3 Identification of select fluazaindolizine metabolites**

## **Table 4 Toxicity profile of salibro nematicide containing fluazaindolizine**





# **Table 5 Toxicity profile of technical fluazaindolizine**

Effects observed in both sexes are presented first followed by sex-specific effects in males, then females, each separated by semi-colons. Organ weight effects reflect both absolute organ weights and relative organ to bodyweights unless otherwise noted. Effects seen above the LOAEL(s) have not been reported in this table for most studies for reasons of brevity.



































### **Table 6 Toxicity profile of metabolites and impurities of fluazaindolizine**

Effects observed in both sexes are presented first followed by sex-specific effects in males, then females, each separated by semi-colons. Organ weight effects reflect both absolute organ weights and relative organ to bodyweights unless otherwise noted. Effects seen above the LOAEL(s) have not been reported in this table for most studies for reasons of brevity.
























## **Table 7 Toxicology reference values for use in health risk assessment for fluazaindolizine**



<sup>1</sup> CAF (composite assessment factor) refers to a total of uncertainty and PCPA factors for dietary assessments; MOE refers to a target MOE for occupational assessments.

<sup>2</sup> Since an oral NOAEL was selected, a dermal absorption factor of 1% was used in route-to-route extrapolation.

<sup>3</sup> Since an oral NOAEL was selected, an inhalation absorption factor of 100% (default value) was used in route-to-route extrapolation.

#### **Table 8 Integrated food residue chemistry summary**















Lactating dairy cows were administered fluazaindolizine via gelatin capsule at dose levels of 2.28 ppm, 6.68 ppm and 20.28 ppm for 28 consecutive days. Animals were sacrificed approximately 22–24 hours after the last dose. A depuration study was conducted using the 19.60 ppm feeding level and selected animals were sacrificed at 1, 2, and 5 days after the last dose. Residues of fluazaindolizine declined to <0.01 ppm in whole milk by Day-31 after the last administered dose (Day-28) of fluazaindolizine to dairy cattle. Residues of metabolites IN-A5760, IN-R2W56, IN-REG72, and IN-RYC33 were nondetectable in all milk and tissue samples.



Another four dairy cows were divided into two groups (treatment; depuration) and dosed with IN-QEK31 at a single dose rate (19.46 ppm) for 28 consecutive days. The depuration study indicated that dairy cattle administered IN-QEK31 (18.5 ppm) had residues of IN-QEK31 <0.01 ppm in whole milk by Day-30. Residues of metabolites IN-A5760, IN-F4106, IN-R2W56, IN-REG72, and IN-RYC33 were non-detectable in all milk and tissue samples.













## **Freezer storage stability in plant matrices at -20 °C**

Fluazaindolizine residues are stable in the five crop commodity categories (high water, high starch, high protein, high oil, and high acid) for at least 24 months, therefore, freezer storage stability can be assumed for all crops, including processed commodities. In dry commodities, residues of fluazaindolizine are stable for at least 23 months. There are acceptable freezer storage stability data in plant matrices to support the frozen storage intervals observed in the magnitude of the residue, processing and field accumulation trials. No correction to residues due to in-storage dissipation is required for crop field trial, processed and field accumulation samples.



#### **Crop field trials and residue decline on carrots PMRA# 2958068**

Eleven (11) field trials were conducted in the United States and Canada during the 2015–2016 growing seasons. Trials were conducted in North American Free Trade Agreement (NAFTA) growing region 1 (NS; 1 trial), 3 (FL; 1 trial), 5 (IA, OH, and ON; 3 trials, QC; 1 trial), 6 (TX; 1 trial), 10 (CA; 3 trials), and 11 (ID; 1 trial). The number and geographic distribution of trials exceed the requirements outlined in Health Canada's DIR2010-05. All trials were considered independent. Fluazaindolizine SC (500 g/L) was applied either once at 2.19–2.30 kg a.i./ha as an in-furrow spray at planting, or twice at 1.07–1.17 kg a.i./ha/application with a retreatment interval of 13–14 days as an in-furrow spray at planting followed by a soil directed spray over the top of the row for a seasonal application rate of 2.2–2.3 kg a.i./ha. Carrot samples were harvested at a minimum of 79 days (1 soil application) and 65 days (2 soil applications) following application. There was no clear trend of decline for residues of fluazaindolizine in carrots. Carrot samples were stored for a maximum of 6 months from harvest to analysis, which is covered by the freezer storage stability interval of 24 months for high starch commodities. Samples were analyzed using a validated analytical method.



Bolded input indicates interval used for MRL calculations.

#### **Crop field trials and residue decline on potatoes PMRA# 2958069**

Twenty one (21) field trials were conducted in the United States and Canada during the 2015-2016 growing seasons. Trials were conducted in North American Free Trade Agreement (NAFTA) growing region 1 (PA and NY; 3 trials; NS and PI; 4 trials),  $2$  (NJ; 1 trial),  $3$  (FL; 1 trial),  $5$  (IL, MN, and ON; 3 trials; QC; 1 trial), 7 (SK; 1 trial), 10 (CA; 1 trial), 11 (CA, ID, and WA; 5 trials), and 14 (MB; 1 trial). Some of the potato trials were determined to be replicates, and as such, residues were averaged, which is reflected in the trial count. The number and geographic distribution of trials exceed the requirements outlined in Health Canada's DIR2010-05 with the exception of region 7A, where no trials were conducted. Fluazaindolizine SC (500 g/L) was applied either once at 2.15–2.32 kg a.i./ha as an in-furrow spray at planting, or twice at 1.09-1.18 kg a.i./ha/application with a retreatment interval of 13–14 days as an in-furrow spray at planting followed by a soil directed spray over the top of the row for a seasonal application rate of 2.2–2.3 kg a.i./ha. Potato samples were harvested at a minimum of 53 days (1 soil application) and 39 days (2 soil applications) following the last application. There was no clear trend of decline for residues of fluazaindolizine in potatoes. Potato samples were stored for a maximum of 16 months from harvest to analysis, which is covered by the freezer storage stability interval of 24 months for high starch commodities. Samples were analyzed using a validated analytical method.



Bolded input indicates interval used for MRL calculations.

### **Crop field trials and residue decline on fruiting vegetables PMRA# 2957997**

Nine (9) trials were conducted with bell peppers in North American Free Trade Agreement (NAFTA) growing region 2 (GA; 1 trial), 3 (FL; 1 trial), 5 (IA and ON; 3 trials, QC; 1 trial), 6 (TX; 1 trial), and 10 (CA; 2 trials); nine (9) trials were conducted with non-bell peppers in regions 2 (GA; 1 trial), 5 (ON; 3 trials, QC; 2 trials), 8 (TX; 1 trial), and 10 (AZ and CA; 2 trials); and twenty (20) trials were conducted with tomatoes (small and large varieties) in region 1 (PA; 1 trial), 2 (GA; 2 trials), 3 (FL; 2 trials), 5 (IA, NE, ON, WI; 6 trials, QC; 2 trials), and 10 (AZ and CA; 7 trials). Some of the tomato and bell pepper trials were determined to be replicates, and as such, residues were averaged, which is reflected in the trial count. The number and geographic distribution of trials exceed the requirements outlined in Health Canada's DIR2010-05. Fluazaindolizine SC (500 g/L) was applied once at 1.12–1.13 kg a.i./ha at planting (drip/drench/spray) followed by 2 soil applications at 0.55–0.57 kg a.i./ha with a retreatment interval of 11-105 days, for a seasonal application rate of 2.22–2.25 kg a.i./ha. At a second treatment plot, four applications were made each at 0.55–0.57 kg a.i./ha/application for a total of 2.19–2.26 kg a.i./ha. Fruiting vegetable samples were harvested at a minimum of 0 to 1 day following 3 or 4 soil applications. Residues of fluazaindolizine declined to <LOQ in tomatoes, bell peppers, and nonbell peppers with increasing PHIs. Tomato and pepper samples were stored for a maximum of 23 months from harvest to analysis, which is covered by the freezer storage stability interval of 34 months for high water commodities. Samples were analyzed using a validated analytical method.





 $n =$  number of independent trials; For computation, values  $\leq$ LOQ are assumed to be at the LOQ. Bolded input indicates interval used for MRL calculations.

# **Crop field trials and residue decline on cucurbit vegetables PMRA#**  $\begin{bmatrix} PMRA \end{bmatrix}$

**2957998**

Twenty-nine (29) field trials were conducted in the United States and Canada during the 2014-2015 growing seasons. Nine trials were conducted on cucumbers in North American Free Trade Agreement (NAFTA) growing region 2 (GA: 2 trials), 3 (FL; 1 trial), 5 (IA, IL, NE, ON and QC; 5 trials), and 6 (TX; 1 trial); 11 trials were conducted with muskmelons in region 2 (GA; 1 trial), 5 (IA, IL, ON and QC; 5 trials), 6 (TX; 1 trial), and 10 (AZ and CA; 4 trials); and 9 trials were conducted with summer squash varieties in Region 1 (PA; 1 trial), 2 (GA; 1 trial), 3 (FL; 1 trial), 5 (IA, NE, ON and QC; 4 trials), and 10 (CA; 2 trials). Some of the cucumber, muskmelon and summer squash trials were determined to be replicates, and as such residues were averaged, which is reflected in the trial count. The number and geographic distribution of trials exceed the requirements outlined in Health Canada's DIR2010-05. Fluazaindolizine SC (500 g/L) was applied once as a soil application (drip. drench, spray) at planting at 1.11 kg a.i./ha followed by 2 soil applications at 0.55–0.56 kg a.i./ha with retreatment interval of 27–91 days for a seasonal application rate of 2.22–2.26 kg a.i./ha. Fluazaindolizine SC (500 g/L) was also applied as 4 soil applications of 0.55–0.57 kg a.i./ha with a retreatment interval of 4–24 days for a seasonal application rate of 2.19–2.25 kg a.i./ha. Cucurbit samples were harvested at a minimum of 0 to 1 day following 3 or 4 soil applications. Residues of fluazaindolizine declined with increasing preharvest intervals. Cucumber, summer squash and muskmelon samples were stored for a maximum of 16 months from harvest to analysis, which is covered by the freezer storage stability interval of 34 months for high water commodities. Samples were analyzed using a validated analytical method.





hydrolysis investigations with a concentration of approximately 10  $\mu$ g/mL. When fluazaindolizine was subjected to high-temperature hydrolysis conditions (20 and 60 minutes), fluazaindolizine was observed to be hydrolytically stable as no other radiolabeled components were identified.



#### **Processed food and feed – Potatoes, tomatoes, soybeans, wheat, field corn, and strawberries PMRA# 2958008, 2958066, 2958067, 2958074, 2958075, 2958076**

Processing studies were conducted using Fluazaindolizine SC (500 g/L) applied at 11.3 kg a.i./ha (fivefold of maximum single seasonal use rate), and approximately 9 kg a.i./ha (fourfold of maximum single seasonal use rate), in/on potatoes, and tomatoes, respectively. Processing trials were also conducted in/on soybeans, wheat, field corn and strawberries at 4.5 kg a.i./ha (twofold of maximum single seasonal use rate) as rotational crops, however, residues of fluazaindolizine were not detected in the RACs of wheat, field corn and strawberries, and as such processing factors could not be determined. Residues of fluazaindolizine did not concentrate in processed commodities for human consumption. Adequate storage stability data are available on diverse crop types to support the storage intervals of the processed food and feed. Samples were analyzed using a validated analytical method.







300 0.531 0.969





### **Limited field accumulation - NAFTA PMRA# 2957918**

Limited field rotation trials (Tier 2) were conducted for six rotational crops (spinach/leaf lettuce, radish, wheat/sorghum, and soybeans), at three trial sites in the United States (NAFTA Regions 2, 5 and 10), where soil was treated with fluazaindolizine (500  $g/L$ ), and rotational crops were planted at three plantback intervals. At each trial site, bare soil was treated with one dripline application at 1.25 kg a.i./ha  $(0.5\text{-}fold\text{ GAP})$  or with two dripline applications of 1.25 kg a.i./ha with a  $60\pm 10$  days retreatment interval for a total of 2.5 kg a.i./ha/season (1.1-fold GAP). Based on the principles of proportionality, residue data from trials conducted at 2.5 kg a.i./ha were scaled to the maximum seasonal application rate of 2.24 kg a.i./ha for primary crops and are reported herein. No adjuvants were used. Residues of fluazaindolizine decreased with increasing PBI, except for soybean hay where residues increased. In general, adequate storage stability data are available on diverse commodity categories to support the storage intervals of the rotational crop field trials. Although some samples were stored for periods outside the range of demonstrated storage stability, it is not expected to impact negatively the overall results of the study. Samples were analyzed using a validated analytical method.





Limited field rotation trials (Tier 2) were conducted on four rotational crops (leaf lettuce, radish, wheat, and beans), at two trial sites, each in North and South Spain, where soil was treated with fluazaindolizine (DPX-Q8U80 500 g/L SC), and rotational crops were planted at three plant-back intervals. At each trial site, bare soil was treated with one dripline application at 1.25 kg a.i./ha (0.5-fold GAP) or with two dripline applications of 1.25 kg a.i./ha with a  $60±10$  days retreatment interval for a total of 2.5 kg a.i./ha/season (1.1-fold GAP). Based on the principles of proportionality, residue data from trials conducted at 2.5 kg a.i./ha were scaled to the maximum seasonal application rate of 2.24 kg a.i./ha for primary crops and are reported herein. No adjuvants were used. A decline trend was not established as many of the residues were less than LOQ, with the exception of radish roots, wheat straw and bean hay, which declined by the third PBI. In general, adequate storage stability data are available on diverse commodity categories to support the storage intervals of the rotational crop field trials. Although some samples were stored for periods outside the range of demonstrated storage stability, it is not expected to impact negatively the overall results of the study. Samples were analyzed using a validated analytical method.





Values based on per-trial averages. For computation, values <LOQ are assumed to be at the LOQ; n = number of independent field trials.

260–369 | 5 | <0.010 | <0.010 | <0.010 | 0

#### **Extended field accumulation - NAFTA PMRA# 2958031**

Residue data (2014–2016) were submitted for four rotational crops (dried peas, soybeans, field corn, and wheat), at five trial sites each in NAFTA Regions (2, 5, 6 and 11), where soil was treated with fluazaindolizine (500 g/L) and rotational crops were planted at three plant-back intervals. At each trial site, crops were treated with 4 applications of 1.12 kg a.i./ha/application at 7-day retreatment interval for a total rate of 4.4–4.5 kg a.i./ha/season (twofold GAP). Based on the principles of proportionality, residue data were scaled to the maximum seasonal application rate of 2.24 kg a.i./ha for primary crops and are reported herein. Adjuvants were used at only 7 trial sites out of 20. Crops were harvested at maturity and prepared for residue analysis. Quantifiable residues of fluazaindolizine declined with increasing plantback intervals, except for wheat straw, whereby residues increased at 60–64 days before decreasing by 365 days. In general, adequate storage stability data are available on diverse commodity categories to support the storage intervals of the rotational crop field trials. Although some samples were stored for periods outside the range of demonstrated storage stability, it is not expected to impact negatively the overall results of the study. Samples were analyzed using a validated analytical method.





Values based on per-trial averages. For computation, values <LOQ are assumed to be at the LOQ. n = number of independent field trials.

#### **Extended field accumulation - EU PMRA# 2958035**

Five rotational crop field trials, each including broccoli, lettuce, Swiss chard, celery, strawberry, tomato, and turnip, were conducted in Europe during the 2014–2015 growing seasons and rotational crops were planted at three plant-back intervals. Trials were conducted in the south of France (1 trial), north of Spain (2 trials), and south of Spain (2 trials). Two trials were conducted in plastic tunnels (protected environments), while the other trials were conducted in the field. At each trial site, four broadcast applications of a (500 g a.i./L) suspension concentrate (SC) formulation of fluazaindolizine were made to bare soil at 1.05–1.20 kg a.i./ha/application for a total rate of 4.29–4.55 kg a.i./ha (twofold GAP). Applications were made using ground equipment in spray volumes of 143–163 L/ha at retreatment intervals of 13–15 days. Based on the principles of proportionality, residue data were scaled to the maximum seasonal application rate of 2.24 kg a.i./ha for primary crops and are reported herein. No adjuvants were used at any trial. Samples were harvested at commercial maturity from each PBI at each trial. A decline trend was not established as many of the residues were less than LOQ, with the exception of turnip roots which declined by the third PBI. Adequate storage stability data are available on diverse commodity categories to support the storage intervals of the rotational crop field trials. Samples were analyzed using a validated analytical method.





Values based on single sample per trial. For computation, values <LOQ are assumed to be at the LOQ.

n = number of independent field trials.

### **Extended field accumulation - EU PMRA# 2958030**

Five rotational crop field trials were conducted in the south of France (1 trial), north of Spain (2 trials), and south of Spain (2 trials) in/on dry peas, wheat, field corn, and oilseed rape during the 2014 growing season and rotational crops were planted at three plant-back intervals. Two of the trials were considered as dependent and as such values were averaged. At each trial site, four broadcast applications of a 500 g a.i./L suspension concentrate (SC) formulation of Fluazaindolizine was made to bare soil at 0.825 kg a.i./ha/application for a total rate of 3.0–3.4 kg a.i./ha (1.5-fold GAP). Applications were made using ground equipment in spray volumes of 143-160 L/ha at retreatment intervals of 14 days. Based on the principles of proportionality, residue data were scaled to the maximum seasonal application rate of 2.24 kg a.i./ha for primary crops and are reported herein. No adjuvants were used at any trial. Samples were harvested at commercial maturity. Quantifiable residues of fluazaindolizine declined with increasing plantback intervals. Adequate storage stability data are available on diverse commodity categories to support the storage intervals of the rotational crop field trials. Samples were analyzed using a validated analytical method.





Values based on individual samples/trial. For computation, values <LOQ are assumed to be at the LOQ.  $n =$  number of independent field trials.

### **Combined NAFTA and EU rotational crop data (Based on super crop groups)**

Based on the OECD Guidance Document of Residues in Rotational Crops (ENV/JM/MONO (2018)), data from Tier 2 (limited) and Tier 3 (extensive) field rotational crop studies were combined based on the super crop group approach. Data from Tier 2 and Tier 3 studies were scaled to the maximum seasonal application rate for Canada (2.24 kg a.i./ha). Residues in edible and feed-relevant plant parts of rotational crops from the 1<sup>st</sup> rotation were selected to establish MRLs and for the estimation of dietary burden. Residues of fluazaindolizine in celery were highest from the 2<sup>nd</sup> rotation.





## **Table 9 Food residue chemistry overview of metabolism studies and risk assessment**



#### **DIETARY RISK FROM FOOD AND DRINKING WATER RDDEA: Sum of IN-A5760 + IN-F4106 + IN-QEK31 + IN-QZY47 + IN-RSU03 + IN-UJV12 + IN-UNS90 (free and conjugated), expressed as parent equivalents Refined acute dietary exposure analysis, 95th percentile ARfD = 1.3 mg/kg bw Estimated acute drinking water concentration = 1.926 ppm POPULATION ESTIMATED RISK % of ACUTE REFERENCE DOSE (ARfD) Food Alone Food and Drinking Water** All infants 6.5 **29.5 (0.383 mg/kg)** Children  $1-2$  years  $\begin{array}{|l|} 6.5 \end{array}$  16.3 Children 3–5 years 15.7 12.7 Children  $6-12$  years  $\begin{array}{|l|} 3.5 \end{array}$  9.3 Youth 13–19 years 2.2 7.8 Adults 20–49 years 2.2 9.0 Adults 50-99 years 1.9 1.9 7.9 Total population  $\begin{array}{|c|c|c|c|c|c|} \hline \end{array}$  2.8  $\begin{array}{|c|c|c|c|c|c|} \hline \end{array}$  9.7 (0.126 mg/kg) **Refined chronic non-cancer dietary exposure analysis ADI = 0.2 mg/kg bw/day Estimated chronic drinking water concentration = 1.924 ppm POPULATION ESTIMATED RISK % of ACCEPTABLE DAILY INTAKE (ADI) Food alone Food and drinking water** All infants 0.8 **73.4 (0.147 mg/kg bw/day)** Children  $1-2$  years  $1.3$  28.0 Children  $3-5$  years  $1.0$  22.8 Children 6–12 years 0.7 16.9 Youth  $13-19$  years  $\begin{array}{|l|c|} \hline 0.4 & 14.1 \end{array}$ Adults 20–49 years 0.4 19.7 Adults 50-99 years 0.3 19.1 Total population  $0.5$  19.9 (0.040 mg/kg bw/day)


# **Table 10 Major TPs of fluazaindolizine in the environment**

































(3) The IN-REG72 test item was labelled only on the phenyl ring. As such, TPs formed on the imidazopyridine ring (i.e., IN-QEK31 and IN-VM862) could not be measured.

(4) As the concentration of IN-QEK31 was increasing at the end of the study, and had reached 9.89% AR in the total system, it is considered a major TP.









#### Appendix I





(1) USEPA classification, where applicable.

(2) Endpoints for minor TPs were not be carried forward into the risk assessment.

(3) The most sensitive endpoints for each taxa were used in the risk assessment. The honeybee endpoints were determined to be protective of bumblebees, and the *D.* magna endpoints were determined to be protective of chironomids because they were lower values.

(4) A LD50 for zebra finch could not be calculated due to feed aversion.

Organism	<b>Exposure</b>	<b>Test</b>	<b>Endpoint value</b>	UF	Endpoint/UF
		substance			
<b>Terrestrial organisms</b>					
<b>Terrestrial invertebrates</b>					
Earthworm	28d-Contact	Fluazaindoli	$NOEC \geq 100$ mg	$\mathbf{1}$	$> 100$ mg a.i./kg soil
		zine	a.i./kg soil		
		DPX-	$NOEC = 205.8$ mg a.i./kg soil	$\mathbf{1}$	$205.8$ mg a.i./kg soil
		Q8U80 500			
		$g/L$ SC			
		(end-use			
		product) IN-A5760			
			$NOEC = 3$ mg/kg soil	$\mathbf{1}$ $\mathbf{1}$	$3$ mg/kg soil
		IN-F4106 IN-QEK31	$NOEC = 50$ mg/kg soil	$\mathbf{1}$	50 mg/kg soil
		<b>IN-VM862</b>	$NOEC = 50$ mg/kg soil $NOEC = 25$ mg/kg soil	$\mathbf{1}$	50 mg/kg soil 25 mg/kg soil
		Fluazaindoli	$LD_{50}$ > 19.62 µg		
Honeybee	48h-Oral	zine	a.i./bee	$\mathbf{1}$	$> 19.62 \mu g$ a.i./bee
		DPX-	$LD_{50} = 120.8 \mu g$ a.i./bee	$\mathbf{1}$	$120.8 \mu$ g a.i./bee
		Q8U80 500			
		$g/L$ SC			
		(end-use			
		product)			
		IN-F4106	$LD_{50} = 15.8 \text{ µg/bee}$	$\mathbf{1}$	$15.8 \mu g/bee$
		IN-QEK31	$LD_{50} > 110 \mu g/bee$	$\mathbf{1}$	$> 110 \mu g/$ bee
	48h-Contact	Fluazaindoli	$LD_{50} > 200 \mu g$ a.i./bee	$\mathbf{1}$	$>$ 200 µg a.i./bee
		zine			
		DPX-	$LD_{50} > 200 \mu g$ a.i./bee	$\mathbf{1}$	$>$ 200 µg a.i./bee
		Q8U80 500 $g/L$ SC			
		(end-use			
		product)			
		IN-F4106	$LD_{50} > 100 \mu g/bee$	$\mathbf{1}$	$> 100 \mu g/bee$
		IN-QEK31	$LD_{50} > 100 \mu g/bee$	1	$> 100 \mu g/$ bee
	120h-Larval	Fluazaindoli	$LD_{50} = 0.916 \mu g$		
		zine	a.i./larva/d	$\mathbf{1}$	$0.916 \mu g$ a.i./larva/d
		IN-F4106	$LD_{50} = 4.4 \mu g$	$\mathbf{1}$	$4.4 \mu$ g a.i./larva/d
			a.i./larva/d		
		IN-QEK31	$LD_{50} > 25 \mu g$	$\mathbf{1}$	$>$ 25 µg a.i./larva/d
			a.i./larva/d		
	10d-Oral	Fluazaindoli	$NOED > 4.76 \mu g$	$\mathbf{1}$	$\geq$ 4.76 µg a.i./bee/d
		zine	a.i./bee/d		
		IN-F4106	$NOED = 4.0 \mu g$	$\mathbf{1}$	$4.0 \mu$ g a.i./bee/d
			a.i./bee/d		

**Table 13 Toxicity endpoints used in the risk assessment**







(1) The most sensitive avian acute oral endpoint was used in the screening level risk assessment, rather than the endpoint from the dietary studies, as it is a more conservative exposure scenario (direct exposure via capsule). (2) Rainbow trout to be used as a surrogate for amphibians.

# **Table 14 Screening level risk assessment for non-target terrestrial species**







The EECs for the major TPs were conservatively calculated assuming 100% conversion of the parent on a molar basis.

- (1) EEC in soil is the maximum single application rate of 2240 g a.i./ha, assuming a soil bulk density of 1.5  $g/cm<sup>3</sup>$  and soil depth of 15 cm.
- (2) EEC for bees (Contact) = Application rate (kg a.i./ha)\*2.4  $\mu$ g a.i./bee
- (3) EEC for bees (oral exposure soil incorporated) was calculated as the Brigg's EEC  $\times$  food consumptions rate. The food consumption rates for larvae and adult worker bees were 0.124 g/day and 0.292 g/day, respectively. The Briggs EEC for fluazaindolizine (0.993 µg a.i./g plant**)** is calculated as follows:

**Equation 1.** 
$$
C_{stem} = [10^{(0.95 * Log Kow - 2.05)} + 0.82] * TSCF * \left[\frac{\rho}{\theta + \rho * Koc * foc}\right] * C_{soil}
$$

Where:

C <sub>stem</sub>	= concentration in stems ( $\mu$ g	= 1.00 mg a.i./kg (soil
$f_{oc}$	= concentration in soil ( $\mu$ g a.i./g	EEC)
$\theta$	soil	= 0.01
$\rho$	= fraction of organic carbon in	= 0.2 cm <sup>3</sup> /cm <sup>3</sup>
$I_{oc}$	= soil-water content by volume	= 2.24 <sup>(3)</sup>
$(cm3/cm3)$	= 147.8 (mean value)	
TSCF	= soil bulk density (g-dw/cm <sup>3</sup> ) based on submitted	
= log octanol-water partitioning adsorption/ desorption		



**Equation 2.**  $TSCF = -0.0648 * (Log Kow)^{2} + 0.241 * Log Kow + 0.5822$ 

Log *K*ow at pH 4 used in the calculation as the log *K*ow values for fluazaindolizine at pH 7 and 9 are negative, resulting in lower estimated concentrations in plant stems

- (4)Brigg's EEC for IN-F4106 of 1.18 µg a.i./g plant calculated using a soil EEC of 2.11 mg/g soil, log  $K_{ow}$  of 0.73, and mean  $K_{oc}$  of 98.27. Only one  $K_{ow}$  at 20<sup>o</sup>C for IN-F4106 is available.
- (5) Brigg's EEC for IN-QEK31 of 1.10 µg a.i./g plant was calculated using a soil EEC of 1.77 mg/g soil, log *K*ow of 0.58, and *K*oc of 82.46. The log *K*ow at pH 4 was used as the log *K*ow values for IN-QEK31 at pH 7 and 9 are negative, resulting in lower estimated concentrations in plant stems
- (6) The maximum single application rate of fluazaindolizine (based on Salibro Nematicide).
- (7) The maximum single application rate, accounting for 6% spray drift deposition from application with a field sprayer and ASAE medium droplet size.
- (8) A LOC of 2 is used for spray applications on glass plates for *T. pyri* and *A. rhopalosiphi*, based on an extensive empirical comparison of the risk quotients and known acceptable effects from field and semi-field studies for the two indicator species. Significant ecological effects of pest control products on non-target arthropod populations are not expected at a risk quotient of 2 or less. A LOC of 1 is used for other beneficial arthropod species, given the LOC of 2 was only validated for spray applications on glass plates with *T. pyri* and *A. rhopalosiphi*.
- (9) A LOC of 1 is used for a refined risk assessment for *T. pyri* and *A. rhopalosiphi*.

# **Table 15 Screening level risk assessment for birds and mammals**





(1) EDE = Estimated dietary exposure; is calculated using the following formula: (FIR/bw)  $\times$ EEC, where:

FIR: Food Ingestion Rate (Nagy, 1987). For generic birds with body weight less than or equal

to 200 g, the "passerine" equation was used; for generic birds with body weight greater than

200 g, the "all birds" equation was used:

Passerine Equation (body weight < or = 200 g): FIR (g dry weight/day) =  $0.398$ (bw in g)<sup>0.850</sup>

All birds Equation (body weight > 200 g): FIR (g dry weight/day) =  $0.648$ (bw in g)<sup>0.651</sup>.

For mammals, the "all mammals" equation was used: FIR (g dry weight/day) =  $0.235$ (bw in g) 0.822

EEC: Concentration of pesticide on food item based on Hoerger and Kenaga (1972) and Kenaga (1973) and modified according to Fletcher et al. (1994). At the screening level, relevant food items representing the most conservative EEC for each feeding guild are used.

## **Table 16 Refined risk assessment for birds and mammals**







#### **Table 17 Further refinement of the risk assessment for reproductive risks to birds considering LOED**





# **Table 18 Screening level risk assessment for non-target aquatic species**







# **Table 19 Toxic substances management policy considerations**





<sup>1</sup>All pesticides will be considered CEPA-toxic or CEPA toxic equivalent for the purpose of initially assessing a pesticide against the TSMP criteria. Assessment of the CEPA toxicity criteria may be refined if required (in other words, all other TSMP criteria are met).

<sup>2</sup>The policy considers a substance "predominantly anthropogenic" if, based on expert judgement, its concentration in the environment medium is largely due to human activity, rather than to natural sources or releases.

 $3$  If the pesticide and/or the TPs meet one persistence criterion identified for one media (soil, water, sediment or air) than the criterion for persistence is considered to be met.

<sup>4</sup> Bioaccumulation Factors (BAF) are preferred over Bioconcentration Factors (BCF); in the absence of BAF or BCF data, the octanol-water partition coefficient (log *K*ow) may be used.

# **Table 20 List of supported uses**

## **Supported use claims for Salibro Nematicide**

**Crop:** Tuberous and corm vegetables (Crop Subgroup 1C)<sup>1</sup>

**Pest:** Root-knot nematode (*Meloidogyne* spp.)

**Claims:** Suppression at the low rate and control at the high rate

## **Application instructions:**

- 2.24–4.48 L product/ha applied by pre-plant incorporated or broadcast followed by soil incorporation, or by in-furrow application; and/or,
- 1.12–2.24 L product/ha applied by postplant chemigation as supplemental in-season chemigation following a pre-plant or at plant application of Salibro Nematicide or fumigant.

A maximum of two applications per year (no more than 4.48 L/ha per year) is allowed with a minimum of 14 days re-application interval.

## **Crop:** Carrot

**Pest:** Root-knot nematode (*Meloidogyne* spp.)

**Claims:** Suppression at the low rate and control at the high rate

## **Application instructions:**

- 2.24–4.48 L product/ha applied by pre-plant incorporated or broadcast followed by soil incorporation; and/or,
- 1.12–2.24 L product/ha applied by postplant chemigation as supplemental in-season chemigation following a pre-plant or at plant application of Salibro or fumigant.

A maximum of two applications per year (no more than 4.48 L/ha per year) is allowed with a minimum of 14 days re-application interval.

**Crop:** Cucurbit vegetables (Crop Group 9)<sup>2</sup>

**Pest:** Root-knot nematode (*Meloidogyne* spp.)

**Claim:** Suppression only

## **Application instructions**:

- 1.12–2.24 L product/ha applied by pre-plant incorporated or broadcast followed by soil incorporation, or by pre-plant or at-plant chemigation application; and/or,
- 0.56–1.12 L product/ha applied by postplant chemigation applications as supplemental in-season chemigation following a pre-plant or at plant application of Salibro or fumigant.

A maximum of four applications per year (no more than 4.48 L/ha per year) is allowed with a minimum of 14 days re-application interval.

**Crop:** Fruiting vegetables (Crop Group 8-09)<sup>3</sup>

**Pest:** Root-knot nematode (*Meloidogyne* spp.)

**Claims:** Suppression at the low rate and control at the high rate

**Application instructions**:

- 2.24–4.48 L product/ha applied by pre-plant incorporated or broadcast followed by soil incorporation; and/or,
- 1.12–2.24 L product/ha applied by postplant chemigation applications as supplemental in-season chemigation following a pre-plant or at plant application of Salibro or fumigant.

A maximum of three applications per year (no more than 4.48 L/ha per year) is allowed with a minimum of 14 days re-application interval.

**<sup>1</sup> Crop subgroup 1C**: Arrowroot, chayote root, Chinese artichoke, Jerusalem artichoke, edible canna, chufa, dasheen, ginger, potato, sweet potato, and true yam.

**<sup>2</sup> Crop Group 9**: Chayote, Chinese waxgourd, citron melon, cucumber, gherkin, edible gourd (hyotan, cucuzza, hechima and Chinese okra), *Momordica* spp. (balsam apple, balsam pear, bitter melon and Chinese cucumber), muskmelon (true cantaloupe, cantaloupe, casaba, crenshaw melon, golden pershaw melon, honeydew melon, honey balls, mango melon, Persian melon, pineapple melon, Santa Claus melon and snake melon), pumpkin, summer squash (crookneck squash, scallop squash, straightneck squash, vegetable marrow and zucchini), winter squash (butternut squash, calabaza, hubbard squash, acorn squash and spaghetti squash) and watermelon.

**3 Crop Group 8-09**: African eggplant, currant tomato, eggplant, garden huckleberry, goji berry, ground cherry, martynia, okra, pea eggplant, pepino, bell pepper, non-bell pepper, scarlet eggplant, sunberry, tomatillo and tomato.
# **Appendix II Supplemental maximum residue limit information— International situation and trade implications**

Fluazaindolizine is an active ingredient that is concurrently being registered in Canada and the United States for use on various crops. The MRLs proposed for fluazaindolizine in Canada are the same as corresponding tolerances to be promulgated in the United States, except for poultry commodities, in accordance with Table 1, for which differences in MRLs/tolerances are due to different regulatory requirements.

Once established, the American tolerances for fluazaindolizine will be listed in the [Electronic](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=ffae5f82b935173c30cb6e67e1ba3811&ty=HTML&h=L&n=pt40.24.180&r=PART)  [Code of Federal Regulations,](http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=ffae5f82b935173c30cb6e67e1ba3811&ty=HTML&h=L&n=pt40.24.180&r=PART) 40 CFR Part 180, by pesticide.

Currently, there are no Codex  $MRLs<sup>10</sup>$  $MRLs<sup>10</sup>$  $MRLs<sup>10</sup>$  listed for fluazaindolizine in or on any commodity on the Codex Alimentarius [Pesticide Index](http://www.fao.org/fao-who-codexalimentarius/codex-texts/dbs/pestres/pesticides/en/) website.

Table 1 compares the MRL proposed for fluazaindolizine in Canada with corresponding American tolerances and Codex MRL.

#### **Table 1 Comparison of Canadian MRL, American tolerance and codex MRL (where different)**



Under the North American Free Trade Agreement (NAFTA), Canada, the United States and Mexico are committed to resolving MRL discrepancies to the broadest extent possible. Harmonization will standardize the protection of human health across North America and promote the free trade of safe food products. Until harmonization is achieved, the Canadian MRLs specified in this document are necessary. The differences in MRLs outlined above are not expected to impact businesses negatively or adversely affect international competitiveness of Canadian firms or to negatively affect any regions of Canada.

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<span id="page-144-0"></span><sup>&</sup>lt;sup>10</sup> The Codex Alimentarius Commission is an international organization under the auspices of the United Nations that develops international food standards, including MRLs.

# **References**

- **A. List of studies/Information submitted by registrant** 
	- **1.0 Chemistry**

**PMRA** 







### **2.0 Human and Animal Health**

### **PMRA**





















#### **3.0 Environment**

# **PMRA**

















#### **PMRA**

# **Document**

**Number Reference**<br>2957755 2019, BIOI 2019, BIOLOGICAL ASSESSMENT DOSSIER FOR FLUAZAINDOLIZINE OR DPX Q8U80 500 SC, DACO: 10.1 (OECD),10.2.3.1,10.3.1,10.3.1 (OECD),12.7, Document M, IIIA 6.6