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Pest Management Regulatory Agency | Agence de réglementation de la lutte antiparasitaire

Proposed Maximum Residue Limit PMRL2007-03

Triclopyr

(publié aussi en français)

27 April 2007

This document is published by the Alternative Strategies and Regulatory Affairs Division, Pest Management Regulatory Agency. For further information, please contact:

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ISBN: H113-24/2007-3E (H113-24/2007-3E-PDF)
Catalogue number: 978-0-662-45906-4 (978-0-662-45907-1)

Health Canada's Pest Management Regulatory Agency (PMRA), under the authority of the *Pest Control Products Act* (PCPA), has granted registration to end-use products containing technical grade triclopyr for the control of several types of weeds on pastures and rangelands. The specific uses that were approved in Canada are detailed on the labels of Remedy II EC Herbicide, Release EC Silvicultural Herbicide, Fencerow EC Herbicide and Garlon 4 EC Herbicide (PCPA Registration Number 28430, 28431, 28433 and 28434, respectively).

The evaluation of these triclopyr applications indicated that the end-use products have merit and value and that the human health and environmental risks associated with their proposed uses are acceptable. Details on these registrations can be found in the corresponding Evaluation Reports that are presented on the PMRA website, under Public Registry, Product Information, Current Applications[1].

Before registering a pesticide for food use in Canada, the PMRA must determine the quantity of residues that are likely to remain in or on the food when the pesticide is used according to the label directions and that such residues will not pose an unacceptable health risk. This quantity is then legally established as a maximum residue limit (MRL). An MRL applies to the identified raw agricultural food commodity as well as to any processed food product that contains it, except where separate MRLs are specified for the raw agricultural commodity and a processed product made from it.

Currently, MRLs are legally established under the Food and Drug Regulations (FDR) after consultation through the *Canada Gazette*. Amendments to the *Food and Drugs Act* (FDA), via Bill C-28, anticipated to come into force in 2007, will allow pesticide MRLs to be legally established under the PCPA without their having to be adopted by regulation under the FDA, thereby resulting in a more efficient means of establishing, revising and revoking pesticide MRLs.

Consultation on the proposed MRLs for triclopyr is being conducted via this document (see Next Steps). This action is being taken in advance of Bill C-28 coming into force to allow the MRLs to be legally established as soon as possible after the FDA is amended.

[1] Relevant reports can be accessed by selecting the Applications/New/Historical tab and opening the Evaluation Report found under Application Number 2005-1003, 2005-1009, 2005-1011 or 2005-1012.

The proposed MRLs for triclopyr in Canada in or on food, to be added to those MRLs already legally established, are as follows:

Table 1 Proposed Maximum Residue Limits for Triclopyr

Common Chemical Name	Chemical Name of Substance	MRL (ppm)	Food Commodities
Triclopyr	3,5,6-trichloro-2-pyridyloxyacetic acid	0.01	Milk
	3,5,6-trichloro-2-pyridyloxyacetic acid, including the metabolite 3,5,6-trichloro-2-pyridinol	0.1	Fat, meat and meat byproducts (except kidney and liver) of cattle, goats, hogs, horses and sheep

A complete list of all MRLs established in Canada can be found in Table II, Division 15 of the FDR. Once the amendments to the FDA via Bill C-28 are in force, the list of legally established Canadian MRLs will be available on the PMRA's MRL webpage, which will be updated to include the MRLs listed in this document.

International Situation and Trade Implications

MRLs may vary from one country to another for a number of reasons, including differences in pesticide use patterns. For animal commodities, differences in MRLs can also be due to different livestock feed items and practices. Table 2 identifies differences among MRLs in Canada, tolerances in the United States and Codex[2] MRLs. The proposed MRLs in Canada for animal commodities, except milk, differ from the corresponding tolerances in the United States as listed in 40 CFR 180 (searchable by pesticide). Currently, there are no Codex MRLs established for triclopyr (Codex MRLs searchable by pesticide or commodity).

Table 2 Comparison of Canadian MRLs, American Tolerances and Codex MRLs

Food Commodities	Canadian MRLs (ppm)	American Tolerances (ppm)	Codex MRLs (ppm)
Fat, meat and meat byproducts (except kidney and liver) of cattle, goats, hogs, horses and sheep	0.1	0.05	No Codex MRLs have been established for triclopyr.

[2] Codex is an international organization under the auspices of the United Nations, which develops international food standards, including MRLs.

Next Steps

The PMRA invites the public to submit written comments on the proposed MRLs for triclopyr within 75 days from the date of publication of this document. Please forward your comments to Publications (see address on the cover page of this document) by 11 July 2007. Health Canada will consider all comments received before making a final decision on the proposed MRLs for triclopyr and before posting an Established Maximum Residue Limit document on the PMRA's website once the amendments to the FDA are in force.