



## Evaluation Report for Category B, Subcategory 3.4 Application

**Application Number:** 2022-2574  
**Application:** Changes to Product Labels – Application Method  
**Product:** Garlon XRT Herbicide  
**Registration Number:** 28945  
**Active ingredient (a.i.):** Triclopyr, present as butoxyethyl ester  
**PMRA Document Number:** 3560168

### Purpose of Application

The purpose of this application was to add the remote piloted aircraft system (RPAS) application method to the Garlon XRT Herbicide label.

### Chemistry Assessment

A chemistry assessment was not required for this application.

### Health Assessments

The occupational exposure and risk from the addition of RPAS as a method of application to control willow, aspen and poplar tree species in non-crop areas such as rights-of-way and industrial sites on the Garlon XRT Herbicide label was assessed. Chemical handler, postapplication worker and bystander quantitative risk assessments were conducted. No health risks of concern were identified provided that workers wear the appropriate personal protective equipment and follow all label directions, including restricted entry intervals.

Toxicological and dietary exposure assessments were not required for this application.

### Environmental Assessment

The addition of RPAS applications for use in vegetation management to control labelled tree species is within the currently registered use pattern for triclopyr. Given that the environmental assessment conservatively accounts for spray drift resulting from RPAS application, the risk is acceptable when Garlon XRT Herbicide is used in accordance with the label, which includes statements and spray buffer zones to mitigate risks to the environment.

### Value Assessment

The addition of RPAS as a method of application for the control of willow, aspen and poplar tree species growing on non-crop areas such as rights-of-ways and industrial sites provides users of Garlon XRT Herbicide another option to control these brush species growing in difficult to access locations.

Value information submitted for review consisted of data from research trials conducted in Alberta and Quebec between 2020 and 2021. The provided trial data demonstrated that Garlon XRT Herbicide applied with a RPAS using a minimum application volume of 30 L/ha would be expected to control willow, aspen and poplar species similar to registered application methods using ground and traditional aerial application equipment. Based on the weight of available evidence, the amendment of the Garlon XRT Herbicide registration to include RPAS as a method to treat willow, aspen and poplar brush species growing on non-crop areas such as rights-of-ways and industrial sites is considered to have acceptable value.

## **Conclusion**

The Pest Management Regulatory Agency has completed an assessment of the information provided, and has found the information acceptable to support the addition of the RPAS application method to the Garlon XRT Herbicide label.

## References

### PMRA

#### Document

#### Number

#### Reference

3452007	2009, In Vitro percutaneous absorption of [14C] Triclopyr butoxyethyl ester formulated as GF-1365 and a field dilution through human and rat skin membranes using flow-through diffusion cells, DACO: 5.8
3530111	2013, In Vitro Dermal Absorption of Triclopyr 2-BEE, Formulated in GF-2953 and Two Dilutions, Through Human Split-Thickness Skin Using Flow Through Diffusion Cells, DACO: 5.8
3530112	2013, In Vitro Dermal Absorption of Triclopyr 2-BEE, Formulated in GF-2044 and Two Dilutions, Through Human Split-Thickness Skin Using Flow Through Diffusion Cells, DACO: 5.8
3530113	2013, In Vitro Dermal Absorption of Triclopyr BEE, Formulated in GF-1360 and Two Dilutions, Through Human Split-Thickness Skin Using Flow-Through Diffusion Cells, DACO: 5.8
3530114	2005, In Vitro Percutaneous Absorption of Triclopyr 2,6-14C-2-Butoxyethyl Ester in Two Spray Dilutions of Garlon 4 EC Through Human Skin using Flow-Through Diffusion Cells, DACO: 5.8
3363571	2020, Efficacy with Garlon applied with a drone; Trial Reports, DACO: 10.2.3.3

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