

Evaluation Report for Category B, Subcategory 3.10, 3.11 and 3.12 Application

Application Number: 2013-3481
Application: Changes to product label – Tank mix, new pests, new site or host
Product: Tordon 22K Herbicide
Registration Number: 9005
Active ingredients (a.i.): Picloram (present as potassium salt) [PIB]
PMRA Document Number : 2369339

Purpose of Application

The purpose of this application was to amend the label of the currently registered product, Tordon 22K Herbicide (Registration Number 9005; guarantee 240 g/L picloram present as potassium salt) to remove the geographic restriction “in western Canada”, add a new tank mix with 2,4-D Amine for control of woody plants in non-cropland areas, change the package size from 1 L to bulk, and update the label with minor label improvement statements.

Tordon 22K Herbicide is currently registered for the control of deep-rooted perennial and biennial weeds in rangeland, permanent grass pastures and non-cropland areas in Western Canada.

Chemistry Assessment

A chemistry assessment was not required for this application.

Health Assessments

No new residue data for picloram were submitted to support the removal of the geographic restriction of Tordon 22K Herbicide on permanent grass pastures and rangeland. Previously reviewed residue data from field trials conducted in/on grass were reassessed in the framework of this petition.

The amendment to the label of Tordon 22K Herbicide, to remove the geographic restriction for use and sale, is not expected to alter the residues in animal commodities resulting from feeding and grazing of pasture and rangeland treated with picloram. Therefore, the dietary exposure to picloram is not expected to increase and will not pose an unacceptable risk to any segment of the population, including infants, children, adults and seniors.

The proposed use on woody plants, tank mix with 2,4 D amine and the geographical expansion across the country fits within the registered use for picloram. No risks of concern are expected when workers follow the label directions and wear the personal protection equipment identified on the label.

Environmental Assessment

The new tank mix of Tordon 22K Herbicide with 2,4-D amine, extending its use across Canada and the label amendments are not expected to pose additional environmental concerns.

Value Assessment

Value information including scientific rationale and use history information from one source in the USA was submitted for review.

Removal of the geographic restriction, for sale and for use “in Western Canada”, was supported for the following reasons:

- Another picloram-containing product, Tordon 101 Herbicide (Registration Number 9007; 65 g/L picloram + 240 g/L 2,4-D Amine), has been registered for use nation-wide since the 1960's.
- Tordon 22K Specialty (EPA Registration Number 62719-6), which has an identical formulation and a similar use pattern as the Canadian product Tordon 22K Herbicide, has been registered across broad geographic areas in the USA since the 1960's .
- Treatment of Tordon 22K Herbicide is a broadcast foliar application which would be unlikely affected by soil and environmental conditions.

Addition of tank mix with 2,4-D Amine for control of woody plants in non-cropland areas was supported for the following reasons:

- 2,4-D Amine as a tank mix partner has been registered on the USA Tordon 22K Specialty label since 1974. The tank mix of Tordon 22K Herbicide plus 2,4-D Amine has been used in Canada since the implementation of the unlabeled tank mix policy. The use history information in both the USA and Canada supported a control claim of woody plants with an application of Tordon 22K Herbicide plus 2,4-D Amine at the requested rates.
- Application of the 2,4-D Amine component in the tank mix matches with its product label for control of woody plants in non-cropland areas.
- Since both picloram, a pyridine carboxylic acid, and 2,4-D, a phenoxy carboxylic acid, belong to the herbicide mode of action Group 4, issues with compatibility, synergy or antagonism with the tank mix of Tordon 22K Herbicide + 2,4-D Amine would not be expected.

All other minor label amendments were reviewed and supported from a value standpoint.

The amendments to the registration of Tordon 22K Herbicide will provide users more flexibility to use picloram as an alone treatment in Eastern Canada. The registration of Tordon 22K Herbicide, containing picloram (present as potassium salt), plus 2,4-D Amine (present as dimethylamine salt), will provide users more flexibility to handle the application compared to

Tordon 101 Herbicide, containing picloram and 2,4-D Amine (both actives present as triisopropanolamine salts).

Conclusion

The PMRA has reviewed all available information and found the information sufficient to support all the amendments to the Tordon 22K Herbicide label.

References

PMRA Document Number	Reference
2320659	2013, DAS Letter, add 2,4-D TM & Eastern Can uses to Tordon 22K, PCP 9005, DACO: 0.8
2320672	2013, Rationale for adding 2,4-D Amine tank-mix, DACO: 10.2.3.3, 10.3.2(A)
2320674	2013, Use history of Tordon 22K in U.S. to support 2,4-D amine tank-mix, DACO: 10.2.3.3, 10.3.2(A)

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