PEP-7004 - Notices of Objection Reports

Objection notice id	94
Form id	7004
Form language	en
Portal flag	N
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Date decision made public	07-MAR-2024 00:00:00
Decision on application	-
Decision on reevaluation	-

Scientific basis description	The environmental risk assessment for Sodium Monofluoroacetate failed to consider the paucity of toxicity data for non-target species, variation in toxicity between species and due to ambient temperature, as well as sublethal impacts on non-target species. Notably, many species listed as sensitive or at-risk in Alberta were absent from the risk assessment for Sodium Monofluoroacetate. Assessment of secondary poisoning risk failed to include non-target species vectors, and pesticides residue in carcass tissues have been found to differ between species. The PMRA has overly relied on the EPA's assessments of Sodium Monofluoroacetate despite the EPA not having assessed the Canadian formulation of high concentration tablets. As such, the PMRA has not completed a fulsome review of the scientific literature on this pesticide. The PMRA failed to conduct aquatic risk assessments for water bodies representative of the area and context where Sodium Monofluoroacetate has been used. The PMRA has concluded that environmental risks are acceptable despite not having many complete use records from the registrant, and not requesting any use records prior to 2011. Due to the way in which Compound 1080 interacts in animals' bodies, there is fundamental difficulty, if not impossibility, in studying the extent of the non-target deaths it causes, particularly because the PMRA only requires bait station monitoring every 7 days. Those complete use records we do have from the registrant show that, similar to strychnine, carcasses poisoned with Compound 1080 are rarely collected, but baits are often consumed. The importance of complete use records is no better illustrated than the PMRA's reversal of its proposed decision to maintain the registration for strychnine on the basis of 2005-2010 records provided by the Objectors. The value is not supported by published literature, and cannot be ascertained with incomplete use records. Please see attached document for more details.
Active ingredients	Sodium Monofluoroacetate (RVD2024-04)

Pest Management Regulatory Agency

Registration number	-
Submission time	06-MAY-2024 16:37:51
Evaluation area	Environmental_Risk_Assessment_(Environmental_Fate,_Environmental_Toxicolo
Submission confirmation n...	pep-7004-1715027871456-e-n
Attachment names	"PEP-7004-1715027871456-E-N-ATT-Notice of Objection to Final Decision Continued Registration of Strychnine and Compound 1080.docx(2)-FINAL.pdf", "PEP-7004-1715027871456-E-N-ATT-References_compiled_NOO_May62024-compressed.pdf"

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