

UPDATE ON PESTICIDE REGISTRATION

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In Canada, pesticides are regulated under the Pest Control Products Act which is administered by Agriculture Canada. The Pest Control Products Regulations were amended in 1972 to broaden the definition of a pesticide to include, among other things, microbial control products. As wood treating chemicals, whether they are wood preservatives, fungicides, mildewicides or sapstain control chemicals, are defined as pesticides, they are regulated under the Pest Control Products Act.

Since 1972, many products have been registered under the PCP Act containing a variety of active ingredients. These products were registered using a generic approach to evaluate each product. However, in September 1980, a new registration policy called Product Specific Registration, was put into effect. It was not retroactive in that products already registered under the Pest Control Products Act were not affected by the new policy. Applications for registration received before September 8, 1980 were processed under the old policy.

Briefly stated, the new pesticide registration procedures are more product specific than the previous generic approach. Well, what does this mean? It means that Agriculture Canada is tightening pesticide registration controls by requiring that each new product being considered for registration be tied to a specific set of up-to-date manufacturing specifications and a supporting data package for the active ingredient.

To be specific, an application to register a new formulation containing a previously registered active ingredient must be accompanied by the following items:

- a) manufacturing details on the active ingredient as described in Trade Memorandum T-1-223;
- b) all toxicological and environmental data currently available on the active ingredient organized in the format outlined in Trade Memorandum T-1-212;
- c) written confirmation from the manufacturer of the active ingredient to be used that his product is the ultimate source of the active ingredient.

All of the items mentioned above may be submitted directly, on behalf of the applicant, by the manufacturer to the Pesticides Division.

Hence, the term Product Specific Registration: new products will be tied to a specific set of specifications. This policy does not restrict an applicant to one source of active ingredient. However, each *source* must supply the information described above that is pertinent to their product.

It should be noted that information required by Product Specific Registration is not new. Trade Memoranda T-1-212 and T-1-223 have existed for a number of years. However, an application to register a new formulation received after September 8, 1980 will only be reviewed if the information outlined in these memoranda accompanies the submission. In other words, supporting data must be reviewed *before* registration is granted — not after.

Obviously the ball is in the court of the basic manufacturers to review the requirements of Product Specific Registration and update their files accordingly. Hopefully, the manufacturers will take the initiative in this regard to smooth the path for future registrations based on their particular products.

As a special note, manufacturing specifications or supporting data taken from the literature is generally not considered acceptable for registration purposes since it is not specific to any one product.