

# PMRA REGISTRATIONS CONSULTANT'S PERSPECTIVE



Canadian Wood Preservation  
Association  
October 27, 2005

D. W. Latter and Associates

# AGENCY RESPONSIBLE FOR REGISTRATION OF ALL P.C.P. PRODUCTS



**HEALTH CANADA**  
**PEST MANAGEMENT**  
**REGULATORY AGENCY**

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# PMRA'S MANDATE

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- SAFETY
- MERIT
- VALUE

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# PMRA'S MANDATE cont'd

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- SAFETY
  - Toxicology
  - Residue
  - Enviro-chemistry
  - Exposure
  - Metabolism
  - Enviro-Tox

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## PMRA'S MANDATE cont'd

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### ● MERIT

Improvement on registered products  
Reduced Risk Profile  
Economic Benefits

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341

## PMRA'S MANDATE cont'd

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### ● VALUE

Efficacy  
PMRA standards/  
not industry standards

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342

## LEGAL DEFINITION OF PESTICIDE

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- a product, an organism or a substance, that is manufactured, represented, distributed or used as a means for directly or indirectly controlling, destroying, attracting or repelling a pest or for mitigating or preventing its injurious, noxious, or troublesome effects

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343

## ALMOST NO CLAIM IS EXEMPT FROM PCP ACT

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- GUNS, BULLETS
- FLY PAPER
- FLY SWATTER
- STICKY BOARDS FOR RODENTS
- FOOD BAITED TRAPS

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## RESULT

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- EVERY PRODUCT FOR WHICH A PEST CONTROL CLAIM IS MADE IS SUBJECT TO THE FULL EVALUATION SYSTEM
- OBVIOUS SAFETY OF PRODUCT IS NOT A CONSIDERATION

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## RESULT

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- Soybean Oil
- Anhydrous ammonia
- CO2 generators

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## Wood Preservatives

- REQUIREMENTS ESSENTIALLY THE SAME AS FOR CONVENTIONAL PESTICIDES
- ALL PRODUCTS GO THROUGH THE SAME REVIEW PROCESS

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## Wood Preservatives

- 8 Data Parts to be submitted
- Plus Label and Index
- Minimum 24 Binders
- Need Data, Waiver or Reference to a Study on File for Each of approx 85 Data Points

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## Wood Preservatives

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- Concerns – Additional Studies
- Review Period Extended by time to Complete Study and Second Review
- Non critical studies can be completed under a temporary Registration

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## REVIEW PERIOD

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- 2-3 YEARS
- 2 YEARS WITH NO DEFICIENCIES
- 3 YEARS- DATA GAPS/DISPUTES

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## VALUE

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- Efficacy Studies required in Canada

Canadian Data (outdoors) or Lab data  
from anywhere

## VALUE

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- Not Reviewed by EPA
- Not Submitted to EPA
- Weakest Part of US Data Package



## VALUE

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- Statistically significant data
- Compare to (Registered )Standard
- Determine Lowest Effective Rate

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## 3 PRINCIPLES

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- Preparation
- Patience
- Persistence

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## Canadian Wood Treaters

- Can only use wood preservatives registered in Canada
- Imported wood products can use unregistered products approved under CEPA (on DSL)

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## Canadian Wood Treaters

- Suffer discrimination under the PCP Act
- Face unfair competition  
    Fault of regulations not competitors
- New products unavailable or available years after they are approved in US.

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356

## Canadian Wood Treaters

- PMRA are aware of the problem

Not prepared to make changes at this time

Suggests the Industry work collectively  
NAFTA issue

## GOING FORWARD

- Work through association on import problem
- Approach Industry Trade and Commerce
- Develop industry wide efficacy guidelines with PMRA

## GOING FORWARD

- New director at PMRA provides an opening for improving contact with industry
- Make protection of Canadian wood industry and value added in Canada a political priority