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Publications
Pest Management Regulatory Agency
Health Canada
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Re: Proposed Re-evaluation Decision PRVD2016-02-Methomyl (Lannate)

To Whom It May Concern:

On behalf of Canada's horticultural producers, the Canadian Horticultural Council (CHC) appreciates the opportunity to comment on the Pest Management Regulatory Agency's (PMRA) Proposed Re-evaluation Decision PRVD2016-02-Methomyl (Lannate).

The CHC represents producers across Canada involved in the production and packing of over 100 fruit and vegetable crops. Members include provincial and national horticultural commodity organizations as well as allied and service organizations, provincial governments and individual producers. The CHC represents members on key issues such as crop protection, access to a consistent supply of farm labour, food safety and traceability, fair access to markets, research and innovation and government programs to ensure a more innovative, profitable and sustainable horticultural industry for future generations. The CHC and its members are committed to ensuring that strong Canadian farms will continue to be able to provide safe, secure and healthy food for families in Canada, and around the world. As an integral part of CHC's operations is the Crop Protection Advisory Committee, whose role is to develop and advance crop protection management policies and programs that promote the economic viability and competitiveness of the Canadian Horticultural Council and its members within a sustainable framework.

Health Canada's Pest Management Regulatory Agency (PMRA) has now completed the risk and value assessments for Methomyl. The PMRA is proposing continued registration of certain uses of Methomyl in Canada and based on the health risk assessment conducted intends to cancel all food uses and associated MRLs on Methomyl. The PMRA states:

- Non-food uses of Methomyl continue to have value and do not present an unacceptable risk to human health or the environment, when used according to revised label directions.
- Based on the human health risk assessment, food and feed uses of Methomyl, including use on tobacco, are being proposed for cancellation and all established maximum residue limits (MRLs) for Methomyl are proposed for revocation.

Methomyl is a carbamate insecticide, used to control a broad range of insect pests on a wide variety of sites. It is applied using conventional ground and aerial application equipment by farmers, farm workers and professional applicators. Methomyl is a relatively low use insecticide, but the Lannate® label does include use on many vegetable crops and apples. The PMRA reported <50,000 kg a.i. use in 2013 (the lowest use category). The edible horticulture uses of Methomyl Registered in Canada are: Apples, Peas, Potatoes, Sweet Corn, Broccoli, Brussel Sprouts, Cabbage, Cauliflower, Field lettuce, Snap Beans, Tomatoes.

According to the PMRA, potential exposure to Methomyl may occur through the diet (in other words, food and drinking water), when applying the product or by entering treated sites. The most sensitive endpoint used for risk assessment was the effect on the nervous system (decreased cholinesterase activity). The PMRA risk assessment takes this sensitivity into account in determining the allowable level of human exposure to Methomyl.

Also according to the PMRA, the human exposure to Methomyl was calculated based on residues in treated crops and drinking water. Residue estimates in food were mostly based on monitoring data from the United States Department of Agriculture (USDA) Pesticide Data Program as well as the Canadian Food Inspection Agency (CFIA) National Chemical Residue Monitoring Program. Residues in drinking water were based on modelling data. Acute risk concerns were identified from exposure to food only as well as exposure from drinking water only. Chronic exposure from drinking water exceeded 100% of the ADI for one population subgroup: infants at 158% of the ADI.

Canadian Horticultural Council member representatives of the cole crop and pea sectors in Canada are concerned. The cole crop and pea sectors in Canada do not support the proposed decision to discontinue the registration of Methomyl. Methomyl is an important product in long season crops like brussel sprouts where growers must rotate many products through a rigorous spray schedule. Methomyl provides better residual control for *Lepidoptera* species and may be more active longer in hotter times when the pyrethroids break down quickly. This active ingredient has been a solid part of spray programs in cole crops and especially brussel sprouts. There are other *Lepidoptera* control options, and they are used in spray rotation as well for their differing capabilities. But that's what is good - having different modes of action and residual characteristics to use when conditions warrant. Regarding use on peas, Methomyl is an important control option for Alfalfa Looper, although application may not be required every year.

The area of concern identified by the PMRA associated with the proposed revocation of the Methomyl uses is the dietary risk assessment for the active, specifically infants to children ages 5. With that in mind, the Canadian Horticultural Council believes that there are still uses of Methomyl that provide value to Canadian growers (Cabbage Looper, Imported, Cabbage Worm, Diamond Back Moth control in brussel sprouts, broccoli, cabbage and cauliflower, slug control in brussel sprouts and Alfalfa Looper control in peas) that could be retained and under a revised risk assessment may not have unacceptable risk to human health.

The argument for continuing use resides in a review of the data sources and estimates used in the re-evaluation. Methomyl is almost absent in Canadian monitoring for residues in horticultural

crops. It is also absent in the Ontario summary of pesticide monitoring in drinking water for 25 years. This includes both well water and surface water sources. As a result, it is our position that estimates used by the PMRA may be grossly overstated for both food and water residues. The PMRA has relied on default residue values instead of relying on what monitoring data actually describes; that residues of Methomyl in crops or water are low.

Furthermore, we are concerned that the dietary risk cup has been filled with conservative estimates of imported commodity residues, and as a result Canadian growers are being penalized by losing access to the domestic uses of Methomyl.

Finally, as reported by the PMRA, Methomyl is currently acceptable for use in other OECD member countries, including the United States, Australia and the European Union. As of 9 April 2015, no decision by an OECD member country to prohibit all uses of Methomyl for health or environmental reasons had been identified. The Canadian Horticultural Council believes that Canada should consider this fact in establishing their position relative to Methomyl and consider the negative trade effects that can arise when decisions in Canada are not corroborated in other trading jurisdictions.

Thank you for the opportunity to comment. Please do not hesitate to contact us if you have any questions or require further comments on this submission.

Yours truly,



Charles Stevens, Chair
CHC Crop Protection Advisory Committee

cc: CHC Board of Directors