
HEALTH CANADA

CONSUMER PRODUCT SAFETY

Re-evaluation Note REV2010-02

February 2nd, 2010

INTRODUCTION

In Canada, glyphosate is under re-evaluation by Health Canada's Pest Management Regulatory Agency (PMRA).

The Pest Management Regulatory Agency's pesticide re-evaluation program considers potential risks as well as the value of pesticide products to ensure they meet modern standards established to protect human health and the environment.

Under the authority of section 16 of the Pest Control Products Act, the registrants of glyphosate were served notice of the initiation of the re-evaluation of glyphosate in November-December of 2009.

This Re-evaluation Note outlines a work plan and timeline for review as well as summarizes anticipated needs relevant to the re-evaluation of glyphosate.

Glyphosate is a non-selective herbicide that has been registered in Canada under various forms.

Currently registered glyphosate and its other forms include the following: glyphosate acid (GPS); glyphosate potassium salt (GPP); glyphosate mono-ammonium salt or diammonium salt (GPM); glyphosate isopropylamine salt or ethanolamine salt (GPI); glyphosate trimethylsulfonium salt (GPT, also known as glyphosate TMS); and glyphosate dimethylamine (GPX).

Glyphosate is registered on the following Use-Site Categories:

- Forests and Woodlots (Use-Site Category 4);
- Industrial and Domestic Vegetation Control Non-food Sites (Use-Site Category 16);
- Industrial Oil Seed Crops and Fibre Crops (Use-Site Category 7);
- Ornamentals Outdoors (Use-Site Category 27);
- Terrestrial Feed Crops (Use-Site Category 13);
- Terrestrial Food Crops (Use-Site Category 14);
- Turf (Use-Site Category 30).

Glyphosate products are formulated as liquids or solids and can be applied at pre-planting, after emergence, pre-harvest or after harvest using ground or aerial equipment.

The work plan discussed below outlines the anticipated risk assessment and data needs.

The United States Environmental Protection Agency (U.S. EPA) is re-evaluating glyphosate as part of its registration review program, and has published a final registration review work plan.

The Pest Management Regulatory Agency will be working cooperatively with the U.S. Environmental Protection Agency on the re-evaluation of glyphosate.

The overall Canadian re-evaluation timelines will be closely aligned with those of the U.S. Environmental Protection Agency.

Currently, the assessment is targeted for completion in 2014.

**RE-EVALUATION WORK PLAN — HUMAN HEALTH
ASSESSMENT**

- Consideration will be given to any new toxicological data including data being generated for the U.S. Environmental Protection Agency and available in relevant published scientific literature.
 - The assessment will include application of the Pest Control Products Act factors.
 - Occupational and residential risk assessments will be revised if required should there be any changes to toxicology endpoints or the Pest Control Products Act factors.
 - Dietary risk is well below the levels of concern based on current modern assessments. New assessments will not be needed provided there are no changes to toxicology endpoints as a result of the Pest Control Products Act factor considerations.
 - The Pest Management Regulatory Agency will conduct new assessments if required and workshare with the U.S. Environmental Protection Agency.
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RE-EVALUATION WORK PLAN – ENVIRONMENTAL RISK ASSESSMENT

- Additional environmental data that have been submitted or required in recent years will be considered in the re-evaluation of glyphosate as well as any relevant scientific literature.
 - Environmental risk mitigation measures will be reviewed to ensure consistency among labels (for example, spray buffer zones).
 - The major transformation products of glyphosate, including amino methyl phosphonic acid (AMPA), will be considered as part of the scheduled re-evaluation of glyphosate.
 - The Pest Management Regulatory Agency will conduct new assessments and workshare with the U.S. Environmental Protection Agency as needed.
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RE-EVALUATION WORK PLAN – FORMULANT

- Polyethoxylated tallow amines (POEA) is a family of many compounds. In Canada, some glyphosate end-use products contain the surfactant POEA. A health risk assessment as well as an environmental risk assessment (including consideration of effects on non-target organisms) of the POEA/glyphosate combination will be conducted as part of the scheduled re-evaluation of glyphosate.
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RE-EVALUATION WORK PLAN – CHEMISTRY

- A reassessment of the impurity profile of glyphosate will be conducted.
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RE-EVALUATION WORK PLAN – DATA REQUIREMENTS

- While at this time no new additional data requirements have been identified, the Pest Management Regulatory Agency will examine the data requested by the U.S. Environmental Protection Agency as part of its registration review program.
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William H. Gathercole and Norah G

National Organization Responding Against Huje that TERRORIZE, HARM, and THREATEN the Green Space Industry (NORAHG)

William H. Gathercole, Founder

For a free Force Of Nature e-newsletter, contact force.of.de.nature@gmail.com

FORCE OF NATURE is a series of e-newsletters destined for the Green Space Industry, the Environmental Terror Movement, Governments, and the Media, nationwide across Canada, the United States, and overseas. The information presented in Force Of Nature has been developed for the education and entertainment of the reader by providing a sequence of historical events with commentary. The Whole Truth From An Independent Perspective !

Force Of Nature is the brainchild of William H. Gathercole and his entourage. Norah G is actually an acronym for the stable of anonymous producers and writers that contribute to this e-newsletter and have now replaced Mr. Gathercole. They consist of people from the following industries : Distribution, Fertilizer, Golf, Lawn Care, Manufacturing, Municipal, Nursery, and Orchard. Many of these people are leaders in their own industries. The opinions expressed in Force Of Nature, even though from an INDEPENDENT PERSPECTIVE, may not reflect those of everyone in the Green Space Industry. Force Of Nature may sometimes be very irreverent and fearless with these e-newsletters. Although Force Of Nature appears to be Anti Environment Movement, it is, in fact, simply a strong advocate FOR the Modern Green Space Industry. However, this position has not precluded Force Of Nature from criticizing the Green Space Industry itself.

William H. Gathercole is a principal FOUNDER of the Modern Professional Lawn Care Industry in BOTH Ontario and Quebec. He holds a degree in Horticulture from the UNIVERSITY OF GUELPH, and another pure and applied science degree from MCGILL UNIVERSITY. He has worked in virtually all aspects of the Green Space Industry, including GOLF and PROFESSIONAL LAWN CARE, and has served in public affairs, workplace safety, and environmental compliance. Mr. Gathercole has supervised, consulted, programmed, and/or overseen the execution of HUNDREDS OF THOUSANDS of pest control applications in the urban landscape. He has trained, instructed, and consulted with THOUSANDS of turf managers and technicians. Mr. Gathercole has also been an agricultural agronomist. For many years, Mr. Gathercole was a contributing columnist for TURF & Recreation Magazine, Canada's Turf and Grounds Maintenance Authority. Mr. Gathercole is now retired from Force Of Nature, although his name continues to appear as the founder.

Mr. Gathercole has followed the evolution of ENVIRONMENTAL TERRORISM for over a quarter century. His involvement in Environmental Issues reached a fevered pitch in the 1990s, when he orchestrated, with his colleagues, legal action against the Forces of Environmental Evil in the Town of Hudson, Quebec. For FIFTEEN YEARS, the strategies designed and implemented by Mr. Gathercole and his colleagues guaranteed the control of Environmental Terror for the entire Modern Green Space Industry across Canada. Mr. Gathercole is personally credited for crafting the Golf Industry Exception Status, that endures to this day. He is also the creator of the signs that are now used for posting after application. His vast knowledge of our long journey with Environmental Issues is UNDENIABLE. (Hopefully !)

Force Of Nature is the instrument of National Organization Responding Against Huje that seek to TERRORIZE, HARM, and THREATEN the Green Space Industry (NORAHG) by routinely concocting FEAR MONGERING, FRAUDULENT LIES, MISCONCEPTIONS, COERCION, THREATS, DECEPTIONS, TERROR, and PARANOID CONSPIRACIES that are designed to SCAM and DECEIVE the public into believing that families are in some NONEXISTENT danger with conventional pest control products. They also SCAM and DECEIVE Government Officials into the NEEDLESS, SENSELESS, and MALICIOUS prohibition of FEDERALLY LEGAL, SCIENTIFICALLY SAFE, TOTALLY IRREPLACEABLE, and ABSOLUTELY INDISPENSABLE conventional pest control products. Enviro Maniac Activists are identified on the basis of their statements, activities, affiliations, and whereabouts. Even though each Enviro Maniac Culprit is a misguided adversary, each still deserves our respect. The use of the terms Maniac, Culprit, Terrorist, or Basterd are not accusations of any legal wrong doing. Force Of Nature is simply holding Enviro-Maniac-Activists accountable for conspiring to change public policies that TERRORIZE, HARM, and THREATEN the Green Space Industry. Their pretentious prohibitionist rants has created LOSS OF REVENUES, BUSINESS FAILURES, BANKRUPTCY, and UNEMPLOYMENT, inflicting DESPAIR and DESTITUTION for THOUSANDS of hapless victims throughout the Green Space Industry. The DEPRAVED INDIFFERENCE of Maniac Culprit Terrorist Basterds is viewed as a form of TERROR, HARM, and THREAT against the Green Space Industry. Additionally, Force Of Nature inspires people to believe that ENVIRONMENTAL TERRORISM can be STOPPED ! The events, characters, companies, and organizations, depicted in this document are not always fictitious. Any similarity to actual persons, living or dead, may not be coincidental. All document excerpts and pictures contained in Force Of Nature were found somewhere on the Internet. These documents and pictures are in the public domain, serving one of the following purposes : archive, education, promotion, publicity, or press release.

The following Force Of Nature documents are currently available — ● A Look At ● Alberta Conspiracy ● British Columbia Conspiracy ● Canadian Association of Physicians for the Environment ● Canadian Cancer Society ● Canadian Environmental Law Association ● Carnage ● Consequences ● Culprit ● David Suzuki Foundation ● Dating Services for Enviro Maniacs ● DDT and Politicized Science ● Death and the Environmental Terror Movement ● Enviro Profit ● Environmental Terrorists Unmasked ● Fertilizer Terror ● Hero ● June Irwin, the Clown of Junk Science ● Kazimiera Jean Cottam ● Landscape Trades Capitulate ● Lying Sac of Enviro-Maniac Cwap ● Myth-Busting ● Needless Hysteria ● New Brunswick Conspiracy ● Newfoundland Conspiracy ● Nova Scotia Conspiracy ● Ontario Conspiracy ● Organic Fertilizers ● Paranoid Theories ● Pesticide Free BC ● Pets and Lawn Care Chemicals ● Positive Waves ● Prince Edward Island Conspiracy ● Quebec Conspiracy ● Rachel Carson, the Queen of Junk Science ● Reining a Terrorist Reaction ● Salmon Arm BC Conspiracy ● Satire ● Terror NEVER Ends ● The 9/11 Era of the Green Space Industry ● The Bin Laden of Enviro Terror, Paul Tukey ● The Failure of Integrated Pest Management ● The Looming Golf Industry Shipwreck ● The Industry Strikes Back ● The Misconceptions About Cancer ● The National Annihilation of the Modern Green Space Industry ● The Wisdom of Bill Bell ● The Wisdom of Drysdale ● The Wisdom of Health Canada ● The Wisdom of Holland ● The Wisdom of Lowes ● The Wisdom of Mains ● The Wisdom of the Solomons ● Update ● Warning ● Ask For a Copy of Any Back Issue of Force Of Nature Today. Read All About Enviro Maniac Activists and their Environmental Terror Organizations in Force Of Nature ! The Whole Truth From An Independent Perspective ! Force Of Nature is

TOTALLY INDEPENDENT of any trade association or business operating within the Green Space Industry. DON'T THANK US. IT'S A PUBLIC SERVICE.