Proposed Maximum Residue Limit

PMRL2010-81

Glyphosate

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Under the authority of the *Pest Control Products Act*, Health Canada's Pest Management Regulatory Agency (PMRA) has concluded that the application of Touchdown iQ Liquid Herbicide and Touchdown Total Herbicide, containing technical grade glyphosate salts, to glyphosate tolerant field corn containing the Optimum GAT genetic event is acceptable. The specific uses approved in Canada for glyphosate tolerant corn are detailed on the product labels of Touchdown iQ Liquid Herbicide and Touchdown Total Herbicide, Pest Control Products Act Registration Numbers 27192 and 28072, respectively.

The evaluation of these glyphosate applications indicated that the end-use products have merit and value and the human health and environmental risks associated with the new uses are acceptable. Details regarding the registration can be found in the corresponding Evaluation Report that is available in the Pesticides and Pest Management section of Health Canada's website, under Public Registry, Pesticide Product Information Database.¹

Before registering a pesticide for food use in Canada, the PMRA must determine the quantity of residues that are likely to remain in or on the food when the pesticide is used according to label directions and that such residues will not be a concern to human health. This quantity is then legally established as a maximum residue limit (MRL). An MRL applies to the identified raw agricultural food commodity as well as to any processed food product that contains it, except where separate MRLs are specified for the raw agricultural commodity and a processed product made from it.

A 3.0 ppm Canadian MRL is currently established for "corn", with a residue definition consisting of glyphosate and the metabolite aminomethylphosphonic acid (AMPA). This MRL action proposes to replace the generic corn MRL with specific MRLs for field, pop and sweet corn at the same value and revise the residue definition for field corn to include 2 additional metabolites in accordance with Table 1.

Consultation on the proposed MRLs for glyphosate is being conducted via this document (see Next Steps, the last section of this document).

To comply with Canada's international trade obligations, consultation on the proposed MRLs is also being conducted internationally by notifying the World Trade Organization, as coordinated by the Standards Council of Canada.

The relevant report can be accessed by selecting the Applications/Amendment/Historical tab and opening the Evaluation Report found under Application Number 2008-2269 (Touchdown iQ) or 2008-2270 (Touchdown Total).

The proposed MRLs for glyphosate in Canada in or on food, to replace the MRLs already legally established, are as follows.

Table 1 **Proposed Maximum Residue Limits for Glyphosate**

| Common Name | Residue Definition | MRL (ppm) | Food Commodity |
|----------------|--|-----------|---|
| Glyphosate | N-(phosphonomethyl)glycine, including the metabolites aminomethylphosphonic acid, [(acetylamino)methyl]phosphonic acid and N-acetyl-N-(phosphonomethyl)glycine | 3.0* | Field corn |
| | <i>N</i> -(phosphonomethyl)glycine, including the metabolite aminomethylphosphonic acid | 3.0* | Popcorn grain, sweet corn kernels plus cob with husks removed |

^{*} Proposed to replace the existing 3.0 ppm MRL for glyphosate and the metabolite AMPA in or on "corn".

A complete list of all pesticide MRLs established in Canada can be found on the Maximum Residue Limits for Pesticides webpage in the Pesticides and Pest Management section of Health Canada's website.

International Situation and Trade Implications

MRLs may vary from one country to another for a number of reasons, including differences in pesticide use patterns and the locations of the field crop trials used to generate residue chemistry data. As per Table 2, the proposed MRLs for glyphosate in Canada differ from the corresponding American tolerances and Codex Alimentarius MRLs². American tolerances are listed in the Electronic Code of Federal Regulations, 40 CFR Part 180, by pesticide. A listing of all established Codex MRLs is available on the Codex Alimentarius Pesticide Residues in Food website.

The Codex Alimentarius Commission is an international organization under the auspices of the United Nations that develops international food standards, including MRLs.

Table 2 Comparison of Canadian MRLs, American Tolerances and Codex MRLs

| Food Commodity | Canadian MRL (ppm) | American Tolerance (ppm) | Codex MRL (ppm) |
|--|-----------------------|--------------------------|--------------------|
| Field corn | 3.0 | 5.0 | 5.0 (Maize) |
| Popcorn grain | 3.0 | 0.1 | |
| Sweet corn kernels plus cob with husks removed | 3.0 | 0.1 | |

Next Steps

The PMRA invites the public to submit written comments on the proposed MRLs for glyphosate up to 75 days from the date of publication of this document. Please forward your comments to Publications (see the contact information on the cover page of this document). The PMRA will consider all comments received before making a final decision on the proposed MRLs for glyphosate and posting a corresponding Established Maximum Residue Limit document in the Pesticides and Pest Management section of Health Canada's website.