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Proposed Maximum Residue Limit

PMRL2013-78

MCPA

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Under the authority of the *Pest Control Products Act*, Health Canada's Pest Management Regulatory Agency (PMRA) is proposing to establish maximum residue limits (MRLs) for residues of MCPA resulting from the domestic use of MCPA on cereals, flax and peas. Residues on these crops were previously covered under Part B, Division 15, Subsection B.15.002(1) of the *Food and Drugs Act* and Regulations (≤ 0.1 ppm).

Before proposing Canadian MRLs, 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 an MRL on the corresponding commodity. 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.

Consultation on the proposed MRLs for MCPA is being conducted via this document (see Next Steps, the last section of this document). A summary of the field trial data used to support the proposed MRLs can be found in Appendix I.

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 proposed MRLs for MCPA are as follows.

Table 1 Proposed Maximum Residue Limits for MCPA

Common Name	Residue Definition	MRL (ppm)	Food Commodity
MCPA	(4-chloro-2-methylphenoxy)acetic acid	0.1*	Dry field peas; edible-podded peas; succulent shelled peas
		0.05	Eggs; fat, meat and meat byproducts of cattle, goats, hogs, horses, poultry and sheep
		0.04	Wheat bran
		0.03	Barley; oats; rye; wheat
		0.015	Sweet corn kernels plus cob with husks removed
		0.01	Field corn; flaxseeds; milk

ppm = parts per million

* Field trial data have shown that MCPA residues may also result from MCPB applications on peas (PRVD2011-06 and RVD2012-08). Thus, an MRL of 0.1 ppm in/on dry and succulent peas is proposed to cover MCPA residues resulting from applications of MCPA or MCPB on pea plants.

MRLs established in Canada may be found using the Maximum Residue Limit Database on the Maximum Residue Limits for Pesticides webpage. The database allows users to search for established MRLs, regulated under the *Pest Control Products Act*, both for pesticides or for food commodities.

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. For livestock commodities, differences in MRLs can also be due to different livestock feed items and practices.

Table 2 compares the MRLs proposed for MCPA in Canada with corresponding American tolerances as listed in the Electronic Code of Federal Regulations, 40 CFR Part 180. Currently, there are no Codex MRLs¹ listed for MCPA in or on any commodity on the Codex Alimentarius Pesticide Residues in Food webpage.

Table 2 Comparison of Canadian MRLs and American Tolerances (where different)

Food Commodity	Canadian MRL (ppm)	American Tolerance (ppm)
Wheat bran	0.04	1.0 (for barley, oat, rye and wheat grains)
Barley, oats, rye, wheat	0.03	
Sweet corn K+CWHR	0.015	Not established
Field corn	0.01	Not established
Flaxseeds	0.01	0.1
Eggs	0.05	Not established
Fat, meat and meat byproducts of cattle, goats, hogs, horses, poultry and sheep	0.05	0.1 (fat, meat and meat byproducts of cattle, goats, hogs, horses, and sheep); Not established for poultry
Milk	0.01	0.1

Next Steps

The PMRA invites the public to submit written comments on the proposed MRLs for MCPA 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. Comments received will be addressed in a separate document linked to this PMRL. The established MRLs will be legally in effect as of the date they are entered into the Maximum Residue Limit Database.

¹ The Codex Alimentarius Commission is an international organization under the auspices of the United Nations that develops international food standards, including MRLs.

Appendix I

Summary of Field Trial Data Used to Support the Proposed MRLs

Residue data from field trials conducted in Canada and the United States were submitted to support the establishment of maximum residue limits (MRLs) for MCPA on peas and flax. MCPA was applied at registered rates to peas and flax, which were harvested according to label directions. Previously reviewed residue data from field trials conducted in/on wheat, barley, field corn, flax and peas were re-assessed to support the establishment of MRLs. In addition, processing studies in treated wheat and flax were also re-assessed to determine the potential for concentration of residues of MCPA into processed commodities.

Maximum Residue Limits

The recommendation for MRLs for MCPA was based on the submitted field trial data, and the guidance provided in the OECD MRL Calculator. Table A1 summarizes the residue data used to calculate the proposed MRLs for cereal grains, flaxseeds and peas.

Table A1 Summary of Field Trial and Processing Data Used to Support Maximum Residue Limits (MRLs)

Commodity	Application Method/ Total Application Rate (g a.i./ha)	PHI (days)	Residues (ppm)		Experimental Processing Factor
			Min	Max	
Wheat	Broadcast foliar/ 1.6–2.2 kg a.e./ha	43–98	<0.01	0.033	Wheat bran: 1.5x; No concentration observed in other processed commodities
Barley	Broadcast foliar/ 0.8–0.9 kg a.e./ha	56–79	<0.01	<0.01	
Field corn grain	Broadcast foliar/ 0.8–0.9 kg a.i./ha	129–146	<0.01	<0.01	No expectation of residues
Sweet corn kernels with husks removed	Broadcast foliar/ 0.8–0.9 kg a.i./ha	63–69	<0.01	0.015	Not required
Flaxseeds	Broadcast foliar/ 0.9 kg a.i./ha	75–111	<0.01	<0.01	No expectation of residues
Peas (succulent shelled and edible-podded)	Broadcast foliar/ 0.4–0.5 kg a.i./ha	29–38	<0.01	<0.01	Not required
Peas (dry)	Broadcast foliar/ 0.5 kg a.i./ha	60–118	<0.01	<0.01	Not required

PHI = preharvest interval; ppm = parts per million

Based on the dietary burden and residue data, MRLs of 0.05 ppm in eggs, fat, meat and meat by-products of cattle, goats, hogs, horses, poultry and sheep, and 0.01 ppm in milk to cover residues of MCPA are also proposed.

Following the review of all available data, MRLs as proposed in Table 1 are recommended to cover residues of MCPA. Residues of MCPA in these crop and livestock commodities at the proposed MRLs will not pose an unacceptable risk to any segment of the population, including infants, children, adults and seniors.