Proposed Maximum Residue Limit PMRL2016-35

# Clopyralid

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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 addition of a new use on turnips to the product label of Lontrel™ 360 Herbicide, containing technical grade clopyralid, is acceptable. The specific uses approved in Canada are detailed on the label of Lontrel™ 360 Herbicide, *Pest Control Products Act* Registration Number 23545.

The evaluation of this clopyralid application indicated that the end-use product has value and the human health and environmental risks associated with the new uses are acceptable.

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.

Consultation on the proposed MRLs for clopyralid 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 Canada's Notification Authority and Enquiry Point.

The proposed MRLs, to replace or be added to the MRLs already established for clopyralid, are as follows.

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

| Common Name | Residue Definition | MRL (ppm)[1] | Food Commodity |
|---|---|---|---|
| Clopyralid | 3,6-dichloro-2-pyridinecarboxylic acid | 1.5 | Kidney of cattle, goats, horses, and sheep[2] |
| | | 0.09 | Meat byproducts (except kidney) of cattle, goats, horses, and sheep[3] |
| | | 0.015 | Milk[4] |

[1] ppm = parts per million
[2] Proposed to replace the currently established MRL of 0.36 ppm in/on these commodities.
[3] Proposed to replace the currently established MRLs of 0.05 ppm in/on meat byproducts of cattle, goats, horses, and sheep.
[4] Proposed to replace the currently established MRL of 0.01 ppm in/on this commodity.

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 crop field 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 clopyralid in Canada with corresponding American tolerances and Codex MRLs.[1] American tolerances are listed in the Electronic Code of Federal Regulations, 40 CFR Part 180, by pesticide. A listing of established Codex MRLs is available on the Codex Alimentarius Pesticide Residues in Food website, by pesticide or commodity.

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

| Food Commodity | Canadian MRL (ppm) | American Tolerance (ppm) | Codex MRL (ppm) |
|---|---|---|---|
| Kidney of cattle, goats, horses, and sheep | 1.5 | 36.0 (Cattle, Goat, Horse, and Sheep, meat byproducts, except liver) | Not Established |
| Meat byproducts (except kidney) of cattle, goats, horses, and sheep | 0.09 | 3.0 (Cattle, Goat, Horse, and Sheep, liver) | Not Established |
| Milk | 0.015 | 0.2 | Not Established |

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

## Next Steps

The PMRA invites the public to submit written comments on the proposed MRLs for clopyralid 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 that they are entered into the MRL Database.

# Appendix I

## Summary of Field Trial Data Used to Support the Proposed Maximum Residue Limits

Residue data for clopyralid in turnip roots and tops were re-assessed to support the domestic use of Lontrel™ 360 Herbicide on turnips.

## Maximum Residue Limits

Based on the residues observed in crops treated according to the current label directions, harvested at the appropriate PHI, and the principles of the Organization for Economic Co-Operation and Development (OECD), it was determined that residues of clopyralid in turnip roots and turnip tops would be covered under the MRLs currently established for these commodities.

**Table A1 Summary of Field Trial Data Used to Support MRLs**

| Commodity | Application Method/ Total Application Rate (g a.i./ha)[1] | Preharvest Interval (days) | Lowest Average Field Trial Residues (ppm) | Highest Average Field Trial Residues (ppm) |
|---|---|---|---|---|
| Turnip roots | Foliar/ 210 – 214 | 28–33 | 0.086 | 0.52 |
| Turnip tops | Foliar/ 210 – 214 | 14–15 | 0.65 | 3.05 |

[1] g a.i./ha = grams of active ingredient per hectare

Based on the dietary burden and residue data, MRLs of 1.5 ppm in kidney of cattle, goats, horses, and sheep and 0.09 ppm meat byproducts (except kidney) of cattle, goats, horses, and sheep and 0.015 ppm in milk to cover residues of clopyralid are proposed.

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