Proposed Maximum Residue Limit PMRL2018-19

Methomyl

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Under the authority of the *Pest Control Products Act*, Health Canada's Pest Management Regulatory Agency (PMRA) granted continued registration of products containing methomyl for sale and use in Canada.

Before registering a pesticide for food use in Canada or allowing for continued registration, 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.

The dietary assessment for methomyl was published in the PRVD2016-02. PMRA had proposed the cancellation of all food and feed uses and the revocation of all Canadian MRLs due to dietary risks of concern. Based on the comments received through the consultation process, the dietary risk assessment was revised to include only the food commodities for which registrations continue to be supported in Canada as a result of the re-evaluation of methomyl (that is, broccoli, cauliflower, Brussels sprouts, succulent shelled peas, cabbage and sweet corn) as well as commodities for which importation continues to be permitted (blueberries, citrus fruits and celery).

The final re-evaluation decision for methomyl (RVD2018-05) indicated that the continued use of this active ingredient on the registered and imported crops listed above has value and the human health and environmental risks associated with these uses are acceptable. However, as indicated in RVD2018-05, the risks from exposure to methomyl residues in/on any other treated crop at the current, established MRL level or at 0.1 ppm (as prescribed in Division B.15.002(1) of the Food and Drug Regulations), exceeded PMRA's level of concern. Therefore, MRLs on treated food commodities other than broccoli, cauliflower, Brussels sprouts, succulent shelled peas, blueberries, citrus fruits, celery, cabbage and sweet corn are being proposed to be set at the limit of quantitation of the enforcement analytical method of 0.01ppm.

Consultation on the proposed MRLs for methomyl for broccoli, cauliflower, Brussels sprouts and succulent shelled peas, previously subject to the 0.1 ppm MRL of the Food and Drug Regulations, is being conducted via this document (see Next Steps). This document is also being used to inform domestic and international stakeholders of the PMRA's decision to set MRLs at the limit of quantitation of the enforcement analytical method of 0.01 ppm for all treated food commodities other than broccoli, cauliflower, Brussels sprouts, succulent shelled peas, blueberries, citrus fruits, celery, cabbage and sweet corn due to risks from exposure to methomyl residues in/on these treated food commodities.

A summary of the field trial data used to support the proposed MRLs on broccoli, cauliflower, Brussels sprouts and succulent shelled peas can be found in Appendix I and in RVD2018-05.

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 methomyl, are as follows.

Table 1 Proposed Maximum Residue Limits for Methomyl

Common Name	Residue Definition	MRL (ppm)[1]	Food Commodity
Methomyl	methyl *N*-[[(methylamino)carbonyl]oxy]ethanimidothioate	5.0	Succulent shelled peas
		3.0	Broccoli
		2.0	Brussels sprouts, cauliflowers
		0.01	All food commodities (other than those listed in this item)[2]

[1] ppm = parts per million

[2] This MRL is proposed to replace the currently established MRLs of 4.0 ppm for grapes, 2.0 ppm for lettuce, 1.0 ppm for strawberries and 0.5 ppm for apples.

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.

Table 2 compares the MRLs proposed for methomyl 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 Index webpage, by pesticide or commodity.

[1] 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)
Succulent shelled peas	5.0	5.0 (peas)	5 peas (pods and succulent – immature seeds)
Broccoli	3.0	3.0	Not established
Brussels sprouts	2.0	2.0	Not established
Cauliflowers	2.0	2.0	Not established
All food commodities (other than those listed in this item)[1]	0.01	Not established	Not established

[1] There are specific American tolerances and/or Codex MRLs established in various food commodities, but none for "all food commodities" as proposed by Canada.

Next Steps

The PMRA invites the public to submit written comments on the proposed MRLs for methomyl 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 Maximum Residue Limit Database.

Appendix I

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

Residue data for methomyl in broccoli, Brussels sprouts, cauliflower and succulent shelled peas were submitted to support the continued domestic registration of methomyl on these crops as a result of the re-evaluation of this active ingredient.

Maximum Residue Limits

The recommendation for maximum residue limits (MRLs) for methomyl was based upon 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 broccoli, Brussels sprouts, cauliflower and succulent shelled peas.

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)	Minimum Trial Residues (ppm)	Maximum Trial Residues (ppm)
Succulent shelled peas	Foliar / 0.5-3.0	1	0.12	4.6
Broccoli	Foliar / 1.0-14	3	0.09	1.8
Brussels sprouts	Foliar / 2.2-12.3	3	0.05	0.89
Cauliflower	Foliar / 3.4-10	3	0.05	1.8

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

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