Proposed Registration Decision

PRD2019-08

Hop Beta Acids (Present as Potassium Salts), HopGuard Liquid, HopGuard II

(publié aussi en français)

<u>2 August 2019</u>

This document is published by the Health Canada Pest Management Regulatory Agency. For further information, please contact:

Publications
Pest Management Regulatory Agency
Health Canada
2720 Riverside Drive
A.L. 6607 D
Ottawa, Ontario K1A 0K9

Internet: canada.ca/pesticides hc.pmra.publications-arla.sc@canada.ca Facsimile: 613-736-3758 Information Service: 1-800-267-6315 or 613-736-3799 hc.pmra.info-arla.sc@canada.ca



ISSN: 1925-0878 (print) 1925-0886 (online)

Catalogue number:

H113-9/2019-8E (print version) H113-9/2019-8E-PDF (PDF version)

© Her Majesty the Queen in Right of Canada, represented by the Minister of Health Canada, 2019

All rights reserved. No part of this information (publication or product) may be reproduced or transmitted in any form or by any means, electronic, mechanical, photocopying, recording or otherwise, or stored in a retrieval system, without prior written permission of the Minister of Public Works and Government Services Canada, Ottawa, Ontario K1A 0S5.

Table of Contents

Overview	1
Proposed Registration Decision for Hop Beta Acids (Present as Potassium Salts)	1
What Does Health Canada Consider When Making a Registration Decision?	
What Is Hop Beta Acids (Present as Potassium Salts)?	2
Health Considerations	2
Environmental Considerations	3
Value Considerations	4
Measures to Minimize Risk	4
Next Steps	4
Other Information	5
Science Evaluation	6
1.0 The Active Ingredient, Its Properties and Uses	6
1.1 Identity of the Active Ingredient	
1.2 Physical and Chemical Properties of the Active Ingredients and End-Use Product	7
1.3 Directions for Use	
1.4 Mode of Action	
2.0 Methods of Analysis	
2.1 Methods for Analysis of the Active Ingredient	
2.2 Method for Formulation Analysis	10
2.3 Methods for Residue Analysis	. 10
3.0 Impact on Human and Animal Health	10
3.1 Toxicology Summary	
3.2 Occupational, Residential and Bystander Exposure and Risk Assessment	
3.2.1 Dermal Absorption	. 10
3.2.2 Use Description	
3.2.3 Mixer, Loader, and Applicator Exposure and Risk	. 11
3.2.4 Postapplication Exposure and Risk	
3.2.5 Residential and Bystander Exposure and Risk	
3.3 Food Residue Exposure Assessment	
3.3.1 Food	
3.3.2 Drinking Water	
3.3.3 Acute and Chronic Dietary Risks for Sensitive Subpopulations	
	. 12
3.3.5 Cumulative Exposure and Risk	
3.3.6 Maximum Residue Limits	
4.0 Impact on the Environment	
5.0 Value	
6.0 Pest Control Product Policy Considerations	
6.1 Toxic Substances Management Policy Considerations	
6.2 Formulants and Contaminants of Health or Environmental Concern	
7.0 Summary	
7.1 Human Health and Safety	
7.2 Value	. 15

8.0 Propos	sed Regulatory Decision	15
	eviations	
Appendix I	Tables and Figures	18
Table 1	Toxicity Profile of HopGuard II Containing Hop Beta Acids (present as potassi	um
	salts)	18
Table 2	Toxicity Profile of HopGuard Liquid Containing Hop Beta Acids (present as	
	potassium salts)	18
Table 3	Toxicity Profile of Potassium Beta Resin	19
References		20

Overview

Proposed Registration Decision for Hop Beta Acids (Present as Potassium Salts)

Health Canada's Pest Management Regulatory Agency (PMRA), under the authority of the <u>Pest Control Products Act</u>, is proposing registration for the sale and use of Potassium Beta Resin, a manufacturing concentrate HopGuard Liquid and the end-use product HopGuard II, containing the technical grade active ingredient hop beta acids (present as potassium salts), to control varroa mites in honeybee hives.

An evaluation of available scientific information found that, under the approved conditions of use, the health and environmental risks and the value of the pest control products are acceptable.

This Overview describes the key points of the evaluation, while the Science Evaluation provides detailed technical information on the human health, environmental and value assessments of hop beta acids (present as potassium salts), HopGuard Liquid and HopGuard II.

What Does Health Canada Consider When Making a Registration Decision?

The key objective of the *Pest Control Products Act* is to prevent unacceptable risks to people and the environment from the use of pest control products. Health or environmental risk is considered acceptable¹ if there is reasonable certainty that no harm to human health, future generations or the environment will result from use or exposure to the product under its proposed conditions of registration. The Act also requires that products have value² when used according to the label directions. Conditions of registration may include special precautionary measures on the product label to further reduce risk.

To reach its decisions, the PMRA applies modern, rigorous risk-assessment methods and policies. These methods consider the unique characteristics of sensitive subpopulations in humans (for example, children) as well as organisms in the environment. These methods and policies also consider the nature of the effects observed and the uncertainties when predicting the impact of pesticides. For more information on how the Health Canada regulates pesticides, the assessment process and risk-reduction programs, please visit the <u>Pesticides</u> section of Canada.ca.

Before making a final registration decision on hop beta acids (present as potassium salts), HopGuard Liquid and HopGuard II, Health Canada's PMRA will consider any comments received from the public in response to this consultation document.³ Health Canada will then

[&]quot;Acceptable risks" as defined by subsection 2(2) of the *Pest Control Products Act*.

[&]quot;Value" as defined by subsection 2(1) of the *Pest Control Products Act*: "the product's actual or potential contribution to pest management, taking into account its conditions or proposed conditions of registration, and includes the product's (a) efficacy; (b) effect on host organisms in connection with which it is intended to be used; and (c) health, safety and environmental benefits and social and economic impact."

[&]quot;Consultation statement" as required by subsection 28(2) of the *Pest Control Products Act*.

publish a Registration Decision⁴ on hop beta acids (present as potassium salts), HopGuard Liquid and HopGuard II, which will include the decision, the reasons for it, a summary of comments received on the proposed registration decision and Health Canada's response to these comments.

For more details on the information presented in this Overview, please refer to the Science Evaluation of this consultation document.

What Is Hop Beta Acids (Present as Potassium Salts)?

Hop beta acids (present as potassium salts) are naturally occurring weak organic acids produced by hop plants (*Humulus lupulus* L.). Hop beta acids (present as potassium salts) are the active ingredient used to formulate HopGuard II, which is used for control of varroa mites in honeybee hives. HopGuard II consists of strips impregnated with hop beta acids (present as potassium salts) which are placed in the brood chamber of bee hives by hanging the strips over hive frames. The mode of action of hop beta acids (present as potassium salts) in killing varroa mite is likely from physical damage to mites leading to death.

Health Considerations

Can Approved Uses of Hop Beta Acids (present as potassium salts) Affect Human Health?

Hop beta acids (present as potassium salts) is unlikely to affect human health when it is used according to label directions.

Potential exposure to hop beta acids (present as potassium salts) may occur when handling and applying the product. When assessing health risks, two key factors are considered: the levels where no health effects occur and the levels to which people may be exposed. The levels used to assess risks are established to protect the most sensitive human population (for example, children and nursing mothers). As such, sex and gender are taken into account in the risk assessment. Only uses for which the exposure is well below levels that cause no effects in animal testing are considered acceptable for registration.

Toxicology studies in laboratory animals describe potential health effects from varying levels of exposure to a chemical and identify the dose where no effects are observed.

In laboratory animal studies, and based on publicly available information, the technical grade active ingredient, Potassium Beta Resin, containing hop beta acids (present as potassium salts), is slightly acutely toxic via the oral route and extremely irritating to the eyes. The manufacturing concentrate, HopGuard Liquid, and the end-use product, HopGuard II, were also considered to be of slight acute oral toxicity and extremely irritating to the eyes.

[&]quot;Decision statement" as required by subsection 28(5) of the Pest Control Products Act.

Requests to waive acute oral, dermal, and inhalation toxicity, skin irritation, and dermal sensitization testing for Potassium Beta Resin, HopGuard Liquid, and HopGuard II, as well as short-term toxicity, prenatal developmental toxicity, and genotoxicity testing of Potassium Beta Resin were accepted in lieu of actual test data. Hop beta acids (present as potassium salts) is not expected to cause adverse health effects when used according to label instructions.

Residues in Water and Food

Dietary risks from food and water are acceptable.

Dietary exposure to hop beta acids (present as potassium salts) to humans is unlikely since application of HopGuard II is limited to brood chambers and not honey supers. Also, users are not to collect honey or wax from the treated brood chambers. It is expected that the proposed use of hop beta acids (present as potassium salts) will not pose a risk to any segment of the population, including infants, children, adults and seniors, from consumption of honey and wax from treated beehives.

Exposure to hop beta acids (present as potassium salts) from drinking water will be negligible. Consequently, the dietary risk from drinking water is acceptable.

Risks in Residential and Other Non-Occupational Environments

Estimated risk for residential and other non-occupational exposure is acceptable.

Residential exposure to individuals coming in contact with hop beta acids (present as potassium salts) during application is not expected. Thus, the risk is considered to be acceptable when HopGuard II is used according to label directions.

Bystander exposure is not expected due to the direct application to beehives. Consequently, the risk to bystanders is acceptable.

Occupational Risks From Handling HopGuard II

Occupational risks are acceptable when HopGuard II is used according to the label directions, which include protective measures.

To protect workers from exposure to HopGuard II, the label states that applicators must wear a long-sleeved shirt, long pants, chemical-resistant gloves, socks and shoes, and protective eyewear. The occupational risks are acceptable when the precautionary statements on the label are observed.

Environmental Considerations

An environmental assessment was not required for this evaluation based on the use pattern of HopGuard II.

Value Considerations

What Is the Value of HopGuard II?

HopGuard II provides control of varroa mites, the most important pest of honeybees, and offers users a new active ingredient for use against this pest.

Varroa mites are the most important parasitic pest of honeybees, and have a severe economic impact on the Canadian beekeeping industry. Significant varroa mite infestation in a honeybee colony will cause the loss of the infested colony. Based on the mode of action of HopGuard II, varroa mites are not expected to develop resistance, which is a problem with some other varroa mite control products.

Measures to Minimize Risk

Labels of registered pesticide products include specific instructions for use. Directions include risk-reduction measures to protect human and environmental health. These directions must be followed by law.

The key risk-reduction measures being proposed on the label of Potassium Beta Resin, HopGuard Liquid and HopGuard II to address the potential risks identified in this assessment are as follows.

Key Risk-Reduction Measures

Human Health

The signal words "CAUTION POISON" and "DANGER – CORROSIVE TO EYES" are required on the principal display panels of the labels for Potassium Beta Resin, HopGuard Liquid, and HopGuard II.

Standard hazard and precautionary statements are also required on the HopGuard II label to inform workers of the acute oral toxicity and eye irritation of the product. Workers handling packages, as well as the individual strips, of HopGuard II will be required to wear standard personal protective equipment including long-sleeved shirt, long pants, chemical-resistant gloves, shoes with socks, and goggles or face shield.

A restricted-entry interval is not required for HopGuard II.

Next Steps

Before making a final registration decision on hop beta acids (present as potassium salts), HopGuard Liquid and HopGuard II, Health Canada's PMRA will consider any comments received from the public in response to this consultation document. Health Canada will accept written comments on this proposal up to 45 days from the date of publication of this document.

Please forward all comments to Publications (contact information on the cover page of this document). Health Canada will then publish a Registration Decision, which will include its decision, the reasons for it, a summary of comments received on the proposed decision and Health Canada's response to these comments.

Other Information

When the Health Canada makes its registration decision, it will publish a Registration Decision on hop beta acids (present as potassium salts), HopGuard Liquid and HopGuard II (based on the Science Evaluation of this consultation document). In addition, the test data referenced in this consultation document will be available for public inspection, upon application, in the PMRA's Reading Room (located in Ottawa).

Science Evaluation

Hop Beta Acids (Present as Potassium Salts), HopGuard Liquid, HopGuard II

1.0 The Active Ingredient, Its Properties and Uses

1.1 Identity of the Active Ingredient

Λ	ctive	cuh	cto	nco

Function acaricide

Chemical name

1. International Union IUPAC chemical names for the major β -acids:

of Pure and Applied Lupulone: 3,5-dihydroxy-4-(3-methylbutanoyl)-2,6,6-tris(3-

Chemistry (IUPAC) methylbut-2-en-1-yl)cyclohexa-2,4-dien-1-one

Adlupulone: 3,5-dihydroxy-2-(2-methylbutanoyl)-4,6,6-tris(3-

methylbut-2-en-1-yl)cyclohexa-2,4-dien-1-one

Colupulone: 3,5-dihydroxy-2,6,6-tris(3-methylbut-2-en-1-yl)-4-(2-

methylpropanoyl)cyclohexa-2,4-dien-1-one

2. Chemical Abstracts CAS chemical names for the major β -acids:

Service (CAS) Lupulone: 2,4-cyclohexadien-1-one, 3,5-dihydroxy-2,6,6-tris(3-

methyl-2-buten-1-yl)-4-(3-methyl-1-oxobutyl)-

Adlupulone: 2,4-cyclohexadien-1-one, 3,5-dihydroxy-4,6,6-tris(3-

methyl-2-buten-1-yl)-2-(2-methyl-1-oxobutyl)-

Colupulone: 2,4-cyclohexadien-1-one, 3,5-dihydroxy-2,6,6-tris(3-

methyl-2-buten-1-yl)-4-(2-methyl-1-oxopropyl)-

CAS number Lupulone 468-28-0

Adlupulone 28374-71-2 Colupulone 468-27-9

Molecular formula Lupulone C₂₆H₃₈O₄

Adlupulone C₂₆H₃₈O₄ Colupulone C₂₅H₃₆O₄

Molecular weight Lupulone 414.6

Adlupulone 414.6 Colupulone 400.6 Structural formula

Lupulone
$$CH_3$$
 OH O CH_3 CH_3 CH_3 CH_3 CH_3

Colupulone
$$CH_3$$
 OH O CH_3 CH_3 CH_3 CH_3

Purity of the active ingredient

56 %

1.2 Physical and Chemical Properties of the Active Ingredients and End-Use Product

Technical Product—Potassium Beta Resin

Property	Result
Colour and physical state	dark brown viscous resin
Odour	faint resinous, hop extract aroma
Melting range	92°C for lupulone
	93-94°C for colupulone
	82-83°C for adlupulone
Boiling point or range	not applicable
Density	1.103 g/mL

Property	Result	
Vapour pressure at 20°C	Not required	
Ultraviolet (UV)-visible	pH λ max (nm) ε (M ⁻¹ cm ⁻¹)	
spectrum	neutral 355.5 48.15	
	basic 355.5 50.24	
	acidic 333.6 25.49	
Solubility in water at 20°C	(for lupulone)	
	pH solubility (ppm)	
	7.0 48	
	6.2 16	
	5.6 8	
Solubility in organic solvents	The beta acids in the free acid form are very soluble in organic solvents; the potassium salt form is not very soluble in organic	
	solvents.	
n -Octanol-water partition coefficient (K_{ow})	$Log K_{ow} = 7.13$ (for lupulone)	
Dissociation constant (pK_a)	6.1 (for β-acids)	
Stability (temperature, metal)	Active degrades slightly under strong acidic and alkaline conditions, and is sensitive to oxidation. Active showed no degradation when exposed to light and high temperature (70 °C).	

Manufacturing Concentrate—HopGuard Liquid

Property	Result
Colour	dark brown
Odour	resinous
Physical state	viscous liquid
Formulation type	SN (solution)
Label concentration	16 %
Container material and	HDPE Plastic drum
description	
Density	1.069 g/mL
pH of 1% dispersion in water	9.0 - 10.0
Oxidizing or reducing action	no oxidizing or reducing action
Storage stability	stable for three years when stored at room temperature
Corrosion characteristics	not expected to be incompatible with container material
Explodability	not potentially explosive

End-Use Product—HopGuard II

Property	Result
Colour	dark brown
Odour	resinous
Physical state	viscous liquid
Formulation type	IF (impregnated fabric)
Label concentration	4 g/strip
Container material and	Foil and film laminate
description	
Density	1.069 g/mL
pH of 1% dispersion in water	9.0 - 10.0
Oxidizing or reducing action	no oxidizing or reducing action
Storage stability	stable for up to 3 years when stored at room temperature in the
	original sealed pouches
Corrosion characteristics	not corrosive to packaging material
Explodability	not potentially explosive

1.3 Directions for Use

HopGuard II is applied in the brood chamber of honeybee hives by hanging the strips over hive frames. HopGuard II is applied at a rate of 1 strip per 5 frames of bees, rounded up to the nearest multiple of 5 frames (in other words, 1 strip for ≤ 5 frames, 2 strips for 6-10 frames of bees, etc.). Two applications, applied at 10 to 15 day intervals, may be required to provide acceptable control of varroa mite. HopGuard II is applied in spring or late summer/fall. Do not apply more than 4 applications per year. HopGuard II should be applied to honeybee hives with little to no brood, as presence of excessive brood will reduce efficacy.

1.4 Mode of Action

The mode of action of hop beta acids in killing varroa mite is likely from physical damage to mites leading to death. Hop beta acids are a contact miticide; therefore, bees must come into contact with the strips in order to kill mites on the bees.

2.0 Methods of Analysis

2.1 Methods for Analysis of the Active Ingredient

The methods provided for the analysis of the active ingredient and impurities in the technical product have been validated and assessed to be acceptable for the determinations.

2.2 Method for Formulation Analysis

The method provided for the analysis of the active ingredient in the formulation has been validated and assessed to be acceptable for use as an enforcement analytical method.

2.3 Methods for Residue Analysis

No methods (including environmental analytical) are required to quantify residues of hop beta acids (present as potassium salts).

3.0 Impact on Human and Animal Health

3.1 Toxicology Summary

The toxicological database submitted in support of registration of hop beta acids (present as potassium salts), consisted of an animal study on primary eye irritation, and requests to waive acute oral, dermal, and inhalation toxicity, primary skin irritation, dermal sensitization, short-term toxicity, prenatal developmental toxicity, and genotoxicity testing (Appendix I, Tables 1-3). The scientific quality of the data and information submitted was considered adequate to assess the toxic effects that may result from exposure to hop beta acids (present as potassium salts).

The primary eye irritation animal study on hop beta acids solution found it to be extremely irritating and the publicly available information submitted as part of a request to waive acute oral toxicity testing found hop beta acids (present as potassium salts) to be of slight acute oral toxicity (LD₅₀ of 1500 mg/kg bw in mice, 1800 mg/kg bw in rats, and 1000 to 2000 mg/kg bw in rabbits).

Requests to waive acute oral, dermal, and inhalation toxicity, skin irritation, and dermal sensitization testing for Potassium Beta Resin, HopGuard Liquid, and HopGuard II, as well as short-term toxicity, prenatal developmental toxicity, and genotoxicity testing of Potassium Beta Resin were accepted.

The formulants in HopGuard II are supported for the proposed use.

Incident Reports

As of 1 November 2018, no humans or domestic animal incident reports involving hop beta acids (present as potassium salts) have been reported to the PMRA.

3.2 Occupational, Residential and Bystander Exposure and Risk Assessment

3.2.1 Dermal Absorption

No information on dermal absorption of hop beta acids (present as potassium salts) from HopGuard II was provided, however, dermal exposure is not expected when the precautionary statements on the label are observed.

3.2.2 Use Description

HopGuard II is proposed for use in beehives. The method of application is by applying corrugated cardboard, mylar-backed strips (1 for every 5 frames of comb covered with bees in each brood chamber) impregnated with the manufacturing concentrate, HopGuard Liquid, containing hops beta acids (present as potassium salts) as the active ingredient. HopGuard II may be applied up to a maximum of 2 to 4 strips for a double brood chamber hive, 4 times per season (twice during the spring and twice during late summer or fall). The maximum quantity of active ingredient handled by one individual is 5.6 kg/day and 22.4 kg/year.

3.2.3 Mixer, Loader, and Applicator Exposure and Risk

There are no mixing and loading activities associated with the use of the product. To protect applicators from exposure to HopGuard II, the label states to wear a long-sleeved shirt, long pants, chemical-resistant gloves, socks and shoes, and protective eyewear. The occupational risks to applicators are acceptable when the precautionary statements on the label are observed.

3.2.4 Postapplication Exposure and Risk

Postapplication activities include IPM scouting, harvesting honey, splitting hives, the removal of spent HopGuard II strips, re-queening the hives, removal of queen cells, managing colony growth, and providing bees protein and sugar feed supplements. Given the nature of the postapplication activities, dermal contact with the treated strips is expected, but the wearing of bee keeping equipment (for example, gloves, jacket, pants, and boots) will mitigate this exposure potential. A restricted-entry interval (REI) was not specified on the proposed label and is not required.

3.2.5 Residential and Bystander Exposure and Risk

As HopGuard II is to be applied directly to beehives and does not involve outdoor spraying, bystander exposure due to drift is not expected. Moreover, the volatility of HopGuard II is low, and the overall risk to bystanders is acceptable.

HopGuard II is not proposed for domestic classification as a pest control product, but could be used in beehives near residential areas. The direct application of HopGuard II to beehives, coupled with a low degree of volatility of hop beta acids (present as potassium salts) is such that exposure to humans and companion animals in residential areas is unlikely.

3.3 Food Residue Exposure Assessment

3.3.1 Food

HopGuard II is proposed for use exclusively in the brood chambers, not the honey supers, and workers are not to harvest honey or wax from the brood chambers. Also, hop beta acids have a low degree of volatility and a long history of use in foods without reports of adverse effects.

Thus, dietary exposure to hop beta acids (present as potassium salts) from honey and wax harvested from treated hives is not expected to present a health risk of concern. Consequently, dietary risk is acceptable.

3.3.2 Drinking Water

HopGuard II is proposed for use in brood chambers inside the beehives and is not subject to agricultural run-off during application, postapplication activities, or due to inclement weather. Exposure to hop beta acids (present as potassium salts) from drinking water is expected to be negligible and will not present a health risk of concern.

3.3.3 Acute and Chronic Dietary Risks for Sensitive Subpopulations

Calculations of acute reference doses and acceptable daily intakes are not required for hop beta acids (present as potassium salts).

Based on all the available information and hazard data, the PMRA concludes that hop beta acids (present as potassium salts) is of low toxicity. As a result, there is no need to apply uncertainty factors to account for intra- and interspecies variability or have a margin of exposure given that a threshold for potential effects is not required.

3.3.4 Aggregate Exposure and Risk

Based on the relevant information in the PMRA's database, there is reasonable certainty that no harm will result from aggregate exposure of residues of hop beta acids (present as potassium salts) to the general population in Canada, including infants and children, when HopGuard II is used according to the label. This includes all anticipated dietary (food and drinking water) exposures and all other non-occupational exposures (dermal and inhalation) for which there is reliable information.

3.3.5 Cumulative Exposure and Risk

The *Pest Control Products Act* requires that the PMRA consider the cumulative exposure to pesticides with a common mechanism of toxicity. For the current evaluation, the PMRA did not identify the potential for dietary or residential exposure for hop beta acids (present as potassium salts). Therefore, there is no requirement for a cumulative health risk assessment at this time.

3.3.6 Maximum Residue Limits

As part of the assessment process prior to the registration of a pesticide, Health Canada must determine that the consumption of the maximum amount of residues that are expected to remain on food products, when a pesticide is used according to label directions, will not be a concern to human health. This maximum amount of residues expected is then legally specified as an MRL under the *Pest Control Products Act* for the purposes of adulteration provision of the *Food and Drugs Act*. Health Canada specifies science-based MRLs to ensure the food Canadians eat is safe.

The dietary risks from food and drinking water are considered to be negligible given that HopGuard II is proposed for use in the brood chambers and not the honey supers, that honey or wax are not to be harvested from the brood chambers, that hop beta acids have a low degree of volatility, and a long history of use in foods without reports of adverse effects. Consequently, the specification of a maximum residue limit (MRL) under the *Pest Control Products Act* is not required.

4.0 Impact on the Environment

An environmental assessment was not required for this evaluation based on the use pattern of HopGuard II.

5.0 Value

Efficacy trials demonstrated the level of control provided by HopGuard II is affected by presence of brood in the hive and by the number of applications. The data supported the application of one strip per five frames of bees for a period of 10—15 days, applied when little to no brood are present in the hive. While only one application may provide control, the results were not as consistent as when two sequential applications were applied. Therefore, two applications applied at 10-15 day intervals may be required to provide control of varroa mite. HopGuard II should be applied in spring or late summer/fall when there are little to no brood in the treated hives.

Tolerance of honeybees to HopGuard II was supported based on observations on adverse effects in the efficacy trials and 6 additional adverse effects studies. In one adverse effect study, when the product was applied to hives with brood present injury to brood directly adjacent to the strips was observed; brood injury was not observed in areas not directly adjacent to strips. Based on this evidence, the supported application rate and application timing (little to no brood present) is not expected to result in any significant injury to treated honeybee hives. A warning on the HopGuard II label regarding potential brood injury is required.

Alternative active ingredients registered to treat honeybee hives infested with varroa mites include oxalic acid, formic acid, amitraz, thymol, fluvalinate-tau, coumaphos, and flumethrin. Varroa mites have historically developed resistance to conventional miticides such as fluvalinate-tau and coumaphos, resulting in difficulty in controlling this pest. Based on the mode of action of hop beta acids (present as potassium salts) as a contact miticide which causes physical damage to mites, resulting in mite mortality, varroa mites are unlikely to develop resistance to HopGuard II.

HopGuard II has value as it controls varroa mites in honeybee hives with a mode of action which is unlikely to lead to resistance. HopGuard II is compatible with current management practices and will be a useful addition to the integrated pest management of varroa mites and aid in the control of resistant mites.

6.0 Pest Control Product Policy Considerations

6.1 Toxic Substances Management Policy Considerations

The Toxic Substances Management Policy (TSMP) is a federal government policy developed to provide direction on the management of substances of concern that are released into the environment. The TSMP calls for the virtual elimination of Track 1 substances, in other words, those that meet all four criteria outlined in the policy: persistent (in air, soil, water and/or sediment), bio-accumulative, primarily a result of human activity and toxic as defined by the *Canadian Environmental Protection Act*. The *Pest Control Products Act* requires that the TSMP be given effect in evaluating the risks of a product.

During the review process, hop beta acids (present as potassium salts) and their transformation products were assessed in accordance with the PMRA Regulatory Directive DIR99-03⁵ and evaluated against the Track 1 criteria. The PMRA has reached the following conclusions:

Hop beta acids (present as potassium salts) do not meet Track 1 criteria, and are not considered Track 1 substances.

6.2 Formulants and Contaminants of Health or Environmental Concern

During the review process, contaminants in the technical as well as formulants and contaminants in the end-use products are compared against the *List of Pest Control Product Formulants and Contaminants of Health or Environmental Concern.* The list is used as described in the PMRA Notice of Intent NOI2005-01⁷ and is based on existing policies and regulations including DIR99-03 and DIR2006-02, and taking into consideration the Ozone-depleting Substance Regulations, 1998, of the *Canadian Environmental Protection Act*, 1999 (substances designated under the Montreal Protocol). The PMRA has reached the following conclusions:

Technical grade Potassium Beta Resin does not contain any contaminants identified in the List of Pest Control Product Formulants and Contaminants of Health or Environmental Concern.

The manufacturing concentrate, HopGuard Liquid, and the end-use product, HopGuard II, both contain ethylene oxide and 1,4-dioxane, contaminants of health or environmental concern identified in the *List of Pest Control Product Formulants and Contaminants of Health or Environmental Concern*. However, the contaminants are present at acceptable levels.

-

DIR99-03, The Pest Management Regulatory Agency's Strategy for Implementing the Toxic Substances Management Policy.

⁶ SI/2005-114

NOI2005-01, List of Pest Control Product Formulants and Contaminants of Health or Environmental Concern

⁸ DIR2006-02, Formulants Policy and Implementation Guidance Document.

The use of formulants in registered pest control products is assessed on an ongoing basis through

PMRA formulant initiatives and Regulatory Directive DIR2006-02.

7.0 Summary

7.1 Human Health and Safety

The toxicology database for hop beta acids (present as potassium salts) is adequate to define the toxic effects that may result from exposure to hop beta acids (present as potassium salts). Based on publicly available information provided in a request to waive acute oral toxicity testing, the active ingredient, hop beta acids (present as potassium salts), is of slight acute toxicity by the oral route. There was evidence of extreme irritation to the eyes of rabbits after acute dosing. Requests to waive acute oral, dermal, and inhalation toxicity, dermal irritation, and dermal sensitization testing for Potassium Beta Resin, HopGuard Liquid, and HopGuard II, as well as requests to waive short-term toxicity, prenatal developmental toxicity, and genotoxicity testing for Potassium Beta Resin were accepted based on a long history of use without reports of adverse effects.

Applicators will not be exposed to unacceptable levels of hop beta acids (present as potassium salts) when HopGuard II is used according to label directions.

Bystander and residential exposure during application of HopGuard II is not expected. Consequently, the risk to bystanders and residents is considered acceptable.

Exposure to hop beta acids (present as potassium salts) from food and drinking water will be negligible. Consequently, the dietary risk from food and drinking water is acceptable.

The specification of an MRL under the *Pest Control Products Act* is not required.

7.2 Value

Varroa mites are the most important parasitic pest of honeybees, and have a severe economic impact on the Canadian beekeeping industry. Significant varroa mite infestation in a honeybee colony will cause the loss of the infested colony. Based on the mode of action of HopGuard II, varroa mites are not expected to develop resistance, which is a problem with some other varroa mite control products. HopGuard II provides control of varroa mites when applied at a rate of one strip for every five frames of bees in spring or late summer/fall, for an application period of 10–15 days. Two applications, applied at 10 to 15 day intervals, may be required to provide control of varroa mite.

8.0 Proposed Regulatory Decision

Health Canada's PMRA, under the authority of the *Pest Control Products Act*, is proposing registration for the sale and use of Potassium Beta Resin, HopGuard Liquid and HopGuard II, containing the technical grade active ingredient hop beta acids (present as potassium salts), to control varroa mites in honeybee hives.

An evaluation of available scientific information found that, under the approved conditions of use, the health and environmental risks and the value of the pest control products are acceptable		

List of Abbreviations

∂ male

ADI acceptable daily intake

bw body weight

CAS Chemical Abstracts Service

cm centimetres g gram ha hectare(s)

HDPE High Density Polyethylene

HPLC high performance liquid chromatography

hrs hours

IPM integrated pest management

IUPAC International Union of Pure and Applied Chemistry

kg kilogram

 K_{ow} n-octanol-water partition coefficient

L litre

LD₅₀ median lethal dose

LOAEL lowest observed adverse effect level LOEC low observed effect concentration

LOQ limit of quantitation

mg milligram mL millilitre

MAS maximum average score
MIS maximum irritation score
MOE margin of exposure
MRL maximum residue limit

N/A not applicable

NOAEL no observed adverse effect level no observed effect concentration

NOEL no observed effect level NOER no observed effect rate

N/R not required

OC organic carbon content pKa dissociation constant

PMRA Pest Management Regulatory Agency

PPE personal protective equipment

ppm parts per million

TSMP Toxic Substances Management Policy

USEPA United States Environmental Protection Agency

UV ultraviolet

Appendix I Tables and Figures

Table 1 Toxicity Profile of HopGuard II Containing Hop Beta Acids (present as potassium salts)

(Effects are known or assumed to occur in both sexes unless otherwise noted; in such cases, sex-specific effects are separated by semi-colons)

Study	Study Results
Type/Animal/PMRA#	
Acute oral toxicity	LD ₅₀ 1800 mg/kg bw
Rat	
PMRA# 2783883	Slight toxicity
Acute dermal toxicity	Based on a long history of safe use, waivers were requested and
Acute inhalation toxicity	granted.
Primary skin irritation	
Dermal sensitization	
PMRA# 2783883	
Eye irritation	MAS $^{a} = 48.6/110$
	MIS $^{b} = 84.4/110 (10 \text{ days})$
Rabbit, New Zealand	
White (♂)	The irritation was not resolved by Day 21 of the study.
PMRA# 2783804	Extremely irritating

^a MAS = Maximum Average Score for 24, 48, and 72 hrs

Table 2 Toxicity Profile of HopGuard Liquid Containing Hop Beta Acids (present as potassium salts)

(Effects are known or assumed to occur in both sexes unless otherwise noted; in such cases, sex-specific effects are separated by semi-colons)

Study Type/Animal/PMRA#	Study Results
Acute oral toxicity	LD ₅₀ 1800 mg/kg bw
Rat	
PMRA# 2783883	Slight toxicity
Acute dermal toxicity	Based on a long history of safe use, waivers were requested and
Acute inhalation toxicity	granted.
Primary skin irritation	
Dermal sensitization	
PMRA# 2783883	

^b MIS = Maximum Irritation Score (average)

Study	Study Results
Type/Animal/PMRA#	
	MAS $^{a} = 48.6/110$
	MIS $^{b} = 84.4/110 (10 \text{ days})$
Rabbit, New Zealand	
White (♂)	The irritation was not resolved by Day 21 of the study.
PMRA# 2783804	Extremely irritating

^a MAS = Maximum Average Score for 24, 48, and 72 hrs ^b MIS = Maximum Irritation Score (average)

Toxicity Profile of Potassium Beta Resin Table 3

(Effects are known or assumed to occur in both sexes unless otherwise noted)

Study	Study Results
Type/Animal/PMRA#	
Acute oral toxicity	LD ₅₀ 1800 mg/kg bw
Rat	
PMRA# 2783883	Slight toxicity
Acute dermal toxicity	Based on a long history of safe use, waivers were requested and
Acute inhalation toxicity	granted.
Primary skin irritation	
Dermal sensitization	
PMRA# 2783883	
Eye irritation	MAS $^{a} = 48.6/110$
	MIS $^{b} = 84.4/110 (10 \text{ days})$
Rabbit, New Zealand	
White (♂)	The irritation was not resolved by Day 21 of the study.
PMRA# 2783804	Extremely irritating
Short-term oral toxicity	Based on a long history of safe use, waivers were requested and
Short-term dermal toxicity	granted.
Short-term inhalation	
toxicity	
Prenatal developmental	
toxicity Gene mutations in bacteria	
Gene mutations in bacteria	
mammalian cells (in vitro)	
Chromosome aberrations	
(in vitro)	
(III vido)	
PMRA# 2783883	

References

A. List of Studies/Information Submitted by Registrant

PMRA References

Document Number

1.0 Chemistry

2783879	2018, Preliminary Analysis, DACO: 2.13 CBI
2783881	2018, Storage Stability Data, DACO: 2.14.14 CBI
2783882	2018, Storage Stability Data, DACO: 2.14.14 CBI
2908877	2017, Preliminary Analysis, DACO: 2.13 CBI
2908879	2018, Preliminary Analysis, DACO: 2.13 CBI
2909532	2014, Storage Stability Data, DACO: 2.14.14 CBI
2908886	2018, 3 HPLC chromatogram of HopGuard Liquid I-818.pdf, DACO: 3.4.1
2908893	2018, 3 HPLC chromatogram HopGuard Y06718.pdf, DACO: 3.4.1
2908891	2018, 1 Reply to PMRA re CES_Clarification_email_1 HG EP 8-1-18.doc,
	DACO: 0.8
2783825	2017, Summary DACO data requirements and data for HopGuard II TGAI-MA-
	EP 4-12-2017.xlsx, DACO: 3.0,3.1,4.1,5.2,6.1,7.1,8.1,9.1
2908887	2018, Storage Stability Data, DACO: 3.5.10 CBI
2908888	2018, Storage Stability Data, DACO: 3.5.10 CBI

2.0 Human and Animal Health

2783804	2012, An Acute Irritation Study of KBR by Ocular Administration in Rabbits,
	DACO: 4.2.4
2783872	2015, Potassium Salts of Hops Beta Acids; Exemption From the Requirement of a
	Tolerance, DACO: 12.5
2783873	2014, EPA Science Review in Support of the Registration of HopGuard, DACO:
	12.5
2783874	2015, Registration Decision for New Active Ingredient of Potassium Salts of
	Hops Beta Acids, DACO: 12.5
2783883	2013, Health Effects Waiver Rationale for the Technical Grade Active Ingredient-
	Potassium Salts of Hop Beta Acids and the End Use Product-HopGuard, DACO:
	4.1,4.2,4.2.1,4.2.2,4.2.3,4.2.5,4.2.6,4.2.7,4.3.1,4.3.2,4.3.3,4.3.4,4.3.5,4.3.6,
	4.4.1,4.4.2,4.4.3,4.4.4,4.4.5,4.5.1,4.5.10,4.5.11,4.5.12,4.5.13,4.5.14,4.5.15,4.5.2,
	4.5.3,4.5.4,4.5.5,4.5.6,4.5.7,4.5.8,4.5.9,4.6.2,4.6.3,4.6.4,4.6.5,4.6.7,4.6.8,4.6.9,4.7,
	4.8,4.8(A),4.8(B)
2783884	2017, Use Description and Exposure Scenarios (Handler and Post-Application)
	for HOPGUARD(R) II Acaricide on Honey Beehives, DACO: 5.2

3.0 Value

2783869	2017, Value summary spreadsheet, DACO: 10.1, 10.3.1
2783870	2017, DACO 10 Value Assessment, DACO: 10.1, 10.2.1, 10.2.2, 10.2.3.1,
	10.2.3.3, 10.3.1, 10.3.2, 2.10
2783871	2017, DACO 10 Value Assessment (raw data Nasr studies), DACO: 10.2, 10.2.3
2783878	2017, Value Dossier, DACO: 10.1, 3.0, 3.1, 4.1, 5.2, 6.1, 7.1, 8.1, 9.1 CBI