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Re-evaluation Decision

RVD2023-10

# Capsaicin and Related Capsaicinoids and Its Associated End-use Products

*Final Decision*

*(publié aussi en français)*

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## Re-evaluation decision for capsaicin and related capsaicinoids and associated end-use products

Under the authority of the *Pest Control Products Act*, all registered pesticides must be regularly re-evaluated by Health Canada's Pest Management Regulatory Agency (PMRA) to ensure that they continue to meet health and environmental safety standards and continue to have value. The re-evaluation considers information from various sources such as data and information from pesticide manufacturers and other regulatory agencies, as well as comments received during public consultations. Health Canada applies internationally accepted risk assessment methods as well as current risk management approaches and policies.

Capsaicin and related capsaicinoids (dihydrocapsaicin and nordihydrocapsaicin) are the essential oil extracts from pepper fruit, and the actives are always co-formulated. In Canada, capsaicin and related capsaicinoids are registered as animal repellents. They act as vertebrate repellents through irritation when they come into contact with skin or mucous membranes. Capsaicin and its related compounds are the only actives registered to repel bears. These are restricted class products formulated as pressurized spray to be used only by authorized customers. Similar products, at a lower concentration and smaller size, are also registered to deter aggressive dogs or coyotes in domestic settings. The actives, formulated as a suspension, are registered as commercial and domestic class products for use to protect trees and ornamentals from deer, rabbits and hares. Granular, dust and liquid domestic class products are also registered to deter dog, cat, raccoon, skunk, groundhog and squirrels to protect the residential areas or bird seeds.

Currently registered products containing capsaicin and related capsaicinoids can be found in the [Pesticide Product Information Database](#) and in Appendix I. The Proposed Re-evaluation Decision PRVD2022-14, *Capsaicin and related capsaicinoids* containing the evaluation of capsaicin and related capsaicinoids and proposed decision, underwent a 90-day consultation<sup>1</sup> period ending on 3 October 2022. PRVD2022-14 proposed continued registration of capsaicin and related capsaicinoids products in Canada, with the proposed updates to label directions and precautions to reflect the current labelling standards and improve clarity.

Health Canada received one comment relating to the value assessment. Commenters are listed in Appendix II. The comment is summarized in Appendix III along with the response by Health Canada. The comment did not result in revisions to the value assessment and did not result in changes to the proposed re-evaluation decision as described in PRVD2022-14. A reference list of information used as the basis for the proposed re-evaluation decision is included in PRVD2022-14.

This document presents the final re-evaluation decision<sup>2</sup> for the re-evaluation of capsaicin and related capsaicinoids, including the required label updates required to bring labels to current standards and improve clarity. All products containing capsaicin and related capsaicinoids that are registered in Canada are subject to this re-evaluation decision.

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<sup>1</sup> "Consultation statement" as required by subsection 28(2) of the *Pest Control Products Act*.

<sup>2</sup> "Decision statement" as required by subsection 28(5) of the *Pest Control Products Act*.

## **Re-evaluation decision for capsaicin and related capsaicinoids**

Health Canada has completed the re-evaluation of capsaicin and related capsaicinoids. Under the authority of the *Pest Control Products Act*, Health Canada has determined that continued registration of products containing capsaicin and related capsaicinoids is acceptable. Following a scientific review of the available information, Health Canada has determined that the health and environmental risks and the value of capsaicin and related capsaicinoids continue to be acceptable provided that the required mitigation measures are implemented. Label amendments, as summarized below and listed in Appendix IV, are required. No additional data are required at this time.

### **Risk mitigation measures**

Registered pesticide product labels include specific directions for use. Directions include risk mitigation measures to protect human health and the environment and must be followed by law. The required updated label statements as a result of the re-evaluation of capsaicin and related capsaicinoids, are summarized below. Refer to Appendix IV for details.

#### **Label improvements to meet current standards:**

##### **Human health**

- Update to standard label statements (wording related to directions for use, first aid, and health precautions).

##### **Environment**

- Updates to standard label statements (directions for use and disposal).

### **Next steps**

To comply with this decision, the required amendments (mitigation measures and label updates) must be implemented on all product labels no later than 24 months after the publication date of this decision document. Accordingly, both registrants and retailers will have up to 24 months from the date of this decision document to transition to selling the product with the newly amended labels. Similarly, users will also have the same 24-month period from the date of this decision document to transition to using the newly amended labels, which will be available on the Public Registry.

Refer to Appendix I for details on specific products impacted by this decision.

## **Other information**

Any person may file a notice of objection<sup>3</sup> regarding this decision on capsaicin and related capsaicinoids and its associated end-use products within 60 days from the date of publication of this Re-evaluation Decision. For more information regarding the basis for objecting (which must be based on scientific grounds), please refer to the Pesticides section of the Canada.ca website (Request a Reconsideration of Decision) or contact PMRA's Pest Management Information Service.

The relevant confidential test data on which the decision is based (as referenced in PRVD2022-14) are available for public inspection, upon application, in PMRA's Reading Room. For more information, please contact the Pest Management Information Service.

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<sup>3</sup> As per subsection 35(1) of the *Pest Control Products Act*

## Appendix I Registered products containing Capsaicin and related Capsaicinoids in Canada

**Table 1** Products containing Capsaicin and related Capsaicinoids requiring (Label amendments)<sup>1</sup>

Registration number	Class	Registrant	Product name	Formulation type	Active ingredient (%)
27929	T	Bushwacker Backpack & Supply DBA Counter Assault	OC - Capsaicin	Liquid	RCS-8.92; CAS-10.85
27906	T	Robertet Canada, Inc.	Oleoresin Capsicum 33% Manufacturing Concentrate	Suspension	RCS-15.25; CAS-17.75
27907	T	Robertet Canada, Inc.	Oleoresin Capsicum 13.3% Manufacturing Concentrate	Suspension	RCS-6.22; CAS-7.08
27908	T	Robertet Canada, Inc.	Oleoresin Capsicum 6.6% Manufacturing Concentrate	Suspension	RCS-3.10; CAS-3.50;
27909	T	Robertet Canada, Inc.	Oleoresin Capsicum 20% Manufacturing Concentrate	Suspension	RCS-8.94; CAS-11.06
26477	T	Squirrel Proof Inc.	Snyder Capsicum #1	Suspension	RCS-0.48; CAS-0.60;
26852	T	Squirrel Proof Inc.	Snyder Capsicum #3	Solution	RCS-2.20; CAS-2.30
27837	T	West Coast Aerosols Ltd.	IDP Oleoresin Capsicum	Liquid	RCS-5.08; CAS-7.00
22137	R	Bushwacker Backpack & Supply DBA Counter Assault	Counter Assault Ultra Bear Deterrent	Pressurized Product	RCS-0.9; CAS-1.1
27380	R	Parkland Aero-Fillers	Back-Off Bear Deterrent	Pressurized Product	RCS-0.84; CAS-0.98
27381	R	Parkland Aero-Fillers	Bear Beware	Pressurized Product	RCS-0.65; CAS-0.75
27382	R	Parkland Aero-Fillers	Bear Beware Plus	Pressurized Product	RCS-0.84; CAS-0.98
28950*	R	Parkland Aero-Fillers	Stay-Away Bear Deterrent	Pressurized Product	CAS-0.98
28951*	R	Parkland Aero-Fillers	Stop! Bear Deterrent	Pressurized Product	CAS-0.98

Registration number	Class	Registrant	Product name	Formulation type	Active ingredient (%)
26619	R	Security Equipment Corporation	Frontiersman Bear Attack Deterrent	Pressurized Product	RCS-0.753; CAS-0.857
28410	R	Security Equipment Corporation	Frontiersman Xtra Bear Attack Deterrent	Pressurized Product	RCS-0.84; CAS-1.00
29114	R	Security Equipment Corporation	Sabre Wild Max Bear Attack Deterrent	Pressurized Product	RCS-0.84; CAS-1.0
29357	R	Security Equipment Corporation	Sabre Wild Bear Attack Deterrent	Pressurized Product	CAS-0.857; RCS-0.753
27715	R	UDAP Industries, Inc.	UDAP Pepper Power Bear Deterrent	Pressurized Product	RCS-0.64; CAS-0.75
25590	R	West Coast Aerosols Ltd.	Ruger Bear Deterrent	Pressurized Product	RCS-0.54; CAS-0.75
27685	R	West Coast Aerosols Ltd.	Bear D'fense Professional Bear Deterrent	Pressurized Product	RCS-0.72; CAS-1.00
27926	R	West Coast Aerosols Ltd.	Bearguard Professional Bear Deterrent	Pressurized Product	RCS-0.72; CAS-1.00
28596	R	West Coast Aerosols Ltd.	Yukon Magnum (TM) Bear Deterrent	Pressurized Product	RCS-0.72; CAS-1.0
30571	R	West Coast Aerosols Ltd.	Ruger Extreme Bear Repellent	Pressurized Product	RCS-0.72; CAS-1.0
33903	R	West Coast Aerosols Ltd.	Bear Scare Bear Deterrent	Pressurized Product	RCS-0.72; CAS-1.0
34369	R	Guardian Protective Devices, Inc.	Bear Shield	Pressurized Product	RCS- 0.9641; CAS- 1.0974
32038	C	Bobbex, Inc.	Bobbex Commercial Deer & Rabbit Repellent Concentrate	Suspension	WNT-0.53; RCS-0.0025; MTX-1.10; GRO-0.028; FSO-0.31; FMM-6.13; EGS-2.32; CST-0.33; CAS-0.003
29804	D	Bobbex, Inc.	Bobbex Deer & Rabbit Repellent Concentrate	Suspension	WNT-0.53; RCS-0.0025; MTX-1.1; GRO-0.028; FSO-0.31; FMM-6.13; EGS-2.32; CST-0.33; CAS-0.003



Registration number	Class	Registrant	Product name	Formulation type	Active ingredient (%)
29805	D	Bobbex, Inc.	Bobbex Deer & Rabbit Repellent Ready-To-Use Spray	Suspension	WNT-0.53; RCS-0.001; MTX-0.3; GRO-0.014; FSO-0.21; FMM-4.09; EGS-0.93; CST-0.17; CAS-0.001
27771	D	Bushwacker Backpack & Supply DBA Counter Assault	Counter Assault Dog Deterrent Pepper Spray	Pressurized Product	RCS-0.42; CAS-0.50
26479*	D	Squirrel Proof Inc.	Squirrel Proof Chili Treat Wild Bird Seed	Granular	CAS + RCS-0.023
26480*	D	Squirrel Proof Inc.	Squirrel Proof(TM) Seed Saver(TM)	Dust or powder	CAS + RCS -1.08
26853*	D	Squirrel Proof Inc.	Squirrel Proof Suet With Chili Treat (TM)	Solid	CAS + RCS -0.17
27383*	D	Parkland Aero-Fillers	Dog Beware	Pressurized Product	CAS-0.44
28948*	D	Parkland Aero-Fillers	Stay-Away Dog Deterrent	Pressurized Product	CAS-0.44
28949*	D	Parkland Aero-Fillers	Stop! Dog Deterrent	Pressurized Product	CAS-0.44
25789	D	Passion-Krafts Int'l	Scentagone Animal Repellent	Granular	RCS-0.0015; CAU-0.480; CAT-0.018; CAS-0.0017
25829	D	Woodstream Canada Corporation	Safer`s Critter Ridder	Granular	RCS-0.0015; CAU-0.480; CAT-0.018; CAS-0.0017
29741	D	Woodstream Canada Corporation	Chemfree Critter Ridder Concentrate	Liquid	RCS-0.121; CAU-3.84; CAT-1.48; CAS-0.136
29743	D	Woodstream Canada Corporation	Safer`s Critter Ridder Ready to Use	Liquid	RCS-0.015; CAU-0.48; CAT-0.185; CAS-0.017
29858	D	Woodstream Canada Corporation	Safer`s Critter Ridder Granular	Granular	RCS-0.0015; CAU-0.48; CAT-0.018; CAS-0.0017

Registration number	Class	Registrant	Product name	Formulation type	Active ingredient (%)
27051	D	Security Equipment Corporation	Sabre K9 Dog & Coyote Attack Deterrent	Pressurized Product	RCS-0.44; CAS-0.50
33884	D	Security Equipment Corporation	Sabre 2-In-1 K9 Dog & Coyote Attack Deterrent With LED Armband	Pressurized Product	RCS-0.44; CAS-0.50
27714	D	UDAP Industries, Inc.	UDAP Industries Pepper Power Dog Deterrent	Pressurized Product	RCS-0.29; CAS-0.35
27690	D	West Coast Aerosols Ltd.	Bodyguard Cone Dog Repellent	Pressurized Product	RCS-0.36; CAS-0.50
29967	D	West Coast Aerosols Ltd.	Spike Stream Dog Repellent	Pressurized Product	RCS-0.36; CAS-0.50
29967.02	D	West Coast Aerosols Ltd.	Bodyguard Stream Dog Repellent	Pressurized Product	RCS-0.36; CAS-0.50
29967.03	D	West Coast Aerosols Ltd.	Ruger Stream Dog Repellent	Pressurized Product	RCS-0.36; CAS-0.50

<sup>1</sup> As of 24 January 2023, excluding discontinued products or products with a submission for discontinuation.

T = Technical grade active ingredient, R = Restricted, C = Commercial, D = Domestic,

CAS = Capsaicin, RCS = Related capsaicinoids, CAU = Oil of black pepper; CAT = Piperine (from oleoresin of black pepper);

WNT = Wintergreen oil; MTX = Meat meal mixture; GRO = Garlic oil; FSO = Fish oil mixture; FMM = Fish meal mixture;

EGS = Dried eggs; CST = Castor oil;

\* Capsaicin is always co-formulated with related capsaicinoids (i.e., individual active ingredient (%) of capsaicin and related capsaicinoids), thus label update will be required.

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**Appendix II List of commenters to PRVD2022-14**

List of commenters' affiliations for comments submitted in response to PRVD2022-14.

<b>Category</b>	<b>Commenter</b>
Public	General public

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## Appendix III Comment and response

Health Canada received one written comment during the public consultation for the capsaicin and related capsaicinoids proposed re-evaluation decision. Commenters' affiliations are listed in Appendix II. The comment was considered during the final decision phase of this re-evaluation. The summarized comment and Health Canada's response is provided below.

### 1.0 Comment related to the value assessment

#### 1.1 Comment

A comment was received from the public regarding the legal concentration of capsaicin in bear spray repellent products sold in Canada compared to capsaicin products sold in the United States. The commenter would like to have a higher strength (up to 2%), similar to a US product, available in Canada.

#### Health Canada response

Capsaicin is the primary capsaicinoid (out of six capsaicinoids) typically found in capsicum peppers, all of which have pesticidal active properties. The active ingredients of bear spray repellent products in Canada are described as "Capsaicin and Related Capsaicinoids". In Canada, the "capsaicin" concentration is shown separately from the "related capsaicinoids" concentration on product labels, whereas in the United States, active ingredients, "Capsaicin and Related Capsaicinoids" are presented as a single concentration. Nineteen bear spray repellent products are registered in Canada. Of those products, two are formulated with a total capsaicin and related capsaicinoids content of 2%, similar to products sold in the United States.

Under the *Pest Control Products Act*, pesticides are registered if the risks to human health and the environment are determined to be acceptable considering the conditions of use of the pesticide, and if the pesticide has value. Registrants have the option to submit new studies and additional information to Health Canada to amend a registration, for example, increase concentration of the product, provided the required data is submitted to support the amendment. All new applications will be assessed according to Regulatory Directive DIR2017-01, *Management of Submissions Policy*.

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## Appendix IV Label amendments for products containing capsaicin and related capsaicinoids

Information on approved labels of currently registered products should not be removed unless it contradicts the label statements provided below.

The following statements must be updated to meet current labelling standards:

1) For All products:

A. On the principal display panel,

replace

“WARNING IRRITANT”

with

“WARNING EYE AND SKIN IRRITANT”

B. The **FIRST AID** section must be updated as per the PMRA guidance document, *First Aid Labelling Statements* (March 2022).

2) Add to labels of all technical grade active ingredient products:

A. DO NOT discharge effluent containing this product into sewer systems, lakes, streams, ponds, estuaries, oceans or other waters.

B. Canadian manufacturers should dispose of unwanted active ingredients and containers in accordance with municipal and provincial regulations. For additional details and clean up of spills, contact the manufacturer and the provincial regulatory agency.

3) Add to labels of all end-use products:

“**DO NOT** apply to any body of water.”

4) For the domestic class products, Reg. No. 27383, 27690, 27714, 27771, 28948, 28949, 29967, 29967.02, 29967.03, pressurized spray products, under the section entitled **PRECAUTIONS**, add the following statement:

“**Do not** spray this product on objects or humans”

5) For the commercial class product Reg. No. 32038, suspension product , under the section entitled **PRECAUTIONS**;

replace

“safety goggles”

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with  
“protective eyewear (goggles or face shield)”

- 6) For the domestic class products Reg. No. 29804 and 29805, suspension product, under the section entitled **PRECAUTIONS**, add the following statement:

“Wear long-sleeved shirt, long pants, waterproof gloves, socks and shoes when diluting, mixing and applying the product.”

- 7) For the domestic class products Reg. No. 25789, 25829, and 29858, granular products, under the section entitled **PRECAUTIONS**, add the following statement:

“Wear long-sleeved shirt, long pants, waterproof gloves, socks and shoes when applying the product.”

- 8) For the domestic class products Reg. No. 29741 and 29743, liquid products, under the section entitled **PRECAUTIONS**:

Replace  
“pants, shoes and socks”

With  
“long pants, socks and shoes”

- 9) For the domestic class products Reg. No 26480, dust product, under the section entitled **PRECAUTIONS**,

replace  
“Wear eye and face protection and rubber gloves”

with  
“Wear waterproof gloves and protective eyewear (goggles or face shield)”

- 10) For the commercial class suspension product Reg. No. 32038, and the domestic class suspension products Reg. No. 29804 and 29805, under the section entitled **Directions for Use**, add the following statement of re-entry interval:

“**DO NOT** enter or allow entry into treated areas until sprays have dried.”

- 11) For the domestic class granular products Reg. No. 25789, 25829 and 29858, under the section entitled **Directions for Use**, add the following statement of re-entry interval:

“**DO NOT** enter or allow entry into treated areas until dusts have settled.”

12) For the domestic class liquid products Reg. No. 29741 and 29743, under the section entitled **Directions for Use**, add the following statement of re-entry interval:

“DO NOT enter or allow entry into treated areas until sprays have dried.”

13) For domestic class products Reg. No. 29804 and 29805, under the section entitled **PRECAUTIONS**,

Replace  
“temperature”

with  
“temperature inversions”

14) For all restricted class products: under the section entitled **Directions for Use**,

If there is any wording of the term "trained operators", it should be replaced with  
“certified applicators”.

15) Following tables are proposed to all or individual products indicated:

**Table 1**      **General label improvements for products containing Capsaicin and related Capsaicinoids**

Label element	Label improvement	Additional comments
General	<p>Label improvements are required to ensure clarity and to remove general terms.</p> <p>Refer to the following PMRA regulatory policies and guidelines listed below for more guidance on pest control product labelling:</p> <ul style="list-style-type: none"> <li>• Checklist of Labelling Requirements and</li> <li>• LPS2011-02, Guidance to Improve Statements on Labels of Domestic Class Products.</li> </ul>	
Principal display panel: Active Ingredient	<p>On the principal display, remove “Guarantee” and replace with “Active Ingredient”.</p> <p>The label must indicate the guarantee for both capsaicin and related capsaicinoids. As per the 2010 <i>Memorandum to Registrants, Applicants and their Representatives for Capsaicin Products - Capsaicin Statement of Guarantee and Labelling Allowances</i>, the guarantee declaration on the SPSF and label for products containing capsaicin must include the capsaicin and the related capsaicinoids.</p>	<p>For example, <b>ACTIVE INGREDIENT</b></p> <p>Capsaicin.....X% Related Capsaicinoids.....Y%</p>

Label element	Label improvement	Additional comments
Principal display panel: Net Contents	For aggressive dog and coyote spray products, the net contents must be between 20 grams to 50 grams. For aggressive bear spray products, the net content must be between 225 grams to 500 grams.	
Principal display panel	The general statement found on the principal display panel must reflect all the use patterns stated in the DIRECTIONS FOR USE section of the secondary panel of the label.	
Principal display panel	Add the product type if missing from the principal display panel.	The product type needs to be in the principal display panel as per the “Labelling Checklist”.
Principal display panel and secondary display panel	The principal and secondary panel must clearly identify whether the product is “FOR INDOOR USE ONLY”, “FOR OUTDOOR USE ONLY” and “FOR INDOOR OR OUTDOOR USE”. Label instructions must be consistent with where the product is to be used throughout the label (for example, no references to outdoor uses if product is used indoors only).	As per the “Labelling Checklist”.
Secondary display panel	For products applied to repel animals from outdoor areas containing a limitation of not applying to edible crops or where children play in the PRECAUTIONS, add the following in the DIRECTIONS FOR USE: “DO NOT apply in areas where plants are grown for food or feed (e.g., vegetables, fruit, herbs) or where children play.”	
Secondary display panel	Remove unacceptable advertising statements as per Regulatory Directive DIR2016-01, <i>Guidelines for the Advertising of Pest Control Products</i> and non-pest control product claims. Any reference to a product being non-toxic to animals and the environment must be removed from the label. Non-pest control product claims must also be removed.	
Secondary display panel	For concentrate products that must be diluted before use, add the following statement in the directions for use: DO NOT apply undiluted.	
Secondary display panel	For general outdoor products with a specific re-treatment interval, vague statements indicating “reapply as necessary” or equivalent must be deleted from the label and replaced with the re-treatment interval statement followed by “Treatment must only be repeated if pest problem persist or reoccurs.”	



Label element	Label improvement	Additional comments
Secondary display panel	Where there is a potential of damage, non-safety adverse effects statements should be added if not present such as “Users should test (treat) a small, inconspicuous area first to ensure there are no adverse effects such as staining or discolouration.”, “Before treating large areas, test the potential damage of the repellent by first treating a small inconspicuous area” and “It is advisable to treat a small portion of plants to determine if damage will occur.”	

**Table 2 Product specific label improvements**

Product specific label amendments		
Label element and Reg. Nos.	Label improvement	Comments
<p>Dog/Coyote repellent products</p> <p>Reg. Nos. 27383 27690 27714 27771 28948 28949 29967 29967.02 29967.03 33884</p> <p>Secondary display panel: Use Directions</p>	<p>On the capsaicin products used to protect people from dog and/or coyote attacks, the site claims must be amended to “<i>aggressive dogs</i>” and “<i>aggressive coyotes</i>”.</p> <p>The Directions for Use section must include the following:  <i>“FOR OUTDOOR USE ONLY. Capsaicin sprays have been proven effective in repelling aggressive [insert target animal, i.e., dogs and/or coyotes] only when sprayed directly into the face, especially in the eyes or on the nose of the animal. This product is only to be used to deter aggressive [insert target animal, i.e., dogs and/or coyotes] that are attacking or about to attack people. DO NOT seek out encounters with [insert target animal, i.e., dogs and/or coyotes]. There is no guaranteed method of responding to an aggressive [insert target animal, i.e., dogs and/or coyotes] encounter because each encounter is unique. This product is a [insert target animal, i.e., dogs and/or coyotes] attack repellent that may protect users in some unexpected confrontations with these animals but may not be effective in all situations or prevent all injuries. This product must be used only as a last resort. DO NOT use this product against people or non-target animals. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE AGGRESSIVE [INSERT TARGET ANIMAL, I.E., DOGS AND/OR COYOTES] MIGHT BE ENCOUNTERED.</i></p>	<p>Do not remove product specific use directions such as “Depress top button, spraying into face and eyes of threatening dog. Spray in a series of short bursts. Spray is most effective at short range (up to 3m).” or text such as “When threatened by a dog, turn actuator 45 degrees to “Ready” position. Point nozzle directly toward dog’s face. Depress actuator button for a burst of spray to a maximum range of 3 metres. Move away to avoid exposure to spray.”</p>

Product specific label amendments		
Label element and Reg. Nos.	Label improvement	Comments
Bear repellent products  Reg. Nos. 22137 25590 26619 27380 27381 27382 28950 28951 29114 29357 34369  27685 27715 27926 28410 28596 30571 33903  Secondary display panel: Use Directions and Precautions	<p>On the capsaicin products used to protect people from bear attacks, the site claims must be amended to “<i>aggressive bears</i>”.</p> <p>Move use directions currently under Precautions section to Direction for Use section.</p> <p>Specifically, the Directions for Use section must include the following:</p> <p><i>“FOR OUTDOOR USE ONLY. Capsaicin sprays have been proven effective in repelling aggressive bears only when sprayed directly into the face, especially in the eyes or on the nose of the animal. This product is only to be used to deter aggressive bears that are attacking or about to attack people. DO NOT seek out encounters with bears. There is no guaranteed method of responding to an aggressive bear encounter because each encounter is unique. This product is a bear attack repellent that may protect users in some unexpected confrontations with these animals but may not be effective in all situations or prevent all injuries. Strict attention to the advice of wildlife professionals on safety is advised. This product must be used only as a last resort. Capsaicin sprays will not repel bears from treated objects or areas. DO NOT spray objects (e.g., tents, clothing) or areas with this product. DO NOT use this product against people or non-target animals. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE AGGRESSIVE BEARS MIGHT BE ENCOUNTERED.”</i></p> <p>And the PRECAUTIONS section must read as follows:  <b>“PRECAUTIONS: KEEP OUT OF REACH OF CHILDREN.</b> Severe irritation to eyes, nose, respiratory and skin areas can occur. Persons with respiratory problems or wearing contact lenses should not use this product. Avoid contact with skin and eyes and avoid inhalation of spray.  <b>WHEN TRAVELLING DO NOT STORE IN PASSENGER COMPARTMENT.</b> Contact air carriers for regulations concerning air transport. Contents under pressure. Container may explode if heated. Do not place in hot water or near</p>	<p>Move use directions currently under Precautions section to Direction for Use section.</p>

Product specific label amendments		
Label element and Reg. Nos.	Label improvement	Comments
	radiators, stoves or other sources of heat. Do not use in the presence of open flame or spark or while smoking. Do not leave in hot vehicle. For safety and performance, do not store above <i>[Insert numerical value as found on registered label]°C</i> or below <i>[Insert numerical value as found on registered label]°C</i> . Be careful not to puncture container. DO NOT INCINERATE CONTAINER. Wash hands before touching eyes or face and prior to using the washroom.”	
General outdoor – granules  Reg. Nos. 25789 25829 29858  Secondary display panel: General Information and Directions for Use	<p>General information:</p> <p><b>Replace</b>  “GENERAL INFORMATION: Scent-a-gone contains ingredients that irritate animals when they touch or taste the product. It can be used to repel animals such as dogs, cats, groundhogs, skunks and raccoons from treated areas for about 30 days.”</p> <p><b>With</b>  “GENERAL INFORMATION: <i>[Insert product name]</i> contains ingredients that irritate animals when they touch or taste the product. It can be used to repel dogs, cats, groundhogs, skunks and raccoons from treated areas for about 30 days.”</p> <p><b>Directions for Use:</b>  <b>Replace with</b>  “DIRECTIONS FOR USE:</p> <p><u>Indoors:</u> Spread at a rate of 83 g/m<sup>2</sup> (100 ml/m<sup>2</sup>) to flat structural surfaces (e.g., floors behind furniture) to be protected. Reapply after 30 days if animals continue to be a problem. Treatment must only be repeated if pest problem persist or reoccurs. A <i>[Insert numerical value as found on registered label with appropriate units (e.g., g or kg)]</i> kg product will treat <i>[Insert numerical value as found on registered label]</i> m<sup>2</sup>. <u>DO NOT apply to any indoor plants or where children will play.</u></p> <p><u>Outdoors:</u> Apply on sunny, dry days. Spread by hand or using manual or motorized spreaders at a rate of about 117g/m<sup>2</sup> (125 ml/m<sup>2</sup>). May be applied to lawns, ornamental garden paths and</p>	Adding clarity on the target pests, rates and non-food/non-feed and non-children play areas only.

Product specific label amendments		
Label element and Reg. Nos.	Label improvement	Comments
	<p>flower beds. To protect garbage bags, garbage cans, ornamental plants, trees or buildings (e.g., garages, verandas, sheds) apply on the ground as a protective band 0.5 m for skunks, 2 m for raccoons, 0.3 m for groundhogs, 0.5 m for dogs and 0.3 m for cats. A quantity of <i>[Insert numerical value as found on registered label with appropriate units (e.g., g or kg)]</i> will treat <i>[Insert numerical value as found on registered label]</i> m<sup>2</sup>. Reapply after 30 days if animals continue to be a problem. Treatment must only be repeated if pest problem persist or reoccurs.”</p> <p>DO NOT apply in areas where plants are grown for food or feed (e.g., vegetables, fruit, herbs) or where children will play.</p>	
<p>Suet product</p> <p>Reg. No. 26853</p> <p>Principal display panel</p>	<p>Principal display panel:</p> <p><b>Remove</b> “A High-Energy, Health Dietary Supplement For Attracting Wild Birds Treated to Discourage Feeding by Tree Squirrels”</p> <p><b>Replace with</b> “Treated to Discourage Feeding by Tree Squirrels”</p> <p><b>Remove</b> “Our products are non-toxic to animals and the environment.”</p>	<p>Remove unacceptable advertising statements as per Regulatory Directive <i>DIR2016-01, Guidelines for the Advertising of Pest Control Products</i> and non-pest control product claims.</p>
<p>General outdoor product – emulsifiable concentrate</p> <p>Reg. Nos. 29741 29743</p> <p>Principal display panel</p> <p>Secondary display panel -</p>	<p>Remove all references to gardens because it could imply that the product could be applied to food crops.</p> <p>Principal display panel:</p> <p><b>Remove</b> “REPELS CATS, DOGS, GROUNDHOGS, RACCOONS, SKUNKS AND SQUIRRELS FOR UP TO 30 DAYS FROM LANDSCAPED AREAS INCLUDING ORNAMENTALS, GARDENS AND LAWNS, BIRD FEEDERS, GARBAGE BAGS AND GARBAGE CONTAINERS”</p> <p><b>Replace with</b> “REPELS CATS, DOGS, GROUNDHOGS, RACCOONS, SKUNKS AND SQUIRRELS FOR UP TO 30 DAYS FROM LANDSCAPED AREAS INCLUDING ORNAMENTALS, LAWNS, BIRD FEEDERS, GARBAGE BAGS AND</p>	<p>Adds clarity to not apply to gardens growing food/feed crops and not to areas with children.</p>

Product specific label amendments		
Label element and Reg. Nos.	Label improvement	Comments
Directions for Use	<p>GARBAGE CONTAINERS”</p> <p><b>Secondary display panel – Directions for Use:</b>  <b>Remove</b> “<u>Landscaped Areas, including lawns, gardens and ornamentals:</u>”  <b>Replace with</b> “<u>Landscaped Areas, including lawns and ornamentals:</u>”</p> <p><b>Add</b> “DO NOT apply in areas where plants are grown for food or feed (e.g., vegetables, fruit, herbs) or where children play.”</p>	