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Re-evaluation Decision

RVD2024-05

# Sodium Chloride and Its Associated End-use Products

*Final Decision*

*(publié aussi en français)*

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## Re-evaluation Decision for Sodium Chloride and Associated End-use Products

Under the authority of the *Pest Control Products Act*, all registered pesticides must be re-evaluated by Health Canada's Pest Management Regulatory Agency (PMRA) to ensure that they meet current health and environmental standards and have value. The re-evaluation considers data and information from pesticide manufacturers, published scientific reports 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.

This document presents the final re-evaluation decision<sup>1</sup> for the re-evaluation of sodium chloride, including the response to one comment received, and the required label updates. All products containing sodium chloride regulated under the *Pest Control Products Act* in Canada are subject to this re-evaluation decision.

Sodium chloride is a post-emergent herbicide. Application of sodium chloride results in a loss in turgor pressure in the target plants through the rapid loss of water from the plant leaf cells, leading to the desiccation of the plant tissue. Related products are applied as a directed spray to control weeds on non-cropland sites which include roadsides, highways, walkways, vacant lots, industrial sites, parks, playgrounds, cycleways, driveways, residential lands, sidewalks, pathways, and rights-of-way. They are registered as commercial- and domestic-class products.

Currently registered technical grade active ingredient, and end-use products containing sodium chloride can be found in the Pesticide Product Information Database and in Appendix I. The Proposed Re-evaluation Decision PRVD2023-03, *Sodium Chloride and Its Associated End-use Products*<sup>2</sup> containing the evaluation of sodium chloride and the proposed decision, underwent a 90 day consultation period ending on 24 September 2023. PRVD2023-03 proposed continued registration of sodium chloride products in Canada, with updates to label directions and precautions to reflect the current labelling standards and to improve clarity (Appendix IV).

Health Canada received one comment during the public consultation. The comment did not result in revisions or changes to the proposed re-evaluation decision as described in PRVD2023-03. A reference list of information used as the basis for the proposed re-evaluation decision is included in PRVD2023-03.

### Re-evaluation decision for sodium chloride

Health Canada has completed the re-evaluation of sodium chloride. Under the authority of the *Pest Control Products Act*, Health Canada has determined that continued registration of products containing sodium chloride is acceptable. An evaluation of available scientific information found that the use of sodium chloride products meets current standards for protection of human health

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<sup>1</sup> "Decision statement" as required by subsection 28(5) of the *Pest Control Products Act*.

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

and the environment and have acceptable value when used according to revised conditions of registration which includes label amendments.

## **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 sodium chloride, are summarized below. Refer to Appendix IV for details.

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

#### **Human health**

- Addition of standard personal protective equipment to all commercial-class product labels;
- Addition of a best practice statements to avoid potential drift.

#### **Environment**

- Update the environmental precautionary, direction of use, and storage and disposal statements to current standard.
- Update a buffer zone table for clarity.

## **Implementation of the re-evaluation decision**

Regulatory Directive DIR2018-01, *Policy on Cancellations and Amendments Following Re-evaluation and Special Review* provides general timelines for implementation of post-market decisions. When an amendment to a registration is determined to be necessary, such as the need for additional risk mitigation measures, there will be an implementation period of up to two (2) years from the date of the decision to transition to selling and using the product with the newly amended labels, if risks during this period are considered acceptable. Potential risks (human health and the environment) from the use of products containing sodium chloride are considered acceptable during the implementation period under the current label use conditions. Therefore, the required label updates will be implemented within 24 months following the publication of the re-evaluation decision document.

## **Next steps**

To comply with this decision, the required amendments (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 sodium chloride 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 and Pest Management Section of the Canada.ca website (Public Engagement Portal - Public Engagement Portal Forms - Notice of Objection) or contact PMRA's Pest Management Information Service.

The relevant confidential test data on which the decision is based (as referenced in PRVD2023-03) 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 sodium chloride in Canada

**Table 1 Products containing sodium chloride requiring (label) amendments<sup>1</sup>**

Registration number	Class	Registrant	Product name	Formulation type	Active ingredient (%)
28235	T	Herbanatur Inc.	Sodium Chloride Technical	Soluble Granules	Sodium Chloride 99.86
29189	T	G.D.G. Environnement Ltée	Sel de qualité technique	Soluble Granules	Sodium Chloride 99.86
28236	C	Herbanatur Inc.	Adios Ambros Water Soluble Granule	Soluble Granules	Sodium Chloride 99.86
29190	C	G.D.G. Environnement Ltée	Ragweed Off	Soluble Granules	Sodium Chloride 99.86
30940	C	Herbanatur Inc.	A.D.I.O.S.	Soluble Granules	Sodium Chloride 99.86
30406	D	Herbanatur Inc.	Adios Ready to Use Weed Killer	Solution	Sodium Chloride 12
31491	D	Herbanatur Inc.	A.D.I.O.S. Weed Killer Concentrate	Solution	Sodium Chloride 26
34305	D	Herbanatur Inc.	A.D.I.O.S WSG Weed Killer	Soluble Granules	Sodium Chloride 99.86

<sup>1</sup>As of 11 March 2024, excluding discontinued products or products with a submission for discontinuation  
T = Technical Grade Active Ingredient, C = Commercial, D = Domestic

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**Appendix II List of commenters to PRVD2023-03**

List of commenters' affiliations for comments submitted in response to PRVD2023-03

<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 sodium chloride proposed re-evaluation decision. Commenter's affiliation is 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 health and environment assessment

#### 1.1 Comment

A general comment was received from the public related to the health and environment assessment of sodium chloride; specifically concerns for the requirement of animal testing, and the effects of oversalting from herbicide products containing sodium chloride on wetlands and fish, and non-target organisms.

#### Health Canada response

With respect to animal testing, Health Canada requires information on the potential toxic effects of pesticides to protect human health and the environment from potential risks. Toxicity information typically includes, in part, animal testing data generated by pesticide manufacturers. These studies are conducted according to international testing protocols, which includes requirements to ensure protection of the welfare of laboratory animals. However, for the re-evaluation of sodium chloride, Health Canada neither received nor requested additional animal studies.

While animal toxicity testing currently plays a critical role in assessing human health and environmental risks from exposure to pesticides, Health Canada supports the reduction of unnecessary animal testing where scientifically justified. To this end, Health Canada does consider requests from pesticide manufacturers to waive requirements for animal studies or to consider validated non-animal alternatives in hazard assessment whenever possible, provided that the same level of protection of human health or the environment is maintained. For example, Health Canada issued Guidance for Waiving or Bridging of Mammalian Acute Toxicity Tests for Pesticides in 2013.

Health Canada is also an active participant in various international activities aimed at reducing animal testing while ensuring the protection of human health and the environment. Continued participation in these activities is important to encourage adoption of alternative approaches to animal testing.

Regarding concerns for the effects of herbicide products containing sodium chloride on wetlands and fish, Health Canada conducts environmental risk assessments for new pesticides as well as for the re-evaluation of pesticides that have been on the market for at least 15 years. The potential for exposure and toxicity to non-target organisms is considered for protecting nontarget plants and animals in the environment. Risks to aquatic habitats and the organisms that inhabit them were assessed based on the conditions of use of these herbicides and publicly available toxicity information. Buffer zones were required for certain commercial products to mitigate potential risks to aquatic habitats. Other label statements inform users of the potential for toxicity to aquatic organisms, terrestrial plants, birds and small wild mammals, and precautions for

reducing the potential for runoff of sodium chloride to aquatic habitats. Thus, as a result of the available information and the mitigative label statements, the potential risks to aquatic non-target organisms are considered to be acceptable for pesticidal uses of sodium chloride.

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## Appendix IV Label amendments for products containing sodium chloride

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

### For all products:

- I. On the principal display, remove “Guarantee” and replace with “Active Ingredient”.

### For commercial class products:

- I. Under PRECAUTIONS, add the following statements:

“Wear a long-sleeved shirt, long pants, chemical-resistant gloves, socks and shoes during mixing, loading, application, clean-up and repair. Gloves are not required during application within a closed cab.”

“Apply only when the potential for drift to non-target areas of human habitation and human activity is minimal. Take into consideration wind speed, wind direction, temperature inversions, application equipment, and sprayer settings.”

- II. Replace “ENVIRONMENTAL HAZARDS” with “ENVIRONMENTAL PRECAUTIONS”

- III. Under ENVIRONMENTAL PRECAUTIONS, add the following statements:

“To reduce runoff from treated areas into aquatic habitats avoid application to areas with a moderate to steep slope, compacted soil, or clay.”

“Avoid application when heavy rain is forecast.”

“TOXIC to aquatic organisms and non-target terrestrial plants.”

“TOXIC to birds and small wild animals.”

- IV. Under DIRECTIONS FOR USE, add the following statement:

“DO NOT contaminate irrigation or drinking water supplies or aquatic habitats by cleaning of equipment or disposal of wastes.

And replace the following statement:

“DO NOT apply using aerial application equipment.”

With

“DO NOT apply by air.”

V. For Registration Number 29190, under Buffer zones:

Remove the following statement:

“For application to rights-of-way, buffer zones for protection of sensitive terrestrial habitats are not require; however, the best available application strategies which minimize off-site drift, including meteorological conditions (e.g., wind direction, low wind speed) and spray equipment (e.g., coarse droplet sizes, minimizing height above canopy), should be used. Applicators must, however, observe the specified buffer zones for protection of sensitive aquatic habitats.”

Replace the current buffer zone table with the table below:

Method of application	Buffer zones (meters) required for the protection of:				
	Freshwater habitat of depths:		Estuarine/Marine habitats of depths:		Terrestrial habitat
	Less than 1 m	Greater than 1 m	Less than 1 m	Greater than 1 m	
Field sprayer	1	0	1	0	1

Remove the following statement:

“\*Buffer zones for the protection of terrestrial habitats are not required for use on rights-of-way including roadsides, highways and pathways.”

**For domestic class products:**

I. Under the PRECAUTIONS section, add the following statements:

“Do not apply this product in a way that will contact other people/domestic pets, either directly or through drift.”

II. Replace “ENVIRONMENTAL HAZARDS” with “ENVIRONMENTAL PRECAUTIONS”

III. Under ENVIRONMENTAL PRECAUTIONS, add the following statements:

“TOXIC to aquatic organisms and non-target terrestrial plants.”

“TOXIC to birds and small wild animals.”

“To reduce runoff from treated areas into aquatic habitats avoid application to areas with a moderate to steep slope, compacted soil, or clay.”

“Avoid application when heavy rain is forecast.”

IV. Under DIRECTIONS FOR USE, add the following statements:

“DO NOT contaminate irrigation or drinking water supplies or aquatic habitats by cleaning of equipment or disposal of wastes.”

“DO NOT apply to any body of water.”

V. Under STORAGE, add the following statement:

“Store this product away from food or feed.”