



NAFTA Technical Working Group on Pesticides  
Grupo de Trabajo Técnico del TLCAN sobre plaguicidas  
Groupe de travail technique de l'ALENA sur les pesticides

# Panel Discussion: Common Pitfalls in Submissions

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Marriott Crystal Gateway

Arlington, VA

# Labelling Issues

- ◆ Standard statements not followed as per Registration Handbook and/or Guidelines (microbials), e.g., disposal for TGAI, MP, EP
- ◆ Always require “POTENTIAL SENSITIZER” and “CAUTION - EYE IRRITANT” (if no eye irritation study submitted) on principal display panel (microbials)



# Labelling Issues

- ◆ Include date of manufacture and expiry statement (microbials) on principal display panel
- ◆ Product name and guarantee on label does not match PSF (TGAI and EPs)
- ◆ Strain designation not included in Guarantee line of TGAI, EP labels (microbials)



# Product Specification Form (PSF) Issues

- ◆ Each ingredient must be listed on % w/w basis
- ◆ Nominal concentrations for each ingredient preferred (with upper and lower limits)
- ◆ All ingredients must total 100%
- ◆ Include CAS#s for formulants
- ◆ Print legibly if not submitting electronic form



# Data Issues

- ◆ Rationales for data omission (waiver requests) missing or not based on sound scientific reasoning
- ◆ Waivers not supported by literature on related species/strains/isolates or results of literature search (key search words, data bases), if no papers published
- ◆ Papers not accompanied by a critical review demonstrating how each addresses underlying concern behind requirement



# Data Issues

- ◆ QA/QC data lacking for microbial products, including 5 batch analysis for microbial contaminants; must demonstrate absence of primary pathogens
- ◆ No/inadequate storage stability studies for microbial products to support storage claims (temperature range and shelf life) on EP label
- ◆ MSDSs or manufacturer's specifications (plus tech. info.) on formulants (e.g., emulsifiers, stabilizers, preservatives) missing



# Data Issues

- ◆ Test substance not clearly identified in study report
- ◆ Inappropriate test material (PAI, TGAI, EP) and test concentrations selected
- ◆ Not enough raw data to allow for independent analysis
- ◆ No request for pre-submission consultation to identify product-specific data requirements

