



As the Registrant, Canadian distributor and applicator of FUMITOXIN Aluminum phosphide fumigants, SELLEN GRAIN SERVICE LTD would like to bring to your attention, as stakeholders, the recent developments in the re registration process by Health Canada/PMRA for all Aluminum/Magnesium Phosphide and Phosphine Gas products sold/used in Canada

***Fumitoxin***

These decisions will directly affect your operations in the future and for a **very short time YOU can have an input into the decisions made.** We are asking that as stakeholders you write letters of objection to the PMRA concerning their decisions and how those decisions will negatively affect your business operations.

Health Canada's decision document on the use of fumigants that contain aluminum phosphide, magnesium phosphide or phosphine gas was released on August 27, 2015. PMRA has given only 60 days for stakeholders to file any notice of objection regarding this decision

*Any person may file a notice of objection regarding this decision within 60 days from the date of publication of this document. For more information regarding the basis for objecting (which must be based on scientific grounds), please refer to the Pesticides and Pest Management portion of Health Canada's website, Request a Reconsideration of Decision, or contact the PMRA's Pest Management Information Service.*

The Canadian Pest Management Association (CPMA), with whom we are members, are the only national trade group for professional pest management companies.



On September 18th, CPMA wrote to Dr. Richard Aucoin, the Executive Director of Health Canada's Pest Management Regulatory Agency (PMRA), requesting both an extension of 120 days to submit comments/objections and a formal consultation period for key stakeholders on the Aluminum/Magnesium Phosphide and Phosphine Gas Re-evaluation Decision (RVD2015-03).

Some of the comments made by the CPMA have been used in this document.

This extension **May Not** be granted.

The label changes proposed in the Re-evaluation Decision would drastically impact fumigation services, in many cases making them **impossible to perform**, which would result in severe impacts on agriculture, food safety, public health, and international trade.

Quoting the PMRA's release:

"Health Canada's Pest Management Regulatory Agency (PMRA) has published a re-evaluation decision document on August 27, 2015 relating to the use of fumigants containing either aluminum phosphide, magnesium phosphide or phosphine gas. New use restrictions and mitigation measures are required to be implemented in order to reduce the risk of exposure to humans (workers and bystanders) when using these fumigants. Key mitigation measures include additional safety information, such as revised use restrictions, and new buffer zone requirements as outlined below:

- A minimum buffer zone of 200 metres must be established for difficult-to-evacuate sites. These sites include schools, daycare centres, nursing homes, assisted living facilities, hospitals, in-patient clinics, and prisons.
- To further protect workers and bystanders, a minimum buffer zone of 50 metres must be established for fumigated sites.
- With respect to rodent burrow treatment on farms, this means 50 metres from buildings that are or may be occupied by humans, and/or domestic animals, and that are under the control of the owner/operator of the application site; otherwise a 500 metre restriction is applicable.
- This minimum buffer zone of 50 metres is not required for ships and railcars that are in motion (in other words, moving in transit). However, this minimum buffer zone must be established for stationary ships in Canadian waters, ports and harbours, as well as for fumigated railcars while located at rail terminals and for any prolonged stops en route. New label mitigation measures are required specifying that railway vehicles containing treated commodities must be placed as far as possible from occupied train compartments, in order to minimize exposure to crew during in-transit fumigations.
- Once a buffer zone has been established, applicators must continually monitor hydrogen phosphide (phosphine) gas levels at several locations along the buffer zone perimeter. If hydrogen phosphide gas concentrations approach the limit restriction of 0.1 ppm, the applicator must take appropriate action such as extending the size of the buffer zone.

As a requirement for continued registration and use of these fumigants, the new and revised risk mitigation measures appearing in the decision document should be implemented as soon as possible, but no later than **30 June 2016**.

Starting **1 July 2016**, all products sold will bear a new label and include a new Applicator's Manual which reflects the new mitigation measures as well as a several other label improvements.

The full document is available on Health Canada's website:

[http://www.hc-sc.gc.ca/cps-spc/pubs/pest/\\_decisions/rvd2015-03/index-eng.php](http://www.hc-sc.gc.ca/cps-spc/pubs/pest/_decisions/rvd2015-03/index-eng.php)

The proposal imposes unrealistic and, in many instances, impossible restrictions on the use of the product. Not only would the cost of fumigating a structure or commodity increase dramatically, the proposal language is unclear and would leave inadequate guidance to pest management professionals.

For example:

1. How would an applicator determine whether there is a "difficult-to-evacuate" site within 200 metres?
2. Would it be the responsibility of an applicator to notify all parties within a 100 or 400 square metre buffer zone?
3. Who would require notification in an apartment/condominium, office building or retail establishment?
4. If the occupants refused to evacuate, would that prevent a fumigation?
5. How would an applicator Policy the buffer zone?
6. What steps would an applicator take to prevent entry to a treated application site/buffer zone?
7. What is the meaning of "continually monitor" at several locations along the buffer zone?

Few decisions made by PMRA have the potential for as profound an impact on PMPs, farmers, shippers, grain elevators, anyone involved in the importation and exportation of raw commodities, food processors and others as does the final language of this proposal.

The proposed mitigation will make it **impossible, or extremely difficult**, to ever use the product. In the least, the cost of fumigating a structure or commodity would increase dramatically.

Equally troubling is the confusion surrounding key restrictions and new buffer requirements.

These restrictions and requirements could eliminate almost all uses of phosphine fumigation and, in our opinion, stop the flow of grain throughout Canada and the world.

If you disagree with the decisions of Health Canada/PMRA with respect to the re registration of Aluminum/Magnesium Phosphide and Phosphine Gas products, please write the PMRA as soon as possible.

Thank You,



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