



North American Free Trade Agreement  
Technical Working Group on Pesticides

# Five-Year Strategy

2008–2013



*Maintaining  
Progress*

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# Strategic Plan Framework

## Mission

The NAFTA TWG serves as a focal point for addressing pesticide issues arising in the context of liberalized trade among the NAFTA countries, while recognizing the environmental, ecological and human health objectives of NAFTA.

## Goal

Create an aligned North American registration system for pesticides and products treated with pesticides and make work sharing a way of doing business.

## Strategic Objectives and Priority Work Areas

**Objective 1: Provide the United States (U.S.), Canadian and Mexican growers and other pesticide users with equal access to and same time introduction of pest management tools, including safer alternatives.**

- Addressing the technology gap through joint reviews and work sharing
- Encourage industry's development and use of NAFTA labels

**Objective 2: Work cooperatively on the re-evaluation/registration review of older pesticides using each country's re-evaluation program to the fullest to increase efficiency.**

- Coordination of registration review/re-evaluation work
- Trade irritant resolution
- Transition strategies

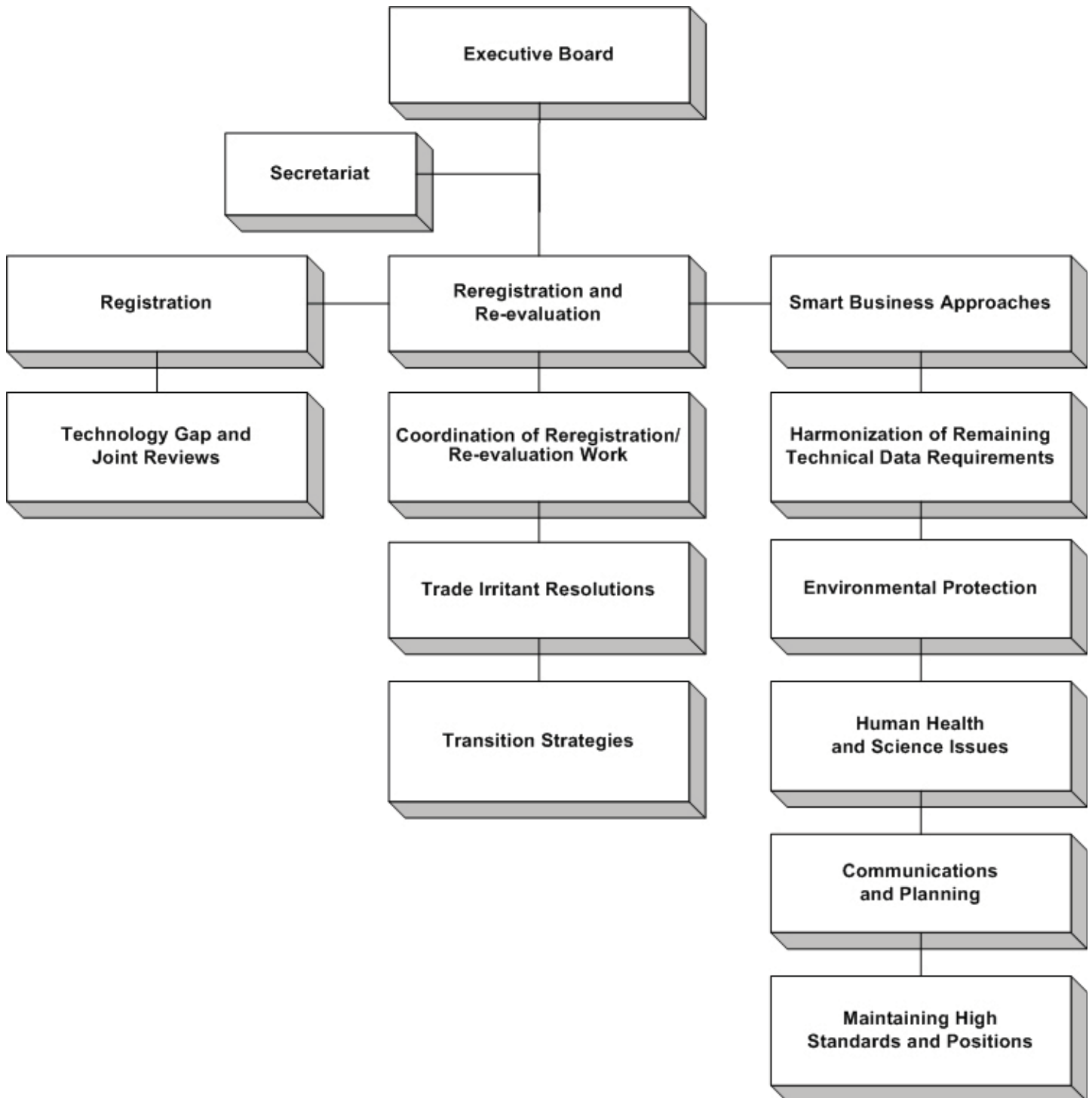
**Objective 3: Integrate smart business approaches and practices into NAFTA TWG work**

- Harmonization of remaining technical data requirements
- Environmental protection
- Human safety and science issues
- Effective communication and planning
- Maintaining high international standards

## Guiding Principles

- Continue to make human health, safety and the environment our priority
- Engage and communicate with stakeholders
- Promote risk-reduction strategies, including registration of the appropriate pesticides and their adoption by users
- Develop innovative ways to reduce trade irritants
- Create efficiencies

## Strategic Objectives and Work Areas



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## Message from the Executive Board

For more than 10 years, the North American Free Trade Agreement's Technical Working Group on Pesticides (NAFTA TWG) has been the primary forum for discussions involving pesticide regulatory cooperation between the United States, Canada and Mexico. Continuous discussion and cooperation has resulted in measurable success in aligning pesticide regulation in North America while maintaining high standards of protection for human health, safety and the environment.

This document presents the NAFTA TWG's proposed strategic framework for the next five years, outlining the objectives of the TWG, specific work areas we will focus on to meet those objectives and indicators to measure our success.

This strategic plan was first published as a proposal for stakeholder comment July 23, 2008. Comments were received from representatives of pesticide users complimenting the TWG on the progress to date, but often encouraging more emphasis on non-agricultural areas such as control of invasive/exotic pests in ornamentals and forests, antimicrobials and domestic products.

Several comments were also received in support of NAFTA labels, which greatly facilitate the cross boarder movement of pesticides. The TWG will continue to encourage industry to develop and use NAFTA labels. The Executive Board appreciates the positive comments received from the stakeholders in response to the proposed strategic plan and looks forward to working with stakeholders as we tackle the challenges of the next five years.



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# Section 1 – Introduction

## 1.1 Purpose and Scope

This document represents the North American Free Trade Agreement (NAFTA) Technical Working Group (TWG) on Pesticides' strategy that will guide its future work and direction for the next five years. It reflects our collective goal of creating an aligned North American registration system for pesticides and for products treated with pesticides as well as our commitments to the partners we work with.

The sections that follow discuss in detail our vision, goal, strategic objectives and related work areas for the TWG, each developed with input and advice from our partners. These are pragmatic, results-oriented steps we and our partners will use over the next five years to move us toward our vision. Our success will be measured against these steps. The strategy also analyzes the operating environment of the TWG to provide accurate, credible and useful information that may influence its strategic directions. All these steps reflect the TWG's cumulative experience and the lessons learned over the years to identify efficient and strategic ways to address major policy issues related to pesticide regulation in North America.

In 2003, the TWG published its second five-year strategy, setting out an ambitious program and providing a solid foundation for its work. This new strategy builds upon earlier strategies describing existing initiatives to be continued and new ones the TWG will undertake to facilitate simultaneous access to pesticide products in Mexico, Canada and the United States.

A major requirement is for the TWG to evaluate its performance continually to ensure the successful implementation of this strategy. To that effect, we have identified specific indicators and measures of success to document our accomplishments. These measures will also help gauge how effectively our activities are addressing the needs of our partners.

## 1.2 Background and Context

Before new pesticides are registered and made available for use, governments conduct stringent assessments to ensure they meet high human health, safety and environmental standards. These assessments require complex science, detailed testing and extensive data.

To ensure that the potential risks of those products remain acceptable as standards evolve, products are re-evaluated on a cyclical basis taking the most recent data and evaluation methods into account. In the past, countries evaluated and registered pesticides individually. These processes were seen to be resource-intensive and duplicative, particularly given the integrated nature of the North American market. At the same time, the differing regulatory

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structures between countries gave rise to different requirements for pesticide registration, substantially increasing cost to industry.

Thus, in 1997, the NAFTA TWG on Pesticides was established under the NAFTA provisions on Sanitary and Phytosanitary Measures to implement a core function of the North American Free Trade Agreement signed in 1994—to serve as a focal point for addressing pesticide issues arising in the context of liberalized trade among the NAFTA countries.<sup>1</sup> In fact, NAFTA ushered in a new level of cooperation among the governments of Canada, Mexico and the United States. The agreement highlights the importance of promoting trade and regional cooperation among governments, and established various mechanisms to collaborate on issues of key importance.

Since its creation, the TWG has maintained a primary focus on facilitating cost-effective pesticide regulation among the three countries through collaboration and work sharing, while achieving the environmental, ecological and human health objectives of NAFTA.<sup>2</sup> Cooperation has also covered a wide range of activities, such as sharing information, undertaking collaborative scientific work, forging common data requirements, collaborating on risk assessments, compliance methods, joint reviews and common NAFTA or international standards.

### 1.3 Strategies and Means

The responsibility for ensuring that pesticides do not pose concern for human health and the environment is shared by many—governments, pesticide manufacturing companies, distributors, pest control operators, growers, workers, public interest groups, and the general public. The TWG takes a holistic approach to pesticide management to create a high standard of excellence.

Health Canada’s Pest Management Regulatory Agency (PMRA), the United States Environmental Protection Agency’s (EPA) Office of Pesticide Programs (OPP), and Mexico’s Secretaría de Agricultura, Ganadería, Desarrollo Rural, Pesca y Alimentación (SAGARPA)<sup>3</sup> and Secretaría de Salud,<sup>4</sup> are the key agencies participating in the NAFTA TWG activities. The heads of the first three agencies constitute the TWG’s Executive Board, responsible for providing the overall leadership and direction of this collaborative engagement. Representatives of PMRA, OPP, and SAGARPA also constitute the TWG Secretariat, responsible for overall coordination and management of the TWG program. The TWG conducts its activities through a series of project

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1 NAFTA TWG Terms of Reference, dated June 1997.

2 NAFTA Chapter Seven, Subchapter B: “...for the protection of human, animal or plant life or health in its territory, including a measure more stringent than an international standard, guideline, or recommendation”.

3 Ministry of Agriculture, Livestock, Rural Development, Fish and Food.

4 Ministry of Health

Maintaining open, effective and timely communication with our stakeholders has been an important objective in the day-to-day management of our operations.



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teams that are aligned with strategic objectives. The lead agencies build strategic working relationships with other federal departments and agencies<sup>5</sup> to broaden and leverage their institutional experience and, in turn, to improve services offered to the public in North America.

Grower groups and the pesticide industry play a vital role in the TWG's process, supporting projects and providing relevant data and information. Public interest groups also participate by commenting on proposed policies.

The NAFTA TWG holds two meetings a year. First, a government only meeting is held for the Executive Board and other regulatory officials. Then, a government-stakeholder meeting takes place with a broad number of participants—the Executive Board, regulatory officials, growers, industry and public interest groups. The public is consulted prior to the meetings and invited to identify key topics of interest. A meeting summary is published for the public to report on key outcomes of the meetings.

## Section 2 – Operating Environment

The environment within which the TWG operates is constantly changing. A number of drivers, both external and internal, are critical in influencing TWG's strategic directions. They define the work that the TWG must deliver to meet stakeholder needs and improve overall outcomes. The TWG aims to ensure it is well positioned to take advantage of opportunities, monitor trends and assess implications. Some important features of the TWG's external operating environment are summarized below.

### 2.1 Economic and Social Context

Pesticides are used all over the world to control an enormous variety of unwanted plants and pests. Over the past years, the demand for pesticides has increased although there is also an increase in crop protection via non-chemical means e.g. through seed technology.<sup>6</sup> While pesticides are recognized as an important component in meeting the increasing demand for food and in fighting insect-borne diseases, they could also create serious problems affecting human health and the environment if used inappropriately. Governments around the world are adopting a lifecycle management approach for these products. Differences in health and safety measures for pesticides can impact agricultural trade in world markets.

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5 Agriculture and Agri-Food Canada's Pest Management Centre, the United States Department of Agriculture's Interregional Research Project Number 4 (IR-4 Project) and Health Canada's Therapeutic Products Directorate are also members of the TWG.

6 World demand for pesticides is projected to increase 1.7 percent per year to US\$28.4 billion in 2009. Market Wire, June 2005.



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As a result of these and other concerns, people in diverse settings—from growers to urban dwellers, from business owners to school administrators who make decisions about controlling pests—are concerned about how pesticides are regulated. Consumers throughout North America want assurance their food supply is safe. They are demanding more information on food-related matters. They also want more recognition of their right to contribute to decisions concerning their health. Given these pressures, there is an increased trend towards reduced-risk pesticides.

## 2.2 Industry Trends

Even though consolidation within the chemical and, more particularly, the agrochemical industry may have slowed, we are witnessing more and more business agreements among companies in efforts to make significant gains in market share in the crop protection sector. Companies are also creating the critical mass to develop new products in both agricultural and non-agricultural sectors. Introducing these new products will require new and complex science and extensive data. The future trend is towards more generic manufacturers and significant competition for company resources.

## 2.3 Requirement to Satisfy Obligations

All three NAFTA partners have national legislation and policies designed to reduce the risk associated with pesticide use and satisfy obligations. In designing its programs and developing new strategies, the TWG must consider fora from around the world, including Codex Alimentarius, the Organisation for Economic Co-operation and Development and the World Trade Organisation. These organizations encourage such cooperation as a mechanism to promote health and environmental safety while facilitating trade.

## 2.4 Government-Wide Policy Context

The governments of Canada, United States and Mexico have set out a trilateral agenda to improve the quality of life of North American citizens through a commitment for enhancing prosperity under the Security and Prosperity Partnership. The goal is to enhance the competitive position of North American manufacturers and users by reducing trade barriers and making regulations compatible, while maintaining high health and safety standards.

In 2007, the leaders of the three NAFTA countries re-affirmed their governments' commitment to address the safety of food and products imported



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into North America while facilitating the significant trade in these products that our countries already have and without imposing unnecessary barriers to trade. The TWG's efforts must support and fit into this framework.

Over the last two years NAFTA governments have worked closely with major manufacturers in the context of OECD to develop global joint review and work-sharing programs. Over the next five years we anticipate this activity to grow substantially in a way that is consistent with the NAFTA vision.

## 2.5 Implications

To rise to these challenges and benefit from opportunities, the TWG will need stable, long-term approaches that reach across the life cycle of a pesticide, complement each other and are based on a set of clear guiding principles:

- continue to make human health, safety and the environment our priority; continually engage our partners and stakeholders in our decision-making process;
- promote risk-reduction strategies, registration of the appropriate pesticides and their adoption by users;
- develop innovative ways to reduce trade irritants; and
- create efficiencies.

### Did you Know?

Our joint review program has resulted in the registration of a significant number of new pesticide products in the United States and Canada. Since 2003, the TWG has completed at least 24 joint reviews and 8 workshare reviews. These include minor use label expansions of 6 chemicals and 1 maximum residue limit for an imported commodity.

## Section 3 – Where We Have Been— The Last Five Years

The last five years have been an exciting period during which the NAFTA TWG addressed a number of specific issues with the goal of creating a North American market for pesticides.<sup>7</sup> The focus of this work has been to develop short- and long-term measures to cost effective pesticide regulation across North America through collaboration and work sharing without compromising human health, environmental and safety standards.

We collaborated with industry, growers and other stakeholders to reduce a number of trade irritants and are encouraging simultaneous introduction of newer, safer products. We have improved working relationships among governments, increased worker protection education, enhanced adoption of integrated pest management and helped to ensure a safe and secure food supply for North America.

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<sup>7</sup> A complete description of TWG's achievements over the last 5 years is presented in the *NAFTA TWG Accomplishments Report*.

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Together, we have addressed key science policy issues affecting our work. We have developed North American zone maps to streamline and facilitate the development and exchange of residue data. A statistical methodology has been developed to facilitate the generation of maximum residue limits (MRLs) and tolerances for residues in food.

The NAFTA countries have initiated a North American planning and priority-setting process with industry, growers, grower representatives and pesticide distributors. This process will benchmark work sharing, identify priorities and implement strategies to facilitate cross-border movement of pesticide products, such as those bearing a NAFTA label.

In addition, we have aggressively pursued innovative strategies and approaches to address the technology gap that exists between the United States and Canada on pesticide registrations and to resolve differences in MRLs or tolerances.

Collectively, these activities, among many others, have begun to structure the North American market for pesticides. They have reduced duplication in data generation, improved access to the best scientific information and knowledge to support decision-making, and provided access to important new pesticides in a more efficient manner.

We are proud of these accomplishments, but we realize more work remains. The last five years have provided us with lessons learned to improve upon our future performance. This strategy will provide the necessary roadmap through which ongoing planning can occur.

## Section 4 – Where We Are Going— The Next Five Years

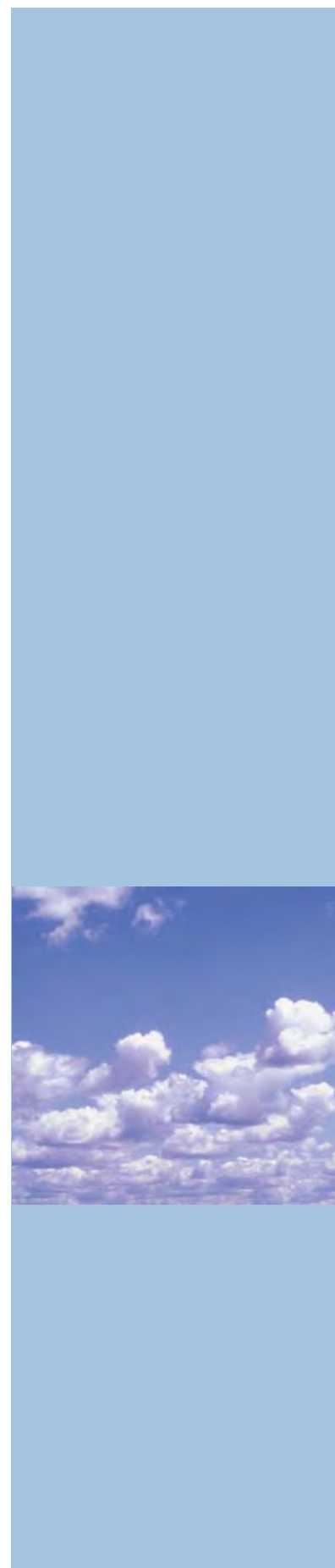
The past gives us experience and memories; the present gives us challenges and opportunities; the future gives us vision and hope.

—William Arthur Ward

### Vision

In 1998, the governments of North America formally articulated their vision:

A North American region as a world model for common approaches to pesticide regulation and free trade in pesticides and food, reinforced by a strong culture of work sharing among governments and stakeholders, consistent with the goals and intent of NAFTA.



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Outlined in *A North American Initiative for Pesticides: Operation of the NAFTA Technical Working Group on Pesticides*, this vision committed Canada, Mexico and the United States to working toward two goals over a five-year period.<sup>8</sup>

The three countries have revisited the vision and goals in light of the accomplishments over the past five years and current priorities. The three governments believe that the original vision remains critical and relevant in fulfilling the NAFTA mandate as they were in 1998.

## Goal

This strategy is designed to create an aligned North American registration system for pesticides and for products treated with pesticides and to continue to make work sharing a way of doing business.

## Strategic Objectives

To set a higher standard of performance in pursuit of this goal, we have decided to focus on three strategic objectives designed to propel the TWG into the future and ensure achievement of the goal. Achieving these objectives will require a concerted effort on the part of regulators, industry, growers, scientists, public interest groups and concerned citizens.

### Strategic Objective 1

**Provide U.S., Canadian and Mexican growers and other pesticide users with equal access to and same time introduction of pest management tools**

In keeping with our vision to develop a North American market for pesticides, we have developed our first strategic objective to focus on ensuring that pesticide users in any NAFTA country have equal access to new technologies. A true North American market for pesticides will allow growers and other pesticide users in all three countries to access the same new pesticides and pest control tools—including lower-risk alternatives—at the same time. This is essential for improving pest management and supporting sustainable environmental initiatives for agriculture and other sectors. For farmers and other users in one NAFTA country to fairly compete with their counterparts in the other two and to be able to trade their produce across national borders, they will need access to the same pesticides for the same uses. When a particular use is available in one country but not in another, there is a competitive disadvantage.

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<sup>8</sup> The NAFTA countries articulated a vision for the future—within five years, work sharing would be routine among them. This forward view has led to the development of the concept of a North American market for pesticides.

Through joint submissions and work sharing, including through OECD global joint reviews, countries will share the work of reviewing pesticides, thereby providing optimal and effective use of government and stakeholder resources. This will require industry to produce joint submissions to register new chemicals in all NAFTA countries. The overlap of work plans for use expansions will need to be increased.

## Work Area 1 – Technology Gap and Joint Reviews

### Issues

Many products are registered in the US, but not in Canada because of the small Canadian market size. It is important to have targeted registration programs to increase submissions to register products in Canada so that Canadian growers are not at a competitive disadvantage with their US counterparts. When this disadvantage occurs, a technology gap will exist because growers in one country will have access to a new pesticide but growers with similar pest control needs in the other countries will not have access to that pesticide that use is not registered. Over the past years, the gap has been widening, with more registrations being granted in the United States than in Canada.

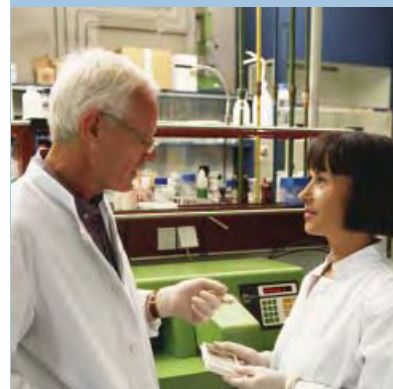
The TWG's various work-sharing arrangements<sup>9</sup> have proven vital in developing compatible review procedures for conventional pesticides and biopesticides, for exchanging scientific knowledge and for sharing regulatory work. The advances under these various efforts are helping to reduce the technology gap. **Joint reviews** of new data packages resulting in registration decisions made within the same general timeframe. For new pesticides or new registrations and new uses of existing pesticides which, **workshare reviews** (i.e. exchanged reviews for new registrations with staggered review and registration time frames) and **cooperative reviews of older pesticides** under re-registration or registration review in the U.S. or re-evaluation in Canada have been some of the most effective tools for avoiding potential disparities in MRLs/tolerances and improving available technologies. These work-sharing arrangements can improve the efficiency of the registration process, facilitate registrations as well as increase access to new and better pest management tools in participating countries.

Registrants play a critical role in this effort by making joint submissions and providing the necessary authorization to the governments to share these reviews. Where pest problems and cropping scenarios differ among the three countries, industry is encouraged to pursue registration and establishment of necessary import MRLs/tolerances in a coordinated fashion across North America. NAFTA partners will continue to encourage the registrants to make

<sup>9</sup> Work-sharing arrangements include joint reviews, workshare reviews, and cooperative reviews.

### Priority Work Area

- Technology gap and joint review



### Related Projects

- Joint review of reduced-risk chemicals, non-reduced-risk chemicals, microbials, pheromones and "other" biopesticides
- Minor use joint review procedures
- Development of regulatory processes for handling NAFTA labels and amendments on regular basis
- NAFTA label pilot project for hard surface disinfectants

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joint review submissions, particularly for biopesticides and non-agricultural pesticides (i.e, domestic/ consumer, ornamental, forestry, antimicrobial and biocide products). Such strategies will maximize opportunities to workshare, provide growers and other users with equal access to newer pest control tools and additional minor uses as well as assure growers the ability to export foods that comply with MRLs or tolerances in all three countries.

### **What we will do over the next five years**

Countries will compare work plans to look for areas of cooperation for new chemicals and for new uses of currently registered products. The EPA and PMRA will also share work plans for biopesticides and antimicrobials to identify new opportunities for cooperation. The workplan comparison activity will also take into consideration cooperation in the global context, including joint reviews and workshare reviews with partners outside the NAFTA region.

The PMRA and the EPA will use the work plan comparison exercise to discuss joint submission candidates. We will continue to encourage industry to make joint submissions when registering new active ingredients and new uses for Canada and the United States, and vigorously participate in the NAFTA joint submission and work sharing processes. Reduced-risk pesticides will continue to be a priority.

Mexico will continue to enhance its participation in work sharing to the extent feasible. To facilitate Mexico's participation, Canada and the United States will share data reviews with Mexican regulators and scientists and will seek opportunities for sharing pesticide regulatory knowledge and expertise with Mexico. These work sharing projects range from discipline-specific chemical assessments, to the development of new assessment methodologies, to the consideration of a joint review for re-evaluating/reregistering a chemical.

Growers and other groups must continue to identify differences in pesticide registrations and develop relevant data, particularly with respect to minor uses. NAFTA partners will continue to encourage registrants to develop and use NAFTA labels.

NAFTA labels facilitate movement of pesticide products across borders. The TWG will continue to support the development of NAFTA labels for agricultural and non-agricultural products. The first non-agricultural NAFTA label has been approved. The Non-Agricultural Working Group is also pursuing a NAFTA label for non-agricultural/antimicrobial consumer products, such as cleaning products, to minimize the number of trade barriers. The TWG has incorporated this area of work within its NAFTA label activities. The NAFTA Label Working Group on agricultural products has developed a labelling guidance document that could be useful to both sectors.

#### **Did You Know?**

To date, Canada and the United States have approved nine NAFTA labels which will allow free movement of these products across the Canada–United States border. Many other NAFTA label candidates are under discussion at this time. Grower groups across the country have hailed this as a significant accomplishment.

Industry must adopt a broader North American approach in developing and marketing pesticides throughout the region as well as in developing and submitting pesticide registration applications simultaneously in Canada and the United States to reduce trade barriers and provide pesticide users equal access to safer pesticide products. Industry must also continue to take a North American approach to its strategic planning efforts on product formulation, data development and registration submissions.

## Strategic Objective 2

**Work cooperatively on the Re-evaluation/Registration Review of older pesticides using each country’s re-evaluation program to the fullest to increase efficiency.**

A major challenge facing pesticide regulators is the commitment to reassess older pesticides currently on the market under re-evaluation or registration review. The type and amount of data required to demonstrate the safety of a pesticide have expanded considerably during the last two decades. Thus, those older pesticides still on the market that have not been subjected to today’s more scientifically rigorous standards must be re-evaluated. Reviewing these products and removing unsafe products from the market can play an important part in managing the risks associated with pesticides. Given the large number of pesticides on the market, re-evaluation/registration review is a formidable task.

## Work Area 1 – Coordination of Registration Review and Re-evaluation Work

### Issues

*The Food Quality Protection Act* requires the EPA to review existing pesticide registrations on a 15-year cycle. Canada’s new *Pest Control Products Act* also requires a similar cyclical review of older pesticides. Traditionally, joint reviews and work sharing activities under the NAFTA TWG have tended to focus on newer pest control products.

However, registration review and re-evaluation activities can also benefit from a similar approach. Further, reregistering and re-evaluating pesticides may result in changes in the uses and associated MRLs or tolerances of these pesticides. This could affect trade with NAFTA partners. As a result, it is important that the regulatory agencies work closely together to ensure the best possible information is used in making decisions and all groups are kept fully informed throughout the registration review/re-evaluation process.

### Approved NAFTA Labelled Products

Sprodex WP biological fungicide ( <i>Pseudozyma flocculosa</i> ), 2002 *
Simplicity Herbicide (Pyroxulam), January 2008
Reflex Liquid Herbicide (Fomesafen), October 2007
Gavel 75 DF Fungicide (Mancozeb, Zoxamide), May 2007
Asepticare Aerosol Disinfectant Virucide, March 2008 *
Avadex Microactiv Herbicide (Triallate), January 2007
Axial TBC (US)/Broadband Herbicide (CN) November 2008
Revus Fungicide
August 2008
Discover (US)/Horizon 60 NG Herbicide (CN) October 2008
* Includes non-agricultural uses

### Did You Know?

Canada and the U.S. have been working cooperatively to reassess the following pesticides:

- CCA
- Pentachlorophenol
- Creosote
- Clomazone
- Clofentezine

### Priority Work Areas

- Coordination of registration review and re-evaluation work
- Retrospective trade irritant resolution
- Transition strategies

### Working together...

We are committed to working with users to identify the most important MRL and technology gap differences and then with industry to remedy them in the most effective manner.

## What we will do over the next five years

Over the next five years, Canadian regulators will work with their U.S. counterparts in their next round of re-evaluation. We will map out recent and future registration review and re-evaluation work plans and, wherever possible, identify work linkages and benefits for those linkages. The two agencies will identify pilot candidates for work sharing and finalize a crosswalk to identify other candidates for joint work over the next five years. The objective is to develop mechanisms for reassessing MRLs and tolerances in Canada and the United States for active ingredients where re-evaluation is the appropriate tool, for adding uses to existing registrations, for sharing or reducing workload and for implementing NAFTA labels.

Further, the registration review/re-evaluation process may complement the mechanisms being identified to address the technology gap. Coordinating work on transition strategies for older active ingredients between the NAFTA partners will facilitate risk-reduction efforts. Coordination will also help ensure a smooth transition to safer alternatives in the North American market and that older pesticides meet high human health, safety and environmental standards.

## Work Area 2 – Trade Irritant Resolution

### Issues

Facilitating trade in a manner that is protective of human health and the environment is one of the key responsibilities of the TWG; thus this work area is critically important to the success of this five-year strategy. Over the years, the TWG has been collaborating with affected stakeholders to prevent and resolve trade irritants. Prospectively, some registrants have taken advantage of the TWG's joint review program to obtain product registrations and comparable MRLs in all three countries. The MRL calculator project and residue trial efficiencies will contribute to addressing the MRLs/tolerances issue.

Retrospectively, the TWG adopted an approach to resolving MRL-related trade irritants documented in the *Procedures for the Identification and Resolution of NAFTA Pesticide Trade Irritants (1988)*.

Stakeholder groups have cooperated in the completion of three commodity-based pilot projects for NAFTA trade crops: pulses, tomatoes and potatoes, and with the initiation of a fourth project on avocados that includes Mexican participation. To date, many of the MRLs and tolerance issues among the NAFTA countries have been resolved, and the NAFTA TWG will continue to work toward resolving remaining differences.

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## What we will do over the next five years

The U.S. and Mexico will complete the final commodity-specific pilot project on avocado.

Governments have now begun work with a number of interested commodity groups to help identify their major trade issues, and this work will continue. Our next objective is to initiate chemical-based projects for addressing MRL/tolerance differences and technology gap issues between the NAFTA countries. Growers and their associations will be involved in developing priority lists for active ingredient / use combinations and, with registrants, approach the regulatory agencies to address priority issues within existing programs.

We will encourage smaller working groups to be established, where feasible, to allow more focus to be given to priority issues. Resolution of MRL/tolerance issues is as important as harmonization of registration requirements, especially with older pesticides.

## Work Area 3 – Transition Strategies

### Issues

Through the re-evaluation/registration review process, a number of pesticide products that are identified as key uses in commodities could be lost. These key uses are commodity-pest combinations for which there are no alternative control products, there are not enough registered alternative control products to manage resistance or the available alternative control products are not economically viable. The loss of these key uses can be devastating to commodity groups due to losses in yield or quality of product. The TWG is initiating NAFTA transition strategies to ensure coordination and collaboration between Canada, Mexico and the United States in developing alternative pest control strategies and transition plans.

The PMRA and the EPA expect the efforts associated with these strategies will encourage transition to safer alternatives and reduce risks to North American farm workers, pesticide applicators and ecosystems. Canada, Mexico and the United States are committed to facilitating risk-reduction strategies and developing alternatives for key uses lost through the re-evaluation/registration review process. These projects can significantly contribute to world-wide availability of NAFTA trade crops and to their sustainable development.



### Related Projects

- Commodity based strategy for addressing trade irritants and risk reduction for pulse crops, potatoes and tomatoes.
- Development of Canadian and the U.S. priority MRL/tolerance issues and registration needs.





## What we will do over the next five years

Over the next five years, we will work to develop a framework for collaborative transition-strategy projects which include government, registrants and pesticide users. Based on a pilot strategy for azinphos-methyl, additional candidates for such projects will be identified. The objective is to coordinate and harmonize North American regulatory activities pertaining to phase-out decisions that affected the agricultural industry and move towards harmonizing lower risk pest management strategies.

Coordinating work between the NAFTA partners on transition strategies for older active ingredients will facilitate risk-reduction efforts and help ensure a smooth transition to safer alternatives in the North American market. The transitions to lower risk pest management strategies will take pesticide user concerns over economic, trade and regulatory barriers associated with adopting alternatives into consideration. Ensuring older pesticides meet modern human health, safety and environmental standards is essential in this work. In so doing, the project will complement other mechanisms addressing technology gap and will help provide a level playing field for trade of commodities in North America.

## Strategic Objective 3

### **Integrate smart business approaches and practices into NAFTA TWG work.**

Modern tools and practices for NAFTA TWG work can create efficiencies by lowering costs to businesses and governments. These practices will translate into net savings and a win-win situation for industry and for governments. Businesses can adopt one approach or platform across the NAFTA jurisdiction, and the number of country-specific requirements with which they must comply should decrease. Growers and other pesticide users can benefit from having improved and equal access to new pesticides and technology. Governments will see more efficiencies.

Over the last five years, regulators from Canada, Mexico and the United States have come together with growers, scientists, industry representatives, researchers and other concerned stakeholders in open meetings to set priorities, coordinate work projects, solve problems, address complex policy issues and gain an understanding of one another's concerns. As a result of these efforts, the governments of North America have been developing processes for sharing resources when reviewing pesticides, for streamlining registration procedures and for eliminating repetitive regulatory requirements across borders. Registrants and other stakeholders have supported these government efforts by working together on North American priorities for registrations, MRLs or tolerances, and other concerns. A growing North American outlook for free trade in food products and other goods compels this work to maintain a high level of health and environmental protection.

### **Priority Work Areas**

- Harmonization
- Environmental protection
- Human safety and science issues
- Effective communication and planning

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The TWG continues to encourage its stakeholders to organize themselves on a tri-national basis to identify and forward suggestions and priorities that are important to the North American region as a whole.

## Work Area 1 – Harmonization of Remaining Technical Data Requirements

### Issues

Over the past decade, the amount and complexity of data needed to support evaluations of pesticides has increased significantly due to increases in scientific knowledge. This has created added burdens not only for pesticide manufacturers but also for regulators as well.

Further work is needed to harmonize technical data requirements for antimicrobial and non-agricultural pesticide products. TWG members have been working closely on this issue. Work on antimicrobial products will proceed following the publication of the proposed data requirements (i.e. 40 CFR Part 158W) by the United States. Joint reviews, particularly, for non-agricultural uses will also help to identify data requirement differences amongst countries as the reviews progress.

Technical data requirements are mostly harmonized for food uses as well as for microbials and pheromones. The governments continue to consult and seek ways of maximizing consistency, including on the remaining issues in harmonizing protocols and among other domestic requirements. Harmonization of the technical data requirements and testing guidelines will save registrants time and money by eliminating duplicative studies.

### What we will do over the next five years

To achieve this objective, Canada, Mexico and the United States will continue to harmonize pesticide registration requirements, including remaining technical data requirements and risk assessment approaches. The TWG will encourage joint submissions for non-agricultural uses. Canada and the United States will accelerate the pace of new product registration and trade irritant resolution in each country. The NAFTA countries will complete harmonization work on remaining technical data requirements for submissions.

## Work Area 2 – Environmental Protection

The NAFTA TWG's harmonization goals include reducing needless duplication and getting safer products to market faster. Over the past years, the three countries have harmonized most of the regulatory requirements. The long-term objective is to resolve the remaining differences and increase

### Related Projects

- Harmonization and evaluation of antimicrobial pesticides
- Harmonization and evaluation of biochemical pesticides
- Harmonization approach for dermal absorption

### Related Projects

- Guidance for evaluating the acceptability of environmental fate studies conducted on foreign soils (soil cross-walk).
- Modeling pesticide transport to groundwater.
- Development of guidance for evaluating and calculating degradation kinetics in environmental media.

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uniformity. Harmonization has brought the agencies involved closer together, sharing data reviews and building solid working relationships between scientific staffs.

### **What we will do over the next five years**

Key to our strategy is strengthening public health and environmental standards as well as building a sustainable agricultural system across North America. Based on the experience gained, we will consider developing tools to help countries work more efficiently to make better use of the existing resources.

Criteria for identifying chemicals that should be the subject of targeted environmental monitoring to facilitate comparison of monitoring data across countries should be established. These could focus on the potential to persist or to bioaccumulate in the environment, or the level of toxicity.

Methodologies for conducting lifecycle assessments of pesticides should be considered. This could include promoting integrated policies across production, consumption and disposal consistent with the principles and approaches that will facilitate the adoption of integrated pest management.

## **Work Area 3 – Human Safety and Science Issues**

### **Issue**

This work area seeks to promote various efforts to ensure the safety of particularly vulnerable groups, such as children and agricultural workers, from pesticide-related health risks. These activities range from information sharing and comparative reviews to hands-on training. Building on recent activities, the TWG will also consider promoting prevention and sound management of pesticide wastes, including containers and obsolete stockpiles. A recent Canadian review on the use of uncertainty factors in risk assessment has resulted in reduced differences between Canada and the U.S., facilitating joint reviews. Other key science/regulatory policies and tools will be reviewed or developed and used consistently. These approaches will reduce duplicative efforts and minimize trade problems resulting from, for example, different MRLs or tolerances on agricultural commodities traded among the three countries as well as increase efficiency for government and industry.

### **What we will do over the next five years**

#### **Addressing Children's Health**

To ensure that Canada, Mexico and the United States are effectively coordinating their activities related to protecting children from any potential effects of pesticides, we will work closely with the North American Commission on Environmental Cooperation to share information on basic principles and methodologies for conducting risk assessments with a focus on children's health. The objective is to assure a common understanding



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of terms and concepts across the three countries and across environmental and health sectors so that relevant epidemiological, exposure and other data are considered in pesticide evaluations, thus improving children's health protection across the continent.

### **Protecting Agricultural Workers**

Canada and the United States have developed worker safety programs for protecting agricultural workers from the potential risks pesticides pose. Building on current state and local infrastructure, Mexico has launched a pilot national pesticide safety training program that will benefit the common North American agricultural workforce.

Over the next five years, Canada and the United States will continue to build on the success of the train the-trainer program. We will also explore how an integrated pesticide worker safety program, comparable throughout North America, can be implemented to address health and safety concerns for agricultural labourers (field workers, pesticide handlers, pesticide applicators and others in treated fields) and their families. In addition, we will explore adapting these training programs to serve the needs of professional applicators working in urban areas. Canada and the United States will also work on exchanging information related to their urban applicator programs.

### **Developing Scientific Tools**

Based on the experience gained from our past work, we will consider developing tools to help countries to work more efficiently and make better use of the existing resources. These could include:

- development of a range of “easy-to-use” risk indicators, in particular ways to combine information on hazard and exposure that provide indications/ trends of relative risk over time for individual pesticides or total pesticide use nation wide
- dietary exposure assessment methodologies
- residue trial efficiencies

## **Work Area 4 – Effective Communication and Planning**

Our stakeholders are partners in everything the NAFTA TWG does—from contributing to environmental protection, sustainable agricultural practices, integrated pest management and risk-reduction strategies—by knowing what alternative pesticide products to use in managing pests.

### **Related Projects**

- Expansion, development and harmonization of crop groups with specified representative crops for field crop residues studies
- Residue trial efficiencies
- Crop groupings



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Consultation and citizen engagement are the main tools by which the TWG builds dialogue with interested parties. In the coming years, the NAFTA TWG will develop and implement a strategy that will coordinate and harmonize the consultation efforts undertaken by the TWG. The consultation strategy will encompass a cross-section of stakeholders, disciplines and objectives.

### **What we will do over the next five years**

In the next five years, we will continue to provide useful and timely information that helps our partners contribute to strengthening human health and environmental protection standards. We will also explore opportunities and innovative approaches to partnerships with other governments, pesticide users, industry and public interest groups to advance common communication goals.

We remain fully committed to being open about our scientific processes, our programs and activities, our policies and the decision-making behind them.

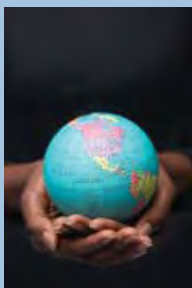
We will continue to consult on major decisions that impact the health of our citizens. We will also continue to publish materials about our decisions, meeting reports, directions and plans, and maintain up-to-date information on the websites of the agencies involved in the NAFTA TWG.

## **Work Area 5 – Maintaining High International Standards**

Within North America, the governments of Canada, the United States and Mexico are working together under the NAFTA TWG to ensure a collaborative approach to pesticide regulation within its territory. However, pesticide regulation has become a global activity, and governments are working together to address associated science and policy issues. Standards, registration reviews and regulatory approaches are being aligned around the globe through treaties and global agreements.

The Organisation for Economic Co-operation and Development Pesticide Programme, under the OECD Environment health and Safety Programme, provides a setting where governments can compare policy experiences, seek answers to common problems, identify good practice and coordinate domestic and international policies.

We are working closely with OECD countries on science policy issues and now have an extensive joint review/work sharing program underway for new pesticides.



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The United Nations Globally Harmonized System of Classification and Labelling of Chemicals is a single, harmonized system that classifies chemicals according to their hazards/risks and communicates related information through labels and safety data sheets. The system is designed to enhance protection of human health and the environment as well as facilitate international trade in chemicals whose hazards have been properly assessed and identified on an international basis.

### **What we will do over the next five years**

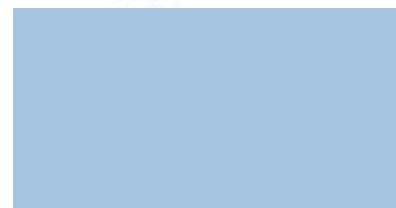
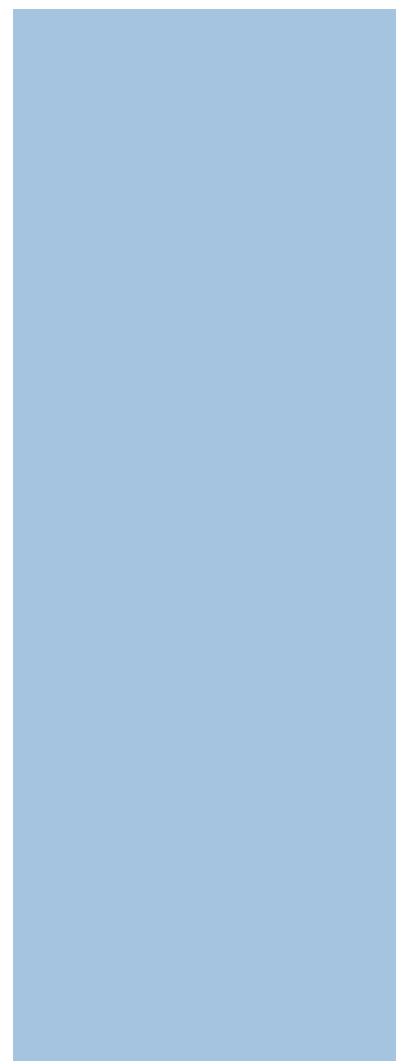
We will work with our counterparts at the OECD and present North American interests at that forum. Building on the NAFTA soil and ecoregion crosswalk projects, we will propose similar projects within the OECD. We will also continue to monitor and promote the use of the fast track procedure and decision-making criteria to ensure continued efficient establishment of Codex MRLs, encourage registrants to submit requests for Codex MRLs—particularly for the newer, reduced-risk chemistries—and to promote support for crop groupings. We will work in a global context, continuing to encourage and facilitate the simultaneous global introduction of new chemicals and biopesticides.

We will continue to develop implementation methods for the Globally Harmonized System. Information will be exchanged with Mexico about its national regulation for implementing the Globally Harmonized System in Mexico.

## **Section 5 – Performance Measurement and Evaluation**

Our planning process will be incomplete unless we tie it to how well we are doing. Performance evaluation allows us to identify our results. This will be done through monitoring our work to verify if we are achieving the objectives of our projects. The TWG has developed some practical and meaningful ways to measure and communicate the success of its work. These are outcome-based, result-oriented performance measures that reflect our strategic priorities.

The NAFTA countries are working cooperatively on reviewing submissions for new pesticides and uses and re-evaluating currently registered pesticides. This cooperation includes work on all pesticide types (conventionals, biopesticides, and antimicrobials) and uses. The countries have identified three categories for this cooperation, as defined below.



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### **Joint Reviews**

Joint reviews are completed reviews of new data packages submitted at the same time where the workload is split and reviews are exchanged/peer reviewed. This includes new active ingredients and second entry reviews, which include new uses (minor and major) and new sources of active ingredients of currently registered pesticides. The goal is to reach harmonized registration decisions within the same general timeframe.

### **Work-Share Reviews**

This category is similar to joint reviews except that new data packages are submitted at different times to two or more countries and the reviews are shared as they become available. The goal is to reach harmonized registration decisions, but possibly following different timeframes.

### **Cooperative Reviews**

This category is limited to reassessments of currently registered pesticides. It includes completed reviews of data supporting existing older pesticides within the same general timeframe, where the workload is split between two or more countries and reviews are exchanged/peer reviews. The goal is to reach harmonized registration decisions for older active ingredients using modern data and evaluation methods within the same general timeframe.

## NAFTA TWG Performance Measures

Strategic Objectives	Desired Outcomes	Suggested Indicators
1) Provide U.S., Canadian and Mexican growers and other pesticide users with equal access to and same time introduction of pest management tools	Access to new pesticide solutions and better access to pesticide tools provided through regular use of work-sharing initiatives	Number of new registrations following joint reviews and workshare reviews  Number of minor uses added.  Number of MRLs/tolerances set through joint reviews or workshare reviews
	Availability of reduced-risk products across the NAFTA region  Overall pesticide risks to the citizens of North America are reduced as potential hazards are identified, assessed and managed	Number of reduced-risk pesticides registered following joint and workshare reviews
	NAFTA labels	Number of NAFTA labels approved
	2) Work Cooperatively on the Re-evaluation/ Registration Review of older pesticides using each country's re-evaluation program to the fullest to increase efficiency	Regular work sharing in re-evaluation
	Trade barriers of treated commodities reduced	Number of MRL/tolerance differences addressed
	Overall pesticide risks to the citizens of North America are reduced as potential hazards are identified, assessed and managed	Number of older products assessed as meeting modern human health and environmental safety standards  Number of risk-reduction strategies (e.g. worker safety program, commodity/active ingredient based transition strategies, programs for adoption of biopesticides, etc.)
	Transition strategies employed when appropriate	Number of alternatives for older active ingredients available on the North American market

Strategic Objectives	Desired Outcomes	Suggested Indicators
3) Integrate smart business approaches and practices into NAFTA TWG Work	Improved environmental and human health-risk assessments leading to better decision-making	Number of data requirements harmonized Number of new tools and methodologies developed Number of risk assessment methods harmonized
	Public and stakeholder confidence in TWG activities is maintained through easy access to reliable information concerning TWG programs, policies and decisions	Information on TWG activities and accomplishments provided to public and stakeholders via different mechanisms (e.g. website, progress and accomplishments reports, meetings, etc.) Number of opportunities for public and /or stakeholders to provide input and comment to TWG
	Strong representation for North Americans at international forums	Number of NAFTA TWG projects advanced at the OECD

## Section 6 – Moving Forward

Progress is impossible without change, and those who cannot change their minds cannot change anything.

—George Bernard Shaw

As we maintain our commitment to the priorities outlined in this strategy, we must provide a continuous process to ensure that our vision, mission, goal and strategic objectives are successfully achieved and our values direct the way we conduct business. This means we will have to be more proactive and manage workloads and expectations. We will work with all stakeholders to support and encourage involvement in health and environmental protection.

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We will also ensure the elements within this document are fully supported and integrated throughout all segments of our work. All stakeholders must see themselves in and play an active role in it.

This five-year strategy is a working blueprint that lays the management foundation for growth and change within the NAFTA TWG.

Our partners are equally committed to success. They are strong in their desire to improve health and environmental outcomes for the people they serve. That is why we incorporated their ideas into the development of this strategy. Our shared mission is clear. Together, we will move forward to achieving full worksharing and a North American market for pesticides during the next five years.

We look forward to working together with you, our stakeholders, to make this a reality in the near future.

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## List of Acronyms

CFR	Code of Federal Regulations (United States)
EPA	Environmental Protection Agency (United States)
MRL	maximum residue limit
NAFTA	North American Free Trade Agreement
OECD	Organisation for Economic Co-operation and Development
PMRA	Pest Management Regulatory Agency (Canada)
SAGARPA	Secretaría de Agricultura, Ganadería, Desarrollo Rural, Pesca y Alimentación
TWG	Technical Working Group on Pesticides
U.S.	United States