Health Canada Santé Canada

Canada

Pest Management Regulatory Agency

Notification/ Non-notification

PMRA Guidance Document

Protecting the health and environment of Canadians

Protéger la santé des Canadiens et l'environnement

18 September 2023
Également disponible en français sous le titre :
Modifications de l'homologation nécessitant ou non l'envoi d'un avis

This document is published by the Health Canada Pest Management Regulatory Agency.
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Document history (revision/update)

Updated	Update/Rationale:
September 2023	Updated to current formatting guidelines. This guidance document supersedes Regulatory Directive DIR2016-02, Notification/Non-notification.
May 2016	This directive supersedes Regulatory Directive DIR2013-02, Notification/Non-notification.

Disclaimer

This document does not constitute part of the *Pest Control Products Act* or its regulations and in the event of any inconsistency or conflict between the Act or regulations and this document, the Act or the regulations take precedence. This document is an administrative document that is intended to facilitate compliance by the regulated party with the Act, the regulations and the applicable administrative policies.

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1. Introduction

1.1 Purpose

The purpose of this document is to communicate to industry and other interested parties revisions to Health Canada's Pest Management Regulatory Agency's (PMRA) Notification/Non-notification Policy that streamline and expand the changes to registration that can be made through these processes. This guidance document supersedes Regulatory Directive DIR2016-02, Notification/Non-notification.

1.2 Background

Since 1994, the PMRA has provided a mechanism whereby certain minor changes to registered products do not require a standard amendment application, but may be made through a simplified application process known as notification (the PMRA must be notified) or non-notification (the PMRA does not need to be notified).

The Notification/Non-notification Policy was first revised in 2001 and again in 2013, 2014 and 2016, expanding the changes that could be made through these processes. This latest revision includes further changes that can be made through notification/non-notification, streamlines the notification process, clarifies previous provisions, and eliminates those that became redundant with the changes to the *Pest Control Products Act* and Regulations.

In revising the Notification/Non-notification Policy, the PMRA examined similar programs in other jurisdictions, including the United States, United Kingdom and Australia, as well as other Health Canada regulatory programs, and consulted with industry.

The PMRA is confident that the changes in this guidance document will improve efficiencies for registrants and PMRA, while maintaining PMRA's mandate to protect human health and the environment.

The PMRA is also committed to ongoing review and analysis of its submission policies. As further product changes deemed appropriate for notification or non-notification are identified, the PMRA will strive to keep the policy evergreen.

1.3 Provisos

The PMRA will not process any notification requests if there are data protection implications. The regulations for the protection of test data can be found in the data protection provisions in the Pest Control Products Regulations ("Protection of Test Data", s.17.1 to 17.94).

Based on the outcome of a re-evaluation, special review or new policy implementation, there may be situations where new labelling, specification-related or other requirements that would be appropriate for notification or non-notification are identified, but not covered within the provisions of this guidance document.

In those cases, the regulatory documents outlining the new requirements will indicate how the registration changes are to be implemented (in other words, whether the changes are notifiable or non-notifiable or whether another application type is required).

There also may be circumstances resulting from a special review, re-evaluation or identification of required label corrections, where due to the number of products affected and the urgent nature of the situation, the PMRA may proactively update the PMRA's label of record and notify registrants of this action. It is the responsibility of registrants to ensure that these label revisions are incorporated into the marketplace labels within the specified timeframes or, where no timeframes are provided, at the earliest opportunity.

For changes to registration not identified in Sections 2 through 6 (Notification) or Section 7 (Non-notification) of this guidance document, or indicated in other PMRA regulatory documents as being notifiable or non-notifiable changes, registrants must continue to submit an Application for New or Amended Registration - Form 6005 (available upon request at the Registrants and Applicants page on Canada.ca). All amendments other than non-notifiable changes require review and approval by the PMRA before sale of the product.

Any changes to product registrations through notification or non-notification may be audited during the review of subsequent applications.

2. Notification

Notifiable changes are minor changes, as described below, to registered products that do not require a standard amendment application and thus, can be made through a simplified application process known as notification (the PMRA must be notified) or non-notification (the PMRA does not need to be notified).

2.1 Documentation Requirements

The documentation requirements for eligible notification submissions are outlined below by category of change. Details on the specific changes that can be made by notification within each category, and any other documentation requirements, are described in Sections 3–6. In all cases the Application for New or Amended Registration - Form 6005 must be completed. A covering letter that clearly explains the purpose of the notification submission is also strongly recommended for inclusion in the notification submission package. For guidance on submitting documents to the PMRA, please consult the Electronic Pesticide Regulatory System (e-PRS) page on the Pesticides and Pest Management section of Canada.ca.

2.1.1 Changes to Labels

Completed Application for New or Amended Registration - Form 6005.

Label text in Microsoft Word format with the notifiable changes identified using the track changes feature. Identified changes should include additions to label text as well as deletions that have been stricken. All label components should be submitted, including

Emergency Registration supplemental label text (be sure to use the current approved label text). Registrants must attest that the only changes being made to the label are those which are identified. The PMRA will only verify the identified label text and, if acceptable, the full label will be posted to the Pesticides and Pest Management section of Canada.ca and become the current label text of record.

2.1.2 Changes to Statement of Product Specifications (SPS)

Completed Application for New or Amended Registration - Form 6005.

Supporting documentation, if required (for example, letter of confirmation for change in source of supply of active ingredient).

Indicate the specific change and corresponding values/units.

Completed SPSF. Changes (in other words, additions and substitutions/replacements) must be highlighted on the SPSF. Deletions to the SPSF must be indicated on the Application for New or Amended Registration - Form 6005 or in the covering letter. Where a product has more than one SPSF (in other words, more than one formulation) include only the SPSFs that have changes. Indicate the formulations that are not changing on the Application for New or Amended Registration - Form 6005 or in the covering letter, by listing the formulation and version numbers of the SPSFs that have not been submitted. Registrants must attest that the only changes being made to the SPSF are those which are highlighted on the submitted SPSF and/or indicated on the notification form. The PMRA will only verify these changes. If acceptable, these SPSFs will become the SPSFs of record.

2.1.3 Registration of Repackaged-Relabelled Products (Repack-Relabels)

Completed Application for New or Amended Registration - Form 6005.

Letter of confirmation and letter of authorization from the registrant of the source product.

Text Label in Microsoft Word format based upon the precedent label (refer to Section 5.1 for details)

NOTE: SPSFs are not to be submitted with Repack-Relabel notification requests.

2.1.4 Others

Completed Application for New or Amended Registration - Form 6005.

Supporting documentation as required.

2.2 Implementation of Changes by Registrants

The PMRA will process notification requests and advise registrants, normally within 45 days from receipt of the notification submission, if the notifiable change has been accepted or not and if any subsequent action is required. If a notification request is not properly documented or is unacceptable, it will be denied.

In the case of Repackaged-Relabelled product (Repack-Relabel) requests, the PMRA must first issue a registration number before the product may be sold.

Registrants must attest on the Application for New or Amended Registration - Form 6005 that the only changes being made to the label text or the SPSF are the ones that have been identified/highlighted. Registrants are advised that it is a contravention of the *Pest Control Products Act* to make changes to a pest control product that are not in conformance with the provisions of this guidance. Where contravention does occur, appropriate corrective action will be required to bring about compliance.

Registrants are encouraged to contact the Pest Management Information Service for advice about proposed changes if they are unsure of whether planned changes may be accommodated through notification or non-notification.

3. Notifiable Label Changes

The following label changes may be made by notification.

3.1 Changes to the Registrant's Address, Regulatory Mailing Address or the Name or Address of the Canadian Agent

Registrants are responsible for maintaining up-to-date contact information. The PMRA must be informed of any changes to the registrant's address, or the name or address of the Canadian agent. This may be done through notification. When these changes affect multiple products, the affected products may be listed on the same notification form Application for New or Amended Registration - Form 6005 or in the covering letter.

3.2 Changes to Packaging and Related Statements

Changes to the shape or colour of packaging and related labelling statements are permitted by notification only if all the following criteria are met:

- the rate, concentration, frequency or methods of application do not change;
- the proposed changes would not result in new or additional protective clothing or equipment requirements;
- precautionary statements, directions for use or other required labelling statements are not changed;
- a change in package size does not change the net contents in a way that is noncompliant with the criteria established for notifiable or non-notifiable changes to net contents outlined in this guidance (refer to Sections 3.19 and 7.2).

NOTE: Changes to packaging for rodenticides, bait/control/attractant stations or other packaging that houses the pesticide during its use, or products with water soluble packaging, are not permitted through notification and require an application for new or amended registration.

3.3 Product Name Change

The name of a registered product may be changed by notification provided the registration number and registrant do not change. The new name should be specific to the product and may include a distinctive brand or trademark and the common chemical name of the active ingredient, if established. Product names cannot be the same as those of other registered pest control products. Product names that are false, confusing, misleading or make exaggerated claims will be rejected.

References to the product name on the label (in other words, in the directions for use) may also be revised through notification. For product labels that do not include references to other products (for example, tank mix partners), registrants may replace the product name with the term "this product" by notification.

3.4 Deleting a Use

A use site and/or pest may be deleted from a product label by notification provided there remains at least one use site and at least one pest for each use site on the label. The reason for the deletion must be included as a comment on the submitted label.

3.5 Disposal Statements

Registrants may revise outdated disposal statements through notification by choosing the appropriate statement verbatim from the PMRA published standard disposal statements. The PMRA document from which the disposal statement was taken must be referenced on the Application for New or Amended Registration - Form 6005 or in the covering letter.

Registrants may adopt standard disposal statements for commercial and restricted class products used in agriculture and non-crop land as specified in Regulatory Directive DIR99-04, *Disposal Statements for Control Product Labels* (or most recent version) by notification. This includes statements for recyclable, returnable and refillable containers.

For products for which standard statements do not apply, or where a registrant wishes to request a variation in the wording of the standard statements, changes to disposal statements must be submitted with an application for amended registration.

3.6 First Aid Statements

Where the PMRA has published standard first aid statements (for example, PMRA Guidance Document, *First Aid Labelling Statements,* or most recent version), registrants may by notification update the first aid statements as appropriate to a product by choosing verbatim the applicable PMRA published standard statements.

The PMRA document from which the first aid statement was taken should be referenced on the Application for New or Amended Registration - Form 6005 or in the covering letter.

3.7 Treated Paper with Food Contact Advisory Statement

For antimicrobial products used in the manufacture of paper, the label statement indicating that the pest control product cannot be used in the manufacture of paper that comes into contact with food may be removed through notification. This notification must be accompanied by a letter of no objection issued by Health Canada that clearly supports the pest control product for use on paper with food contact along with a copy of the product specifications and label text provided to support the request for the letter of no objection.

3.8 Resistance Management Statement

Resistance management statements as detailed in Regulatory Directive DIR2013-04, *Pesticide Resistance Management Labelling Based on Target Site/Mode of Action* (or most recent version), may be added verbatim to product labels through notification provided the criteria outlined in the guidance are met.

3.9 Product Composition Statements

Certain statements pertaining to product composition may be added to pest control product labels through notification as follows:

Product type

A statement identifying the product type may be added by notification. Examples of product type are: acaricide, insect repellent, insecticide, molluscicide, pheromone, rodenticide, fungicide, nematicide, pruning paint, algaecide, herbicide, adjuvant, surfactant, plant growth regulator, animal repellent, bird repellent, fish toxicant, anti-fouling paint, material preservative, sanitizer, slimicide, swimming pool algaecide, swimming pool bactericide, wood preservative.

3.10 Addition of Tank Mixes to Product Labels

A registrant may add through notification a tank mix to a registered product label where that tank mix already appears on the tank mix partner label.

For example, if the label for product A contains a tank mix with product B, the tank mix may be added to the label for product B through notification. The notification request must clearly indicate the exact text that is being added to the label as well as the location of text placement. The text related to the tank mix must be copied in its entirety and must be identical to that which appears on the tank mix partner label.

Once approved for the master product, a tank mix may be added to the related master copy products through notification provided the master copy label contains the uses to which the tank mix applies, and the criteria outlined in Section 5.2 Regarding updating a Master Copy based on its Master Product are met.

3.11 Addition of Marketing Text to the Principal Display Panel

Marketing text may be added to the principal display panel of a label provided it is consistent with the approved directions for use, the text is not false or misleading, and it does not obscure or adversely affect/impair the visibility or legibility of required label text. For example, claims pertaining to specific uses such as "For the control of bed bugs" or "Controls mosquitoes" may be added to the principal display panel of a product label, provided the claim (use) is already specified under the "directions for use" section of the label. Text that requires substantiation (in other words, not obvious that it is consistent with the approved directions for use) may not be added through notification.

3.12 Translation Corrections

Registrants may through notification advise the PMRA of translation corrections made to the French or English label text when omissions or errors are identified.

Corrections of typographical errors on marketplace labels are non-notifiable changes. Please refer to Section 7.1 of this guidance document.

3.13 Disclosure Labelling for List 1 Formulants

When a formulant is recategorized to List 1, disclosure labelling may be added through notification providing that a completed Application for New or Amended Registration - Form 6005 and appropriate supporting documentation are received by the PMRA prior to the deadline specified by the PMRA. The following statement must be added to the label in proximity to, on the same panel as, and in a type and font size comparable to, the guarantee statement:

"This product contains the toxic formulant [insert name of chemical] at [insert proportion by weight] %."

3.14 Formulation Containing Ozone-Depleting Formulants Governed by the Montreal Protocol

If the list of ozone depleting substances governed by the Montreal Protocol is expanded to include additional substances that are formulants, the addition of a warning on the label for a formulation containing these ozone-depleting formulants may be added through notification providing a completed Application for New or Amended Registration - Form 6005 and appropriate supporting documentation is received by the PMRA prior to the deadline specified by the PMRA. The following statement must appear prominently on the principal display panel:

"WARNING: This product contains [insert name of chemical], which harms public health and the environment by destroying the ozone in the upper atmosphere."

3.15 Pest Control Products Containing Common Allergens

If a new allergen is identified as requiring disclosure labelling, the addition of a warning on the label of pest control products containing this allergen may be added through notification providing a completed Application for New or Amended Registration - Form 6005 and appropriate supporting documentation is received by the date specified by the PMRA. The following statement must be added to the label in proximity to, on the same panel as, and in a type and font size comparable to, the guarantee statement:

"WARNING: contains the allergen [insert name of allergen]."

3.16 Effects on Treated Objects or Sites

When applicable to a pest control product, the following advisory statement may be added to the product label through notification:

"Users should test (treat) a small, inconspicuous area first to ensure there are no adverse effects such as staining or discolouration."

3.17 Refillable Container

Where facilities or products exist to allow for refilling, registrants may through notification add the term "refillable" to an end-use product label to indicate that the container may be refilled with the same product. The label must include a statement that indicates the container may only be refilled with the same product (for example, "The container may only be refilled with this pest control product"). Instructions for refilling the container and any purchases required for doing so (for example, purchasing a refill pouch) must also be included on the label.

3.18 Container Size Changes / Changes in Net Contents

Certain changes in net contents/container size may be added through notification as described below, provided such changes do not result in changes to use directions (*except as indicated below), mixing instructions, precautionary statements, package type, class designation or other requirements pertaining to size.

Sizes may be removed or a size range narrowed through notification.

For technical and manufacturing class products only, container sizes may be increased through notification provided any associated changes to the disposal statement would be covered by the published standard disposal statements (in other words, a standard disposal statement could be used verbatim).

Smaller container sizes may be added to any class of pest control product through notification provided the smaller size does not negatively affect the legibility of the label text, the package size is not reduced to the point that the net contents of the package are smaller than the amount required by the directions for use, and a minimum container size has not been specified by the PMRA (for example, a minimum size of 20 g has been specified for capsaicin dog repellent products).

When a master product registration has been amended to change container sizes, the same changes may be made to the related master copy products through notification.

*When a container size/net contents is changed, the use directions may change to accommodate the different size provided the dilution ratio remains constant (for example, a 5 kg container to be mixed with 1,000 litres of water could be changed to a 1 kg container to be mixed with 200 litres of water).

Certain changes to container size/net contents are non-notifiable. Refer to Section 7.2.

3.19 Obsolete Label Information

Registrants may remove obsolete label information, such as references to other pest control products that are no longer registered, through notification.

3.20 Rotational Crops and Plant-Back Intervals

Changes to rotational crops (addition or removal) and plant-back intervals (addition or removal) may be made through notification when they are based on a precedent with identical formulation, which has been previously assessed by the PMRA. The following conditions apply:

- The precedent product must have the same (that is, identical) formulation or differ only in aspects that would qualify as notifiable changes.
- Only one precedent product can be used for each notifiable change. All labelled information for each combination of use site/crop/pest/rate/frequency/and method of application must be identical to that on the registered precedent product label.
- The applicant for the submission must also be the registrant for the precedent product being cited. Alternatively, the registrant may cite a valid precedent owned by another registrant if they provide a letter of access from the precedent owner.
- The applicant must use the most recent, approved, registered label and attest that no other changes have been made other than those identified on the label submitted for notification.
- For deletions of information, the full context of the information being deleted needs to be considered. Therefore, any other information on the label which relates or refers to the information being deleted, and does not relate to anything else on the label, must also be removed.

An **increase** in plant-back interval or **removal** of a rotational crop may be submitted through notification, which is not based on a precedent, under the following conditions:

- The applicant must use the most recent, approved, registered label and attest that no other changes have been made other than those identified on the label submitted for notification.
- For deletions of information, the full context of the information being deleted needs to be considered. Therefore, any other information on the label which relates or refers to the information being deleted, and does not relate to anything else on the label, must also be removed.

- The notification process **does not** apply to a decrease in plant-back interval or addition of a plant-back interval when a precedent cannot be cited. In this case, an amendment application for the change must be submitted.

3.21 Changes to Application Rate (increase or decrease), Application Timing, Application Number or Frequency, or Application Method When Based on a Precedent

Registrants may make these specified changes (addition or removal) to a product label through notification when they are based on a precedent and the precedent product has been previously assessed by the PMRA. The following conditions apply:

- The precedent product must have the same (that is, identical) formulation or differ only in aspects that would qualify as notifiable changes.
- Only one precedent product can be used for each notifiable change. All labelled information for each combination of use site/crop/pest/rate/frequency/and method of application must be identical to that on the registered precedent product label.
- The applicant for the submission must also be the registrant for the precedent product being cited. Alternatively, the registrant may cite a valid precedent owned by another registrant if they provide a letter of access from the precedent owner.
- The applicant must use the most recent, approved, registered label and attest that no other changes have been made other than those identified on the label submitted for notification.
- For deletions of information, the full context of the information being deleted needs to be considered. Therefore, any other information on the label which relates or refers to the information being deleted, and does not relate to anything else on the label, must also be removed.

3.22 Precautions

Where precautionary statements have been changed or modified for a precedent product with identical formulation, based on an assessment of data for a submission subsequent to that of the original review, these changes may be requested by notification for products that were based on the precedent product provided there are no implications regarding data protection. The applicant for the submission must, therefore, also be the registrant for the precedent product being cited. Alternatively, the registrant may cite a valid precedent owned by another registrant if they provide a letter of access from the precedent owner.

For example, Product B was based on precedent Product A. Subsequent to the registration of Product A, new data were submitted and reviewed which supported changes to the label of Product A regarding related hazard symbols and precautionary statements. The applicant would now like to apply these same changes to Product B which has the identical formulation and uses.

As Product B was based on precedent Product A, both Product A and B must have the identical formulation and be registered for the same uses. The precautionary statements (in other words, precaution section) and hazard symbols must be copied in their entirety from the precedent label.

The applicant must use the most recent, approved, registered label and attest that no other changes have been made other than those identified on the label submitted for notification.

For deletions of information, the full context of the information being deleted needs to be considered. Therefore, any other information on the label which relates or refers to the information being deleted, and does not relate to anything else on the label, must also be removed.

4. Formulation/Specification-related Changes

The following changes pertaining to product formulations/specifications are notifiable.

4.1 Change in Formulation Process

A change in the formulation process may be made by notification when:

- only a blending or dilution of product components is involved;
- the nominal concentration and certified limits of the active ingredient(s) and formulants do not change; and
- the physical, chemical and biological characteristics and the performance of the product remain unchanged.

An application for amended registration is required when changes in the formulation process involve a chemical reaction or the change is beyond the scope of the parameters listed above.

4.2 Change in Nominal Concentration of Formulant

A change in the nominal concentration of a formulant may be made by notification when:

- the nominal concentration falls within the certified limits for that ingredient as listed on the accepted SPSF;
- the composition of the formulant is known to the PMRA;
- the formulant is not on the PMRA List 1; and
- the formulant does not contain contaminants of toxicological concern.

The composition of a product must add up to 100%. Therefore, a change in nominal concentration of any given formulant must be accompanied by information on the identity and change in nominal concentration of other formulant(s), to ensure that the composition of the product adds up to 100%. The same criteria as listed above would apply to these other formulants.

4.3 Change in Certified Limits of Formulant

A change in the certified limits of a formulant may be made by notification when:

- the certified limits fall within standard certified limits;
- the PMRA has not previously determined that alternative or special certified limits apply; and
- the nominal concentration has not previously been changed by notification.

4.4 Change in the Identity of a Formulant / Formulant Substitution (Where Concentration Does Not Change)

In cases where the composition of the proposed formulant is chemically similar to the formulant currently contained in the pest control product formulation, a change in formulant may be accepted through notification provided:

- the difference in composition* between the proposed formulant and the current formulant is small (for example, less than 5% by weight) (*: the composition of the formulant in question - not to be confused with the concentration (% w/w) of the formulant in the overall product, which must be constant. In other words, the ingredients that make up each of the formulants involved must be within 5% of each other;
- the composition of the proposed formulant is known to the PMRA;
- the formulant or all its components are on the PMRA List of Formulants as List 2, 3 or 4 formulants or on the United States Environmental Protection Agency (USEPA) list of approved food or non-food use inert ingredients;
- the proposed formulant is not on the PMRA List 1;
- the proposed formulant does not contain contaminants of toxicological concern; and
- the pest control product is not an antifouling paint.

4.5 Change/Addition of Formulator Name or Address for End-Use Products and Manufacturing Concentrates Only

The site of formulation for an end-use product or a manufacturing concentrate may be changed by notification, except for microbial (biological) pest control products which require an application for amended registration. Similar changes for a technical grade active ingredient, or an integrated system product (ISP) require an application for amended registration.

4.6 Change of Colourants

Change to a colourant in the form of an addition, deletion or substitution may be made through notification when:

- the total percentage of the affected colourant does not exceed 1% by weight of the formulation;

- the product is not intended for use on or mixing with seeds, and is not an antifouling paint;
- the ingredient(s) of the colourant are on PMRA List 3 or 4 or the USEPA list of approved food or non-food use inert ingredients, meet the requirements for food or drug use under the *Food and Drugs Act,* or have an appropriate USEPA exemption from the requirements of a tolerance, in which case the pesticide product containing the colourant must also meet the conditions associated with the exemption; and
- the product is not a technical grade active ingredient.

Note that pigments and dyes, while having the same function, are not considered chemically similar and cannot be substituted for each other.

4.7 Change of Fragrances

Change to a fragrance in the form of an addition, deletion or substitution may be made through notification when:

- the total percentage of the affected fragrance does not exceed 1% by weight of the formulation;
- the composition of the fragrance has been provided to the PMRA by the supplier, manufacturer or registrant;
- the ingredient(s) of the fragrance are on PMRA List 3 or 4 or the USEPA list of approved food or non-food use inert ingredients, or the USEPA Fragrance Ingredient List, or the ingredient(s) of the fragrance meet the requirements for food or drug use under the *Food and Drugs Act*; and
- the product is not a technical grade active ingredient.

4.8 Change in the Source of Technical Grade Active Ingredient for an End-Use Product or Manufacturing Concentrate

A registrant may add or change a source of the same technical grade active ingredient by notification, provided the alternate source:

- is registered for the same uses as the current source;
- contains no formulants;
- contains no impurities of toxicological concern at levels higher than are present in the current source;
- has a nominal concentration that is within the standard certified limits of the nominal concentration of the current source; and
- has a nominal guarantee and in the cases where the registrant wishes to retain the current source(s), the guarantee of the current source(s) is also nominal.

A letter of confirmation of source of supply (LOC) for the new source of technical grade active ingredient must be submitted.

Where the addition of an alternate source results in a change in formulant proportions, the SPSF must reflect this.

4.9 Removal of a Source of Active Ingredient

A source of active ingredient may be removed from an end-use product or a manufacturing concentrate through notification provided there remains at least one registered source of active ingredient and no other changes are being made.

4.10 Deletion of a Formulation

A formulation and related label statements (for example, allergen or formulation preservative) may be deleted through notification, provided at least one current formulation remains and no other changes are being made.

4.11 Deletion of Alternate Formulant(s)

An alternate formulant(s) and related label statements may be deleted through notification provided the basic formulant remains and no other changes are being made.

4.12 Change in the pH Range

The pH range for a pest control product may be revised through notification (for example, from 7 to a range of pH 6–8) provided there is no change in the composition of the product beyond what is allowable through notification.

A material change in pH (for example, from pH 7 to pH 4) can only be made through notification if the update will not result in any change in the composition of the product beyond what is allowable through notification. Otherwise, such an update would require an application for amended registration.

4.13 Guarantee Change from Minimal to Nominal Concentration

A guarantee change from minimal to nominal concentration may be done through notification for an end-use product or manufacturing concentrate provided:

- the source of the active ingredient (for example, technical product, manufacturing concentrate) has a guarantee expressed as a nominal concentration;
- the registrant provides the nominal concentration and the upper and lower certified limits;
- the upper and lower limits fall within the standard limits; and
- the change in guarantee does not involve an adjustment in the amount of technical product.

4.14 Changes in Source of Starting Materials That Are Not Commodity Chemicals

For technical products, changes in the source of starting materials that are not commodity chemicals may be made by notification if the technical grade active ingredient or integrated system product remains in accordance with the specifications upon which registration was granted and the purity of the starting material is greater than or equal to the purity of the existing source. (Changes in source of starting materials that are commodity chemicals are non-notifiable changes as outlined in Section 7.8 of this document.) Registrants must attest on the Application for New or Amended Registration - Form 6005 or in the covering letter that the purity of the new source of starting material is at least as high as the existing source. Notification is acceptable, therefore, if:

- the nominal guarantee and certified limits of the active ingredient(s) are not changed;
- the upper certified limit of any existing impurity is not exceeded;
- there are no new impurities found at a level equal to or greater than 0.1% by weight;
- the purity of the new source of starting material is greater than or equal to the purity of the existing source; and
- impurities of toxicological significance, as described in DACO 2.13.4 of current guidance for chemistry requirements for the registration of a technical grade active ingredient, are not introduced, or the current upper certified limits of such impurities currently listed in the product specifications are not exceeded.

Otherwise, a submission to amend the registration is required.

5. Repackaged-Relabelled Products (Repack-Relabels)

5.1 Registration of Repack-Relabels

A product that is a repack and a relabel of a registered pest control product (known as the source product) may be registered through notification. The following application elements are required:

- Completed Application for New or Amended Registration - Form 6005;
- A letter of confirmation of source of supply (LOC) indicating that the product is a repack of the source product and a letter of authorization (LOA) to copy label uses from the registrant of the source product;
- Text Label in Microsoft Word format. The proposed label must be identical to that of the source product in all aspects except for: trade dress, company name and address, product name, pest control product registration number, and Canadian contact information, as appropriate; and
- The name and address of the formulating (that is, repackaging) site.

Note:

- Repack-Relabels of technical grade active ingredients are not permitted through notification.

5.2 Repack-Relabel product changes

The following changes may be made to Repack-Relabel products through notification:

- Changes in product trade name, trade dress, company address and Canadian contact information, as appropriate;
- Label changes to match approved amendments to the source product provided the revised repack label is identical to the revised version of the source product excluding the product name, trade dress and company address, and an LOA from the source product registrant supporting the addition of new label text (for example, new uses) is provided for these label changes; and
- Additions or changes to the container size to match approved amendments to the source product.

Label changes to a master copy product to match amendments to the related master product may be done through notification provided the master copy product meets the criteria of a Repack-Relabel product. For label changes to a master copy product to match amendments to the related master product where the master copy product DOES NOT meet the criteria of a Repack-Relabel product (e.g. the master copy only uses a subset of the uses found on the master product label), registrants should contact the PMRA beforehand to determine if the change in question can be made via notification.

An LOA from the master product registrant is required to support the addition of new label text that has been approved for the master product.

6. Other Notifiable Changes

6.1 Upgrade to Master Product Status

A pest control product's registration status may be upgraded to master product status by notification provided:

- the product is an end-use product or manufacturing concentrate (technical grade active ingredients cannot be master products); and
- the product does not contain any unregistered active ingredient.

If the PMRA does not have a current LOC (in other words, dated within the last five years) for the active ingredient(s) used in the formulation of the product, an updated LOC must be submitted with the notification request.

6.2 Removal of Initial Product Status

The initial product status of products which have initial or combined initial master product status may be removed through notification provided there are no associated private label products registered.

6.3 Other Potential Notifiable Changes

There may be cases where certain simple minor label or specification-related changes not specified in this document, might be appropriate for notification. In such cases, registrants should contact the PMRA to determine the appropriate mechanism for processing the changes (in other words, via notification or by submitting an application for amended registration).

7. Non-notification

Non-notification changes are those that can be made to a registered product without notifying the PMRA.

The following non-notifiable changes may be made to product labelling, packaging or specifications.

7.1 Change of the Supplier of a Formulant

A change in the supplier of a formulant is a non-notification when:

- the composition of the formulant is known to the PMRA;
- the CAS registry numbers are the same;
- the formulant is not on the PMRA List 1;
- the formulant does not contain contaminants of toxicological concern; and
- the formulant is not proprietary (for proprietary formulants refer to Section 4.4).

7.2 Correction of Typographical or Print Errors on Marketplace Labels

The correction of typographical or print errors on marketplace labels are non-notifiable.

7.3 Changes in Net Content

Certain changes in the net contents of products are non-notifiable provided such changes do not impact use directions, mixing instructions, precautionary statements, package type, class designation or other requirements pertaining to size. The net content change must fall within the range currently approved by the PMRA for the product. Where a range does not exist, the proposed change must fall between the smallest and largest size currently approved for the product.

Certain other changes in net contents may be submitted as notifiable changes (refer to Section 3.19).

7.4 Changes to Non-mandatory Label Elements

The revision, addition or deletion of the following may be made without notifying the PMRA:

- the Transportation of Dangerous Goods hazard symbols, when a shipping container is also the immediate container offered for sale;
- lot or batch codes or other production identifiers;
- date of manufacture or label approval; and
- distributor's name and address (the registrant's full name and address must remain on the principal display panel).

7.5 Label Format

Changes to label format design that do not modify approved label text and are consistent with the requirements of the Pest Control Products Regulations and information contained in other relevant PMRA guidance documents may be made without notifying the PMRA. These may include changes in label colour, company logo, type size or style, use of space, configuration, or placement of label elements. Improvements to label design, label wording and presentation of information, as outlined in Label Process Series documents LPS2011-03, *Designing Marketplace Labels of Domestic Class Pest Control Products* and LPS2011-04, *Guidance for Designing Peel-Back and Multi-Component Labels of Domestic Class Pest Control Products* (or more recent versions), are non-notifiable.

7.6 Notice to User Statement

Where there is no Notice to User Statement on a product label, or where a previous version is currently included on the label, only the following statement may be added to the secondary display panel, as per section 26(2)(g) of the Pest Control Products Regulations without notification:

"NOTICE TO USER: This pest control product is to be used only in accordance with the directions on the label. It is an offence under the *Pest Control Products Act* to use this product in a way that is inconsistent with the directions on the label."

For domestic class products only, the Notice to User Statement may be removed from the product label without notifying the PMRA.

7.7 Symbols or Graphics (Pictograms And Drawings) Consistent With Label Text

Pictograms and drawings may be added to the product label without notification, provided that they accurately represent the instructions on the approved label, are not false or misleading, and are consistent with the provisions in Label Process Series LPS2011-03 *Designing Marketplace Labels of Domestic Class Pest Control Products* or other applicable guidance.

7.8 Redundant Labelling Statements

Redundant labelling statements may be removed without notification provided that:

- the change does not contravene labelling requirements stated in the Pest Control Products Regulations;
- the precautionary symbol(s) and statement(s) are retained, and all other requirements of the Pest Control Products Regulations are met; and
- statements specifically required by the PMRA are not removed (for example, statements such as grazing or aerial application limitations).

7.9 Changes in Source of Starting Materials that Are Commodity Chemicals

For technical products covered by PMRA Regulatory Directive DIR98-04, *Chemistry Requirements for the Registration of a Technical Grade of Active Ingredient or an Integrated System Product* (or most recent version) changes in the source of starting materials that are commodity chemicals may be made without notification if the technical grade active ingredient or integrated system product remains in accordance with the specifications upon which registration was granted. Commodity chemicals are products manufactured globally on a large scale using standardized manufacturing methods, with well-defined impurities, and are characterized and sold by nationally or internationally recognized standard specifications. Examples of commodity chemicals include, but are not limited to, sodium chloride, hydrochloric acid and acetic acid. Non-notification is acceptable, therefore, if:

- the nominal guarantee and certified limits of the active ingredient(s) are not changed;
- the upper certified limit of any existing impurity is not exceeded;
- there are no new impurities found at a level equal to or greater than 0.1% by weight; and
- impurities of toxicological significance, as described in DACO 2.13.4 of Guidance for Developing Datasets for Conventional Pest Control Product Applications: Data Codes for Parts 1, 2, 3, 4, 5, 6, 7 and 10 are not introduced, or the current upper certified limits of such impurities currently listed in the product specifications are not exceeded.

Otherwise, a submission to amend the registration is required. Changes in the source of starting materials that are not commodity chemicals are addressed under Section 4.14 of this guidance document.

7.10 Recycled Packaging

A statement and/or the Mobius loop symbol reflecting the recycled content of the product packaging may be added to, deleted from or changed on, a label through non-notification provided the statement and symbol are consistent with the latest version of the Canadian Standards Association (CSA) ISO 14021 standard on Environmental labels and declarations – Self-declared environmental claims (Type II environmental labelling).

7.11 Non-pesticidal Characteristics

The following non pesticidal information may be added, deleted or changed without notifying the PMRA:

"Made in Canada"

- Factual statements about where a product is made (for example, "Made in Canada" or "Product of Canada") may be added to pest control product labels provided they comply with criteria established by the Competition Bureau Canada in their publication *Enforcement Guidelines for "Product of Canada" and "Made in Canada" Claims*, published on 22 December 2009 (or most recent version).

Consumer access information

- Telephone numbers, internet addresses and emergency contact information may be added/deleted/changed. (Note: Changes to a registrant's address, regulatory mailing address and the name or address of the Canadian agent are notifiable changes. Refer to Section 3.1 of this document.)

Price or price-related marketing

- Claims regarding price or price-related marketing such as "rebate available" and "low price" may be added/deleted/changed.

Company history

- Information pertaining to company history such as "selling insect repellents since 1952" may be added/deleted/changed.

New formulation

- Accurate statements about formulation changes (for example, "new" or "improved") that have been approved by the PMRA may be added to a product label for a period of one year, from the time the new formulation is first marketed. The product attribute that is "new" or "improved" must be clearly specified (for example, "new formulation," "new scent," etc.).

7.12 Buffer Zone Calculator Reference

The following statement may be added verbatim to a pest control product label without notifying the PMRA provided the label contains buffer zones, and the specified application methods on the label comply with the criteria for being able to use the calculator. Registrants wishing to add a statement that differs from this standard statement must submit an application for new or amended registration.

"The spray buffer zones for this product can be modified based on weather conditions and spray equipment configuration by accessing the Spray Buffer Zone Calculator on the Pesticides portion of the Canada.ca website."

7.13 Trade Label Statement

The following statement specified in Regulatory Note REG2001-05, *Residue Level Label Statement*, is no longer being hosted on CropLife Canada's website and thus, can be removed from a product label by non-notification:

"If this pest control product is to be used on a commodity that may be exported to the United States and you require information on acceptable residue levels in the United States, visit CropLife Canada's website at www.croplife.ca."

List of Abbreviations

EP	End-use product
LOA	Letter of authorization
LOC	Letter of confirmation of source of supply
PMRA	Pest Management Regulatory Agency
SPS	Statement of Product Specifications
SPSF	Statement of Product Specifications Form
TGAI	Technical grade active ingredient
USEPA	United States Environmental Protection Agency

Appendix I

Table A: Product Changes Described in this Guidance Document (Applicable Section of this Guidance Document in Parentheses)

Type of Change	Notification	Non-notification	Application for New or Amended Registration
LABEL CHANGES			
Address for registrant or regulatory mail	(3.1)		
Name and address of Canadian agent	(3.1)		
Packaging and related statements	Criteria are met (3.2)		
Product name	(3.3)		
Deleting a use	(3.4)		
Disposal statements	Using PMRA standard disposal statements (3.5)		Using non-standard statements and variations of the standard statements
First aid statement	Using PMRA standard first aid statements (3.6)		Using non-standard statements and variations of the standard statements
Removal of treated paper with food contact advisory statement	(3.7)		
Resistance management statement	Using PMRA standard statement (3.8)		Using non-standard statements and variations of the standard statements
Product type	(3.9)		
Addition of tank mixes	Where currently labelled on tank mix partner and text is identical (3.10)		Notification criteria are not met
Marketing text	Where text is clearly consistent with approved directions for use (3.11)		Text that is not clearly supported by the approved directions for use, for example, duration of control claims
Translation corrections	For text omissions or errors (3.12)	Typographical or print errors on marketplace labels (7.2)	General "improvement" of translated text

Type of Change	Notification	Non-notification	Application for New or Amended Registration
List 1 formulant label disclosure	(3.13)		
Ozone-depleting formulant label disclosure	(3.14)		
Allergen label disclosure	(3.15)		
Effects on treated objects or sites	Using PMRA standard statement (3.16)		Other advisory statements
"Refillable" container	(3.17)		
Net contents/container size	Notification criteria are met (3.18)	Non-notification criteria are met (7.3)	Neither notification nor non-notification criteria are met
Obsolete label information	(3.19)		
Rotational crops and plant-back interval	Criteria are met (3.20)		Neither notification nor non-notification criteria are met
Changes to application rate (increase or decrease), application timing, application number or frequency, or application method when based on a precedent	Criteria are met (3.21)		Neither notification nor non-notification criteria are met
Precautions	Criteria are met (3.22)		Neither notification nor non-notification criteria are met
Correction of typographical or print errors		(7.2)	
Non-mandatory label elements		As specified (7.4)	Other non-mandatory label elements/text
Label format		(7.5)	
Notice to user statement		(7.6)	
Symbols or graphics (pictograms and drawings)		(7.7)	
Redundant label statements		(7.8)	
Recycled packaging		(7.10)	
Place of manufacture		(7.11)	
Consumer access information		(7.11)	

Type of Change	Notification	Non-notification	Application for New or Amended Registration
Price or price-related marketing text		(7.11)	
Company history		(7.11)	
"New" or "improved" formulation		(7.11)	
Buffer zone calculator reference	Using PMRA standard statement	Using PMRA standard statement (7.12)	Changes to the standard statement
Trade Label Statement		(7.13)	
FORMULATION/SPECIFICATION-RELATED CHANGES			
Formulation process	Criteria are met (4.1)		Criteria are not met
Nominal concentration of a formulant	Criteria are met (4.2)		Criteria are not met
Certified limits of a formulant	Criteria are met (4.3)		Criteria are not met
Supplier of a formulant		Criteria are met (7.1)	Criteria are not met
Identity of a formulant/ formulant substitution	Criteria are met (4.4)		Criteria are not met
Formulator name or address	For end-use products and manufacturing concentrates that are not microbial pest control products (4.5)		For all technical grade active ingredients and integrated system products, and microbial end-use and manufacturing products
Colourants	Criteria are met (4.6)		Criteria are not met
Fragrances	Criteria are met (4.7)		Criteria are not met
Source of technical grade active ingredient for an end-use product	Criteria are met (4.8)		Criteria are not met
Removal of a source of active ingredient	(4.9)		
Deletion of a formulation	(4.10)		
Deletion of alternate formulant	(4.11)		
Change in pH range	Criteria are met (4.12)		
Guarantee conversion from minimal to nominal	For end use products and manufacturing concentrates where guarantee for		For technical products

Type of Change	Notification	Non-notification	Application for New or Amended Registration
	technical product used is nominal (4.13)		
Changes in source of starting materials that are not commodity chemicals	Criteria are met (4.14)		Neither notification nor non-notification criteria are met
Changes in source of starting materials that are commodity chemicals		Criteria are met (7.9)	Criteria are not met
Repack-Relabels			
Registration of Repack-Relabels	Criteria are met (5.1)		Criteria are not met
Amendments to Repack-Relabels	Criteria are met (5.2)		Criteria are not met
OTHER CHANGES			
Upgrade to Master Product status	Criteria are met (6.1)		
Removal of Initial Product status	Where there are no related private label products registered (6.2)		
Other potential notifiable changes	Consult the PMRA (6.3)		