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Re-evaluation Note

REV2010-01

Uncoupling of Fertilizer-Pesticide Combination Products for Lawn and Turf Uses

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1.0 Purpose

This document is to communicate to stakeholders the decision to uncouple fertilizer-pesticide combination products intended for lawn and turf uses.

2.0 Scope

This regulatory action is focussed on the lawn and turf uses of fertilizer-pesticide combination products on the following types of turf:

- Lawn turf planted in or around residences, as well as public and commercial buildings including schools and cemeteries
- Sports and recreational turf such as turf in parks, playgrounds, golf courses, zoos, botanical gardens and athletic playing fields

These types of turf are collectively known as fine turf, which may be maintained by homeowners or by professional applicators.

This regulatory action does not include agricultural uses of fertilizer-pesticide combination products (turf farms), or products that have a single active material with both fertilizer and pesticidal properties.

3.0 Background

Health Canada's Pest Management Regulatory Agency (PMRA) regulates pesticides under the *Pest Control Products Act* including those intended for lawn and turf uses. All pesticide products that are registered for use and sale in Canada have undergone rigorous health and environmental risk assessments including the pesticides present in fertilizer-pesticide combinations.

Pesticides are often combined with fertilizers and sold as fertilizer-pesticide combination products, which are regulated by the Canadian Food Inspection Agency under the *Fertilizers Act*. When pesticides are combined with fertilizer such that the two components can only be applied at the same time and to the same area, the delivery mechanism for the pesticide component is brought into question. The very nature of combination products removes the flexibility of applying the pesticide as a spot application due to the need to accommodate the fertilizer, which is designed for broadcast application to the entire lawn surface at specified times of the year.

Pesticides should only be used when and where there is a need. Broadcast applications of pesticides over the whole area are warranted only for severe pest infestations that are widespread. As pest infestations are typically patchy, spot applications of pesticides to those areas are most often sufficient to ensure adequate control in turf.

To be effective, fertilizers and pesticides must each be applied at the appropriate timings, which typically do not coincide. Fertilizers are most often applied in spring or early summer, and/or in late summer or fall. A spring-applied lawn fertilizer results in increased tillering and rapid growth as temperatures increase, resulting in turf of increased density. A fall-applied lawn fertilizer also results in increased tillering and may result in increased winter hardiness.

The majority of pesticides found in pesticide-fertilizer combination products are broadleaf herbicides belonging to the synthetic auxin group of chemicals. This group of chemicals only controls broadleaf weeds that have emerged and are actively growing in the lawn. These herbicides are not preventative in that they will only control weeds that have emerged and they do not prevent weeds from becoming established in the lawn. Further, this group of chemicals is not long lasting in that they do not persist in the soil to prevent future weed infestations.

Combination products have been purchased for their convenience and ease of use as a two-in-one product to address separate lawn maintenance issues (for example, nutrient deficiency and various pest infestations) with a single application. However, these products are unsuitable as a delivery mechanism because they support broadcast application of the pesticide when this might not be warranted.

Ultimately, fertilizer and pesticide applications should be based on need. Fertilizer should only be used if the turf will benefit from additional nutrients, and pesticide should only be used as a broadcast treatment if the pest densities are sufficiently high across the area to be treated. Targeted, well-timed liquid formulations of pesticides minimize pesticide use on the lawn and turf sites.

4.0 Regulatory decision

Based on consultation with the provinces, experts and registrants, the PMRA has concluded that fertilizer-pesticide combination products for lawn and turf uses do not support the goals of best practices for pest management in turf. The PMRA, in conjunction with Canadian Food Inspection Agency, is taking action to uncouple the fertilizer-pesticide combination products intended for lawn and turf uses. A date of last sale of 31 December 2012 for fertilizer-pesticide combination products for lawn and turf uses has been set in order to allow for replacement products to be made available where needed.

Should situations arise to warrant the use of a fertilizer-pesticide combination product for lawn and turf uses, the PMRA will assess combination products in terms of the timing of application and flexibility to apply as a spot treatment, as well as potential risks to human health and the environment.

The PMRA decision to uncouple fertilizer-pesticide combination products is not based on the health or environmental risk assessments but rather the nature of combination products. Combination products remove the flexibility of applying spot applications of the pesticide due to the need to accommodate the fertilizer, which is designed for broadcast application to the entire lawn surface at specified times of the year.

Turf fertilizers will continue to be available for broadcast application when needed. Pesticide-only products will also continue to be available for lawn care use to homeowners and commercial applicators for either spot treatments of localized weed patches or for use as broadcast applications to severely infested turf areas when warranted. Although more time consuming, pest control in lawn and turf can be achieved with careful pesticide spot applications that target only the pests that are present and separate broadcast applications of fertilizers.