



## Laboratory Certification | Test Verification | Member Education

### Health Canada / IAC

*Q&A between the IAC and Dana Chaulk, Senior Policy Analyst, Pest Management Regulatory Agency, Health Canada.*

*If an antimicrobial active isn't registered with Health Canada how long does it take for an active to get registered?*

The review timelines for a Category A application (a new chemical, a major new use) is 22 months. The process may take longer if the PMRA requires additional studies to be conducted to better understand the potential health or environmental impact of the active.

*Are conditional registrations granted by Health Canada?*

No, conditional registrations are no longer granted by the PMRA.

*Are there any label claims requirements like the EU?*

Label claims are not required by the PMRA for antimicrobial treated articles. However, if one wishes to include claims, an acceptable label claims [document](#) is available which provides guidance for acceptable label claims for treated articles.

*More information is available to IAC Members by e-mailing [Director@amcouncil.org](mailto:Director@amcouncil.org)*



Health  
Canada

Santé  
Canada

### Health Canada Defines Treated Article Position

*The IAC has been interacting with Health Canada over the past year on Health Canada's position on Canada's rules regarding treated articles under the Pest Control Products Act (PCPA). In doing so the IAC is working to assist Health Canada in helping actives providers as well as retailers, brands and their manufacturers understand how the Health Canada rules impact their use of odor control products in treated articles that are imported into or produced in Canada.*

The [Pest Control Products Act](#) defines a pest control product as a product, an organism or a substance that is used directly or indirectly to control, destroy, attract or repel a pest, or mitigating or preventing its injurious, noxious or troublesome effects. The term "**treated article**" is generally used to refer to any product that has been intentionally treated with a pesticide. Articles can be treated with pesticides such as antimicrobials (for example, textile treated with a preservative), insecticides (for example, insecticide-treated clothing), and herbicides (for example, herbicide-treated landscape fabric).

*A pesticide that has been intentionally incorporated into or applied to an article during manufacture for import, sale or use in Canada must be registered under the Pest Control Products Act.*

Many everyday items (for example, household products, clothing, and toys) that are currently available on the Canadian market have been treated with an antimicrobial during the manufacturing stage. Such treated articles allow the manufacturer to produce products with qualities (longer life & odor control) many consumers are looking for in the products they buy. Those antimicrobials registered with Health Canada and used to treat these products have undergone a rigorous scientific assessment by the PMRA to determine if the risks associated with the use of the pesticide are acceptable.

To be clear regarding **imported treated articles**, the active ingredient used to treat the article (in the foreign jurisdiction) must be registered under the Pest Control Products Act in Canada for treatment for that end use. *This requirement applies to treated articles whether label claims are being made or not.*