

First In, First Out: Best practices for handling products after re-evaluation label changes

Health Canada's Pest Management Regulatory Agency (PMRA) is the federal agency responsible for regulating pesticides in Canada. Pesticides are required to undergo periodic reviews by the PMRA to ensure that they continue to meet current standards for continued use in Canada. Re-evaluations of each registered pesticide are required within 15 years of its initial registration or the most recent major decision affecting the registration. These reviews can result in label changes.

When label changes are required, the value chain, including retailers and distributors, must transition to the new marketplace/package label by the end of the PMRA's label implementation period – typically within 2 years.

After the implementation period, products bearing the outdated label are **not permitted to be sold** in Canada. At this point, the PMRA requires products bearing old labels to be either disposed of in accordance with label directions and any applicable provincial laws **or** re-labeled with a newly amended label.

To avoid disposal **or** re-labelling, CropLife Canada strongly recommends that all distributors and retailers use the **First In, First Out (FIFO)** method. FIFO is an inventory management practice designed to promote the sale of old or pre-existing products before the sale of new products.

Best practices include:

- Putting older products at the front of the shelf and newer products behind them, with labels facing forward.
- Training employees on the importance of FIFO and updating policies.
- Displaying FIFO best practices with clear signage in storage areas.
- Retailers and distributors may learn more about label changes through:
 - Communications from your registrant partners outlining requirements and timelines.
 - Contacting the pesticide company listed on the label.
 - Visiting the PMRA website: Pesticide users can be encouraged to visit the PMRA label search tool to use the product according to the last approved label.
 - For most commercial products, signing up for the Agrichemical Warehousing Standards Association (AWSA) e-blasts for products that have label changes.

