Below is the summary of a response sent by the PWG to the Pest Management Regulatory Agency (PMRA) of Health Canada regarding PMRA’s proposed re-evaluation decision to cancel the registration of the active ingredient linuron in the herbicide Lorox L. Lorox L is an important product for poplar and willow growers and loss of this active ingredient would severely restrict weed control option for our growers.

Summary

Lorox L (a.i. linuron) is labelled for use as a post-emergent herbicide in one-year old ‘short-rotation-intensive-culture’ (‘SRIC’) poplar crops in western Canada; it was approved in November 2007. A subsequent URMULE submitted in 2008 requested a Lorox L label expansion to include national use in both poplar and willow SRIC crops as a pre-emergent at time of planting, in addition to the already labelled post-emergent use for poplar (the post-emergent use should include willow). PMRA designated this URMULE 2008-4866 for Lorox L herbicide for “intensively cultured poplar and willow crops”; this was a straight conversion of AAFC 09-035 to a D.3.2. The final submission would have been based on a rationale due to the availability of published supporting data.

Then on 17 July 2009 PMRA informed the Pest Management Centre (PMC) of Agriculture and AgriFood Canada (AAFC) that the URMULE could not be considered due to the re-evaluation of the active ingredient linuron.

As a developing agronomic crop concept, SRIC crops of poplar and willow must rely on availability of suitable pre-emergent herbicides to cost-effectively manage weed competition. The nature of these perennial crops and the length of time needed to carry the initial establishment investment necessitate cost inputs that are as low as possible. The use of suitable pre-emergent herbicides fits that requirement. At present only two pre-emergent herbicides are available for SRIC poplar crops that could be applied at time of planting: SureGuard (a.i. flumioxazin) and Goal 2XL (a.i. oxyfluorfen), both of which are Group 14 herbicides. For SRIC willow crops only SureGuard (a.i. flumioxazin) is labelled in Canada for use at time of planting; however, SureGuard is not labelled for use on fine-textured soils in Canada. This poses a problem for willow growers in particular.

Based on available published data, linuron (in the product Lorox L) has long been considered by the Poplar Council of Canada as the base herbicide for the successful establishment of SRIC crops. The active ingredient has a much broader weed spectrum than the two alternatives referred to earlier and can control several problematic weeds the two alternatives cannot. Linuron is a Group 7 herbicide and will be needed to prevent possible resistance of weeds to the active ingredients flumioxazin (in SureGuard) and oxyfluorfen (in Goal 2XL).

As perennial crops, SRIC poplar and willow require use of pre-emergent herbicides at time of planting and during the establishment phase following planting. This can last anywhere from one to three years, after which well-weeded crops should be able to sufficiently close canopy and control competing vegetation through shading.

As good neighbours to farmers growing more traditional agronomic crops, our growers need to control weeds that are problematic for all. The current lack of herbicides labelled for SRIC poplar and willow crops puts our growers at a serious disadvantage.

Submitted to PMRA on 6 September 2012
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