

December 13, 2024

Pest Management Regulatory Agency  
Health Canada  
2 Constellation Drive, Ottawa, ON  
K1A 0K9 Canada

**RE: Comments on the Proposed Special Review Decision for the Metalworking Fluid Uses of Iodocarb and Its Associated End-use Products [PSRD2024-02]**

Dear Pest Management Regulatory Agency,

The Independent Lubricant Manufacturers Association (ILMA or Association) submits the following comments regarding the proposed special review decision for 3-iodo-2-propynyl butyl carbamate (IPBC) and its associated uses in metalworking fluids under the Pest Control Products Act (PCPA). ILMA supports the technical comments provided by the Troy Chemical Corporation et. al. IPBC Task Force (IPBC Task Force), which expressed significant concerns about the proposal's scientific assumptions. Additionally, the Association urges the Pest Management Regulatory Agency (PMRA) not to overlook the significant regulatory impacts of the proposed mitigation measures.

ILMA represents over 300 lubricant manufacturers, suppliers, and distributors—many who are Canadian entities—responsible for commercializing more than three-quarters of the metalworking fluids (MWFs) sold in North America. Many formulators rely on IPBC as a preservative to control the growth of fungi and microbes given its water-based solubility. Since its registration with Health Canada and the U.S. Environmental Protection Agency (EPA) in the late 1970s, IPBC has been widely recognized as a safe biocide alternative. ILMA has collaborated with Health Canada, the EPA, and other international regulatory agencies to demonstrate how its members and their customers responsibly use IPBC.

ILMA urges the PMRA to reconsider its assessment based on the IPBC Task Force input and revise mitigation measures to ensure reasonable risk management without undermining IPBC's benefits in fluid formulations. The PCPA requires a thorough consideration of the risk-to-value balance when imposing risk regulations for pest control products.<sup>1</sup> However, the proposed

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<sup>1</sup> Section 7 of the Pest Control Products Act ("The Minister shall ... conduct any evaluations that the Minister considers necessary with respect to health or environmental risks or the value of the pest control product."); *see also* Pest Management Regulatory Agency, *PMRA Guidance Document, A Framework for Risk Assessment and Risk Management of Pest Control Products* (April 12, 2024) ("The outcomes of the assessments of risks to human health

mitigation measures present significant challenges for the lubricants industry without adding a wider margin of occupational safety. ILMA's detailed comments follow.

**I. The PMRA Should Obtain Granular Data About Exposure and Dosing Systems to Accurately Assess Risks Before Imposing Strict Post Treatment Thresholds.**

The proposed restriction limiting workers to handling a maximum of 1.25 kg of IPBC active ingredient per person per day through open pouring, with a requirement for closed transfer systems beyond this threshold, poses significant operational challenges. This restriction is likely to implicate costly investments in closed transfer systems for many facilities, which may not be economically feasible for small- and medium-sized businesses. While large scale facilities would be better positioned to manage such a financial impact, it would still create a ripple effect downstream. As a result, these compliance requirements could ultimately increase production costs, creating financial strain throughout the supply chain.

While the regulatory impact of the proposed measure would surely be felt, it is unclear whether it would provide an additional safety margin. The PMRA itself acknowledges that the proposal relies on "generic data" due to the lack of "appropriate chemical-specific handler exposure data."<sup>2</sup> Additionally, the risk evaluation makes various unsupported assumptions. For instance, the PMRA assumes that large facilities "would have closed transfer systems already in place,"<sup>3</sup> but ILMA has not seen any field data supporting the widespread installation of such systems at large scale facilities. In practice, numerous variables—beyond facility size—impact the feasibility of implementing closed transfer systems, including engineering setups, safety considerations, and costs. Thus, ILMA urges the PMRA to revisit its risk evaluation, as detailed by the IPBC Task Force, and obtain granular information about dosing systems before rushing through regulation.

**II. The Proposed Maximum Concentration Limit Negatively Impacts the Overall Quality and Performance of Metalworking Fluids.**

The imposition of a maximum concentration limit of 750 ppm for IPBC in metalworking fluids presents significant challenges for the lubricants industry in terms of quality assurance. Metalworking fluids are complex formulations designed to meet diverse and demanding operational requirements in its downstream applications, including cooling, lubrication, and corrosion protection. To meet customers' demands, effective quality assurance and control depends, in great part, in using preservatives in precisely controlled quantities. ILMA urges the PMRA not to modify the existing maximum concentration limit for IPBC because, as the IPBC Task Force highlights, a rate reduction is not justified on health grounds.

Effective preservation against fungal and microbial contamination is critical, as proliferation can lead to degradation of the fluid, unpleasant odors, biofilm formation, and even

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and the environment, and the assessment of value, are the basis for the next steps: identifying and analyzing risk mitigation and management options.").

<sup>2</sup> Pest Management Regulatory Agency, *Proposed Special Review Decision for the Metalworking Fluid Uses of Iodocarb and Its Associated End-use Product*, PSRD2024-02, 7-8 (Oct. 30, 2024).

<sup>3</sup> *Id.* at 7.

worker health concerns. IPBC has long been valued for its broad-spectrum efficacy and compatibility in metalworking fluid formulations. Limiting its use to 750 ppm may compromise its ability to effectively control fungal and microbial growth, particularly in systems prone to high levels of contamination or under challenging environmental conditions.

This restriction also places undue pressure on formulators to rely on alternative preservatives, many of which may not be as effective, cost-efficient, or compatible with existing fluid chemistries. Preservatives often work synergistically, and a reduced rate for IPBC could disrupt this balance, forcing reformulation and increasing production costs. Such a low ceiling on IPBC usage risks diminishing the overall quality and performance of metalworking fluids, potentially increasing equipment wear, production downtime, and operational inefficiencies for end users. A higher rate would provide the necessary flexibility to address these challenges while maintaining compliance and safeguarding fluid performance.

Finally, the proposed lower rate may pose heightened risks to worker health and safety as it would be more difficult to control the presence of fungal and bacterial contamination in the fluid. This trade-off should not be overlooked when managing occupational risks.

### **III. Conclusion.**

A careful assessment of the risk-to-value balance is central to the decision-making process under the PCPA. While worker safety is of paramount importance, the proposed mitigation measures impose a one-size-fits-all approach based on unsupported assumptions and without considering the value of IPBC in the lubricants industry. Instead of rigid limits, a risk-based approach that meticulously considers specific safety measures and the value of the pest control product could provide better outcomes for both worker safety and industry operations.

Thus, ILMA urges the PMRA to finalize the special review on IPBC based on sound science and field data, without making unsupported assumptions, as detailed by the IPBC Task Force. Finally, the Association requests a more thorough consideration of the value conferred of IPBC as a metalworking fluids biocide.

ILMA appreciates the opportunity to comment on this consultation. If you have any questions regarding this letter, please contact me or the Association's regulatory counsel, Jorge Roman ([jroman@bmalaw.net](mailto:jroman@bmalaw.net)).

Sincerely,



Holly Alfano  
CEO

cc: Jeffrey Leiter, General Counsel  
John Howell, Environmental Consultant  
Robin Dilts, MWF Committee Chair