CONSUMER PRODUCTS SERVICES DIVISION

ZENOVA LTD

Technical Report: **(5121)117-0040Revision** May 17, 2021
Date Received: April 27, 2021 PAGE 1 OF 3

GRAEME SARGENT

ZENOVA LTD
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Sample Description:	WILDFIRE RETARDANT / BARRIER FLUID		
Vendor:	N/A	Sample Size:	1
Manufacturer:	N/A	Style No(s):	N/A
Buyer:	N/A	SKN/SKU No.:	N/A
Labeled Age Grade:	N/A	PO No.:	N/A
Appropriate Age Grade:	N/A	Ref #:	N/A
Client Specified Age Grade:	N/A	Country of Origin:	NO INFORMATION
Tested Age Grade:	N/A	Assortment No.:	N/A
UPC Code:	N/A		

EXECUTIVE SUMMARY:

The sample(s) was tested to the following requirement(s) and the data provided is for informational purposes only:

TRA (US)

- Based on the available data, the product is not considered to be toxic (acute/chronic), a skin irritant, eye irritant, corrosive and/or a strong sensitizer when used as intended or under circumstances involving reasonably foreseeable misuse. The classification of hazards are as defined in the 16 CFR 1500.3(b)(5), (7) – (9) (FHSA regulations), based on a Toxicological Risk Assessment of the submitted product formulation by a Diplomate of the American Board of Toxicology (DABT).

  Note: In addition, the ingredients in the product are not included in the list of banned hazardous substances cited in 16 CFR 1500.17.

TRA (CAN)

- Based on the available data, the product is not considered to be very toxic, toxic or harmful (acute), corrosive or a skin/eye irritant per the requirements set forth in the Canadian Consumer Chemicals and Containers Regulations, 2001 (SOR/2016-170), when used as intended or under circumstances involving reasonable foreseeable misuse, based on an assessment of the submitted product formulation by a Diplomate of the American Board of Toxicology (DABT). Additionally, this product is not considered to be toxic (chronic), per the information provided in the Canada Consumer Product Safety Act (S.C. 2010, c.21).

TRA (EU)

- Classification of not being acute toxic, skin corrosive, serious eye-damaging, germ cell mutagenic, carcinogenic, reproductive toxic, respiratory/skin sensitizing or specific target organ toxic (single or repeated exposure) as defined in Annex I of sections 3.1.1, 3.2.1, 3.3.1, 3.4.1, 3.5.1, 3.6.1, 3.7.1, 3.8.1, 3.9.1 of Regulation (EC) no. 1272/2008.

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TRA (AUS)

- Based on available data, the product is not expected to be toxic (acute), corrosive or irritating to the skin, damaging or irritating to the eye, sensitizing, mutagenic, carcinogenic, toxic to reproduction or toxic to specific target organs (acute/chronic) as outlined in the HCIS and defined by the GHS and the model SWA regulations. In addition, the ingredients in the product, Wildfire Retardant/Barrier Fluid, not prohibited according to the Schedules 5 (Caution), 6 (Poison), 7 (Dangerous Poison), 9 (Prohibited Substance) and 10 (Substances of such danger to health as to warrant prohibition of sale, supply and use) of the Australian Poisons Standard (SUSMP) (February 2021) and consideration of the toxicology profile, use, purpose and product presentation. This evaluation does not constitute a regulatory review or an assessment of compliance with any other Australian regulations.

Environmental TRA

- Based on the available data, the product is not expected to present an environmental hazard according to the criteria set out in the GHS approach for the assessment of environmental hazards (hazards to the aquatic environment).

  Note: Three ingredients within the formulation meet the criteria for categorization as persistent and toxic to aquatic organisms according to the detailed categorization criteria of Canadian Environmental Protection Agency (CEP) Domestic Substances List (DSL).

Biodegradability Evaluation

- The product was evaluated for its biodegradability potential based on its persistence and bioaccumulation potential. As the ingredients in the product are inorganic, a PBT assessment is not generally conducted. As inorganic substances, the ingredients are considered persistent; however, given the nature of all ingredients, the ingredients will completely dissociate in aquatic environments. It should be noted that the ingredients meet the criteria for categorization as persistent and toxic to aquatic organisms according to the detailed categorization criteria of Canadian Environmental Protection Agency (CEP) Domestic Substances List (DSL).

Toxicity Assessment:

This evaluation was conducted based solely on the product formulation submitted by the client and information provided on the test request form. Evaluation of the final product was conducted through consideration of the toxicity of the individual ingredients with consideration given to potential interactive effects with the mixture of ingredients when such effects may be anticipated based on the available data.

Exposure Assessment:

The product, *Wildfire Retardant/Barrier Fluid*, is a liquid fire-retardant formulation intended to be sprayed on dry vegetation to form a wildfire barrier. The product is shipped in Intermediate Bulk Containers (IBC) containers (275 and 330 US gal) and drums (55 US gal) and is intended to be sprayed at a rate of 1 gallon per square meter. The product is intended for use by adults. Consideration was given to consumer exposure with intended product use and under circumstances involving reasonable foreseeable misuse. Intentional product misuse was not considered within the scope of the assessment. This evaluation was conducted under the assumption that potential acute exposure to product ingredients is through the dermal route and possibly the oral route through accidental ingestion. Chronic exposure is only considered to occur via the dermal route given that chronic accidental ingestion is unlikely. Any volatile and/or airborne ingredients were evaluated for the inhalation route of exposure (acute/chronic).

Considerations:
It was assumed that all product formulation details are accurate and that there are no additional ingredients that are not listed (note: chemical testing was not conducted as part of this product evaluation and chemical analyses data were not provided in support of this evaluation). It was also assumed that any ingredients provided in the product formulation do not contain any impurities and/or contaminants (e.g., heavy metal(s) or lead) or infectious agents that would cause toxicity in a consumer who may be exposed to them. This product was not evaluated for toxicological considerations related to physical or chemical properties of the formulation (e.g., pH, viscosity, volatility) and potential for physical injury (e.g., choking hazard or mechanical irritation) was not considered.

Note: This evaluation constitutes a regulatory review for the relevant regulations cited above, and provides hazard warning guidance, as necessary. Detailed labeling requirements (i.e., label content, prominence, placement, and conspicuousness, and any relevant exemptions) beyond any necessary hazard warning guidance were not considered.

Note: This evaluation is relevant solely to the conditions described herein. Any substitution of ingredients, increase in ingredient concentrations, or change in use pattern will necessitate a new evaluation.

Note: This report has been revised to remove proprietary information.

BVCPS Buffalo Contact Information for this Report:

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