



Labeling and Performance Standards for Spray Adjuvants and Soil Conditioners

**EPA/CPDA Symposium on Inert
Ingredients**

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Intec Agro Products

Why?

- Late 60's through mid 80's
 - Predominantly a pre-emerge herbicide market
 - Adjuvant usage focused on formulations
- Mid to late 80's to current
 - Transition to post emergence herbicides
 - Explosion in the need for adjuvants to enhance herbicide performance

Late 80's - CPDA Addresses Issue

- Adjuvants not registered like pesticides
- Limited use of standardized definitions
- Undefined product functionality claims
- Failure of some products to correctly warn of safety and handling issues
- Inconsistent composition
- Variable performance
- Use of incorrect products or use rates

The consequences!

- Consumer confusion / frustration
- Open to increased regulatory scrutiny
- Certain states began to develop adjuvant regulations
- CPDA – let's get pro-active and develop *Adjuvant Standards*

Adjuvant Standards

Concepts and Principles

- (1) Voluntary and self-certifying program
- (2) Benefit end-users and Pesticide manufacturers
- (3) Encourage pesticide manufacturers to promote and recommend CPDA Certified Adjuvants
- (4) Adjuvant manufacturers must promote the value of Certified Adjuvants to consumers



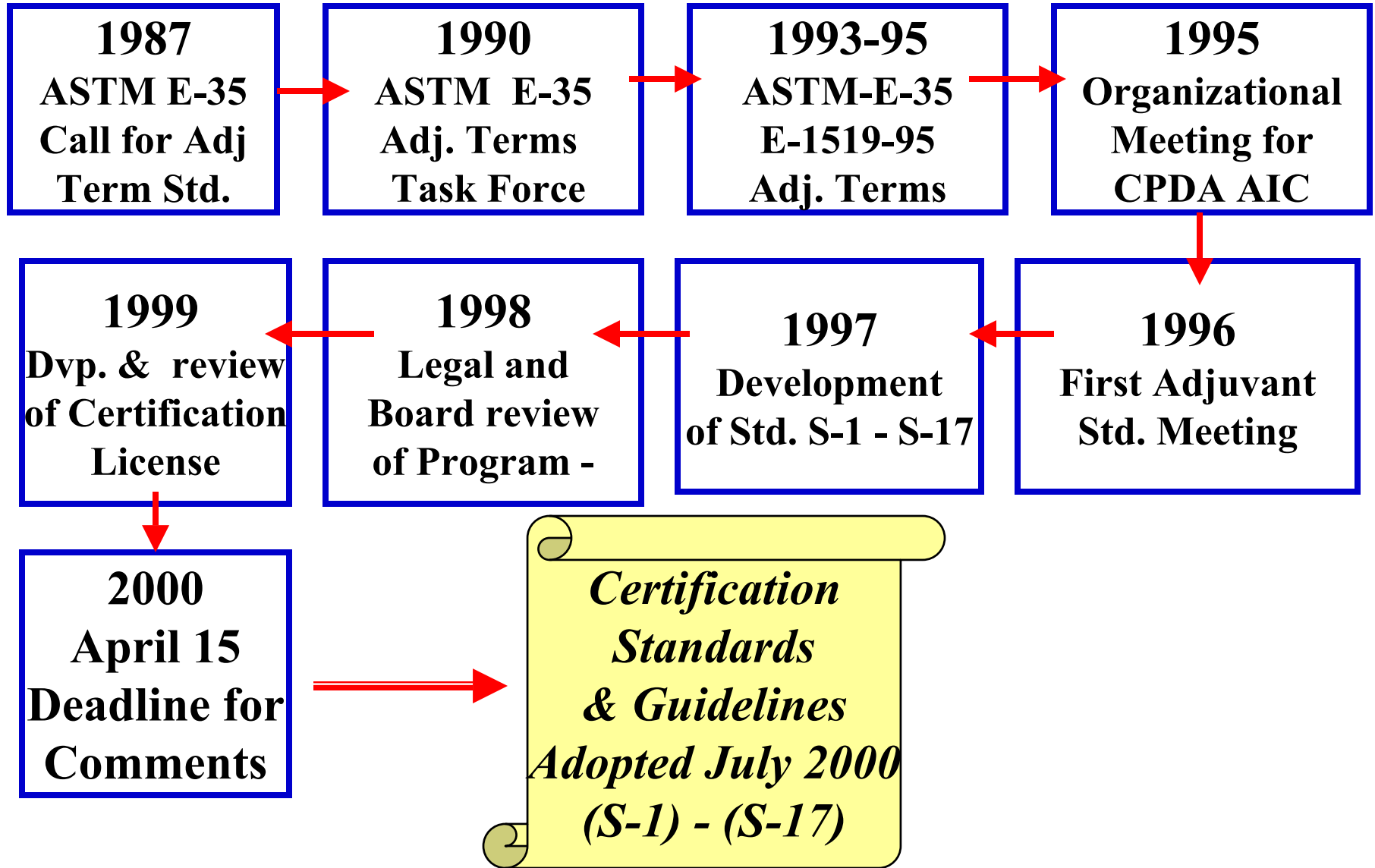
Adjuvant Certification Concepts and Principles

(5) Initial Certification activities are focused on developing standards and guidelines for labels

(6) ASTM was utilized as the source for standardized definitions and, when available, test methods to document functionality claims in the Certification Program



History of ASTM / CPDA Adjuvant Standardization



Benefits of CPDA / ASTM Adjuvant Standardization Efforts

- The standardization of >70 terms
- Development of standardized methods for (3) common adjuvant parameters (drying, spreading, acidifying)
- Incorporation of CPDA guidelines by State regulators

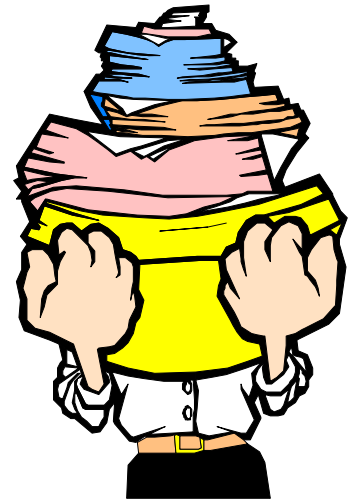
Chemical Producers and Distributors Association

- Labeling and Performance Standards For
- Spray Adjuvants and Soil Conditioners

The Self Certification Process

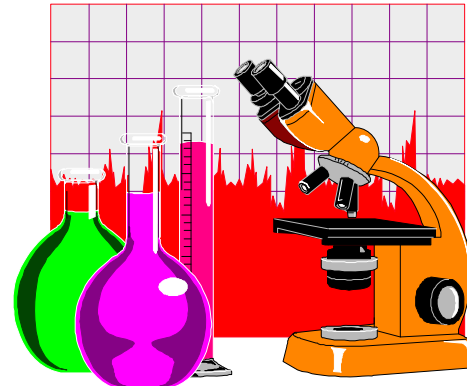
Certification Process

- Product Name
 - Primary License
 - Sub-License
 - If sub-license – list name of primary product being sub-licensed
- Product Type (NIS, COC, etc.) must be defined in ASTM E-1519 or E-609
- Submit Copy of Current Label



Certification Process

- Submit Summary of Tox Studies
 - Dermal, Oral and Eye Irritation Mandatory
 - LD-50 in Each Category Required
- Submit MSDS
- Complete Company Information
- Sub-License – List Name and Address of Sub-Licensee as it Appears on the Label



Certification Process

- Functionality Claims Must Be Defined in ASTM E-1519 or E-609
- Were ASTM Standardized Methods Used?
- Labeled for Use on Food Crops?
- Components Listed in CFR 40, 180?
- Packaging DOT Compliant?



Certification Process

- Contain OSHA Regulated Hazardous Materials?
 - If yes then tox studies for inhalation, dermal irritation and skin sensitization required.
- List 24 Hour Data Service
- Precautionary Statements Included?
- Designation of Proper Product Hazard Signal Word Included?



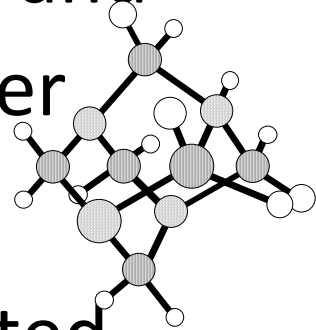
Certification Process

- Aquatic Uses on Label? If Yes - Aquatic Tox Study Required
- Active Ingredients Contribute to One or More of the Functions Defined in ASTM E-1519 or E-609?
- List % Surfactant Guarantee



Certification Process

- Components Are Water Dispersible and Reduce Surface Tension of Water per ASTM Method D-1331
- Types of Oil (if two or more) are Listed in Descending Order
- Unsulphonated Oil Residue (UR) Value Listed



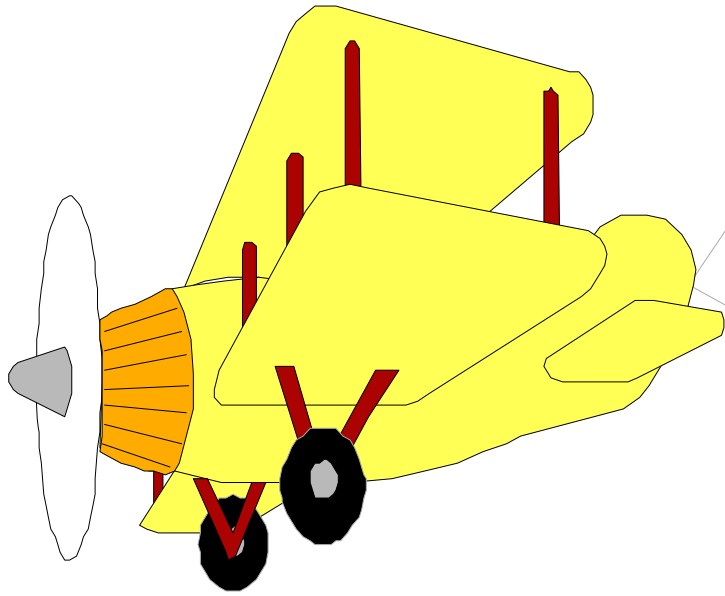
Certification Process Completion

- Applicant Advised of Approval
- Sign Licensing Agreement and Letter of Compliance
- Pay Appropriate Fees



Certified Products

- Agri-Dex
- Alliance
- Array
- BroncMax
- Cayuse Plus
- Choice Weather Master
- Class Act NG
- Competitor
- Crop Oil Concentrate
- Destiny HC
- Formula 1
- Hasten
- Induce
- In-Place
- Interlock
- Kinetic
- MSO Concentrate
- N-Ter
- Penetrator Plus
- R.O.C. Crop Oil Concentrate
- Succeed
- Superb HC
- Super Spread 7000
- Super Spread MSO
- Syl-Tac
- Vegetable Oil Concentrate



Thank You