

Chapter 3

Specific Labeling Statement Interpretations

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Section 3.1

Avoidance Statements--General

Interprets FAC section 12973; 3 CCR section 6000

Interpretation The general labeling statement, "Avoid breathing spray mists or dusts," does not necessarily mean that a respirator is required. This labeling statement allows for other methods or equipment, such as engineering controls. When these controls cannot mitigate the exposure, respiratory equipment is required.

The employer is required to provide the employee with approved respiratory protective equipment when specifically required by pesticide labeling, established regulation, or when respiratory protection is needed to maintain employee exposure below an applicable recognized exposure standard. When labeling simply directs the handler to avoid breathing mist or dust, respiratory equipment is not specifically required by pesticide labeling. There is, however, a recognized exposure standard for nuisance dust that has been established in 8 CCR section 5155. This standard may apply to some dusts, for example, sulfur.

Open air application of pesticides may not result in air concentrations that approach or exceed the exposure standard. If the handler can avoid breathing the spray or dust in amounts that exceed the standard without respiratory protective equipment, the use is in compliance with a general labeling statement. If the applicator cannot avoid breathing the mist or dust, the use of approved respiratory protective equipment is required and the employer must comply with 3 CCR section 6738(h).

Section 3.2

Bait Boxes

Interprets FAC section 12973; 3 CCR section 6000

Introduction Rodenticide labeling often contains the statement, "Treated baits must be placed in locations not accessible to children, pets, wildlife and domestic animals, or in tamper-resistant bait boxes." This statement requires enforcement personnel to address two questions when faced with rodenticide baiting situations: (1) Is the treated bait in a location accessible to children, pets, wildlife or domestic animals? (2) If the treated bait is in an accessible location, is a tamper-resistant bait box being used?

Placement Different application sites require different methods. Each application site requires individual evaluation and mitigation of known hazards prior to choosing the application method.

When estimating hazards, consideration is given to the feeding behavior of wild or domestic animals. Some rodenticide labels require removal of bait prior to livestock grazing. In areas where bait applications may be hazardous to endangered species, special precautions may be required to mitigate those hazards.

There is a perceived discrepancy between standardized label statements such as, "Baits should be placed in areas inaccessible to children, pets, wildlife and domestic animals or in tamper-resistant bait boxes" and other instructions on the label that describe hand-broadcast applications.

The majority of labels allow hand-broadcast applications, but not the scattering of baits in areas accessible to children, pets, nontarget wildlife, or domestic animals. Areas accessible to the designated groups require tamper-resistant bait boxes.

Accessibility to young children represents the most important factor in evaluating application sites. Tamper-resistant bait boxes are the only acceptable treatment method when young children are present in public or private parks or recreation areas. Using natural or man-made barriers at the application site to exclude young children provides sufficient mitigation.

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Bait Boxes, Continued

Tamper-resistant bait boxes

Since neither U.S. EPA nor DPR “approves” bait boxes prior to use, Pesticide Enforcement personnel must judge the adequacy of bait boxes in actual use situations. Criteria have been adopted from U.S. EPA (Pesticide Registration [PR] Notice 94-7) for enforcement decisions regarding bait boxes containing treated bait. Under these criteria, bait boxes are to be:

- Resistant to weather. (A critical factor of evaluation is placement, i.e., a bait box placed outside will need to be more resistant to varying weather conditions than one placed indoors or under shelter.)
- Strong enough to prohibit entry by large nontarget species. (Placement is again a factor, i.e., is the bait box likely to be broken or affected adversely by nontarget animals?)
- Equipped with an access panel that can be securely attached (meaning a locking lid or secured rebaiting hatches).
- Equipped with entrances which readily allow target animals access to baits while denying access to larger, nontarget species (suggested means for achieving this include use of baffles, mazes, or small entrances).
- Capable of being anchored securely to resist effort to move the container or to displace its contents.
- Equipped with an internal structure for containing baits (most boxes contain baffles to contain bait).
- Made in such a way as not to be an "attractive" nuisance.
- Capable of displaying "proper" precautionary statements in a prominent location.
- Bait station labeling in non-licensed situations is regulated by the label (*FAC section 12973*) and the U.S. EPA criteria for tamper-resistant bait stations.
- Bait stations are intended to present (apply) the pesticide to the target pest. Bait stations are considered application equipment and subject to the labeling requirements of *3 CCR section 6630* when placed by a licensed pest control company.

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Bait Boxes, Continued

Tamper-resistant bait boxes
(continued)

16 CCR section 1983(i) more specifically states, "When a covered or uncovered bait station is used for any pesticide, the bait station shall be adequately marked with the signal word or symbols required on the original pesticide label, the generic name of the pesticide, and the name, address, and telephone number of the structural pest control company. A building which is vacated, posted, locked and in the care, custody, and control of the registered company shall be considered the bait station." Any device that is designed to dispense pesticidal baits while unattended is a bait station. Since this requirement is contained in the Structural Pest Control Act, it applies only to persons operating within their Structural Pest Control Business license. It is the responsibility of the Structural Pest Control Operator to ensure that the bait stations are labeled.

The size of the letters to be used is not addressed in the regulations; however, they should be large enough to "adequately mark" the device. The purpose of the regulation is to provide a warning to persons who may come in contact with the station and therefore the information should be of a size, and located such that they can see the pesticide name and signal word without picking up the device. The name, address, and telephone number of the operator could be displayed on the bottom of the station if the device is too small to display the information on the top. If desired, the required labeling can be displayed on a card attached to the device.

If, in your judgment, a bait box in use does not meet these eight criteria, it is not "tamper-resistant" and, therefore, is in violation of *FAC section 12973*, "Use in Conflict with the Label" or *16 CCR section 1983(i)*.

Section 3.3

Bee Protection Statements

Interprets FAC sections 12973, 29102, and 29103; 3 CCR sections 6000 and 6614

Approved State program FAC section 29102 states: “The director shall adopt regulations necessary to minimize the hazard to bees, while still providing for the reasonable and necessary application of pesticides toxic to bees to blossoming plants.” “The regulations may also include provisions for timely notification of apiary owners of proposed pesticide applications, and limitations on the time and method of application of the pesticides and the pesticide used.”

Additionally, FAC section 29103 states: “Failure of a beekeeper to remove hives from a specific location ...after notification ...shall not prevent the application of pesticides to blossoming plants if consistent with the pesticide’s labeling and regulations. When the pesticide applicator has complied with the notification ...the applicator shall not be liable for injury to bees that enter the area treated during or after the application.”

Interpretation of basic statements U.S. EPA recommends specific bee caution statements on pesticide labeling. DPR has analyzed these statements and offers the following interpretative guidance.

U.S. EPA allows for some flexibility in bee protection labeling statements, so some pesticides may have bee protection labeling statements that differ from the U.S. EPA recommended statements found in their Label Review Manual (LRM). Some of those differences can have a significant impact on the requirements that apply, as discussed below. Some labeling refers to a State program that provides for the protection of bees. California's statutory and regulatory bee protection requirements meet that labeling provision.

Drift effects Relative to the term “drift” used in mandatory bee caution statements, “drift” implies deposition outside of the treatment area rather than within the target site. Drift is a separate concept that should not be confused with on-site issues. Drift impacts on bees should be handled similar to drift impacts on any other sensitive site.

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Bee Protection Statements, Continued

Drift effects (continued)

It is acknowledged that some drift is a common occurrence. Substantial drift is always prohibited by FAC section 12972. A violation of this labeling phrase occurs when an applicator fails to exercise due care and bees on neighboring property are damaged by drift, under the stated conditions on the labeling.

The applicator must always use discretion when making an application. It is the responsibility of the applicator to comply with the pesticide's labeling and regulations and to consider the potential impacts of the application. Any application resulting in damage to bees off-site could be a violation of *FAC section 12973* (use in conflict with labeling) or *3 CCR section 6614*.

Residual toxicity

Pesticides toxic to bee are those that include the words “toxic to bees” on labeling, regardless of modifying words such as “highly” or “moderately.” Residual toxicity (RT), as specified on the labeling, is the period of time after completing a pesticide application until there is minimal toxic effect to bees. *3 CCR section 6650 contains standards relating to bee activity.*

When data submitted by the registrant shows that RT is prolonged, the U.S. EPA LRM-recommended bee protection statements for both bee toxicity group I (highly toxic) and bee toxicity group II (toxic) labeling contains the directional statement, “Do not apply this product if bees are visiting the treatment area.” For pesticides that are highly toxic to bees, there is an additional statement relating to drift onto blooming crops or weeds.

The intent of this labeling statement is to prohibit applications when the RT period specified on the labeling will extend into the subsequent bee activity periods.

Note: Most products do not show RT times on labeling.

When data submitted by the registrant shows that residual toxicity is NOT prolonged, the U.S. EPA LRM-recommended bee protection statements for both bee toxicity group I (highly toxic) and bee toxicity group II (toxic) labeling contains the directional statement, “Do not apply this product while bees are actively visiting the treatment area.” For pesticides that are highly toxic to bees, there is an additional statement relating to drift onto blooming crops or weeds. Some interpretation of the meaning of the word “actively” and how it affects the requirement is required.

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Bee Protection Statements, Continued

Residual toxicity
(continued)

The intent of this labeling statement is to have applications made when bees are not active and the hazard to bees is minimal by the next active period when the bees may visit /enter the area treated. Bees are “actively visiting” when they are physically present.

Bee hazard information

More information on evaluating bee hazards is available in: *How to Reduce Bee Poisoning from Pesticides* at <http://extension.oregonstate.edu/catalog/pdf/pnw/pnw591.pdf>. This document provides useful information but is not an enforceable standard unless specifically included, in whole or part, in permit conditions.

Agreed upon standards

One of the primary purposes of the statutory bee protection program provisions is to bring the operator of the property to be treated and the owner of the bees into a site-specific discussion of the potential risks and impacts. Often, these discussions result in an "agreed standard" for interpreting the impact on bees with the potential to visit the site versus impacts of applying available mitigations. This approach recognizes the impracticality of basing an interpretation of "visiting" strictly on a number. In effect, the parties, whether individuals or industry groups, most directly impacted and closest to the scene, interpret the labeling provisions in a manner agreeable to both. DPR recommends that, as a general rule, these site-specific, interpretative agreements be honored and accepted for labeling enforcement purposes.

To be acceptable, any agreed standard must meet the following criteria:

1. Be mutually agreed upon by relevant parties without coercion.
 2. Create a documented standard for acceptable "bee visitation" through such mitigation practices as timing, dosage, method of application, amount of bloom, or other factors to minimize the number of bees exposed.
 3. Contain terms that are measurable/enforceable, so that it can be clearly determined whether the agreement was honored by all parties involved.
 4. Convey the terms to the CAC in advance of any application.
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Bee Protection Statements, Continued

Example of labeling statements: Variation statement 1

When the pesticide product labeling states: “This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. **Do not apply** this product, [or allow it to drift to blooming crops or weeds,] if bees are **visiting** (or actively visiting) the treatment area.”

Interpretation:

The first sentence is advisory. It provides facts or information about the product. Advisory labeling statements do not create a specific enforceable obligation upon the user. The second sentence is a mandatory statement. Mandatory statements address how the product must be used or handled and generally, must be followed to avoid a violation. However, before this mandatory statement can be interpreted, the term “visiting” must be defined. Merriam-Webster’s Collegiate Dictionary, 11th edition, on page 1398, defines “visiting” as “to go to see or stay at (a place) for a particular purpose.” 3 CCR section 6650 defines “inactive” as from one hour after sunset to two hours before sunrise (night time and twilight hours) or when the temperature is below 55 degrees Fahrenheit (°F). Use the above criteria to establish that bees are “active” and can potentially be “visiting” (or foraging) during daylight and twilight hours between two hours before sunrise to one hour after sunset when the temperature is above 55°F. During this time, it is still necessary to determine if bees are visiting in sufficient numbers to be significantly impacted by the application.

Based on the above definition of the term “visiting,” the mandatory bee caution statement above is interpreted as follows.

Products with this labeling statement can be applied to a crop:

1. That is not “blooming” under an established or agreed upon standard.
2. That is blooming when bees are inactive.
3. That is blooming when bees are active, provided the threshold is below the criteria in an established or agreed upon standard for “visiting.”

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Bee Protection Statements, Continued

Example of labeling statements: Variation statement 2

“This product is toxic to bees exposed to treatment for 3 hours following treatment. **Do not apply** this pesticide to **blooming**, pollen-shedding or nectar-producing parts of plants if bees may **forage** on the plants during this time period. The 3-hour limitation does not apply if the applicator operates in a state with a formal, state-approved bee protection program, and the applicator follows all applicable requirements of the state-approved program designed to ensure that managed bees are not present in the treatment area during this time period.”

Interpretation:

The first and third sentences are advisory. The first sentence provides information that the product is toxic to bees exposed to treatment for 3 hours following treatment. The third sentence informs the user that the 3-hour limitation does not apply if the applicator operates in a state with a formal, state-approved bee protection program (such as California), and the applicator follows all applicable requirements of the state-approved program designed to ensure that managed bees are not present in the treatment area during this time period. These advisory labeling statements do not create a specific enforceable obligation upon the user.

The second sentence is a mandatory statement. This mandatory statement addresses how the product must be used or handled to avoid a violation.

However, this statement prohibits application to blooming plants only if bees may forage during a specific 3-hour time period. Furthermore, this mandatory statement (limitation) does not apply in a state (such as California) with a bee protection program. In effect, the mandatory limitation is cancelled by the third advisory sentence. As written, no part of this statement is enforceable in California. Notwithstanding the above statement, the applicator must use discretion when making the application to a crop during a bloom period when bees are considered active or (actively foraging). It is the responsibility of the applicator to be aware of the pesticide’s labeling and regulations, and to evaluate the potential impacts of the application. Any application resulting in a bee loss could be a violation of 3 *CCR section 6614*.

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Bee Protection Statements, Continued

**Example of
labeling
statements:
Variation
statement 3**

“This product is toxic to bees exposed to treatment for 3 hours following treatment. **Do not apply** this pesticide to **blooming**, pollen-shedding or nectar-producing parts of plants if bees may **forage** on the plants during this time period.”

Interpretation:

The first sentence is advisory. The first sentence provides information that the product is toxic to bees exposed to treatment for 3 hours following treatment. The second sentence is a mandatory statement. This mandatory statement addresses how the product must be used or handled or a violation. This statement prohibits use of this product during the blooming period if bees are likely to forage on plants within 3 hours. However, before this mandatory statement can be interpreted, the term “forage” must be defined. Merriam-Webster's Collegiate Dictionary, 11th edition, on page 488, defines “forage” as “to wander in search of ...collect ...food.”

Based on the above definition of the term “forage,” this mandatory bee caution statement is interpreted as follows.

Pesticide products with this labeling statement can be applied to a crop:

1. That is not “blooming,” under an established or agreed upon standard.
 2. That is blooming when bees are inactive.
 3. That is blooming when bees are active provided the threshold is below the criteria in an established or agreed upon standard for “foraging.”
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Section 3.4

Feeding Restrictions

Interprets FAC section 12973; 3 CCR section 6000

Interpretation Labeling that states, for example, “Do not use tops for food or feed” prohibits the grower from marketing the root crop (such as carrots) with the tops attached. Root crops and their tops are considered “food” regardless of whether people commonly eat the tops or not. When produce is offered for sale in the grocery store, we have to assume that someone may eat any portion of what they bring home.

A labeling statement might read, for example, "do not use treated foliage for feed or forage," "treated fields are not to be grazed," and "crop residues and cuttings are not to be fed to livestock or baled for such use." These statements prohibit the use of crop residues (straw, trash, screenings, stalks and pumice) for livestock feed. Grazing restrictions apply only to domestic animals such as for meat or dairy use. They do not apply to wild game animals and no hunting restrictions are incurred.

Many growers are unaware of these restrictions because they utilize the services of a commercial pest control business to apply the pesticide and do not have an opportunity to read the labeling restriction. Therefore, a pest control adviser's written recommendation must include any applicable label restrictions on use or disposition of crop or crop by-products and a copy must be provided to the grower (*FAC section 12003(f) and 3 CCR section 6556(c)*).

The agricultural pest control adviser has fulfilled his or her responsibility when he or she includes the restrictive label statements in the written recommendation and provides the grower with a copy. The grower is then responsible for assuring that the restrictive labeling statements are followed. If the grower does not observe the restrictive label statements in the pesticide labeling, he or she is in violation of *FAC section 12973*.

Growers intending to feed crop residues or by-products to livestock should consult their pest control adviser or pesticide dealer to select pesticides that do not have restrictive labeling statements.

Section 3.5

Food Products

Interprets FAC section 12973; 3 CCR section 6000

Interpretation Pesticide labeling commonly includes directions to remove, bag or cover food products prior to treating the area. The term "food products" is interpreted as including other things that are put into the mouth such as, toothpaste, mouthwash, denture adhesives and medicines, even though they may not be swallowed.

Section 3.6

Harvest Date

Interprets FAC section 12973; 3 CCR section 6000

Interpretation Harvest date means the day a crop is removed from its site of growth, such as picked from a tree, bush or vine, or cut as in the case of hay. "Removed from the site of growth" does not mean when the crop is removed from the field or when the crop is threshed or baled after field drying.

Section 3.7

Management of Greenhouse and Nursery Stock After Treatment

Interprets FAC section 12973; 3 CCR sections 6618 and 6770

Purpose This interpretation addresses labeling statements regarding restricted entry intervals (REI) and specific product labeling requirements for personal protective equipment (PPE) concerning greenhouse and nursery stock treatments. See also Section 4.8 for a discussion of greenhouse use relating to site and labeling.

Issues There are several related issues involved in this situation:

- Can plants be sold and moved off property during the REI?
- Does the reference to “other personnel” found on some labeling refer to harvesters and outdoor nursery workers?
- What are the specific labeling requirements after the REI has expired and to whom do they apply?
- What notification requirements apply?

REI requirements Worker protection standards found in 3 CCR section 6770 allow workers to be in the treated area during the REI only to perform specified exempted activities. There is no exemption to harvest or move the plants out of the treatment area.

Treatment area *U.S. EPA Interpretive Policy¹ 5.16: Moving containers during REI*, specifically states that in cases where both the pots and the plants have been treated, both are considered the “treated area” and are subject to REI requirements.

If the pesticide is applied to the potted plants without any spray contacting the pots, the plants could then be moved, as the pots would not part of the “treated area.” We believe this would be a rare, unique circumstance.

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¹U.S. EPA Agricultural Worker Protection Standard 40 CFR parts 156 & 170 Interpretive Policy Questions and Answers. See <http://www.epa.gov/pesticides/safety/workers/amendmnt.htm>.

Management of Greenhouse and Nursery Stock After Treatment, Continued

Movement and sale after the REI expires

Treated plants may be sold and moved off-site only after the REI has expired.

Specific requirements for PPE after REI expires

Occasionally, pesticide product labeling registered for greenhouse and nursery use may require PPE after the REI expires. When labeling requires PPE after the REI expires, all production greenhouse and nursery employees moving treated stock must abide by the labeling requiring specific requirements for use of PPE.

Specific labeling requirements for use of PPE after the REI expires do not apply to destination workers (home and garden retail employees) handling previously treated plants. However, in the event of prolonged contact with treated foliage, it is recommended that retail employees wear PPE.

If the pesticide is applied at a retail center, the California-specific labeling requirements do apply to the workers at the retail establishment.

Notification requirements

Production greenhouse/nursery:

- Posting and notification are required under 3 CCR sections 6761 and 6776.

Retail centers:

- Notification requirements under the worker protection standards only apply to the originating production/greenhouse nursery. Notification to destination workers at retail centers is not required. However, notification to and use of PPE by workers unloading and moving treated stock at a retail nursery or garden center is recommended in the event of prolonged contact with the treated plants.

Customers:

- There is no requirement to notify persons purchasing the potted plants of the continuing PPE requirement, as it does not apply to customers.
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Section 3.8

Physically Present (Certified Applicator)

Interprets FAC section 12973; 3 CCR section 6000

Interpretation The “physically present” language on pesticide labeling requires a certified applicator to provide both “direct supervision” and to be “physically present” when non-certified persons are involved in applying, mixing, and loading these pesticides and when repairing and cleaning the application equipment.

The certified applicator must be located on the premises or contiguous parcel and be in a position to:

- Ensure that non-certified persons are following the labeling directions,
- Provide guidance if the labeling is unclear, and
- Affect changes in procedures if they are not being adhered to or unusual situations occur.

Where California statutes, regulations, or labeling require physical presence and there is **one non-certified handler** at the handling site, the certified applicator must maintain direct supervision and the physically present “in-line of sight” visual standard. Voice contact alone to one non-certified handler does not meet this standard.

In those situations when pesticide handling activities are occurring and there are **two or more non-certified handlers** at separate sites on the same pesticide handling location, the “physically present” statement means the certified applicator must be physically on the premises and must maintain the ability for either visual or two-way voice contact between himself or herself and the non-certified handlers. The ability for immediate communication using their own human voices (not text messaging, computer-generated voice paging, voicemail, etc.), such as by two-way radio or cellular telephone, is required.

Section 3.9

Plant Back Restrictions

Interprets FAC section 12973; 3 CCR section 6000

Interpretation The basis for plant back restrictions is either or both phytotoxicity problems and/or residues in crops for which no tolerance exists. Pesticide labeling plant back restrictions can be classified as either directional (mandatory) or informational (advisory). A mandatory plant back statement is one that addresses how a pesticide must be used. If a grower ignores a mandatory plant back statement, that application is in conflict with labeling and in violation of *FAC section 12973*. An advisory plant back statement is one that provides facts or information about the possible impact. A grower may be responsible for damage or loss that results from a decision to ignore an advisory plant back statement, but is not in violation of *FAC section 12973*. See Chapter 2, *Labeling Statements, Mandatory vs. Advisory*, for a more general discussion of this issue.

Plant back statements are an important consideration in areas where crops are rotated and the same parcel of land may be leased and treated by a succession of growers. If a grower does not observe a mandatory plant back statement and the result is adverse effects to other people, the CAC should consider enforcement action. Adverse effects would include illegal residues on commodities produced and sold by that grower, and illegal residues in or damage to crops produced by subsequent growers who were unaware of the earlier applications.

Enforcement of plant back statements presents unique challenges. DPR recommends appropriate enforcement with respect to any illegal residues on commodities reaching the marketplace to protect the food supply. While "use," as defined in 3 CCR section 6000, specifically mentions plant back restrictions [(c)(2)], tying the application to the subsequent planting that created the "conflict" requires careful presentation when two different people are involved. 3 CCR section 6600 could also be used if the evidence supports it.

Section 3.10

Site Control Statements

Interprets FAC section 12973; 3 CCR section 6000

Interpretation A labeling statement such as, “Keep children and domestic animals out of treated areas until this material has been washed into the soil” does not prohibit the use of the product along roadways and similar areas even though access by the public is not controlled. This statement is intended to apply to products for use on home lawns, parks, and in similar areas where children or pets are likely to play. Its purpose is to avoid repeated or prolonged exposure under those circumstances.

Section 3.11

Professional Applicator Statements

Interprets FAC section 12973; 3 CCR section 6000

Interpretation Statements such as "For use only by professional applicators" or "For use by licensed applicators only" currently have no legal definition, and do not require the user to be a certified applicator nor do they limit the use of the product to licensed agricultural or structural pest control businesses. However, this is an indication that these products are not intended to be consumer products for homeowner use.

U.S. EPA's Label Review Manual, Chapter 11 - *Directions For Use*, Roman numeral VI. - *Guidance for Wording Application Information*, states: "The phrases, "For use only by [certain type of user]"; "For Commercial Use Only" or "For Professional Use Only" should not appear on a product label. Such statements are often used by registrants for marketing purposes. However, neither FIFRA nor the applicable regulations provide for labeling statements such as for "professional use", "industrial use" or other such terms. The registration process does not involve a determination that a product should be used, for example, only by "service persons." Such statements are vague and can mislead customers into believing that a product with such statement is somehow more efficacious than another product. Such statements are also not likely to be enforceable under FIFRA."

Section 3.12

Spray Adjuvant/Surfactant Statements

Interprets FAC section 12973; 3 CCR section 6000

Interpretation There are various labeling statements pertaining to the use of surfactants and other adjuvants with pesticides. Directions for use on pesticide labeling may specify a particular (commonly a proprietary brand name) surfactant at a specified rate. Other labeling statements may include a prohibitive statement, i.e., "Do not use with surfactant other than...." In these cases, the pesticide must be applied with that particular surfactant. All surfactants must be registered as pesticides (spray adjuvants) in California.

Labeling statements may instruct, "Add spreader (non-ionic) at specified rate." This statement would require the use of a spreader meeting the specifications outlined but would allow the user to choose the brand.

Other labeling may state, "A spreader is recommended, but a similar and suitable non-ionic surfactant may be substituted." This labeling may be interpreted to mean that no spreader, or other spreaders may be used, however, only at the indicated rate.
