

Disposal Statements For Control Product Labels

Control products used in agricultural and non-crop land sites are delivered to the user in a variety of reusable and non-reusable container types. The disposal statement currently used on product labels may not be applicable to the handling of all control product container types after use.

Disposal statements for commercial and restricted class control product containers used in agricultural and non-crop land sites have been revised in consultation with the Crop Protection Institute and the Federal/Provincial/Territory Committee on Pest Management and Pesticides. These statements are applicable to specific, defined container types and reflect the unique disposal requirements associated with each type.

Given the extensive consultation and level of agreement, the revised disposal statements will be implemented immediately for new product registrations. Registered product labels will be amended at the time of any other label amendment, at the time of renewal of product registration, or at product re-evaluation.

Section 7.2.2 of the *Registration Handbook* needs to be updated to reflect the revised disposal statement for pest control product labels. The updated version is available on the Pest Management Regulatory Agency Web site as a downloadable document at <http://www.hc-sc.gc.ca/pmra-arla/hndbk-e.html>.

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1.0 Introduction

Control product labels currently have directions for the disposal of the product container after use, and for the disposal of unused, unwanted product. The container disposal directions, however, are only applicable to a control product marketed in a non-reusable, non-recyclable container and do not address all container types currently used to deliver control products to the user.

Innovative, reusable containers have been developed to deliver control products, and the use of this container type is increasing. These include mini-bulk or bulk units that may be refilled at the point of purchase, or returned to the manufacturer for refilling for the user, and therefore require specific directions for handling the empty container.

A recycling program has been implemented by the Crop Protection Institute as an alternative method of disposal of non-reusable control product containers. This program has resulted in the collection of over 25 million containers since initiation in 1989. Currently, 825 collection sites across Canada receive containers.

Revised standard label statements for container disposal of commercial and restricted class control products used in agricultural and non-crop land sites have been developed to address the range of container technology currently used to deliver control products to the user. Specifically, new disposal directions for reusable containers have been developed, and directions for non-reusable containers have been amended to support the significant ongoing container recycling program.

The revised standard label disposal statements have been developed with consultation and contribution from the manufacturing industry through the Label Subcommittee and Technical Committee of the Crop Protection Institute. Consultation with provincial and territorial governments has been accomplished through the Federal/Provincial/Territorial Committee on Pest Management and Pesticides. Both organizations have stated support for the standard disposal label statements outlined in this *Regulatory Directive*.

2.0 Container Definitions

Recyclable Container

These are “one-way” containers and are not reused. Once emptied, rinsed and rendered unsuitable for further use, they are delivered to container collection sites where they may be recycled. Container collection sites will only accept plastic or metal containers of 23 L or less.

Refillable Container

The user/grower may return to the point of purchase with the empty container, and have it immediately refilled with the same product. The user/grower can also return the empty container

to the point of purchase if he does not need more product. The container could then be refilled at the point of purchase, and the product sold to a second user/grower. The number of times the container is refilled at the point of purchase is dependent on the “life” of the container, which will vary from product to product. Once the “life” of the container has expired, it will be returned to the manufacturer.

Returnable Container

A container that is to be returned to the point of purchase by the user/grower. The container is collected from the point of purchase by the manufacturer, and returned to the manufacturing facility. At the manufacturing facility, the returnable container may either be refilled for future use, (e.g., next season) or disposed of by the manufacturer. The container is not refilled at the point of purchase.

3.0 Disposal Label Statements

For all commercial and restricted class control products that are used in agriculture and non-crop land areas (such as forestry, industrial sites, rights-of-way), where recyclable, returnable or refillable containers are used, revised container disposal label statements will be implemented. For commercial and restricted class control products used in sites other than agriculture and non-crop land, where the containers are non-recyclable, non-returnable or non-refillable, the current container disposal label statements with minor modifications will continue to be used.

3.1 Disposal label statements for commercial and restricted class products other than agriculture and non-crop land, where non-recyclable, non-returnable or non-refillable containers are used:

1. *Triple- or pressure-rinse the empty container. Add the rinsings to the spray mixture in the tank.*
2. *Follow provincial instruction for any required additional cleaning of the container prior to its disposal.*
3. *Make the empty container unsuitable for further use.*
4. *Dispose of the container in accordance with provincial requirements.*
5. *For information on disposal of unused, unwanted product, contact the manufacturer or the provincial regulatory agency. Contact the manufacturer and the provincial regulatory agency in case of a spill, and for clean-up of spills.*

3.2 Container disposal label statements for commercial and restricted class products used in agriculture and non-crop land

3.2.1 For recyclable containers

The following statement would apply to plastic or metal containers that contain agricultural and non-crop land uses (e.g., forestry) pesticide products, and that are designed to contain 23 L or less of product.

Disposal of Container:

Do not reuse this container for any purpose. This is a recyclable container, and is to be disposed of at a container collection site. Contact your local distributor/dealer or municipality for the location of the nearest collection site. Before taking the container to the collection site:

- 1. Triple- or pressure-rinse the empty container. Add the rinsings to the spray mixture in the tank.*
- 2. Make the empty, rinsed container unsuitable for further use.*

If there is no container collection site in your area, dispose of the container in accordance with provincial requirements.

3.2.2 For returnable containers

Disposal of Container:

Do not reuse this container for any purpose. For disposal, this empty container may be returned to the point of purchase (distributor/dealer).

3.2.3 For containers that can be refilled for the user by the distributor/dealer

Disposal of Container:

For disposal, this container may be returned to the point of purchase (distributor/dealer). It must be refilled by the distributor/dealer with the same product. Do not reuse this container for any other purpose.

3.2.4 Disposal of unused, unwanted product

A revised standard label statement providing directions for the disposal of unused, unwanted product will be added to labels of agricultural and non-crop land control products:

For information on disposal of unused, unwanted product, contact the manufacturer or the provincial regulatory agency. Contact the manufacturer and the provincial regulatory agency in case of a spill, and for clean-up of spills.

4.0 Implementation of Revised Disposal Statements on Control Product Labels

The revised disposal statements will be implemented immediately on labels of new products registered after the date of publication of this *Regulatory Directive*. For existing registered control product labels, the revised disposal statements will be added at the time any other label amendment is made to the control product, at the time of renewal of the control product registration, or at product re-evaluation.

The registrant should select and propose the appropriate label statement(s) for their product/container combination(s). For a single control product, several product labels with different disposal statements may be required if more than one container type is marketed for a given registration number. All statements for all container types marketed should be outlined on the draft label. It is understood that only the appropriate statement for a particular container type will appear on the printed label for the product. The Pest Management Regulatory Agency will verify that the correct statement(s) has been chosen, apply the standard statement(s) or agree to wording that is equivalent.