

CCC Chemical Container Management Project

Background:

Agvet chemical container management was nominated as a major CCC work program item for 2004–05. The committee agreed that the aim of the project is to improve the content of product labels and ensure the safe and effective handling and disposals of containers.

CCC31 (May 2004) resolved that the issue of agvet chemical container management be progressed initially through the committee seeking feedback from a number of APVMA stakeholders about the appropriateness of pesticide and veterinary medicine containers. Members agreed that this feedback would ensure that the committee had a detailed understanding of the issues associated with container management.

In August 2004, the APVMA wrote to a number of stakeholders, including members of the Registration Liaison Committee, seeking feedback on the appropriateness and usability of product labels and containers. Specifically, respondents were asked to comment on container design, durability, chemical transfer, user friendliness, disposal and labeling. Responses were received from the following organisations:

- i. Department of Health (WA)
- ii. Mr Andy Nicholls, Environment Protection Authority SA
- iii. Environment ACT
- iv. Department of Primary Industries and Fisheries (QLD)
- v. Department of Primary Industries, Water and Environment (TAS)
- vi. Department of Environment and Conservation (NSW)

A copy of all responses received is attached.

Issues:

The comments received from stakeholders have been divided between the headings - container design, durability, chemical transfer and user friendliness, disposal, labeling and other comments.

Container design, durability, transfer and user friendliness

- Inadequate pouring systems
- Need for urgent review of chemical container design to reduce spillage
- No uniformity in terms of design
- Does the APVMA registration process involve a detailed assessment of the containers suitability? If not, is it appropriate that it does?
- Major problems with pourability of large containers eg ‘glugging’
- Inappropriate handles for the size of the container ie very thin handles on heavy containers
- 1kg or 1L limit on all products available for domestic use

Disposal

- Lack of a used pesticide or pesticide container collection program in WA
- General need to increase the number of programs or effectiveness of existing programs that minimise the amount of waste or used containers going to landfill ie drumMUSTER
- drumMUSTER is a positive concept but needs to be improved
- Problems with containers being accepted by drumMUSTER ie containers refused because they are not clean but operators report that some are very difficult to clean or have stains from product

- Support for development of granular formulations that mean containers are easier to dispose of – farmer education programs to increase the uptake of wettable granule formulation types
- Need to provide incentive for users to return containers to drumMUSTER

Labeling

- For domestic use products, area concentration of ‘spray mix’ needs to be expressed more appropriately (ie not per ha)
- Expiry date and/or date of manufacture should be on all containers
- Development or improvement of a specific domestic label that includes appropriate and necessary information only
- Labels must be sufficiently durable to withstand spillage, contact with other materials, environmental conditions and maintain label legibility for a number of years
- Labels need to cater for pesticide users from non-English speaking backgrounds
- Common branding by manufacturers can cause confusion between product types – could separate fungicides, herbicides and insecticides by drum type, colour or other visible signal
- Increase the size of the active constituent information so it stands out more

Other comments

- Agvet chemical container management is a very broad but important topic
- The CCC needs to conduct an extensive consultation with a large number of stakeholders to gain a detailed understanding of the issues surrounding agvet chemical container management
- CCC must consult with spray contractors and users
- Timeframe for consultation in this instance was too short given the scope and importance of the issue