Attention Spray Adjuvant Registrants

The Washington State Department of Agriculture (WSDA) is working toward more accurate labeling of spray adjuvants. Over the next two years you may be directed to revise your label, confidential statement of formula (CSF) or both. We intend to review all current spray adjuvant registrations to ensure they comply with our laws and rules and are not misleading.

WSDA will review spray adjuvant registrations for consistency, clarity and compliance in the following areas:

**Principal Functioning Agents (PFA)**

The chemical name on the label and the CSF must be associated with the specific Chemical Abstracts Service (CAS) number for the ingredient. Group names or family names will not be allowed when a more specific chemical name is available, such as from the U.S. Environmental Protection Agency (EPA) InertFinder database. WSDA will continue to allow a specific common chemical name or an approved synonym for the specific chemical.

Some registrants have said their adjuvants contain propriety formulas, and therefore, they do not want to disclose ingredient information on labels. By rule, WAC 16-228-1400 (3)(c)(i), the top three PFA’s are not considered confidential business information and must appear on the label with the combined percentage of all PFAs. The percentages of the individual PFA’s are not required, which offers some protection of product formulation.

**Adjuvant Function Statement**

By rule, WAC 16-228-1400 (3)(b), the adjuvant function must be a term defined by International ASTM (American Society of Testing and Materials). This term must appear in the function column of the CSF and on the adjuvant label. Only those adjuvant ingredients that are consistent with the function(s) stated on the label can appear in the PFA section on the CSF. For instance, if the adjuvant’s function is “non-ionic surfactant,” then the only ingredients allowed in the PFA section of the CSF would be those that function as non-ionic surfactants. All other ingredients should be listed in the “Constituents Ineffective as Spray Adjuvants” section of the CSF.

In addition, the total PFA percentage on the CSF must match the total PFA percentage on the label. If there are multiple functions listed in the PFA portion of the CSF, then all of those functions must appear on the label in descending order of composition.

**Repacks and Components**

Many adjuvants are either manufactured by another company or use components from another manufacturer. Registrants should provide a copy of the proposed labeling to any supplier of the top three PFA’s to ensure consistency and accuracy of the common chemical name and function on labels.

**Questions?** Contact the WSDA Pesticide Registration Section at (360) 902-2025 or e-mail pestreg@agr.wa.gov.