WSDA Adjuvant Registration

Issues and Actions

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July 17, 2018

Council of Producers & Distributors of Agrotechnology

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Issues

Mission statement

- *CPDA members want to be able to meet the WSDA requirements for the three principal functioning agents on the label without exposing confidential business information.*
  - Confidential Statement of formulations
  - WSDA registration flexibility to purchase ingredients that maintain the product quality standard and provide for supply chain purchasing flexibility

Label concerns

- Principal Functioning Agents

  EPA Inert Finder too specific

  Confidentiality issue

  Piecemeal, not holistic review
- Inconsistent reviews
- Approval timing / consensus with California
- Label inventory

CSF concerns

- Chemical naming
- CAS numbers of formulated inputs
- Supply chain flexibility
- Function statements

Principal Functioning Agents (PFA)

Common Chemical Name	CAS Number (Mandatory)	Name of Supplier	Spray Adjuvant Function(s) Performed	Nominal Percentage
				%

Actions

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WSDA Meeting

- Met with staff for two hours
  - Kelle Davis, Program Manager
  - Erik Johansen, Policy Assistant
  - Steve Foss, Program Specialist
  - Eddie Simons, Program Specialist
  - Chelsee Lyons, Program Specialist
- Endorse WSDA guideline: “consistency, clarity and compliance”
- Maintained that WAC was undefined: “The principal functioning agents must be listed by chemical name in descending order of composition”.
- How does new policy uphold Department mission? Who does it serve?

WSDA Meeting

- WSDA / stakeholder interaction
- Developing database system for drop down registration menu
- EPA Substance Registry System / Inert Finder
- Concern for toxicological differences within broad chemical family
- Substantially similar in terms of functionality and toxicity

Next Steps

CPDA Work Group

- Chemical name review

Common Chemical Name (PRS)	New (Correct) Common Chemical Name or Synonym	CAS Number	Function(s)	Action date	Reference
Alkyl polyglycoside	D-Glucopyranose, oligomeric, C10-16-alkyl glycosides	110615-47-9	Adjuvant	11/21/2017	
Alkyl polyglycoside	D-Glucopyranose, oligomeric, C9-11-alkyl glycosides	132778-08-6	Adjuvant	12/08/2017	
Alkyl polyglycoside	Oligomeric D-glucopyranose decyl octyl glycosides OR D-Glucopyranose, oligomeric, decyl octyl glycosides	68515-73-1	Adjuvant	02/20/2018	EPA SRS

- Regulatory specialists
- Chemists

- Anti-trust issue

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Thank you

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