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Adjuvant Registration in the State of Washington

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Registration in Washington State as several aspects:

- Strikes fear in the heart of seasoned regulatory departments
 - Has been complicated than elsewhere
 - Everyone has a story about a product
- BUT
- Times are changing
 - CPDA has *influenced* WSDA process
 - A CPDA success story



Some Basics:

Law: RCW 15.58.050 thru 130

Rules: WAC 16-228-1400 promulgated in form we recognize today in 1999/2000, with additional changes in 2007

- NCAP lawsuit in 1996 put new emphasis on inerts
- WSDA studied the issue and the 1999/2000 policy changes became rules



WAC 16-228-1400 lays out rules for adjuvants

OF most interest:

- 1) Function statement – must use terms from ASTM E1519 (last updated in 2016)
- 2) Principle functioning agents – top 3 listed in declining order



REQUIRED LABEL ELEMENTS

- Product Brand Name
- Adjuvant Function Statement
- Ingredients Statement
- Keep Out of Reach of Children Statement
- Precautionary Statements
- Directions For Use
- Aquatic Use Statement
- Storage and Disposal
- Product Weight
- Name and Address of Registrant

- XYZ Premium Spray Adjuvant
- Nonionic Surfactant and Antifoaming Agent

PRINCIPAL FUNCTIONING AGENTS:

Alcohols, C10-16, ethoxylated; Nonylphenol ethoxylate;
Dimethylpolysiloxane.....80.5%

CONSTITUENTS INEFFECTIVE AS SPRAY ADJUVANTS:

.....19.5%

TOTAL:

.....100.0



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When label information is correct, submit CSF.
MAKE SURE FUNCTIONS ON CSF MATCH LABEL CLAIMS

#1 complaint from WSDA are incomplete applications!

Submit via WSDA portal



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Browser address bar: <https://fortress.wa.gov/agr/pisces/PlantServices/PesticideUpload/FileUpload.aspx> State of Washington [US] Search...

Browser tabs: Pesticide Registration CSF Port..., Pesticide File Upload

Browser menu: File Edit View Favorites Tools Help

Browser bookmarks: Agrian - Ag Data From Fie..., American Portfolios, By Chapter of HTS 2012-0..., Divine Office - Liturgy of t..., Electronic Code of Federal..., Engenia tank mix, Extendimax tank mix, ezhazmatIDSearchResult, FeXapan™ Tank Mix Partn..., Inert Use Information Iner..., Inert Use Information Iner...



Pesticide Registration CSF Portal

This secure portal is only to be used by pesticide companies for the purpose of transferring Confidential Statement of Formulas (CSFs) to WSDA.

Contact Person:

Company Name: *

Notes:

Windows taskbar: Search bar (Type here to search), taskbar icons (File Explorer, Store, Edge, Word, PowerPoint, Excel, Outlook, Word, Word), system tray (network, volume, date/time: 1:05 AM 8/19/2019).



- Users report portal can work well.
Complaints include:
 - No clear receipt mechanism
 - Sometime the portal doesn't work (reason – there was a live link that allowed public access so the portal was down for some time to fix this)
 - FAX fallback method
 - General Improvement
 - REMEMBER – CSFs submitted by email can be public documents



General Issues:

Interpretations of rules can vary between reviewers

Revisions Revisions Revisions

Accidental release of CBI – including customer in email discussions

Resources are limited, workload is up



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The Debate over Chemical Names *or* “*The Great Synonym Hunt*” *and how CPDA rode to the Rescue*



Since new rules were in effect, some creative naming for ingredients was allowed

“Glycerol acid citro phosphate complex”

Of course everyone wants to differentiate products from competition; having the same ingredients listed as competitors product devalues the whole set of products



In 2018 WSDA proposed naming convention based on CAS numbers and IUPAC names. This would **unambiguously** define an adjuvant, at least for principal functioning agents.

Many CPDA members were opposed to this labeling.

An *ad hoc* team visited WSDA in November 2018 and presented the following major points:



1) Farmers are not chemists – listing IUPAC names would result in a “word salad”, more confusing than educating.

(RS)-2-(4-(2-methylpropyl)phenyl)propanoic acid is really IBUPROFEN. Which name is more instructive to user?

2) CPDA survey showed majority of companies would not introduce new technology into Washington if this naming occurred.

3) Jim Glatzhofer of WE dramatically made this point



WSDA indicated they had problems understanding the some chemical classes themselves

For example oils used in Crop Oil concentrates

CPDA started a dialog resulting in the current spreadsheet of approved chemical names to describe PFA's

Most recent 7/30/2019



Simple rules:

- By statute all acids must be named (eg sulfuric, citric etc).
- Oils can be named by the simple class – “paraffinic oil” or mineral oil, rather than longer distillate names
 - The refining industry has lots of names for their products, even with same CAS number



Other ingredients can be named by the following hierarchy:

- Chemical name
- Approved chemical synonym
- Chemical class

Alcohols, C11-14-iso-, C13-rich, ethoxylated (**NAME**)

Ethoxylated branched C11-14, C13-rich alcohols (**SYNONYM**)

Branched alcohol ethoxylate (**CLASS**)

ADDITIONALLY

Nonionic Surfactant, Spreader, Wetting Agent (**FUNCTION**)

Tolerance exempt, 40 CFR 180.910, data compensation. (**STATUS**)

CDPR, EPA InertFinder, EPA SRS 5/10/2019 (**REFERENCE**)



- The new naming system eliminates the old “creative” naming of ingredients
- Allows for some flexibility
- Does not realistically require full disclosure
- A compromise which is good for all stakeholders
- Shows CPDA and WSDA can work together to find common ground.



Complications:

- Not all cells in the spreadsheet are filled in (especially polymers)

Ammonium lauryl ether sulfate	Ammonium laureth sulfate	None	Anionic Surfactant
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- Can propose appropriate names – Please review the spreadsheet and offer suggestions. (can be submitted by JISC)
- There are “missing CAS numbers” – compounds that were reassessed but did not get placed on Inert Finder. (Being addressed by JISC)



Changes at WSDA

8/30/2019 Erik Johansen is retiring

The spreadsheet will be maintained by Gary Vetter and
Kellie Davis

Kellie Davis Unit Leader

Gary Vetter – Specialist

Steve Foss

Eddie Simons

Shannon Lumsden

Chelsea Lyons



Future Directions

- Complete name database
- *Then* migrate to new database with
 - *Individual company accounts for all documents*
 - *CSFs, SDS, Labels*
 - *Pay fees online*
- WSDA appreciates our input and expertise
- Entering a more collaborative phase



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Thank You

How can CPDA help you?