



Agricultural Chemicals: Label rates for horticultural crops

ACVM position statement (March 2018)

Position statement

MPI's position is that when a product is applied as foliar spray on horticultural crops the label rate must be stated on a 100L water basis (dilute spray). In horticultural crops, the appropriate volume of water per hectare is crucial to ensure good coverage (e.g. to the point of run off). However, as crop canopy develops over the season, water volume required to ensure good coverage late in the season increases and, therefore, is not a fixed variable throughout the season. Spray volume to achieve good coverage in horticultural crops may also depend on other variables, such as tree height/volume and row spacing.

The dilution rate per 100L water on labels is deemed sufficient, as it gives end users some flexibility to adjust spray volume according to local variables. Hence, label guidance should simply direct end users to adjust spray volume accordingly to ensure the product is applied to the point of run off.

While useful in some situations, a set product rate/ha should not be presented on the label guidance for horticultural crops. A rate/ha would be appropriate only if all variables are accounted for throughout the application window, including but not limited to: target stages of crop development, row length and spacing, crop volume, tree height etc. As such guidance will likely result in very wordy and complex labels, this approach is deemed not appropriate.

However, registrants can include a statement on the label that refers the user to appropriate industry guidelines or to additional guidance provided outside the label. For example, registrants could make available additional guidance material specifically designed to inform end users on how to adjust application rates accordingly. Importantly, any material provided outside the label by the registrant must be consistent with the label in all respects, including the approved dilution rate/100L water.

Minimum product rate/ha

A number of products currently registered for use in horticultural crops in New Zealand currently state a 'minimum product rate/ha' in addition to the 'dilute spray rate'. A minimum product rate/ha in addition to the 'dilution rate' is considered not appropriate and should not be presented on the label. In such cases, the 'minimum rate/ha' was set based on the rate/ha for dilute spray in a fully developed canopy. At early stages of development, when canopy is not developed, a lower water volume may be required to ensure good coverage.

When the product is applied as dilute spray, label guidance should be limited to the dilution rate per 100L water and additional guidance should only indicate that the product should be applied in sufficient water volume to achieve good coverage. MPI understands that many industry groups and growers currently have systems in place to calculate appropriate application rates outside the label if an appropriate dilution rate is provided.

Concentrate spray

When applying the product as concentrate spray, the applicator adjusts tank mix to a fraction of the dilute spray volume. The product rate per hectare should be the same as that considered appropriate to ensure good coverage when the product is applied as dilute spray. Tank mix is adjusted according to the technology used to achieve good coverage.

Guidance on how to move from dilute to concentrate spraying can be provided. This guidance must be derived from the rate/ha when the product is applied as dilute spray.

Actions required

MPI's ACVM group is currently amending parts of related documents (e.g. ACVM labelling guidance) in line with this position statement. Amended guidelines will provide clear guidance on how applicants should address product application rates when the product is intended to be used on horticultural crops while developing data packages to support product registration under the Agricultural Compounds and Veterinary Medicines (ACVM) Act 1997. Any applications made for new uses should be in line with these documents.

Registrants currently holding products in the ACVM register should amend any label content not in line with this position as soon as possible, before the next reprint of labels and within 5 years from the date that this Position Statement was issued. Registrants should either:

- **apply for a 'C9: Label change'**

This application type is appropriate when the label change required does NOT modify the risk profile of the trade name product. Please ensure you refer to this position statement (*"Agricultural Chemicals: Label rates for horticultural crops"*) when applying for this 'C9: Label Change'

OR

- **apply for a 'C6: Change in application rate or timing'**

This application type is appropriate when the label change required does modify the risk profile of the trade name product. Please note that label changes that modify the product's risk profile will need to be supported by data or a scientifically sound rationale.