Chemicals Regulation Directorate

The Labelling Handbook

(Version 2)

An Applicant's Guide to Labelling Requirements for Plant Protection Products

Volume 1- Requirements for all Product Labels

Volume 2- Requirements for Professional Product Labels

Volume 3- Requirements for Amateur Product Labels

Volume 4- Requirements for Labels of Products used under Permits for Trial Purposes

Issued by CRD on May 2014

The Labelling Handbook
Volume 1

Requirements for all Product Labels

Contents

1. INTRODUCTION

1.1 Role of the Labelling Handbook

1.1.1 The content and design of a plant protection product (PPP) label is important as it is the main source of information for the user. Label information must be conveyed such that the user can easily read, understand and follow to ensure that the product is used safely, humanely and efficaciously.

1.1.2 This Handbook provides detailed guidance on preparing product labels. New applicants are advised to read through the Handbook in full, but it should also be used as a reference work for more experienced applicants. A glossary of some of the terms used throughout is on our website.

1.2. Products covered by this guidance

1.2.1 This Handbook covers the legal requirements for labels of all **amateur** and **professional PPPs** authorised by CRD

1.2.2 It does not apply to:

(a) **non-agricultural pesticides and biocides** including those for wood preservation, surface biocide treatment, anti-fouling products and animal husbandry) who have their own labelling guidance; or

(b) **adjuvant products** (further details on adjuvant labelling can be found in 'The Applicant Guide').

1.3 Legal basis for these labelling requirements

1.3.1 General labelling requirements were previously defined under the governing national legislation (COPR/PPPR in the UK). Now that all products are authorised under the directly acting EU Regulation 1107/2009, UK labelling requirements are implemented under Regulation 547/2011.

1.3.2 The PPP authorisation includes requirements for the labelling of each product in the 'conditions for sale and supply'. This includes reference to the agreed text and other requirements in this Handbook.

1.3.3 Some label requirements are also specified under *other* non-PPP legislation *e.g.*

(a) The classification and labelling of a product is a requirement of either the Chemicals (Hazard Information and Packaging for Supply) Regulations(CHIP) or

Regulation EC 1272/2008 (Classification, Labelling and Packaging of Substances and Mixtures (the CLP Regulation).

(b) The weight/amount of material must be specified in accordance with the Weights and Measures Act 1985.

1.3.4 In addition labels may also include other information that is provided by the applicant at their discretion (*e.g.* Company Advisory Information).

1.3.5 This Handbook provides advice on how all this information fits together with the PPP Regulations and how it should all appear on the product label.

1.4. Responsibilities of an authorisation holder selling/supplying the label

The text and format of the label supplied with the authorised product must comply with the following:

(a) The draft label text as identified in the **product authorisation** by date submitted, company reference no. and an HSE reference no. Amendments to the draft label text are specified on the covering letter to the authorisation (it is a requirement in the authorisation document itself that these must be implemented);

(b) Classification and labelling under **CHIP or the CLP Regulation**. (The authorisation will include, based on the knowledge available to us, our understanding of the classification).

(c) Structure and format of the final printed label in line with **this Labelling Handbook Volumes 1 and 2 or 3 (professional and amateur products respectively**.

(d) For professional products, an optional Company Advisory Information at the discretion of the authorisation holder in line with the guidance at **this Labelling Handbook Volume 2/ Section 8.**

1.5 Responsibilities of a user following the label

1.5.1 Professional products

The whole product label other than Company Advisory Information has a legal basis and **all label instructions in those sections must be followed by the user**. The authorisation will highlight specific conditions of use which cannot be varied or disregarded in any circumstances (*e.g.* crops to be treated, maximum dose rates, numbers of treatments, latest time of application, personal protective equipment and various other environmental and restrictions that appear on. the authorisation document (copies of which are available on our website). Some Directions for Use *may* possibly be varied by the user by virtue of advice given in the Code of Practice for Using Plant Protection Products *e.g.:*

- Water volume used for the application of products;

- Use of tank-mixtures;
- Use of product on crops in accordance with the requirements of an Extension of Authorisation for Minor Use (previously called the Specific Off-Label Approvals Scheme).

1.5.2 Amateur products

The whole product label has a legal basis and **all label instructions must be followed** by the user

2. PROCEDURES FOR AUTHORISATION OF A LABEL

2.1 Stage 1 - Applicant submits a draft label

2.1.1 For most applications you must provide a copy of a draft label which will be considered during the evaluation of your application. This includes:

(a) Applications for a commercial level of authorisation of a **new product**.

(b) Applications for **changes to an existing authorised product** where changes are required to the label text *e.g.* for authorisation on new crops; for claims to control new pests, diseases or weeds.

2.1.2 The draft label text must include the proposed text set out in;

- the general requirements specified in Volume 1 (all products); plus
- Volume 2 (professional products) or Volume 3 (home garden products) of this Handbook.

2.1.3 All standard text required in this guidance must appear. You must ensure that all the proposed claims and recommendations can be justified by the supporting safety and efficacy data package. It is however not necessary at this stage to reflect all the formatting requirements set out in Volume 1 (*e.g.* legibility, fonts, final artwork and colours).

Important Notes

A draft label is **not required** for the following types of applications;

- applications where there are **no changes to the authorised l**abel *e.g.* those addressing confirmatory data requirements or those for minor changes to the formulation;

- applications for new products submitted via the **Administrative Stream** and applications for new **Parallel Trade Permits** where the Authorisation/Permit will simply make reference to using the authorised label for the 'parent' or 'reference product' with an amendment to the tradename/ MAPP no./ Authorisation/Permit holder. For such products you must still follow all the guidance in this Handbook on formatting, legibility, acceptable text changes, etc.

- applications for a **Permit for Trial Purposes** (you must label the product in line with the conditions set out in the Permit and the requirements of Volume 4 of this Handbook).

Where you do not submit a draft label for a commercial authorisation (other than Parallel Trade Permits), you must provide a suitable reference to the previously authorised label (including COP number under which the product label was submitted and the HSE reference for that label as specified on the current authorisation).

2.2 Stage 2 - CRD considers the draft label as part of an application

We will check the draft label during the processing of your application to ensure that it complies with the legal requirements and that the contents of the label are supported by relevant data and the safety/efficacy assessment. A fee is applied to the checking of a new draft label.

2.3 Stage 3 – CRD issues authorisation with label amendments to the draft label

2.3.1 If appropriate, we will issue an authorisation for the product which will include a reference to the submitted draft label and a list of amendments included in the letter accompanying the authorisation. It is your responsibility to ensure that these amendments are incorporated into the final printed label and that it complies with all the formatting requirements set out in this Handbook.

2.3.2 There is no requirement for the routine submission of the final printed label. However, you may be asked to submit the final label as part of our rolling programme of label checks required under Article 68 of Regulation (EC) No 1107/2009.

3. INFORMATION THAT MUST APPEAR ON THE LABEL

A PPP label will include 3 types of information which for the are known as **'authorised text'** and **'other' text**.

3.1 'Authorised Text'

3.1.1 **''Authorised Text'** is information relating to the safe, efficacious and humane use of the product, which falls within the remit of the PPP legislation and supported by safety and efficacy data *i.e.* the sections headed Important Information, Safety Precautions, Directions for Use, Extensions of Use, plus all the information on the Identity of the product.. This is the part of the label that we check and to which we may require amendments.

3.1.2 'Authorised Text' is applicable to professional products (Volume 2), amateur products (Volume 3) and Experimental Authorisations (Volume 4) although the requirements differ between each. It is important that you refer to the correct section of the Labelling Handbook when considering the 'Authorised Text' for your PPP label.

(a) Professional Products

Authorised text for a Professional Product Label consists of the following:

Product Identity	See Volume 2/ Section 2
Important Information	See Volume 2/ Section 3
Safety Precautions	See Volume 2/ Section 5
Medical Advice	See Volume 2/ Section 6
Directions for Use	See Volume 2/ Section 7

(b) Amateur Products

Authorised text for an Amateur Product Label consists of the following:

Product Identity	See Volume 3/ Section 2
Safety Instructions	See Volume 2/ Section 4
Medical Advice	See Volume 2/ Section 5
Instructions for Use	See Volume 2/ Section 6

3.1.3 The 'Authorised Text' may usually only be substantively amended by submission of an application for change in authorisation. However, the Labelling Handbook allows a degree of flexibility in approach to formatting (see Volume 1/ Section 5).or changes to wording that can be made without applying for authorisation (see Volume 1/ Section 7).

3.2 'Other Text'

3.2.1 **'Other Text'** is either:

(a) Information that has to be appear by virtue of other legislation *e.g.* classification and labelling under **CHIP/CLP**. We do not check this section although the Notice of Authorisation will include either our assessed classification or, if we have not assessed it, the applicant's proposal. **See section 3.3. below and Volume 2/ Section 3 (professional products) and Volume 3/ Section 2 (amateur products) for full guidance.**

(b) Additional advice that may be supplied on, or with the product label and which is not within the remit of the Regulations. It includes additional useful advice on:

- the handling and use of the product at the discretion of the authorisation holder (*e.g.* Company Advisory Information for professional products- see Volume 2/ Section 7);

- information which is required by other legislation (*e.g.* **Material Safety Data Sheets (MSDS) required under REACH regulations**. A requirement of the REACH Regulation is that all products must be supplied with MSDS. They may appear on the label as using the following phrase:

  'This Safety Data Sheet does not form part of the label authorised under Regulation 1107/2009.);

- information that relates to **non-pesticidal uses** which are not controlled under Regulation 1107/2009, *e.g.* uses as a fertiliser/crop nutrient or general disinfectant uses. A label may carry such recommendations as long as they are clearly separated from those for PPP uses and a statement must appear explaining that these uses are not part of the text as controlled under the Regulation 1107/2009;

- website URLs or QR codes which provide links to other useful information for the user. We have no specific restrictions as to their use on labels as long as:
  - their size and location does not restrict label information required under the product authorisation; and
  -- the information linked to is in line with the authorisation or other regulatory requirements

We do not check these aspects of the label and it is your responsibility to comply with the relevant requirements.

3.3 CHIP/CLP requirements

3.3.1 Since 31 July 2004 all PPPs in the UK. have been included under the scope of the Chemicals (Hazard Information and Packaging for Supply) Regulations 2002 (CHIP).

CHIP implemented Directives 67/548/EEC (the 'Dangerous Substances Directive' - DSD) and 1999/45/EC (the 'Dangerous Preparations Directive' - DPD), which require that those responsible for the marketing of the product must classify and label the product with respect to physico-chemical properties, human health and environmental effects. The product must be classified using either the 'conventional' method of calculation (based on the components of the formulation) or by using specific formulation data (or via a combination of both). CHIP requires certain symbols (and associated wording *e.g.* 'Dangerous for the environment'), Risk (R) phrases to reflect the classification, and safety (S) phrases to ensure safe use.

3.3.2 On 20 January 2009 the above Directives were replaced by a new EC Regulation 1272/2008 on Classification, Labelling and Packaging of Substances and Mixtures (the CLP Regulation) which will implement the United Nations' Globally Harmonised System (GHS) for classification and labelling in all EU Member States.. The CLP Regulation introduces new classification criteria, hazard pictograms and labelling phrases (hazard statements and precautionary statements). Further background on the GHS can be found on the HSE website.

3.3.3 CHIP 4 introduces *transitional arrangements* to allow a gradual migration from the existing DSD/DPD classification system (CHIP 3) to the CLP system. CHIP 4 will apply to the classification of substances from 1 December 2010 and to the classification of mixtures from 1 June 2015. Substances and mixtures which are already in the supply chain before 1 December 2010 (substances) and 1 June 2015 (mixtures) may be postponed until 1 December 2012 and 1 June 2017 respectively. The additional two years are granted in order to avoid unnecessary burdens of re-labelling and re-packaging on enterprises reclassifying their substances and mixtures according to CLP.

3.3.4 See the CHIP and CLP Guidance Document for full guidance on authorisation holders' responsibilities for CHIP/CLP labelling and how such labelling impinges on PPP authorisation and labelling.

Important Notes

There are additional '**Special Risk Phrases' (see Annex II of Regulation 547/2011) and Safety Precautions (see Annex III of Regulation 547/2011))** that were originally adopted across the EU in Annexes IV and V of Directive 91/414/EEC They are required in addition to and to complement any phrases required under CHIP/CLP or UK national PPP requirements. In general, these phrases cannot be applied until re-registration of the product (when all of the active substances have been approved under Regulation 1107/2009 and an assessment has been conducted in accordance with the Uniform Principles). A list of the Annex II and III phrases and how they should be applied is given in Volume 2/ Appendix 2 (as they will usually, but not always, apply to professional products).

In some cases the Annex III phrases should be applied before re-registration *e.g.* we have agreed to use the SP1 phrase on all amateur products in advance of re-registration. Volumes 2 and 3 of this Handbook explain where this is the case.

4. LABELLING DIFFERENT PARTS OF THE PACKAGING

4.1 Components of a label

4.1.1 The label is defined as the written, or graphic matter on, or attached to, or accompanying the plant protection product. It may take the form of:

- a label printed on or attached directly to the container;
- a fold-out leaflet attached to that label or a separate or detachable leaflet;
- additional outer packaging (*e.g.* cardboard outers) or separate inner packs (*e.g.* sachets within a cardboard outer).

4.1.2 As it is important to convey certain important information to the user at when the product is first handled, we have defined the type of information that should appear on different parts of the container label for each of the above.

4.2 Physical requirements of a label

4.2.1 The label must be strong, durable and attached securely, and remain so during all conditions under which the container is likely to be transported, stored and used. It should be resistant to both the contents of the container and of other substances with which it might be expected to come into contact.

4.2.2 It must be in a prominent position on the container and for 'dangerous' products (classified in accordance with CHIP/CLP) the label must be placed so that it can be read horizontally when the container is in its upright position.

4.2.3 The label must be the largest size allowed by the design of the pack but at least:

Container capacity	**Dimensions of label**
* 3 litres or less	* not less than 52 x 74 mm
exceeding 3 litres but less than 50 litres	not less than 74 x 104 mm
exceeding 50 litres but less than 500 litres	not less than 105 x 148 mm
exceeding 500 litres	not less than 148 x 210 mm

If it is impracticable to comply with the dimensions for this pack size, the label should be as large as possible. Please contact us for advice in this instance.

4.3 Labels directly affixed to container

Ideally all of the 'Authorised Text' plus the CHIP/CLP information should appear on the label written directly onto or adhered to the container. For clarity, we suggest that this type of label be arranged in two or more areas such as a **Main Area** and a **Subsidiary Area**. (e.g. a 'front' panel and 'back' panel respectively).

The **Main Area** of the label (*e.g.* the front panel) should preferably contain at least

- Product tradename;
- Product registration number;
- Formulation type;
- Amount and name of the active substance;
- the anticholinesterase warning phrase (if appropriate)
- Biological use phrase;
- CHIP/CLP information.

The **Subsidiary Area** (*e.g.* the back panel) should contain the remainder of the 'Authorised Text' if it does not already appear on the front panel. .

However, if space constraints dictate, other options are acceptable providing that all the information is visible to a user upon first handling the pack.

4.4 Use of a separate leaflet for certain label text

4.4.1 Where (due to space constraints) it is impossible to include all of the 'Authorised Text' on the label fixed to the container, then you may include a separate leaflet or similar with the Directions for Use (professional products) or Instructions for Use (amateur products). This may be:

- directly fixed to the container label (*e.g.* a fold-out leaflet);or
- a booklet supplied separately with the product.

4.4.2 The label affixed to the container must contain all of the 'Authorised Text' on safe handling of the product (i.e. everything except the 'Directions for Use/'Instructions for Use). It must include a phrase 'signposting' the user to where this information can be found *e.g.*:

'*See attached leaflet/ separate booklet for 'Directions for Use'/'Instructions for Use*'

4.4.3 As well as the Directions for Use/ 'Instructions for Use the leaflet must contain all of the 'Authorised Text' – *i.e.*. both the information on safe handling and the. It must also contain the following phrase:

'*This leaflet/booklet is part of the authorised Product Label'.*

4.4.4 The leaflet must be of sufficient quality and durability for the purpose.

4.4.5 Where affixed labels are too small to even include all of the information on safe handling, then it may be possible to further reduce the requirements for the label text. You should contact us for advice in such cases.

4.5 Labelling outer packs

4.5.1 Some containers are sold to the user in outer packaging. This outer packaging (*e.g.* often a cardboard carton) must also contain the 'Authorised Text' (as for the label fixed to the container), although where space is limited it is acceptable to refer the Directions/Instruction for Use to the actual product container or a leaflet as under para. 4.4 above.

4.5.2 This only applies to outer packaging which is supplied directly to the user. There are specific labelling requirements relating to packaging used only for the transport of products covered under separate legislation. Guidance can be found on the HSE website. You must ensure that packaging used purely for transport comply with the appropriate legislation.

4.6 Labelling inner containers

4.6.1 Where an inner liner is not intended to be removed from a container (*e.g.* a polyethylene liner in a cardboard outer for solid formulations), a statement warning against removal from the container must appear on the label (*e.g.* DO NOT REMOVE INNER LINER) in the Safety Precautions or Safety Instructions sections as appropriate (see Volumes 2 or 3 for details). As a further precaution, such inner liners may be labelled with essential information on safe handling (*i.e.* all text except Directions for Use (professional products) and Instructions for Use (amateur products)). .

4.6.2 Where an outer pack contains one or more inner containers (*e.g.* sachets; water soluble bags) intended to be removed from the outer pack during use, the inner(s) must also be labelled with essential information for the user on safe handling. Advice on the labelling of certain types of inner containers such as sachets and water soluble packs where space is limited is detailed below. Applicants wishing to label such containers in any other way should discuss the issue with us.

4.7 Labelling water soluble bags

4.7.1 A water soluble bag or sachets should carry all the information required for the safe handling of the product (everything except Directions for Use for professional products and Instructions for Use for amateur products). However, due to the potential size of such packs and impracticality of printing large amounts of information on PVA a reduced level of labelling may be acceptable.

4.7.2 The vital consideration in dealing with such packs is reducing the likelihood of a user removing unlabelled packets from labelled containers long before use and then

forgetting what they are. It is **not** permissible to package a quantity of unlabelled soluble packets in an outer container where they could be separated from the accompanying labelling. Each packet must include identifying labelling on the PVA itself. If this is not feasible, the applicant should contact us to discuss the issue.

4.7.3 The following minimum information has been considered acceptable for the water soluble bag itself. Any application for such labelling will be considered on a case-by-case basis.

(a) Product tradename
(b) Product registration number
(c) The formulation type and name and amount of the active substance
(e) Phrases such as:
DO NOT TOUCH [WITH WET HANDS OR GLOVES]
DO NOT STORE
USE IMMEDIATELY
ENSURE ALL OTHER LABEL INSTRUCTIONS ARE FOLLOWED

4.7.4 Additional Safety Precautions are also usually required on any outer container in which the water soluble bag is supplied to alert the operator to the hazards of touching the bag.

DO NOT TOUCH WATER SOLUBLE BAG [WITH WET HANDS OR GLOVES]
PLACE WHOLE BAG DIRECTLY INTO THE SPRAY TANK

4.7.5 Outer packaging should carry all the 'Authorised Text'. If the applicant wishes to label outer packs in any other way, it is **essential** that draft text is submitted to us for consideration. Any novel packaging type will be dealt with on a case-by-case basis and applicants should contact us for advice. Possible scenarios include:

- **Single bag in protective outer -** *e.g.* tear-open foil envelope containing each soluble packet. The foil will require labelling but reduced labelling may be acceptable depending on the size of the foil pack and whether it is itself packaged in an outer container. (This foil envelope method has the added benefit of protecting the soluble packet from moisture which could cause shelf-life problems).

- **Multiple bags in protective outer -** *e.g.* 'egg-box' type of package where each packet is enclosed in a depression with a tear-off top that seals each depression. The tear-off top may possibly carry required labelling.

4.8 Labelling different authorised products in one outer pack

4.8.1 Where you intend to sell two or more separate authorised products packaged within the same outer pack (*e.g.* 'Agronomy packs'/'Box sets' or similar sold as a promotion), the outer pack offered for sale or supply to the user must comply with the full label requirements for the container label for *each* of the products.

4.8.2 Note that this is not a 'twin-pack' (which is covered by para. 4.9 below) *i.e.* the 'box-set' is not identified as a single product with specific claims/recommendations for use of the 2

or more components together Such packs do not need a separate authorisation,, tradename or MAPP number unlike 'twin-packs.

4.9 Labelling a single product containing two or more separate components (*e.g.* twin-pack)

4.9.1 'Guidelines on the Provision of Pesticide Mixing Services and Sale of Pesticide Twin Packs and Kits' can be found in the Applicant Guide .

Where two or more PPP formulations are packaged and sold together specifically for use as a tank-mix, the 'combination' constitutes a single product with a single tradename and MAPP no. Such products may be supplied as two or more separate packs within a single outer container, as a single container with two or more separate compartments, or any other acceptable system of packaging. The specific labelling requirements will be considered on a case-by case basis depending on the packaging but the following gives the general principles when you are drafting your label for submission with an application.

4.9.2 In all cases, any outer pack label must fully explain the nature of the product as a whole *and* its separate components (*e.g.* specifically for each components, the formulation type, active substance content and pack size) and give full information on handling and use of both the individual components and the mixture. :

4.9.3 Where the product comprises an outer pack containing an number of separate inner pack each component container must:

(a) carry both the tradename and MAPP number of the product and, less prominently, the identity of the individual components (name, formulation type, active substance content, pack size and batch number) (note: if an individual component is authorised separately as a product in its own right, that MAPP number **must not** appear as well).

(b) carry all other information on Product Identity, Important Information, Safety Precautions and Directions/Instructions for Use for the product as a whole (rather than information specific to the individual components), *i.e.*:

(i) The Important Information will include the rates required for each component plus any other requirements for each individual component (there will only be a single maximum number of treatments, latest timing etc for the use of the mixture on any one crop/situation).

(ii) The Safety Precautions must include all the relevant phrases for *each* component Where each component would separately be labelled with a different Safety Precautions phrase addressing the same risk area, the 'worst-case' must be specified (the same will apply to CHIP/CLP, Annex II and Annex III phrases).

(iii) The Directions For Use must give the appropriate information for handling the components and using them in mixture. Note that the same option for use of a separate Leaflet applies.

4,9.4 Where the individual components are supplied in a multi-compartment container (with or without an outer pack):

(a) it must be clear in which compartment each named component is in and the Container Label must clearly identify which information applies to which component.

(b) It must carry all the other information as listed above for separate containers but the information obviously need appear only once on the multi compartment container.

4.9.5 Where a product consists of one (or more) PPPs and is sold with a separately packaged non-PPP (*e.g.* an adjuvant, dye, carrier) to be mixed prior to application of the product, the same labelling guidelines apply. The labelling required will depend on the nature of the non-pesticide (*e.g.* adjuvant, solvent, dye). **Applicants should contact us for specific advice in such cases.**

5. LEGIBILITY OF INFORMATION

5.1 Language

Labels must be in English. It is unusual to have multi-lingual labels in the UK although there is nothing in the UK legislation to prevent you from doing so, *i.e.* translating the UK authorised label into other languages for non-English speaking users in the UK.

5.2. Font and font size

As well as the restrictions on label size, the whole label should be prepared so that it is clear and legible to the user. The largest possible typeface should be used in relation to the label size. Small font sizes cause significant difficulties for those users who are visually impaired. Where appropriate, other Volumes in this guidance set further requirements for the printing of certain text with respect to size, bold-highlighting and capitalisation such that it stands out on the label.

5.3 Text and background colours

Colours of the label background and text are at your discretion. However, to ensure maximum impact, there must be adequate colour contrast of the print to the background, *e.g.* black print on white background. Other combinations which would make the text difficult to read should not be used (*e.g.* red on black).

5.4 Hazard symbol size

The hazard symbol must appear in line with the relevant CHIP/CLP Regulations.

5.5 Legibility of Product Label for refillable containers

You must check the condition and legibility of labels for refillable containers each time the packs are re-filled. Where necessary new labels must be attached to the container.

5.6 Graphics and artwork

5.6.1 Use of graphics as part of the label is at your discretion. If graphics are used as part of the label background upon which text is superimposed, it should not be of a colour or of such complexity to render illegible the overlying text. Use of graphics should not take up excessive space so as to make the label text illegible or difficult to read.

5.6.2 It is acceptable to include artwork or graphics on the final printed label which did not appear on the draft label submitted to us. Artwork may appear for various reasons especially in association with the Directions For Use section (*e.g.* to clarify the text) or as a marketing tool (*e.g.* product logos). We encourage their use if they improve the clarity of the label text. Graphics and symbols are acceptable as long as they do not obscure

or crowd required label text or misrepresent the product. Nor should they be used *instead of* 'Authorised Text'.

5.6.3 Examples of acceptable graphics and symbols include:

- diagrams of how to open product containers;
- pictures depicting authorised personal protective equipment (professional products only),
- pictures illustrating proper use,
- pictures to aid identification of target pests,
- company and product logos.

5.6.4 Examples of unacceptable graphics and symbols include those which are

unrelated to the authorised use, *e.g.*

- an unauthorised crop/situation,
- pictures of people using a product without the required personal protective equipment
- pictures of a pest or weed not claimed to be controlled by the product); or

misleading to the user *e.g.*

- symbols implying safety or non-toxicity, such as a red cross or a medical seal of authorisation,
- pictures of hedgehogs, birds or other wildlife,
- pictures implying home garden use of a commercial/industrial product) **or**
- **a 'child/pet logo' on a metaldehyde containing product or any other product for which this has not specifically been agreed with CRD- see para 5.7. below for full details of the 'Child/Pet Logo' requirements**

5.7 Use of 'Child/Pet Logo'

5.7.1 Full details are in Regulatory Update 03/2010. For any authorised products (and especially those authorised for amateur/home garden use), logos implying 'child/pet friendly/safe' must not be used with the exception that you may include the following 'Industry Standard' logo for **home garden lawn treatments**:

Links to images for label printing can be found on the CRD website.

5.7.2 This logo must be accompanied by a relevant imperative label phrase such as:

'Keep children and pets away from treated area [until granules have been watered in]'

This phrase replaces the former passive version ('Children and pets need not be excluded from the treated area') which is no longer be allowed. We will decide on the precise phrase depending on the nature of the product. No other logos may be used

5.7.3 Some **non-lawn products** have previously been assessed where non-standard logos and passive forms of phrase (such as 'children and pets need not be excluded from the treated area') were agreed by CRD. When the requirements for the above logo came into force these had to be amended to the above logo and the phrase changed to the imperative form by 28 January 2012.

However, the standard logo and imperative phrase cannot be added to products where the non-standard forms have not already been agreed and approved by CRD.

The appropriate form of logo/phrase for new or re-registered products will be considered as part of the risk assessment conducted by CRD.

5.7.4 There are a very small number of low risk products such as **ferric phosphate slug pellets** where this imperative labelling would be inappropriate (given that the pellets need to remain intact to be effective). Ferric phosphate product labels should therefore contain the following phrase alongside the 'children and pets' logo if it is used:

'Use as directed to protect children and pets'.

If using the above phrase the additional phrase 'Keep children and pets away from spillages' must be added to the 'Safety Instructions'

5.7.5 **The logo may not be used on metaldehyde and methiocarb slug pellets and other bait-based products of equivalent toxicity**

Important Note

If in doubt as to whether your required artwork falls within the acceptable criteria, you should contact us for advice before going to print.

6. AVOIDING FALSE OR MISLEADING INFORMATION

6.1 What is 'false and misleading information?

6.1.1 When preparing the draft and final label you must ensure that no false or misleading claims are included. Examples are given below. If you are unsure whether a claim or statement is false or misleading, you should consult us for advice.

(a) A false or misleading statement concerning the composition of the product.

(b) A false or misleading statement concerning the effectiveness of the product as a pesticide.

(c) A false or misleading statement about the use of the product for purposes other than as a pesticide.

(d) A false or misleading comparison with other pesticides.

(e) Any statement directly or indirectly implying that the pesticide is recommended or endorsed by CRD, any Government Department, other than the factual phrase 'This product is authorised under The Control of Pesticides Regulation/The Plant Protection Product Regulations/ EU Regulation 1107/2009'.

(f) A false or misleading statement that the product is endorsed by another organisation.

(g) A true statement worded in such a way as to give a false or misleading impression to the purchaser.

(h) General claims as to the safety of the pesticide or its ingredients. This includes statements such as 'safe,' 'non-poisonous', 'harmless' or 'non-toxic to humans and pets' (irrespective of whether a qualifying phrase such as 'when used as directed' also appears).

(i) Comparative statements on the safety of the product, *e.g.* 'Contains all natural ingredients', 'Among the least toxic chemicals known', and 'Safer than chemical pesticides'

6.1.2 However, specific claims which do not fall within the above categories and which are demonstrably true (*i.e.* supported by our safety and efficacy assessment) may be acceptable *e.g.* 'Children and pets may play on treated turf once dry'.

6.1.3 We note that there may be authorised products on the market which have phrases/claims that may now be unacceptable and these will be addressed when the next suitable application is evaluated *e.g.* re-registration. This includes products with the specific phrases discussed in sections 6.2. and 6.3 below.

6.2 Claims for a 'biodegradable' product

6.2.1 The claim 'biodegradable' is not acceptable. However, the following phrases may be used on product labels if supported by suitable evidence:

PROFESSIONAL PRODUCTS:

- 'Upon soil adsorption the herbicidal properties of {product} are lost, it is degraded by micro-organisms/microbes in the soil. Following crops may be drilled 48 hours after application.'

HOME GARDEN PRODUCTS:

- '[Product] is degraded by micro-organisms/microbes in the soil"; or
- '[Product] is broken down naturally in the soil.' or similar

Note that it is also not appropriate to incorporate words such as 'fully' or 'totally' into these phrases

6.2.2 You must note that these phrases will not be applied where an active substance is simply unavailable in the soil rather than having actually been degraded.

6.3. Claims of 'eco-friendly'/'natural'/'organic'

6.3.1 There are an increasing number of requests for products that make reference to 'Organic', Natural' or 'Eco-friendly' in the tradename or elsewhere on the label. These descriptions imply safety to the environment.

6.3.2 'Natural', 'Eco-friendly' or similar phrases are unacceptable in all cases whether in a tradename or as a label claim.

6.3.3 'Organic' may not appear in the tradename but only be used as a claim on the label if it can be justified as part of an application (based on the formulation composition). Such consideration would normally require technical input and so the Administrative. route is not appropriate (but see 6.3.5 below for an exception for professional products).

It may be possible to allow a statement of fact on the label *e.g.*

'This product is recognised/registered with the [*reference to an appropriate organic association*]....'.

Such a statement must be supported or confirmed to be true by the authorisation holder as part of an application. You may find it helpful to refer to the Defra publication 'Compendium of UK Organic Standards'' Sept 2006 when considering the use of the term 'organic'.

6.3.4 Any text such 'suitable for organic gardening" is unacceptable.

6.3.5 Professional products may include factual statements of acceptance in organic schemes in the 'Company Advisory Section' without the need for an application to change the

label. Such a section does not exist on amateur labels and therefore any such claim must be considered by CRD as explained above.

6.4 Misleading tradenames

You should note that the product name is considered as part of the product label and must not include false or misleading terms (see Section 6.3. above for e.g. our policy on the use of phases such as eco-friendly'/'natural'/'organic'). These mostly apply to home garden products but some will also apply to professional products. Appendix 1 clarifies what is acceptable to CRD, to allow applicants and authorisation holders to make informed choices when developing tradenames.

7. MAKING ACCEPTABLE CHANGES TO 'AUTHORISED TEXT'

7.1 Amending text

In some cases you may be able to make changes to the ''Authorised Text'', which do not require a change to the authorisation and which therefore may be made without a formal application to us. These changes must not alter the *meaning* of the 'Authorised Text', but simply present the same information in a different way, *e.g.* text may be tabulated, or bulleted, or text may be rewritten so that it means the same as the authorised statement. We have produced some examples to help you decide what type of changes can be made to text and these are in Appendix 2 to this Volume.

7.2. Removal of text

7.2.1 You may delete all claims and recommendations for a particular use of a product (*i.e.* crop/situation) where the deleted text is specific **only** to that use. However, you should consider applying for commercial withdrawal of such uses so that the authorisation is amended (see the CRD website for further information).

7.2.2. You should note that the position regarding liability for the consequences of product failure set out in the Consumer Protection Act 1987 applies in these cases. Unless a use is formally withdrawn by means of an application to alter the statutory conditions, the authorisation holder remains liable for any crop damage which may arise so long as the product has been used in accordance with the authorised conditions of use (including during the period of any phased revocation). This applies regardless of whether the use appears on the label.

7.3 Changes to 'convenience tank-mix' recommendations

You may delete or add 'convenience' tank mix recommendations, as long as you have the necessary supporting data (see' tank-mix section' of the 'The Applicant Guide' which also includes guidance on how to include tank-mix information on the label.).

7.4 'Other Text' and 'Company Advisory Information'

7.4.1 Certain information may appear within the body of the ''Authorised Text'' which are not subject to the Regulations and changes may be made to these without a change in authorisation, *e.g.* Company disclaimer statements, trademark information.

7.4.2 For professional products, there is scope for amending information that is not supported by data and not covered by the Regulations. Such text which is considered to be 'advisory' may be removed from the ''Authorised Text'' sections to be included in a separate 'Company Advisory Information' section (see Volume 2 for details).

7.5 Dual UK/Irish labelling

Where appropriate clearance has been obtained from the PCS, you may make the necessary changes to a UK authorised label for the production of a dual UK/Irish label As CRD and the PCS have slightly have slightly different arrangements for authorisation of labels there are different ways in which a dual label may be authorised. Full details of the authorisation procedure and the labelling requirements (which differ for amateur and professional products) can be found in Appendix 3 to this Volume.

7.6 Unacceptable changes to ''Authorised Text''

7.6.1 You must not make any changes to the standard headings, sub-headings and other phrases defined in Volumes 2 & 3 relating to Important Information, Safety Precautions/Information and Directions/Instructions For Use.

7.6.2 You must not change any information on the Product Identity which is specified on the Notice of Authorisation and where such a change requires an amendment to the authorisation (*e.g.* tradename, authorisation holder/marketing company, MAPP no, formulation type, active substance and content etc).

7.6.3 You must not make changes to the meaning of the text.

7.6.4 You must not add any text which was not considered by CRD during evaluation of application(s) for authorisation, **and** for which assessment of supporting safety and/or efficacy data is required.

7.6.5 You must not delete any text which is supported by safety and/or efficacy data/information and is required for the safe and efficacious use of the product.

Important Note

Any changes to the text must also follow the criteria for the '*avoidance of false and misleading information*'. If in doubt as to whether your required changes fall within the acceptable criteria, you should contact us for advice before going to print.

Appendix 1: Requirements for product tradenames

There are a number of different issues surrounding product tradenames that are of potential concern to CRD. The following advice on our position on tradenames was published in an Information Update: 07/2008 (14 February 2008) Please note that for existing products that carried tradenames with the types of claims discussed as potentially unacceptable, we will make a reassessment of those tradenames during re-registration of those products.

1. Market branding and unclear tradenames

1.1 In many instances, companies use market branding, often in terms of a recognisable 'trading family name'. This is often situated close to the agreed tradename, which makes it difficult for the user to distinguish what the product is called. In addition, different font sizes and colours are used to highlight different elements of the product name, e.g.:

'**ROBERTS PATENT weedkiller** **for garden paths**' which is actually registered as 'Weedkiller for Garden Paths' with Roberts Ltd. as the authorisation holder.

1.2. We allow the use of such branding, both as text or pictorial representations, but the 'the product name must be formatted such that it is clear to the user what the full tradename is. Whilst the use of different sized fonts and colours for different parts of the tradename is acceptable, applicants should ensure that this would not confuse a user. Clearly in the example above the actual authorised tradename is ambiguous.

1.3 Whilst it is necessary to maintain flexibility in label layout, proposed product names should be notified to take account of market branding (if it is to be used in close proximity to the name). i.e 'Roberts Patent Weedkiller For Garden Paths' rather than 'Weedkiller For Garden Paths'

2. Market branding and insufficient distinction between tradenames

2.1 Some products are most recognisable via the market branding (which are registered as part of the tradename) and the remainder of the name is very similar within a product range *e.g.* 'ROBERTS WEEDKILLER 1' and 'ROBERTS WEEDKILLER 2'. These products may have different formulations, uses and even active substances.

2.2 This type of differentiation between product names may be insufficient to enable users to clearly distinguish the products, potentially causing incidents through mistaken use (*e.g.* a total weedkiller being used on lawns).

2.3 We consider that where there is a potential safety concern, tradenames must be more distinctive than the above. Where applicants require various products with similar names, we will consider the composition of the products before a decision is made on the acceptability of the name. This will also apply to changes made via the Administrative route.

3. Duplicate/Historical tradenames

Whilst we do not consider trademark or copyright issues with respect to tradenames, we do check if the name has been used previously for another product. You may then be required to change the name (depending on the nature of the historical product and when/if it ceased to be marketed).

4. Inappropriate tradenames

4.1 Tradenames must not mislead users. We do not allow:

- claims for superlative action, expressed or implied (*e.g.* 'BEST EVER weedkiller');
- claims for increased activity where none has been demonstrated by the data provided (*e.g.* 'IMPROVED ACTION bug killer');
- claims for misrepresentations about the content of the product (*e.g.* 'CHEMFREE weedkiller', NATURAL insecticide);
- claims such as 'ORGANIC' even if the product may have been approved by a particular organic association and such a claim has been allowed on the label- see Volume 1/section 6.3.

4.2 In the light of the above, all requests for new tradenames will be scrutinised to determine whether the names are appropriate. If the proposed name is not acceptable, we will contact the applicant(s) to explain the basis for our decision and ask for an alternative name.

Appendix 2: Examples of acceptable alternatives to ''Authorised Text''

1. Contents statement

'Authorised Text'	Acceptable alternatives
An emulsifiable concentrate formulation containing 100g/l [*active 1*] and 50 g/l [*active 2*] in xylene	• [*active 1*] (100g/l) and [*active 2*] (50 g/l) formulated as emulsifiable concentrate (also contains xylene) • Formulation type: emulsifiable concentrate Active substances: 100g/l [*active 1*] and 50 g/l [*active 2*] Contains xylene

2. Biological use phrases

'Authorised Text'	Acceptable alternatives
For the control of annual grasses and a wide range of broad leaved weeds in winter wheat and winter barley, and certain varieties of winter rye and triticale	• A contact and residual herbicide for control of annual grasses and broad leaved weeds in listed cereals • For control of a range of weeds in listed cereals
A fast acting aphicide for use in a range of crops	• An insecticide for control of aphids in sugar beet, potatoes, cereals, peas, beans, brassicas and other crops • An aphicide for use in listed crops
A broad-spectrum insecticide controlling many pests of agricultural, horticultural and forestry crops	• An insecticide for use against a number of pests in a range of crops, including leather jackets in pasture • A broad-spectrum insecticide for the control of a number of insect pests in cereals, pasture and various fruit and vegetable crops

'Authorised Text'	Acceptable alternatives
A protectant fungicide for the control of potato blight, downy mildew in winter oilseed rape and cereal diseases	• A fungicide for use against certain diseases in potato, oilseed rape and cereals • A protectant fungicide for the control of potato blight, downy mildew in winter oilseed rape and leaf spot, brown rust, yellow rust, sooty mould, leaf blotch and net blotch in listed cereals

Note: Where the biological use phrase is expanded (as shown above), this is acceptable only where the claims made are as detailed elsewhere in the Directions For Use.

3. Pest control claims, application doses and timings

'Authorised Text'	Acceptable alternatives
Pest controlled: cutworms. Dose per hectare: 2.0 litres	• Cutworms will be controlled by the application of 2.0 litres of product per hectare • For control of cutworm, apply 2.0 l/ha product
For the reduction of downy mildew (*Peronospora parasitica*) [product] should be applied at 1.7 kg in 200 – 1000 litres of water per hectare	• Disease: downy mildew (reduction of). Application rate: 1.7 kg product in 200 – 1000 l/ha water • Apply 1.7 kg product in 200 – 1000 litres of water per hectare for the reduction of downy mildew (*Peronospora parasitica*
Annual weeds will be controlled if spraying is done while the majority of weeds are seedlings	• For control of annual weeds, apply [Product] when the majority of weeds are seedlings • Control of annual weeds will only be achieved if application takes place when the majority of weeds are at the seedling stage

'Authorised Text'	Acceptable alternatives
Apply post-crop emergence, when susceptible weeds have not passed the stage shown in the following tables and before the crop reaches the second node detectable stage (Zadoks 32)	• Apply [product] before the susceptible weeds have passed their recommended growth stage (see table, below). Applications may be made from crop emergence up to second node detectable stage (Zadoks 32) • Application timing: After crop emergence until the second node detectable stage (Zadoks 32). Susceptible weeds will only be controlled up to the growth stages described in the table below
Leaf blotch: spray when disease is seen, before the second node detectable stage of the crop	• For the control of leaf blotch (*Rhynchosporium secalis*), apply [product] at the first sign of disease. The latest timing of application is the second node detectable stage of the crop (Zadoks 32) • Apply [product] at the onset of disease symptoms for the control of leaf blotch. Application must be made prior to the second node detectable stage of the crop

4. Application method, water volume and spray quality

'Authorised Text'	Acceptable alternatives
Apply [product] in 200-450 litres of water per hectare.	• Use an application volume in the range 200 – 450 l/ha • Apply in 200 – 450 litres of water per hectare • Water volume: 200 – 450 litres of water per hectare

'Authorised Text'	Acceptable alternatives
Apply as a medium quality spray (as defined by BCPC). A spray pressure of 2 – 3 bar is recommended.	• Spray quality: medium spray (BCPC classification), using 2 – 3 bars • A spray pressure of 2 – 3 bars is recommended to give a medium quality spray, as defined by BCPC • Spray quality: BCPC medium spray
Thoroughly mix the pellets with the seed when filling the drill hopper, ensuring that they are evenly distributed throughout the seed	• Mix pellets with the seed when filling the drill. Ensure an even distribution through the seed by mixing thoroughly • It is important to achieve an even distribution with the seed when applying [product] by admixture at drilling. Thoroughly mix the pellets and seed when filling the hopper
Mixing – Half fill the spray tank with water, add the required amount of [product] and agitate during completion of filling	• Spray tank mixing instructions: Half fill the tank with water. Add the recommended amount of [product] and commence agitation. Top up tank to required level and continue agitation • Mixing instructions: Half fill the spray tank before adding the required quantity of product. Commence agitation before completion of filling.

5. Tank cleaning instructions

'Authorised Text'	Acceptable alternatives
Wash equipment thoroughly with water and liquid detergent immediately after use. Finally wash out twice with water and drain	• Following use of the product, immediately wash out the spray tank with water and liquid detergent. Then wash twice more with water, and drain the tank • The spray tank should be washed as soon as possible after use. Thoroughly wash the tank with a mixture of liquid detergent and water. Carry out a further two washes with water and drain.
Wash out the sprayer thoroughly after use of [product], using a wetting agent or proprietary tank cleaner	• Use a wetting agent or proprietary tank cleaner to thoroughly clean the sprayer after use • The spray equipment must be properly cleaned after application of the product. Use a wetting agent or a recommended proprietary tank cleaner (*e.g.* [product]).

6. Restrictions and warnings

'Authorised Text'	Acceptable alternatives
Do not treat broadcast crops as uncovered seed may be damaged	• To avoid damage to uncovered seed, DO NOT treat broadcast crops • This product is not suitable for use on broadcast crops, due to the risk of damage to uncovered seed
Do not treat on crops grown for seed	• Not for use on seed crops • Do not use on crops being grown for seed

'Authorised Text'	Acceptable alternatives
In common with many soil-applied PPPs the activity of [product] may be reduced in organic soils	• Activity may be reduced in organic soils • The activity of this product may be reduced in soils containing more than 10% organic matter
Do not apply when the crop is wet or rain is imminent	• Do not apply to crops with wet foliage, or if rain is expected • Do not apply is rain is expected or if the crop is already wet
Do not roll or harrow within a week of spraying	• Do not roll or harrow for seven days before or after spraying • Do not carry out cultivations (rolling, harrowing) +/- 7 days of spraying

7. Agronomic advice/general recommendations for use

'Authorised Text'	Acceptable alternatives
The purpose of spraying is to delay the 75% foliage blight development stage until after the full weight of tubers has been formed. With main crop varieties, bulking comes to an end in late September, so there is no point in preserving the haulm after this stage	• Treatment is carried out to delay the development of foliar blight until the end of bulking. With main crop varieties the full weight of tubers will have been formed by late-September; there is no point in continuing treatment after this stage • For main crop varieties, bulking will be complete by late-September and there is no point in preserving the haulm after this stage
Phoma leaf spot is spread by rainsplash and can be found from October onwards	• *Phoma* can be found from October onwards, and is spread by rainsplash • Rainsplash is the principal mechanism by which *Phoma* leaf spot is spread through the crop, and it is usually found from October onwards

8. Positive and convenience tank mixtures

'Authorised Text'	Acceptable alternatives
For improved control of [x] and residual activity, [product 2] may be added to [product] applications in a low dose post-emergence programme	• Low dose post-emergence programme: Tank-mix with [product] 2 for improved control of [x] and residual activity • When using [product] in a post-emergence low dose programme, addition of [product 2] will enhance control of [x] and give residual activity
Compatibility: The following mixtures for use on cereals only are compatible provided they are sprayed at the dose and timing for each component	• The following products are compatible with [product] when used in cereals. Note that each product must be applied within the recommended doses and timings. • Compatibility, cereals. The table below gives compatibility recommendations for [product]. All products must be applied within their authorised recommendation for use

Appendix 3: Dual UK/Irish labelling

1. Authorisation procedure

1.1 If it is known at the outset that a dual label is required for a new product, then you must apply to both CRD and PCS (the Irish Regulatory Authority), with labels drafted in accordance with the guidance below following the usual application procedure/ requirements for each Regulatory Authority.

1.2 Alternatively, you may first seek authorisation in the UK, and then subsequently apply for authorisation in Ireland *via* the PCS. In this case you may follow the guidance below and make the necessary changes to the UK authorised label without further recourse to CRD. However, a copy of the updated (joint) label must be submitted once authorisation has been issued by the PCS.

1.3 If you first seek authorisation in the Republic of Ireland, then subsequently apply for authorisation in the UK then a further application must be made to the PCS to secure authorisation for a joint labelled product.

1.4 Where required CRD and the PCS will liaise on any specific issues, which arise, for example if requests are not covered by the guidance.

1.5 Any changes to the label which would affect its dual status (*i.e.* changes to label claims, new crops/situations) must be supported by applications, and accepted by both regulatory authorities before a dual label can be authorised.

2. Joint labelling requirements

The following requirements have been agreed between the PCS and CRD. In general if the labelling requirements between the regulatory authorities differ the more stringent statements (and geographical restrictions) must be used.

2.1 Professional Products

2.1.1 A 'DPD' (risk and safety) text box must appear on the **front panel** of the product label (the same panel as the product name) with the heading 'Risk and Safety information'. This box must contain the relevant symbols and phrases required under the Dangerous Preparations Directive or the CLP Regulation (in full), should be in a prominent position and hold a significant proportion of the front panel area.

2.1.2 Risk phrases should be in bold and each on a separate line of the 'DPD' (risk and safety) box and be in sentence case (not capitalised). The safety phrases should be in normal font, under the risk phrases and each on a separate line, of the 'risk and safety' box.

Where space restrictions apply some flexibility may be given to the layout of these phrases.

2.1.3 The DPD required phrase 'To avoid risk to man and the environment, comply with the instructions for use' must be included in the 'DPD' (risk and safety) box.

2.1.4 Additional UK-safety information (*e.g.* LERAPs, PPE, disposal phrases) must be included **outside** the 'DPD' (risk and safety) box, on the main or subsidiary area of the label (front, side or back). This information must appear under the heading 'SAFETY PRECAUTIONS' and phrases marked 'UK only' where appropriate.

2.1.5 The UK-specific phrases relating to COSHH and the CPA voluntary Initiative must be moved near to the Safety Precautions' section of the label, and must be highlighted as applying in the UK only (*e.g.* 'The (COSHH) Control of Substances Hazardous to Health Regulations may apply to the use of this product at work – UK only')

2.1.6 PCS and MAPP numbers must be included beside each other in the bottom right hand corner of the 'DPD' (risk and safety) box and also in close proximity to the product name.

2.1.7 The GAP information must be in a text box with the heading Important Information on a main panel (front, side or back) of the container or label. Where it is not possible to include all the required detail in the text box it may be signposted to a separate leaflet supplied with the product. The phrase '**Read the label before use. Using this product in a manner that is inconsistent with the label may be an offence. Follow the code of practice for using plant protection products'** must be included in the text box. This phrase should also appear on any separate or detachable leaflet and any additional outer packaging or separate inner packs.

2.1.8 Additional instructions for use should be clearly outlined.

2.2 Amateur Products

2.2.1 Where a product is classified and attracts a hazard symbol in accordance with the Dangerous Preparations Directive or CLP Regulation, a 'DPD' (risk and safety) box must be included on the **front panel** of the label using the same format as professional products. If the product is not classified (*i.e.* does not attract a hazard symbol) the information may be included on another panel of the label.

2.2.2 Risk phrases should be in bold and each on a separate line of the 'DPD' (risk and safety) box. The safety phrases should be in normal font, under the risk phrases and each on a separate line, of the 'DPD' (risk and safety) box. Where space restrictions apply some flexibility may be given to the layout of these phrases.

2.2.3 The phrase 'To avoid risk to man and the environment, comply with the instructions for use' must be included in the 'DPD' (risk and safety) box.

2.2.4 Additional safety information (*e.g.* disposal phrases) must be included **outside** the 'DPD' (risk and safety) box, on the main or subsidiary area of the label (front, side or back),

under the heading Safety INSTRUCTIONS' and phrases marked 'UK only' or 'Ireland-only' where appropriate.

2.2.5 The following disposal phrases may, if required, be included on a dual label in the 'DPD' (risk and safety) box:

- Do not empty into drains (S29)
- Do not contaminate water with the product or its container (SP1)

Additional disposal phrases may be required and where appropriate marked 'UK-only' or 'Ireland-only'. See Volume 3 for further UK guidance and the PCS will advise on any necessary 'Ireland-only' phrases.

2.2.6 Pictures or graphics portraying the product as 'Harmless' or 'safe' to children or pets cannot be included. A phrase indicating re-entry period for humans and animals may be allowed if appropriate.

2.2.7 PCS and MAPP numbers must be included beside each other in the bottom right hand corner of the 'risk and safety' box and also in close proximately to the product name.

2.2.8 Additional instructions for use should be clearly outlined.