

RAMPSUK

The Register of Accredited Metallic
Phosphide Standards in the United Kingdom

Important Label & Use Changes for Aluminium Phosphide Products

Over the past few years the regulatory framework for pesticides and biocides has changed dramatically as active substances have gone through their various review programmes. In certain very rare circumstances, a product can find itself falling under multiple sets of separate regulatory rules with different outcomes emerging at different times. This presents huge challenges to the implementation of newly labelled stock of these products.

An example of this is the supply of Aluminium phosphide used for invertebrate fumigation and mammalian vertebrate pest control. These products fall under both the Plant Protection Product regulations and the Biocidal Product regulations. A simple definition to explain the difference between the two product uses is as follows: -

- Plant Protection Products are pesticides used for the protection of crops or other plants both in the field and after harvest but before processing
- Biocidal Products are products that are used for the control of harmful organisms for reasons other than crop protection
- Because metal phosphides fall under both use categories they have to carry the requirements and instructions from both sets of legislation for very similar uses

As the new authorisations have all been emerging on an irregular basis RAMPS UK have been discussing with the regulatory Authorities how to best represent the new Authorisation requirements in a consistent and understandable label format to the end-user.

In order to be able to quickly issue any changes in the way these products are to be used, and with the agreement of HSE, RAMPS UK have endorsed a temporary method of 'tagging' the new label instructions onto products to provide updated information. This has meant the end- users have been made aware of any changes as soon as possible.

It is with a view to introducing the latest BPR Biocidal Product Authorisations that another update is required to these 'Tag Labels', so that end-users can again be made aware of changes at the earliest opportunity.

It is planned that this temporary "tagging" measure will cease once all of the new product Authorisations have been granted and newly labelled stock can then be put into production.

In the meantime RAMPS UK urges all stockists and end-users to note the new requirements on the tag labels.

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