

Check-list « Conformity and precision of packaging and measuring device for home and garden products submitted for registration in Belgium »

To limit the risks of human, animal and environmental exposure during handling of home and garden products and allow the application of the correct dose of product, following conditions should be taken into account:

Packaging:

- The maximal content of each packaging should not allow to treat more than 5 ares (500 m²), except when exemptions are obtained after evaluation by the Registration Committee. In that case, a packaging allowing the treatment of a smaller area (< 5 ares) should also be available on the market, to the same extent as the bigger packaging for > 5 ares.
- The maximum area treated should be calculated for the main usage with the maximum dose and taking into account the number of treatments mentioned in the authorized GAPs: the label should mention for instance “sufficient to treat 5 ares, 3 times”.
- In no case should an indication appear on the label giving the impression that more than 5 ares can be treated.
- Bottles and sprays must be equipped with a security stopper.
- Aerosols must be sealed and protected with a cap.
- For bottles and bags: the dispositions of art.6, §2 of the royal decree of January 2010 apply (bottle with security tap for liquids and solids or reclosable bag for solids). However, for small volumes (< 5 kg) of solids, a security closing is recommended and the use of boxes or plastic tanks should be preferred to bags.
- A reclosable system (e.g. with a sticker, a zip, etc) should be foreseen for solid products (powders or granulates) commercialized in bags or boxes. Bags without reclosable system (e.g. iron sulphates) will not be accepted anymore.
- For ready to use liquid products (mainly sprays): the packaging must have an on/off position which cannot be dismantled and the compartment containing the liquid should be protected from opening, re-use or re-filling (only separate trigger should be reusable). Clear indications on how to correctly use the spray should be provided

- on the label (how to lock-unlock, when to use the different spray positions, how to adapt the trigger to the liquid compartment, etc.).
- For products commercialized in monodoses (for example WP in water-soluble bags) the content of each dose should be adapted to the area to be treated to avoid that gardeners open the bags.
 - It must be possible to empty the packaging completely (a particular attention should be paid for sprays in which the quantity of gas should be sufficient to expulse the whole quantity of product).
 - If the primary package is in a sealed box: a method should clearly indicate how to properly open the box (dotted line with pre-cut opening, easy opening system, etc) in order to avoid damage to the primary packaging.
 - Opening the package should not lead to unwanted spreading of the products (dusts, bottles filled up over the maximal capacity).
 - The primary package should be and remain clean on the outer face (no dusts or leakage).
 - The design of the packaging (size, form, weight) should allow easy manipulation.
 - The size of the opening must be suited to the physical state of the product (WP, WG, liquid) and allow an easy flow of the product, without being too fast, which could cause leaching or splashing of product in the surrounding environment or emission of dusts.
 - Diameter of the opening must be adapted to the length or diameter of the measuring cup.

Measuring device

- The measuring device should allow the measurement of all reference doses with a limited number of manipulations (max. two fillings). It is possible to provide cups of different sizes corresponding to different uses.
- For products applied in large amounts (fertilizers_or products against mosses) mechanical spreading should be recommended (with indications on how to adjust the spreading device). A suitable way of measuring the quantity to put in the spreader must be provided (either integrated in the packaging or separate).

- All reference doses mentioned on the product label should be easily identified on the measuring cup.
- Units should be adapted to the physical state of the product (ml for liquids, mg for solids). For solids with a measuring cup in ml, a converting factor can be accepted.
- Levels and quantities printed on the measuring cup should be readable, when the measuring cup is either empty or full.
- For solids, the diameter of the measuring cup must allow an easy horizontal levelling of the product.
- After use, fixation of the measuring cup on the packaging should not contaminate the outer face of the bottle/box with product. The adequate method to clean up and fix the measuring cup on the packaging without unnecessary contact of the operator with the product or environmental contamination should be provided.
- The size, material and design of measuring device should be adapted to the product formulation to avoid for instance plugging, excessive adherence, electrostatic effects or deformation of the cup.
- Spoons cannot be submitted as measuring cups.

With each registration request, a paper or electronic copy of the proposed packaging in colors and real size should be submitted, with a complete labelling project and technical description (with pictures) for each packaging model that will be placed on the market. If different sizes are proposed for one packaging model, the smallest size label must be submitted to check its readability.

Reminder: for all registered plant protection products, packaging and measuring cups which will be commercialized in Belgium must correspond to those described on the registration document or in the registration application. The extension of the range of packaging authorized will be considered as a request of extension and a fee of 150 € will be applicable.

Two cases have to be considered:

- The request only concerns a new material (PET instead of HDPE) or a new size for a model of packaging which has already been approved: a letter referring to the approved

packaging accompanied by a short dossier with the technical description of the proposed packaging and (for modification of material) the storage stability tests should be addressed to the expert in physico-chemistry.

- The request concerns a new type of packaging: a sample of the new packaging containing the product should be sent for evaluation to the efficacy experts. For ready to use sprays, the empty spray is sufficient.

The applicant will be informed about the reasons for the refusal of any packaging.

2– Test of precision for the measuring device:

For products to be used with a measuring cup, the following test should be realized:

The test is realized by non qualified people (corresponding to a gardener). Two reference doses (minimal and maximal) are measured with the measuring cup and the accuracy of the weight or volume is verified with a balance or a graduated test tube. The maximum difference of weight or volume for each tested dose must be reported for three repetitions (for example, if the three repetitions give a variation of, respectively, -12 %, - 8 % and -17 %, the maximal variation is - 17 %). A variation of +/- 25 % between the measure realized with the measuring cup and the laboratory tools is allowed.

Results of the test can be submitted with the application. If the results of the test are submitted to the expert in physico-chemistry and positively evaluated, physical samples of the packaging should not be submitted. Technical description and pictures are sufficient. Only if the results of the test are negatively evaluated by the expert, will physical samples of the packaging and the measuring cup be requested.

The test itself can also be done by the efficacy experts themselves. In this case, an example of the packaging containing the product should be sent to the efficacy experts. Remark: the packaging and the measuring cups cannot be sent to the expert before the attribution of the

N-number (and submission of a complete registration request to the Service Pesticides and Fertilizers).

Reference for the test:

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Reference for the submission of packagings and measuring cups:

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