

REGULATIONS REGARDING FERTILIZER-PESTICIDE MIXES

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During the potato harvesting season of 1962, several shipments of Washington grown potatoes were seized by the FDA for violation of the Federal Food, Drug and Cosmetic Act. Following this action, the Washington State Department of Agriculture was called upon to investigate this problem and determine the reasons why above tolerance pesticide residues were found in potatoes. During our investigation, we became alert to the fact that some fertilizer manufacturers had not applied for 1962 pesticide registrations for pesticides included in their fertilizer mixes. This, of course, is a violation of the Washington Pesticide Act, which requires that every pesticide distributed, sold, offered for sale, or held for sale within this state be registered with the Department.

Here we would like to clarify the term or phrase "fertilizer manufacturer": when a fertilizer is mixed, added to, or in any way changed from its original form, it is a different product. Therefore, all fertilizer mixing companies, including companies engaged in custom mixed fertilizers, both dry and liquid, for an individual customer's use are in reality fertilizer manufacturers and must have a registered brand name.

The Department has attempted to notify all fertilizer manufacturers of the requirements of the Washington Pesticide Act; briefly that all fertilizers containing pesticides must be registered as pesticides.

To briefly explain; a registered pesticide-fertilizer mix, one you might buy at your feed store, is required to be registered as follows: A 5-10-10 fertilizer mix containing 1% pesticide would require registration A. A 5-10-10 containing $\frac{1}{2}$ % pesticide would require registration B while a 5-10-5 containing $\frac{1}{2}$ % pesticide would be registered under B and not require an additional registration.

A customer mix fertilizer-pesticide product will be registered on the following basis: The Department will allow a recommended range registration for a particular use, directions, amount, antidotal and precautionary statements. For instance, a product to be applied at 600 pounds per acre with $\frac{1}{2}$ % pesticide would deliver three pounds of pesticide per acre. Another product applied at 1,000 pounds per acre with a .3% pesticide concentration would also deliver three pounds pesticide per acre. Since these two products deliver three pounds of pesticide per acre, only one registration would be required.

Due to the problems involved in the use and/or possible misuse of pesticides completely separated from the plant food compounds covered under the Washington Fertilizer Act, it is necessary that specific labeling requirements for pesticide registrations be compiled with. In the registration procedure, our registrar follows the Washington Pesticide Act, Pesticide Regulations, and the Federal Insecticide, Fungicide and Rodenticide Act. Label recommendations are checked with both WSU and USDA pesticide recommendations to determine whether or not a recommendation is efficacious. A fertilizer

manufacturer who intends to offer fertilizer-pesticide mixes for sale in this state must follow the labeling information contained in the Pesticide Regulations found in Order No. 862.

As you are aware, a great deal of careful research has gone into formulating these laws, regulations, and recommendations, resulting in maximum protection to the manufacturer, user, and the general public.