

Off-label use and MRLs explained

Victorian producers must only use agricultural chemical products that are registered for use on a target crop or pest, permitted under a Department of Primary Industries (DPI) or Australian Pesticides and Veterinary Medicines Authority (APVMA) permit in accordance with Victoria's off-label use policy. This article describes off-label use and DPI and APVMA permits and how they relate to maximum residue limits (MRLs).

Off-label use in Victoria

Off-label use refers to situations when a registered chemical product is used in a manner that is not specified on the product label. Examples of off-label use include when a chemical is used to control a different pest or to protect a different host (crop/animal), or in a different manner to that listed on the label.

Off-label use is not illegal in Victoria providing the following restrictions are followed and residue limits are not exceeded:

- The product is registered with the APVMA
- The product is not a 'restricted use' chemical (i.e. all Schedule 7 Poisons (DANGEROUS POISONS), products containing atrazine, metham sodium or ester formulations of 2,4-D, 2,4-DB, MCPA or triclopyr)
- The use is not at a rate or frequency greater than that stated on the product label
- The product is not used in a way that the label specifically states it must not be used (e.g. 'DO NOT apply by air').

Off-label use of chemical products is not recommended by DPI and is not included within a manufacturer's warranty. All aspects of off-label use are the user's responsibility, including residue control, environmental safeguards, occupational health and safety and animal welfare.

Maximum residue limit (MRL)

Regardless of how a chemical product is used, the resulting chemical residues on the treated crop must not exceed the maximum residue limits (MRLs) set by the APVMA and Food Standards Australia New Zealand (FSANZ).

DPI and APVMA permits

DPI and APVMA both issue off-label use permits to legalise the use of a chemical product in a manner not stipulated on the product label.

DPI issues a section 25A permit to authorise the use of a 'restricted use' chemical product off-label.

An example request is to authorise the use of a product on a different crop or pest.

To apply for a permit, an application must be submitted to DPI which includes field and laboratory data that supports the use on efficacy, safety and trade grounds. Application forms are available from the DPI Chemical Standards website, www.dpi.vic.gov.au/chemicalstandards (search 'section 25A').

In Victoria, an APVMA permit is required to use an unregistered chemical or registered chemical at a rate or frequency greater than that stated on the product label or contrary to specific label prohibition statement.

To apply for a permit, an application must be submitted to the APVMA which includes field and laboratory data that supports the use on efficacy, safety and trade grounds.

The APVMA website www.apvma.gov.au has a searchable database for all currently registered pesticides, off-label permits and lists of all MRLs.



Every agricultural chemical use that is registered or permitted under an APVMA permit has a corresponding MRL. A MRL is the maximum concentration of a chemical residue legally permitted in or on a food, agricultural commodity or animal feed.

In cases where an MRL exists, residues equal to or less than the MRL are deemed safe for consumption. If there is no corresponding MRL for a chemical, a likely situation if a chemical product is used off-label on a non-approved crop, any detectable residue will be unacceptable.

MRLs are set for the use pattern, including application rate and frequency of application specified on the product label or permit. It is not likely that an MRL will be exceeded if the product is used according to label instructions.

If you would like to receive this information/publication in an accessible format (such as large print or audio) please call the Customer Service Centre on 136 186, TTY 1800 122 969, or email customer.service@dpi.vic.gov.au.

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Where food crops are involved in off-label chemical use, great care must be taken to ensure the risks of unacceptable chemical residues are effectively managed. To ensure produce does not contain excessive residues, DPI recommends growers undertake residue testing to confirm the residue status of treated produce.

For more information on off-label chemical use permits visit the DPI Chemical Standards website or APVMA website. MRLs are listed on the APVMA or FSANZ website www.foodstandards.gov.au.

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