

### Risk of 2, 4 – D Damage in Cotton Crops: Cotton Australia Ltd

Cotton along with a number of other summer crops is susceptible to damage from exposure to 2, 4 – D herbicides. In most cases damage is caused by the off target movement of 2, 4 – D herbicide onto cotton by way of vapour drift or droplet drift. The conditions which contribute to drift are well documented and readily available. Product labels for 2, 4 – D products now contain details of the more important factors which will contribute to drift and provide information as to how risk of drift may be minimized.

Among other things the following must be considered when applying 2, 4-D herbicide products:

- (a) Appropriate meteorological conditions
- (b) Risk assessment to determine the risk of movement to nearby crops
- (c) Appropriate 2,4-D product or formulation
- (d) Communications with neighbours

### Restrictions On The Use Of High Volatile 2,4 – D Esters

In 2006 the Australian Pesticides & Veterinary Medicines Authority (APVMA) conducted a review of 2, 4 – D herbicides and as a result of this review, significant restrictions were placed on the use of the **high volatile ester** formulations. From the cotton industry's point of view, the most significant restriction includes:

- (i) The registrations and label approvals of products containing 2, 4-D ethyl, butyl and iso- butyl esters are suspended. Use is permitted under permit; however the permit has a number of conditions attached.
- (ii) Applications of 2, 4-D ethyl ester, butyl ester or isobutyl ester must only take place during a spray window between **1 May and 31 August**.

**IT IS A LEGAL REQUIREMENT THAT NO HIGH VOLATILE ESTER APPLICATIONS TAKE PLACE DURING THE COTTON SEASON**

### Immediate Action If You Suspect You Have Damage

1. Have a qualified agronomist inspect the suspected damage as soon as possible to

establish that the problem has been caused by 2, 4 – D (or other phenoxy herbicide) and have this person make an official record of what they observed. Photographs and samples may be useful.

2. Establish as accurately as possible when the off target herbicide may have contacted your crop and attempt to obtain accurate weather data for that time and record this data. Damage may appear within 24 hours of contact. If odour has been detected, the time of this occurrence should be recorded.
3. Attempt to establish the source of the herbicide drift. Check the possibility that more than one application has been made in the area at that time.
4. Report the matter to Cotton Australia GSM's.
5. If you consider the damage serious or the result of an unlawful act such as use of high volatile ester outside the use window, the matter should be reported to the appropriate regulatory authority in your state ( NSW DECC/EPA or QLD DPI). This should also be done without delay.

### Secondary Action

1. Continue to have an agronomist document the progress of the crop/damage on a regular basis.
2. If preliminary enquiries indicate a commercial applicator (aircraft or ground applicator) is involved, then legal advice should be obtained to look at a possible claim on any off target drift insurance.

### Adverse Experience Reporting Program

*The Australian Pesticides and Veterinary Medicines Authority (APVMA) conducts the “Adverse Experience Reporting Program “ which encourages people impacted adversely by pesticide use to provide details of the matter to the APVMA. Cotton growers who have crops affected by herbicides are encouraged to submit a report to this program. Information collected is used to identify recurring problems with specific pesticides. Remedial action is formulated from these reports.*

For details on submitting a report, contact Cotton Australia Limited (Local GSM) or the APVMA.

**FOR FURTHER INFORMATION CONTACT:**  
Cotton Australia Toowoomba Office: 07 4639 4908  
Narrabri Office: 02 6792 6041