Clear Up Confusion Over Shelf Life Statements

By Graeme Peters

A recent article on Stuff said Kiwis were throwing out thousands of dollars of food each week.

Eighty-six percent of over 1000 Sunday Star-Times readers polled said they bought food and threw it away, despite rising costs at the checkout.

Food past its use-by date makes up nearly half of what is thrown out.

A zero-waste advocate said that food was routinely thrown out before it went off because people mistake best-before dates for use-by dates.

Wasting food was bigger than just a personal cost issue, because it also wasted the efforts of producing, packaging and transporting it.

Snap! Exactly the same situation happens with agrichemicals. People are discarding or returning chemicals because of justified confusion between ‘shelf life’ and when a product expires.

I say justified because it’s astonishing that labels on stable agrichemicals must, according to regulations, display a two-year shelf life. This creates huge hassles for manufacturers and distributors, who field dozens of unnecessary calls a day from users of chemicals wanting to know if their product is ‘off’ when it is perfectly safe to use.

Like many products, agricultural chemicals can undergo chemical and physical changes over time. The rate of change depends on many factors but the product is considered fit for use as long as these changes have no adverse effects on efficacy and safety to people and the environment.

A shelf life statement is acceptable if tests on a product show that it won’t last more than two years. But these products are in the minority. Most agrichemicals are very stable, meaning that stored under normal New Zealand conditions of light, temperature and humidity they will last much longer than two years.

The main problem with a two-year shelf life statement is it confuses end users, who view it as a mandatory use-by expiry date. This results in phone calls asking distributors and manufacturers to take back product that is more than two years old, despite assurances that it is still usable.

Second, the current rules are out of step with rest of the world. Other regulators do not require data to show a product is stable beyond two years. The Australian Pesticides and Veterinary Medicines Authority requires information about expiry date to be on a product label only if the product cannot be stored for at least two years at or above 25°C.

Being out of kilter with the rest of the world is important because chemicals are a global industry and New Zealand represents only 0.2 percent of global demand. While MAF can stamp its foot and demand that manufacturers prove that their products last more than two years, manufacturers will not do the testing because other regulators do not see it as an issue.

Third, a shelf life statement adds costs in time and money for everyone involved. These include users who need to take time to confirm that products are still fit to be used, distributors who are required to check the stability of product with the manufacturer, and manufacturers who must do tests and further paper work to ‘extend’ the shelf life unnecessarily.
Another key point is that a two-year shelf life statement results in more chemicals requiring disposal. It’s better to minimise the accumulation of unused product on farms and orchards rather than send perfectly good product off for high-temperature destruction.

If there is no evidence of instability from accelerated and ambient testing then the product is expected to be stable for the time it is normally anticipated to be in the market place. The reasonable assumption that these tests are an effective indicator of long-term stability is evidenced from the lack of customer complaints about quality and quality related performance of the products.

So, what should be on a New Zealand agricultural chemical label?

The product label should include the date of manufacture, batch number and the relevant storage conditions under which the product should be kept.

If the product has a shelf life of less than two years, an expiry or use-by date should be on the label.

If a product is stable for at least two years, a shelf life statement should not be specified.

This will bring MAF requirements into line with overseas regulators and cut compliance costs for manufacturers, distributors and users – meaning lower prices for farmers and growers.

Reducing unnecessary cost and increasing efficiency and productivity are stated objectives of the current government’s strategy for growth. Agcarm believes that removing the two-year shelf life label requirement would help achieve this.

Agcarm has written to MAF asking for a review of its shelf-life requirements. There’s been no response at time of writing but we expect MAF to give this issue a serious look.

When announcing the merger of the ministries of fisheries, agriculture and forestry, State Services Minister Tony Ryall said ministers agreed to the merger because it would deliver “better results for New Zealanders by reducing back-office bureaucracy and lowering the cost of delivering government services”.

Removing unnecessary shelf-life statements will tick both boxes.

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