



Section 1 - Identification of The Material and Supplier

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Chemical nature: Triclopyr is an aryloxyalkanoic acid derivative; Picloram is a pyridinecarboxylic acid derivative.

Trade Name: **Fightback Herbicide**

APVMA Number: 56847

Product Use: Agricultural herbicide for use as described on the product label.

Creation Date: **August, 2004**

This version issued: **February, 2022** and is valid for 5 years from this date.

Poisons Information Centre: **Phone 13 11 26 from anywhere in Australia**

Section 2 - Hazards Identification

Statement of Hazardous Nature

This product is classified as: Hazardous according to the criteria of SWA Australia.

Not subject to the ADG Code when transported in Australia by Road or Rail (refer to SP AU01). However if transported by Air or Sea, this provision does not apply. Then the product is classed as Dangerous (Class 9 Environmentally Hazardous) by IATA and IMDG/IMSBC respectively. See details below and in Section 14 of this SDS.

SUSMP Classification: S6

ADG Classification: Class 9: Miscellaneous dangerous goods.

UN Number: 3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S.



GHS Signal word: **WARNING**

Acute Toxicity Oral Category 4

Hazardous to aquatic environment Short term/Chronic Category 1

HAZARD STATEMENT:

H302: Harmful if swallowed.

H410: Very toxic to aquatic life with long lasting effects.

PREVENTION

P102: Keep out of reach of children.

P262: Do not get in eyes, on skin, or on clothing.

P264: Wash contacted areas thoroughly after handling.

P270: Do not eat, drink or smoke when using this product.

P273: Avoid release to the environment.

P280: Wear protective gloves, protective clothing and eye or face protection.

RESPONSE

P352: Wash with plenty of soap and water.

P301+P312: IF SWALLOWED: Call a POISON CENTRE or doctor if you feel unwell.

P301+P330+P331: IF SWALLOWED: Rinse mouth. Do NOT induce vomiting.

P391: Collect spillage.

P370+P378: In case of fire, use carbon dioxide, dry chemical, foam, water fog. Alcohol resistant foam is the preferred firefighting medium but, if it is not available, normal foam can be used.

STORAGE

P402+P404: Store in a dry place. Store in a closed container.

P403+P235: Store in a well-ventilated place. Keep cool.

DISPOSAL

P501: Dispose of contents and containers as specified on the registered label.

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Emergency Overview

Physical Description & colour: Clear brown liquid.

Odour: Characteristic odour.

Major Health Hazards: The oral LD₅₀ of Triclopyr in rats ranges from 630 to 729 mg/kg, and is over 2000 mg/kg for various amine and ester formulated products. The dermal LD₅₀ for the technical material in rabbits is greater than 2000 mg/kg, and greater than 4000 mg/kg for the formulations. Inhalation of Triclopyr did not affect rats, but inhalation of some of the formulations did cause nasal irritation. Picloram has a lower toxicity than Triclopyr.

Section 3 - Composition/Information on Ingredients

Ingredients	CAS No	Conc, g/L	TWA (mg/m ³)	STEL (mg/m ³)
Triclopyr *	55335-06-3	300	not set	not set
Picloram **	1918-02-1	100	10	not set
Other non hazardous ingredients	secret	to 1 L	not set	not set

* This ingredient is present as the butoxy ester (CAS 64700-56-7) at 428g/L, sufficient to give 300g/L Triclopyr.

** This ingredient is present as the hexyloxypropylamine salt at 192g/L, sufficient to give 100g/L Picloram.

This is a commercial product whose exact ratio of components may vary slightly. Minor quantities of other non hazardous ingredients are also possible.

The TWA exposure value is the average airborne concentration of a particular substance when calculated over a normal 8 hour working day for a 5 day working week. The STEL (Short Term Exposure Limit) is an exposure value that should not be exceeded for more than 15 minutes and should not be repeated for more than 4 times per day. There should be at least 60 minutes between successive exposures at the STEL. The term "peak" is used when the TWA limit, because of the rapid action of the substance, should never be exceeded, even briefly.

Section 4 - First Aid Measures

General Information:

You should call The Poisons Information Centre if you feel that you may have been poisoned, burned or irritated by this product. The number is 13 11 26 from anywhere in Australia (0800 764 766 in New Zealand) and is available at all times. Have this SDS with you when you call.

Inhalation: First aid is not generally required. If in doubt, contact a Poisons Information Centre or a doctor.

Skin Contact: Irritation is unlikely. However, if irritation does occur, flush with lukewarm, gently flowing water for 5 minutes or until chemical is removed.

Eye Contact: First aid is not generally required. If in doubt, contact a Poisons Information Centre or a doctor. Take special care if exposed person is wearing contact lenses.

Ingestion: If swallowed, do NOT induce vomiting. Wash mouth with water and contact a Poisons Information Centre, or call a doctor.

Section 5 - Fire Fighting Measures

Fire and Explosion Hazards: This product is classified as a C1 combustible product. There is a slight risk of an explosion from this product if commercial quantities are involved in a fire. Violent steam generation or eruption may occur upon application of direct water stream on hot liquids. Vapours from this product are heavier than air and may accumulate in sumps, pits and other low-lying spaces, forming potentially explosive mixtures. They may also flash back considerable distances.

Fire decomposition products from this product may be toxic if inhaled. Take appropriate protective measures.

Extinguishing Media: Try to contain spills, minimise spillage entering drains or water courses.

Fire Fighting: If a significant quantity of this product is involved in a fire, call the fire brigade. There is little danger of a violent reaction or explosion if significant quantities of this product are involved in a fire. Recommended personal protective equipment is full fire kit and breathing apparatus.

Flammability Class: Not flammable (GHS); C1 combustible (AS 1940)

Section 6 - Accidental Release Measures

Accidental release: In the event of a major spill, prevent spillage from entering drains or water courses. Wear full protective clothing including face mask, face shield and gauntlets. All skin areas should be covered. See above under Personal Protection regarding Australian Standards relating to personal protective equipment. Suitable materials for protective clothing include rubber, PVC. Stop leak if safe to do so, and contain spill. Absorb onto sand, vermiculite or other suitable absorbent material. If spill is too large or if absorbent material is not available, try to create a dike to stop material spreading or going into drains or waterways. Sweep up and shovel or collect recoverable product into labelled containers for recycling or salvage, and dispose of promptly. After spills, wash area preventing runoff from entering drains. If a significant quantity of material enters drains, advise emergency services. Full details regarding

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disposal of used containers, spillage and unused material may be found on the label. If there is any conflict between this SDS and the label, instructions on the label prevail. Ensure legality of disposal by consulting regulations prior to disposal. Thoroughly launder protective clothing before storage or re-use. Advise laundry of nature of contamination when sending contaminated clothing to laundry.

Section 7 - Handling and Storage

Handling: Keep exposure to this product to a minimum, and minimise the quantities kept in work areas. Check Section 8 of this SDS for details of personal protective measures, and make sure that those measures are followed. The measures detailed below under "Storage" should be followed during handling in order to minimise risks to persons using the product in the workplace. Also, avoid contact or contamination of product with incompatible materials listed in Section 10.

Storage: Note that this product is combustible and therefore, for Storage, meets the definition of Dangerous Goods in some states. If you store large quantities (tonnes) of such products, we suggest that you consult your state's Dangerous Goods laws in order to clarify your obligations regarding their storage.

Store packages of this product in a cool place. Store in the closed original container in a dry, cool, well-ventilated area out of direct sunlight. Make sure that the product does not come into contact with substances listed under "Materials to avoid" in Section 10. Some liquid preparations settle or separate on standing and may require stirring before use. Check packaging - there may be further storage instructions on the label.

Section 8 - Exposure Controls and Personal Protection

The following Australian Standards will provide general advice regarding safety clothing and equipment:

Respiratory equipment: **AS/NZS 1715**, Protective Gloves: **AS 2161**, Occupational Protective Clothing: AS/NZS 4501 set 2008, Industrial Eye Protection: **AS1336** and **AS/NZS 1337**, Occupational Protective Footwear: **AS/NZS2210**.

SWA Exposure Limits	TWA (mg/m ³)	STEL (mg/m ³)
Picloram	10	not set

The ADI for Triclopyr is set at 0.005mg/kg/day. The corresponding NOEL is set at 0.5mg/kg/day.

The ADI for Picloram is set at 0.07mg/kg/day. The corresponding NOEL is set at 7mg/kg/day. ADI means Acceptable Daily Intake and NOEL means No-observable-effect-level. Values taken from Australian ADI List, June 2014.

No special equipment is usually needed when occasionally handling small quantities. The following instructions are for bulk handling or where regular exposure in an occupational setting occurs without proper containment systems.

Ventilation: No special ventilation requirements are normally necessary for this product. However make sure that the work environment remains clean and that vapours and mists are minimised.

Eye Protection: Eye protection is not normally necessary when this product is being used. However, if in doubt, wear suitable protective glasses or goggles.

Skin Protection: The information at hand indicates that this product is not harmful and that normally no special skin protection is necessary. However, we suggest that you routinely avoid contact with all chemical products and that you wear suitable gloves (preferably elbow-length) when skin contact is likely.

Protective Material Types: There is no specific recommendation for any particular protective material type.

Respirator: Usually, no respirator is necessary when using this product. However, if you have any doubts consult the Australian Standard mentioned above.

Section 9 - Physical and Chemical Properties:

Physical Description & colour:	Clear brown liquid.
Odour:	Characteristic odour.
Boiling Point:	No Specific Data. Expected To Begin Boiling About 220°C at 100kPa
Flash point:	82°C (Pensky Martin closed cup)
Upper Flammability Limit:	No data.
Lower Flammability Limit:	No data.
Autoignition temperature:	No data.
Freezing/Melting Point:	No specific data. Liquid at normal temperatures.
Volatiles:	No specific data. Expected to be low at 100°C.
Vapour Pressure:	Negligible at normal ambient temperatures.
Vapour Density:	No data.
Specific Gravity:	Approx. 1.12 at 20°C.
Water Solubility:	Emulsifiable.
pH:	No data.
Evaporation Rate:	No data.

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Coeff Oil/water distribution: Triclopyr -0.45 at pH 7 (log P octanol/water)

Particle Characteristics:

Reactivity: This product is unlikely to react or decompose under normal storage conditions. However, if you have any doubts, contact the supplier for advice on shelf life properties.

Conditions to Avoid: None known. Store in the closed original container in a dry, cool, well-ventilated area out of direct sunlight.

Incompatibilities: strong oxidising agents.

Fire Decomposition: Carbon dioxide, and if combustion is incomplete, carbon monoxide and smoke. Hydrogen chloride gas, other compounds of chlorine. Water. Carbon monoxide poisoning produces headache, weakness, nausea, dizziness, confusion, dimness of vision, disturbance of judgment, and unconsciousness followed by coma and death.

Polymerisation: This product is unlikely to undergo polymerisation processes.

Section 11 - Toxicological Information

Toxicity: The oral LD₅₀ of Triclopyr in rats ranges from 630 to 729 mg/kg, and is over 2000 mg/kg for various amine and ester formulated products. The dermal LD₅₀ for the technical material in rabbits is greater than 2000 mg/kg, and greater than 4000 mg/kg for the formulations. Inhalation of Triclopyr did not affect rats, but inhalation of some of the formulations did cause nasal irritation. These data indicate Triclopyr is harmful.

Chronic toxicity: Rats fed diets containing between 3 and 30 mg/kg/day of Triclopyr experienced no ill effects. Male rats fed much higher doses (100 mg/kg/day) had decreased liver and body weight and increased kidney weight. Male mice also showed reduced liver weight but at 60 mg/kg/day. Monkeys fed smaller doses of Triclopyr (20 mg/kg/day) showed no adverse effects.

Reproductive effects: Triclopyr fed to rabbits on days 6 to 18 of gestation at doses of 25, 50, and 100 mg/kg/day produced no effects on maternal body weight, litter size, or foetal body weight. A three-generation study of rats at doses of 3, 10, and 30 mg/kg/day for an 8- to 10-week period prior to breeding of each generation showed no impact of Triclopyr on fertility rates. Triclopyr does not appear to cause reproductive toxicity.

Teratogenic effects: Pregnant rats given moderate to high doses of 50, 100, and 200 mg/kg/day on days 6 to 15 of gestation had offspring with mild foetotoxicity, but no birth defects. There were no teratogenic effects in rabbits treated on days 6 to 18 of gestation at dose rates of 10 and 25 mg/kg/day. These data suggest that Triclopyr is not teratogenic.

Mutagenic effects: Triclopyr is nonmutagenic in bacterial and cytogenetic assay systems. A mutagenicity study using rats was weakly positive, but a negative result was found in mice, the more sensitive species. Based on these data, Triclopyr is unlikely to be mutagenic.

Carcinogenic effects: Rats and mice fed oral doses of Triclopyr at 3 to 30 mg/kg/day for 2 years showed no carcinogenic response. Even though the mice did have a high incidence of lymph cancer, this incidence were apparently characteristic of the particular strain of mice and did not represent a dose-related effect. Based on these data, Triclopyr is unlikely to be carcinogenic.

Organ toxicity: Organs affected by exposure to Triclopyr include the kidneys and liver.

Fate in humans and animals: Data from animal studies indicate that Triclopyr is rapidly eliminated via the urine as the unchanged parent compound. At higher oral doses, some Triclopyr may be eliminated through the faeces as the absorption capacity of the intestine is exceeded. Reported half-lives for elimination of Triclopyr from mammals are 14 hours (dog) and <24 hours (monkeys). A human elimination half-life of approximately 5 hours has been suggested. Picloram is of lower toxicity than Triclopyr.

Classification of Hazardous Ingredients

Ingredient	Health Hazard Statement Codes
Triclopyr (Esters)	Conc>=25%: Xn; R22

Potential Health Effects

See section 11 for Chronic exposure studies.

Inhalation:

Short Term Exposure: Available data indicates that this product is not harmful. In addition product is unlikely to cause any discomfort or irritation.

Long Term Exposure: No data for health effects associated with long term inhalation.

Skin Contact:

Short Term Exposure: Available data indicates that this product is not harmful. It should present no hazards in normal use. In addition product is unlikely to cause any discomfort in normal use.

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Long Term Exposure: No data for health effects associated with long term skin exposure.

Eye Contact:

Short Term Exposure: This product is believed to be not irritating to eyes.

Long Term Exposure: No data for health effects associated with long term eye exposure.

Ingestion:

Short Term Exposure: Significant oral exposure is considered to be unlikely. Available data shows that this product is harmful, but symptoms are not available. This product is unlikely to cause any irritation problems in the short or long term.

Long Term Exposure: No data for health effects associated with long term ingestion.

Carcinogen Status:

SWA: No significant ingredient is classified as carcinogenic by SWA.

NTP: No significant ingredient is classified as carcinogenic by NTP.

IARC: Picloram is Class 3 - unclassifiable as to carcinogenicity to humans.

Section 12 - Ecological Information

This product is toxic to flora. Very toxic to aquatic organisms, may cause long-term adverse effects to the aquatic environment.

Effects on birds: Triclopyr is slightly to practically nontoxic to birds. The LD₅₀ of the parent compound in the mallard duck is 1698 mg/kg, while the formulated compounds are of lower toxicity. The LC₅₀ in bobwhite quail and Japanese quail fed Triclopyr for 8 days are 2935 ppm and 3278 ppm, respectively.

Effects on aquatic organisms: Triclopyr and amine salt are practically nontoxic to fish. Triclopyr has a LC₅₀ (96-hour) of 117 mg/L in rainbow trout and 148 mg/L in bluegill sunfish. It is practically nontoxic to the aquatic invertebrate *Daphnia magna*, with a reported LC₅₀ for the amine salt of 1170 mg/L. The ester formulation has reported 96-hour LC₅₀ values of 0.74 mg/L and 0.87 mg/L in the rainbow trout and bluegill sunfish, respectively. The compound has little if any potential to accumulate in aquatic organisms. The bioconcentration factor for Triclopyr in whole bluegill sunfish is only 1.08.

Effects on other organisms: The compound is nontoxic to bees.

Environmental Fate:

Breakdown in soil and groundwater: In natural soil and in aquatic environments, the ester and amine salt formulations rapidly convert to the acid, which in turn is neutralised to a relatively nontoxic salt. It is effectively degraded by soil microorganisms and has a moderate persistence in soil environments. The half-life in soil ranges from 30 to 90 days, depending on soil type and environmental conditions, with an average of about 46 days. The half-life of one of the breakdown products (trichloropyridinol) in 15 soils ranged from 8 to 279 days, with 12 of the tested soils having half-lives of less than 90 days. Longer half-lives may occur in cold or arid conditions. Triclopyr is not strongly adsorbed to soil particles and has the potential to be mobile.

Breakdown in water: Triclopyr is not readily hydrolysed at pH 5 to 9. Hydrolysis of the ester and the amine salt occurs rapidly and results in formation of Triclopyr. Reported half-lives in water are 2.8 to 14.1 hours, depending on season and depth of water. The ester formulation half-life is from 12.5 to 83.4 hours. In water, the most important breakdown process is photolysis.

Breakdown in vegetation: Triclopyr is readily translocated throughout a plant after being taken up by either roots or the foliage. Cowberries contained residues of 2.4 ppm at 6 days, 0.7 to 1.1 ppm at 30 to 36 days, and 0.2 to 0.3 ppm at 92 to 98 days after application. The estimated half-life in above ground drying foliage as in a forest overstory is 2 to 3 months.

Picloram is rapidly photodegraded on soil and in clear, moving water.

Section 13 - Disposal Considerations

Disposal: Special help is available for the disposal of Agricultural Chemicals. The product label will give general advice regarding disposal of small quantities, and how to cleanse containers. However, for help with the collection of unwanted rural chemicals, contact ChemClear 1800 008 182 <http://www.chemclear.com.au/> and for help with the disposal of empty drums, contact DrumMuster <http://www.drummuster.com.au/> where you will find contact details for your area.

Section 14 - Transport Information

Not subject to the ADG Code when transported by Road or Rail in Australia, in packages 500kg(L) or less; or IBCs, but classed as Dangerous by IATA and IMDG/IMSBC when carried by Air or Sea transport (see details below).

UN Number: 3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S.

Hazchem Code: •3Z

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Special Provisions: 179, 274, 331, 335, AU01

Limited quantities: ADG 7 specifies a Limited Quantity value of 5 L for this class of product.

Dangerous Goods Class: Class 9: Miscellaneous Dangerous Goods.

Packing Group: III

Packing Instruction: P001, IBC03, LP01

Class 9 Miscellaneous Dangerous Goods shall not be loaded in the same vehicle or packed in the same freight container with Dangerous Goods of Class 1 (Explosives).

Section 15 - Regulatory Information

AIC: All of the significant ingredients in this product are compliant with AICIS regulations.

The following ingredients; Triclopyr, Picloram are mentioned in the SUSMP.

Section 16 - Other Information

This SDS contains only safety-related information. For other data see product literature.

Acronyms:

ADG Code	Australian Code for the Transport of Dangerous Goods by Road and Rail, 7th Edition
AIC	Australian Inventory of Industrial Chemicals
CAS number	Chemical Abstracts Service Registry Number
Hazchem Code	Emergency action code of numbers and letters that provide information to emergency services especially firefighters
IARC	International Agency for Research on Cancer
SWA	Safe Work Australia, formerly ASCC and NOHSC
NOS	Not otherwise specified
NTP	National Toxicology Program (USA)
SUSMP	Standard for the Uniform Scheduling of Medicines & Poisons
UN Number	United Nations Number

Contact Points:

Call ADAMA on (02) 9431 7800 and ask for the technical manager.

Fax: (02) 9431 7700

Police and Fire Brigade:

Dial 000

Emergency contact:

1800 024 973 (24 hours)

If ineffective:

Dial Poisons Information Centre

(13 11 26 from anywhere in Australia)

THIS SDS SUMMARISES OUR BEST KNOWLEDGE OF THE HEALTH AND SAFETY HAZARD INFORMATION OF THE PRODUCT AND HOW TO SAFELY HANDLE AND USE THE PRODUCT IN THE WORKPLACE. EACH USER MUST REVIEW THIS SDS IN THE CONTEXT OF HOW THE PRODUCT WILL BE HANDLED AND USED IN THE WORKPLACE.

IF CLARIFICATION OR FURTHER INFORMATION IS NEEDED TO ENSURE THAT AN APPROPRIATE RISK ASSESSMENT CAN BE MADE, THE USER SHOULD CONTACT THIS COMPANY SO WE CAN ATTEMPT TO OBTAIN ADDITIONAL INFORMATION FROM OUR SUPPLIERS. OUR RESPONSIBILITY FOR PRODUCTS SOLD IS SUBJECT TO OUR STANDARD TERMS AND CONDITIONS, A COPY OF WHICH IS SENT TO OUR CUSTOMERS AND IS ALSO AVAILABLE ON REQUEST.

Please read all labels carefully before using product.

This SDS is prepared in accord with the SWA document "Preparation of Safety Data Sheets for Hazardous Chemicals - Code of Practice" (July 2020) and GHS Revision 7

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