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Label presentation and layout

1. Information required on labels
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The Agricultural and Veterinary Chemicals Code (Agvet Code), scheduled to the [Agricultural and Veterinary Chemicals Code Act 1994](#), stipulates that, for a label for a container for a chemical product to meet the labelling criteria and be approved, the label must contain adequate instructions relating to specified matters (as are appropriate), including any matters prescribed by the [Agricultural and Veterinary Chemicals Code Regulations 1995](#) (Agvet Code Regulations). Among other things, a label must comply with the requirements of the Labelling Standard or, if there is no Labelling Standard, the Agricultural or Veterinary Labelling Codes made by the Australian Pesticides and Veterinary Medicines Authority (APVMA), as in force from time to time.

Where the term 'must' is used, it is a legal requirement that labels comply with this provision. The Labelling Code also contains some additional guidance on how labels may be structured and presented, where terms such as 'may' and 'should' are used.

In the following sections we set out requirements of the Agricultural Labelling Code and some guidance on:

- what information is required on labels and what should be avoided
- label layout
- printing and legibility requirements.

1. Information required on labels

The Agvet Code stipulates that a label must contain adequate instructions relating to such of the following as are appropriate:

- The circumstances in which the product should be used.
- How the product should be used.
- The times when the product should be used.
- The frequency of the use of the product.
- The withholding period after the use of the product.
- The re-entry period after the use of the product.
- The disposal of the product when it is no longer required.
- The disposal of the product's containers.
- The safe handling of the product and first aid in the event of an accident caused by the handling of the product.
- Any matters prescribed by the Agvet Code Regulations, which include:
 - the prevention of undue prejudice to trade or commerce between Australia and places outside Australia
 - the appropriate signal words (if any) required by the current [Poisons Standard](#)
 - the storage of containers for the product (for a chemical product that is a date-controlled chemical product)

- any other matter determined by the APVMA Chief Executive Officer (CEO).

The label must contain specific labelling information for each of the points listed above, if applicable.

1.1. Legislative compliance

The label must also comply with any of the particulars prescribed by the [Agvet Code Regulations](#) that are appropriate to be contained on the label. The following particulars are prescribed:

- The appropriate signal words required by the current [Poisons Standard](#).
- The name of the chemical product.
- The name of each active constituent in the product.
- The proportion of each active constituent in the product.
- The name of each constituent for the product that is:
 - not an active constituent, and
 - classified as a poison in the current [Poisons Standard](#).
- The proportion of each constituent that is:
 - not an active constituent, and
 - classified as a poison in the current [Poisons Standard](#).
- The net contents of the product.
- Other particulars determined by the APVMA CEO.

The 'relevant particulars' in relation to the approval of a label, as defined in the Agvet Code, include the adequate instructions and prescribed particulars specified above.

The label must also comply with any conditions of the approval imposed by the APVMA. Among other things, a label must comply with the requirements of the Labelling Standard or, if there is no Labelling Standard, the Agricultural or Veterinary Labelling Codes made by the APVMA, as in force from time to time.

The Agricultural Labelling Code also includes requirements relating to certain additional information on the label, its layout, presentation, printing and legibility. These requirements must be met for the label to comply with the conditions of approval of the label.

1.2. Additional information

Labels may also include:

- information needed to meet the requirements of other regulators – for example, reference to safety data sheet and transport emergency information
- other company chosen statements, such as warranty statements, disclaimers regarding liability, logos such as drumMUSTER and barcodes
- other information that is not contrary to the label's relevant particulars or the requirements of the Agvet Code and the Agvet Code Regulations.

This additional information must be placed in such a way as to enable compliance with the layout requirements of this Labelling Code. It will not be assessed as part of the APVMA's label approval process and does not need to be supplied to the APVMA for the purposes of label approval.

1.3. Terms to be avoided

According to the Agvet Code, a label must not include any statement or expression that expressly or impliedly claims – irrespective of how the claim is stated – that the:

- APVMA recommends use of the product
- APVMA guarantees, warrants or assures the safety or efficacy of the product
- product is natural, organic, safe, harmless, non-toxic, non-poisonous, non-injurious or environmentally friendly without qualification, or with a qualification that, in the APVMA's opinion, is unjustified.

1.4. Terms that require qualification if used on a label

The language used on labels should be appropriate for the intended users of the chemical product. Wherever possible, use common words that are likely to be understood by users of the product. Be as specific as possible with instructions and order sentences to reflect the logical order of events. Keep sentences short. Be consistent in the order of words and avoid double negative statements.

Table 1 shows terms that require qualification if used on a label.

Table 1: Terms that require qualification if used on a label

Category/term	Qualification needed
Organic	If used, the name of the certifying body must be included on the label.
Natural, naturally derived or nature's way	<p>May only be used in the name of a product if the formulation is 100% natural, or if the term relates specifically to a natural substance contained in the product formulation.</p> <p>Unless the formulated product is 100% natural, the remaining constituents or ingredients must be declared in the text of the label as being synthetic.</p> <p>Must only be included on labels if the:</p> <ul style="list-style-type: none"> substance or preparation to which the claim relates is exempt from poison schedule classification claim is not misleading, i.e. the substance for which the claim is being made formed naturally.
General environmental claims	<p>Claims that a product is environmentally friendly (including marketing terms such as 'green' and 'frog friendly') must be supported.</p> <p>The <u>Competition and Consumer Act 2010</u> imposes obligations on businesses regarding environmental claims – the Australian Competition and Consumer Commission can provide guidance on complying with these requirements.</p> <p>Although it does not relate specifically to labelling, the <u>Environmental Claims in Advertising and Marketing Code</u>, published in 2009 by the <u>Australian Association of National Advertisers</u>, establishes a set of principles for the use of environmental claims in marketing and on avoiding misleading, vague or ambiguous claims.</p>
Superlatives and comparative (the best, the most effective, etc.)	<p>May be included as part of the relevant particulars, only if adequate justification or support for the statements is provided to, and accepted by, the APVMA.</p> <p>If not part of the relevant particulars, statements will not be assessed by the APVMA and the provisions of the <u>Competition and Consumer Act 2010</u> apply.</p>
Advertising literature, product technical bulletins, promotional tags	<p>All claims and information contained in advertising literature and technical bulletins must be consistent with the information contained on the approved product labels.</p> <p>Claims inconsistent with those on approved labels are not permitted unless appropriate permits are obtained or other appropriate approvals or exemptions are in place.</p>

2. Label layout

Although the APVMA no longer approves the final form of the label when determining an application for approval of a label or an application for variation of the relevant particulars or conditions of the approval, the Agvet Code provides that we may subsequently request the approval holder to provide us with a copy of the approved label as per Regulation 18H of the Agricultural and Veterinary Chemicals Code Regulations 1995. The holder is responsible for conversion of the approved label into the marketed product label.

In the next 2 sections we provide guidance on label layout and how to ensure legibility of the marketed product labels.

The size and type of container determines the space available for labelling and, therefore, the format or layout of a label and the space available for each item on the label. More space and a larger typeface should be allocated for key information.

Space for items such as barcodes and hazard symbols must be taken into account. In doing so, care must be exercised to ensure that the:

- legislative requirements and requirements in relation to the labelling of poisons are not contravened
- information of greatest importance to the user of the product is not made difficult to read.

2.1. Placement of Information

2.1.1. Main panel

A label may consist of 2 or more parts or panels and a label may be easier to read and understand if the necessary information is spread over 2 or more panels. Panels also delineate the information making it easier for a reader to identify the important information. The label should be made as large as possible, with small type and cramped layout avoided.

Where a label consists of 2 or more panels, one panel is designated the main panel, while the others become ancillary panels. The main panel, as the name suggests, is the most prominent panel and must contain the items in the order shown in Table 2.

Table 2: Required information for main panel of label

Required information	Order of appearance on label
Signal headings, as required	1
Name of the chemical product	2
Active constituent statement	3
Solvent and other scheduled ingredients, when present in the product	4
Mode of action identification symbol, if required	5
Statement of claims for use, if required	6
Restricted chemical product statement for declared restricted chemical products, or any other restriction on availability or use	7
Reference to leaflet, booklet or outer pack, if applicable	8
Net contents statement	9
Depending on available space, the name, address and contact phone number of the person responsible for marketing the product	10

Where there is only one panel, it must also contain the information set out below, in that order.

2.1.2. Ancillary panels

If the label has more than one panel, any information not included on the main panel is to be placed on ancillary panels, in the order shown in Table 3.

Table 3: Information for ancillary panels of label

Required information	Order of appearance on label
Directions for use	1
Restraints	2
Directions for use	3
Not to be used statements	4
Other limitations and prohibitions	5
Withholding periods	6
Trade advice	7
General instructions	8
Resistance warnings	9
Compatibility statements	10
Precaution statements	11
Protection statements	12
Storage and disposal statements	13
Safety directions	14
First aid instructions	15

Where there is more than one ancillary panel, breaks may be made at appropriate points, but the information on each panel should maintain the above sequence.

Other information may be placed on either the main or ancillary panels, but must be placed so it does not interfere with the above requirements.

2.1.3. Measure packs

Measure pack means a sealed container that contains a measured quantity of chemical product for use on one occasion. One measure pack, or more, is enclosed in a primary pack.

Measure packs must bear the following items:

- Signal heading
- Name of the product

- Active constituent statement
- Net contents or contents statement
- APVMA approval number

Measure packs must include the following statements in either upper or lower case letters of not less than 2 mm in height:

Not to be sold separately.

Before use read all directions on the outer pack.

If the measure packs are manufactured from water-soluble material, the following words must also be included in, either upper or lower case, letters of not less than 2 mm in height:

Water-soluble packaging. Keep dry.

If it is not possible to print directly on to the water-soluble pack, these requirements must be printed on an outer protective bag.

The following statement must be printed in, either upper or lower case, letters of not less than 2 mm on the main panel of the primary as part of the 'Net contents' statement:

Contains [x] measure packs which it is illegal to sell separately.

2.1.4. Labels with leaflets and booklets

If the size or shape of a container cannot accommodate all the required label information, or the recommendations are too numerous to be listed clearly, some information can be printed in a leaflet or booklet that is supplied with each container. In this case, the leaflet or booklet is part of the label. Table 4 shows the information that must be included for labels that include leaflets and booklets, and the order in which it should appear. Table 5 shows the items that must appear on the label of the immediate container.

Table 4: Information for leaflets and booklets

Required information	Order of appearance on label
Signal heading	1
Name of the product	2
Active constituent statement	3
Solvent statement (if it is a scheduled poison)	4
Other scheduled ingredients	5
Mode of action identification symbol (if required)	6
Statement of claims for use	7
Directions for use	8

General instructions	9
Precaution statements	10
Protection statements	11
Storage and disposal statements	12
Safety directions	13
First aid instructions	14
APVMA approval number	15

Table 5: Information that must appear on the label of the immediate container

Required information	Order of appearance on label
Signal heading	1
Name of the product	2
Active constituent statement	3
Solvent statement (if it is a scheduled poison)	4
Other scheduled ingredients	5
Mode of action identification symbol (if required)	6
Statement of claims for use	7
Reference to leaflet or booklet	8
Net contents or contents statement	9
Name and address of person primarily responsible for marketing the product	10
Storage and disposal statements	11
Safety directions	12
First aid instructions	13
Emergency information panel	14
Batch number	15
Date of manufacture and/or expiry date	16
APVMA approval number	17

If a leaflet or booklet is used, the following statement must appear in, either upper or lower case, letters of not less than 2 mm in height, on the main panel of the primary pack, directly following the statement of claims for use:

Important: Read the attached leaflet/booklet before use.

2.1.5. 'Bottle-in-box' or 'bag-in-box'

If the product to be sold to end users consists of a bottle or bag in an outer box, both the outer box and the inner bottle or bag must be labelled. However, if, in the case of a bag-in-box, the bag is firmly attached to the inside of the box and is not designed to be removed, labelling of the bag is not required.

Outer boxes that are for shipping purposes only do not require full labelling. These labels are covered by the [Australian code for the transport of dangerous goods by road and rail](#). Boxes containing one or more bags or sachets, which are measure packs, must also be labelled according to the requirements for primary pack as specified in the section on measure packs above.

When the bottle or bag is large enough to carry a complete label, that label must include all the required information for labels. However, if the size of the label on the bottle or bag does not allow all the required information to be included, it must include, as a minimum, the information that appears in Table 6.

Table 6: Minimum information for label of bottle or bag

Required information	Order of appearance on label
Signal heading (if required)	1
Name of the product	2
Active constituent statement	3
Statement of claims for use	4
Net contents or contents statement	5
Name and address of the person primarily responsible for marketing the product	6
Storage and disposal statements	7
Safety directions	8
First aid instructions	9
APVMA approval number	10

The label for the bottle or bag must also include the following statement on the main panel of the bottle (or bag) label after the statement of claims for use:

Before using product, read directions on outer pack.

Sale of this bottle except in outer pack is illegal.

The label for the outer pack must contain all labelling requirements including the following statement on the main panel after the statement of claims for use:

The bottle (or bag) must not be sold separately. Do not destroy box while product still remains.

If the outer box is too small to contain all the required information, a leaflet or booklet may be used. In this case, the requirements for labelling, as detailed in the section on Labels with leaflets or booklets, apply for labelling the outer box and the leaflet or booklet.

2.1.6. Carton with inner plastic bladder or container

'Carton with inner plastic container' refers to cartons in which the inner plastic container or bladder is not intended to be removed during use, but is not glued or affixed to the outer carton (for example, Cubidor[®] packs). The minimum labelling required on the inner plastic container is indicated in Table 7.

Table 7: Minimum information for the label on a carton with an inner bladder or container

Required information	Order of appearance on label
Signal heading (if required)	1
Name of the product	2
Active constituent statement	3
Solvent statement (if it is a scheduled poison)	4
Other scheduled ingredient	5
Name and address of person primarily responsible for marketing the product	6
The statement 'DO NOT REUSE THIS CONTAINER FOR ANY PURPOSE', in capital letters of at least 2 mm in height	7
APVMA approval number	8

If the product contains a scheduled poison, the collar of the inner plastic container must have the following label that is either embossed or otherwise permanently affixed:

POISON

The outer pack must be fully labelled and also include the following statement on either the main panel after the statement of claims for use or another prominent position:

DO NOT remove plastic inner container from carton until empty.

2.1.7. QuikPour containers

A QuikPour container is a container that consists of a collapsible internal bladder with a large 'mouth' contained within a box. The inner bladder is not intended to be removed during use and must contain the following warning:

WARNING DO NOT REUSE THIS CONTAINER FOR ANY PURPOSE

POISON

AGRICULTURAL CHEMICAL

If the product contains a scheduled poison other than a Schedule 5 poison, the word 'POISON' is to be indelibly written on the side or shoulder of the inner container.

The outer pack must be fully labelled and also include the following statement on the main panel after the statement of claims for use:

DO NOT remove plastic inner container from carton until empty.

2.1.8. Other types of packaging

If a product is to be sold in other types of packaging, the APVMA may determine the specific requirements for labelling of any components and any statements that are required, depending on the nature of the packaging.

2.1.9. Presentation or promotional containers

Presentation or promotional containers may include two or more products that may be used either as a mixture, or separately, such as:

- insecticides for grain treatment
- herbicides for specific weed control
- products that are always used separately for control of different problems, but are used on the same crop or for similar purposes, such as:
 - herbicides that each have a specific weed spectrum, but have different times of application
 - an insecticide and a herbicide
 - unrelated products included in a presentation pack for promotional purposes, such as a mix of home garden products with (or without) non-chemical products (for example, insecticide, fungicide, snail bait and garden tools).

The amount of information that must appear on labels for presentation or promotional packs depends on the type of material from which the outer pack is made. If it is made from clear plastic or a similar material that allows for easy reading of the main panel details – including first aid and safety directions for each chemical product contained in the pack – no further labelling is required.

If the main panel is not clearly visible, the information listed in Table 8 must be included on the outer pack.

Table 8: Information that must appear on the outer pack of a presentation or promotional container

Required information	Order of appearance on label
Signal heading appropriate to the most toxic compound in the pack	1
Statement indicating the number, pack size and name of each of the registered products in the presentation or promotional pack	2

Active constituent statement, as it appears on the label, and stated below the name of each product	3
For each product contained within: <ul style="list-style-type: none"> • statement of claims for use • name and address of holder, formulator or distributor • safety directions • first aid instructions¹ 	4
In either uppercase or lowercase letters: <ul style="list-style-type: none"> • Statement about compatibility and mixing of the products • Statement 'Read details of each product in this pack before using' 	5

¹ Repetition of safety directions and first aid statements is not necessary if the directions are identical for each product.

3. Printing and legibility requirements

The label instructions required by the APVMA and any other information relevant to the handling or use of the chemical product contained on a label must be legible to the average person using their normal reading aids (for example, glasses) if required, in good natural light conditions (320 lux). If the product is primarily for use indoors (for example, household products), it must be legible using incandescent lighting of the type used in the average household (160 lux).

Any words required on labels must be printed on the outside face of the label or container and be in the English language.

When printed for attachment to containers, labels for agricultural and veterinary chemical products registered under the Agvet Code must adhere to requirements for:

- attachment method
- print size and style
- typeface
- print quality
- colour.

3.1. Attachment method

Every label for a product must be printed on, or securely attached or affixed to, the outside of the container or pack of the product, as per Section 8 of the Agvet Code. Leaflets or booklets, if used, should be attached to the container in plastic pockets or other suitable secure holding methods.

3.2. Print size and style

A print size of 2 mm or greater should be used unless label space is limited. Larger print sizes are more readable by users and other persons dealing with the chemical. This facilitates the clear communication of warnings and instructions and contributes to the safe handling and use of the chemical.

If label space is limited (for example, on very small immediate containers), a minimum letter height of 1.5 mm (6 point type) may be used on the ancillary panel. This means that letters:

- with ascenders or descenders, such as b, f, g, h, l, t, etc. are to be a minimum of 1.5 mm in height
- without ascenders or descenders, such as a, e, i, o, u, m, r, etc. are to be a minimum of 1 mm in height.

This minimum print size should only be used where space is limited.

3.3. Typeface

Typefaces chosen for labels need to be clear and simple. Complicated or decorative fonts can be difficult to read and should be avoided.

Bodies of text should not be in all capitals or italics, unless specifically required. Closely-spaced, condensed or widely-spaced lettering should be avoided. Bold text can be used for emphasis, in addition to where it is required. Where bold text is used, holders must ensure the type does not become so thick that it reduces the white spaces within characters.

3.4. Print quality

Printing must be clear and crisp, and free from blurring or other distortion.

Printing must be sufficiently durable so as not to fade, run, smudge or otherwise lose legibility during reasonable handling and storage for at least 2 years, or the stated shelf life of the product in the case of date-controlled products.

3.5. Colour

The colour of the printed letters must be distinctly contrasted to the background colours – use light-coloured text on dark background and dark text on light background. Well-contrasted colours with widely differing hues and an appreciable difference in value should be used; avoid strongly saturated colour pairs for text and background.

There must be a luminance contrast of at least 30% between letters and background.

Text printed directly over pictorial or multi-coloured backgrounds may be difficult to read and should be avoided. A plain background, preferably white, may be used beneath the letters to improve legibility in these situations.

Colour blindness affects a significant number of people in the community – between 5% to 10% of males and around 0.5% of females. These people usually have difficulty with the colours green, yellow, orange and red, so this should be taken into account when choosing label colours for critical information. In particular, avoid red print on green background or the reverse. Do not use red, green, brown, grey and purple next to each other or on top of each other.

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The Australian Pesticides and Veterinary Medicines Authority (APVMA) is the Australian Government regulator of agricultural and veterinary (agvet) chemical products.

We acknowledge the traditional owners and custodians of country throughout Australia and acknowledge their continuing connection to land, sea and community. We pay our respects to the people, the cultures and the elders past, present and emerging.