

# Safety Data Sheet

PRODUCT NAME **Imtrade Commander 75-D Herbicide**  
APVMA Product Code: 63327

## 1 - IDENTIFICATION OF THE MATERIAL AND SUPPLIER

Supplier Name **IMTRADE AUSTRALIA PTY LTD**  
Address 17 Ocean Street, Kwinana, Western Australia, AUSTRALIA, 6167  
Telephone 1800 171 799  
Fax 1800 171 788  
Emergency In a Transport Emergency Dial 000 – Police or Fire Brigade  
Web site <http://www.imtrade.com.au>  
Product Use: Agricultural herbicide for use as described on the product label.  
Creation Date: **September, 2008**  
This version issued: **January, 2021** and is valid for 5 years from this date.

**Poisons Information Centre: Phone 13 1126 from anywhere in Australia**

Product type: 2,4-D is an aryloxyalkanoic acid derivative; Picloram is a pyridinecarboxylic acid derivative. Both are present as salts for increased water solubility.

## SECTION 2 - HAZARDS IDENTIFICATION

### Statement of Hazardous Nature

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

Not subject to the ADG Code when transported in Australia by Road or Rail in packages 500kg(L) or less; or IBCs (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: DANGER.

Acute Toxicity Oral - Category 4

Skin Sensitisation - Category 1

Serious Eye Damage - Category 1

Hazardous to Aquatic Environment Short Term/Chronic - Category 2

### HAZARD STATEMENTS:

H302: Harmful if swallowed.

H317: May cause an allergic skin reaction.

H318: Causes serious eye damage.

H411: Toxic to aquatic life with long lasting effects.

### PRECAUTIONARY STATEMENTS:

#### PREVENTION

P261: Avoid breathing fumes, mists, vapours or spray.

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.

P272: Contaminated work clothing should not be allowed out of the workplace.

P273: Avoid release to the environment.

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

## SAFETY DATA SHEET

**RESPONSE**

P337: If eye irritation persists: seek medical attention.

P363: Wash contaminated clothing before reuse.

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

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

P302+P352: IF ON SKIN: Wash with plenty of soap and water.

P305+P351+P338: IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.

P333+P313: If skin irritation or rash occurs: Get medical advice.

P370+P378: Not combustible. Use extinguishing media suited to burning materials.

**STORAGE**

P410: Protect from sunlight.

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.

**Emergency Overview**

**Physical Description & Colour:** Clear brown liquid.

**Odour:** No data; amine odour expected.

**Major Health Hazards:** harmful by inhalation and if swallowed.

**SECTION 3 - COMPOSITION/INFORMATION ON INGREDIENTS**

Ingredients	CAS No	Conc, %	TWA (mg/m <sup>3</sup> )	STEL (mg/m <sup>3</sup> )
Picloram (as triisopropanolamine salt)	6753-47-5	75g/L	10	not set
2,4-D (as isopropylamine salt)	32341-80-3	300g/L	not set	not set
Other non hazardous ingredients	secret	to 100	not set	not set

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

The SWA 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 may be equalled (but should not be exceeded) for no longer than 15 minutes and should not be repeated 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 1126 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:** If symptoms of poisoning become evident, contact a Poisons Information Centre, or call a doctor at once. Remove source of contamination or move victim to fresh air. If breathing is difficult, oxygen may be beneficial if administered by trained personnel, preferably on a doctor's advice. DO NOT allow victim to move about unnecessarily. Symptoms of pulmonary oedema can be delayed up to 48 hours after exposure.

**Skin Contact:** Wash gently and thoroughly with water (use non-abrasive soap if necessary) for 5 minutes or until chemical is removed.

**Eye Contact:** No effects expected. If irritation does occur, flush contaminated eye(s) with lukewarm, gently flowing water for 5 minutes or until the product is removed. Obtain medical advice if irritation becomes painful or lasts more than a few minutes. 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:** There is no risk of an explosion from this product under normal circumstances if it is involved in a fire.

This product is likely to decompose only after heating to dryness, followed by further strong heating.

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.

**Flash point:** Does not burn.

**SAFETY DATA SHEET**

<b>Upper Flammability Limit:</b>	Does not burn.
<b>Lower Flammability Limit:</b>	Does not burn.
<b>Autoignition temperature:</b>	Not applicable - does not burn.
<b>Flammability Class:</b>	Does not burn.

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## SECTION 6 - ACCIDENTAL RELEASE MEASURES

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**Accidental release:** In the event of a major spill, prevent spillage from entering drains or water courses. Wear full protective clothing including eye/face protection. All skin areas should be covered. See below under Personal Protection regarding Australian Standards relating to personal protective equipment. Suitable materials for protective clothing include rubber, PVC. Eye/face protective equipment should comprise as a minimum, protective glasses and, preferably, goggles. If there is a significant chance that vapours or mists are likely to build up in the cleanup area, we recommend that you use a respirator. Usually, no respirator is necessary when using this product. However, if you have any doubts consult the Australian Standard mentioned below (section 8). Otherwise, not normally necessary. 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. Recycle containers wherever possible after careful cleaning. Refer to product label for specific instructions. After spills, wash area preventing runoff from entering drains. If a significant quantity of material enters drains, advise emergency services. Full details regarding 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.

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## SECTION 7 - HANDLING AND STORAGE

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**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:** This product is a Scheduled Poison. Observe all relevant regulations regarding sale, transport and storage of this schedule of poison. Make sure that the product does not come into contact with substances listed under "Incompatibilities" 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.

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## SECTION 8 - EXPOSURE CONTROLS AND PERSONAL PROTECTION

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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**.

<b>SWA Exposure Limits</b>	<b>TWA (mg/m<sup>3</sup>)</b>	<b>STEL (mg/m<sup>3</sup>)</b>
Picloram	10	not set

The ADI for 2,4-D is set at 0.01mg/kg/day. The corresponding NOEL is set at 1mg/kg/day. ADI means Acceptable Daily Intake; NOEL means No-observable-effect-level. Data from Australian ADI List, June 2013.

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 such as protective glasses or goggles is recommended when this product is being used.

**Skin Protection:** You should avoid contact even with mild skin irritants. Therefore you should wear suitable impervious elbow-length gloves and facial protection when handling this product. See below for suitable material types.

**Protective Material Types:** We suggest that protective clothing be made from the following: rubber, PVC.

**Respirator:** Usually, no respirator is necessary when using this product. However, if you have any doubts consult the Australian Standard mentioned above. Otherwise, not normally necessary.

Safety deluge showers should, if practical, be provided near to where this product is being used.

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## SECTION 9 - PHYSICAL AND CHEMICAL PROPERTIES:

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<b>Physical Description &amp; colour:</b>	Clear brown liquid.
<b>Odour:</b>	No data; amine odour expected.
<b>Boiling Point:</b>	Approximately 100°C at 100kPa.

## SAFETY DATA SHEET

Freezing/Melting Point:	Below 0°C.
Volatiles:	Water component.
Vapour Pressure:	2.37 kPa at 20°C (water vapour pressure).
Vapour Density:	No data.
Specific Gravity:	No data.
Water Solubility:	Completely soluble in water.
pH:	No data.
Volatility:	No data.
Odour Threshold:	No data.
Evaporation Rate:	No data.
Coeff Oil/water Distribution:	No data
Autoignition temp:	Not applicable - does not burn.

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## SECTION 10 - STABILITY AND REACTIVITY

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**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.

**Incompatibilities:** strong acids, strong bases, strong oxidising agents.

**Fire Decomposition:** This product is likely to decompose only after heating to dryness, followed by further strong heating. Carbon dioxide, and if combustion is incomplete, carbon monoxide and smoke. Nitrogen and its compounds, and under some circumstances, oxides of nitrogen. Occasionally hydrogen cyanide gas in reducing atmospheres. 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 will not undergo polymerisation reactions.

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## SECTION 11 - TOXICOLOGICAL INFORMATION

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### Local Effects:

**Target Organs:** There is no data to hand indicating any particular target organs.

**Toxicity:** An information profile for 2,4-D is available at <http://extoxnet.orst.edu/pips/ghindex.html>

**Acute toxicity:** The acid form of 2,4-D is classified as "harmful". The oral LD<sub>50</sub> of 2,4-D ranges from 375 to 666 mg/kg in the rat, 370 mg/kg in mice, and from less than 320 to 1000 mg/kg in guinea pigs. The dermal LD<sub>50</sub> values are 1500 mg/kg in rats and 1400 mg/kg in rabbits, respectively. In humans, prolonged breathing of 2,4-D causes coughing, burning, dizziness, and temporary loss of muscle coordination. Other symptoms of poisoning can be fatigue and weakness with possible nausea. On rare occasions following high levels of exposure, there can be inflammation of the nerve endings with muscular effects.

**Chronic toxicity:** Rats given high amounts, 50 mg/kg/day, of 2,4-D in the diet for 2 years showed no adverse effects. Dogs fed lower amounts in their food for 2 years died, probably because dogs do not excrete organic acids efficiently. A human given a total of 16.3 g in 32 days therapeutically, lapsed into a stupor and showed signs of incoordination, weak reflexes, and loss of bladder control.

**Reproductive effects:** High levels of 2,4-D (about 50 mg/kg/day) administered orally to pregnant rats did not cause any adverse effects on birth weights or litter size. The evidence suggests that if 2,4-D causes reproductive effects in animals, this only occurs at very high doses. Thus reproductive problems associated with 2,4-D are unlikely in humans under normal circumstances.

**Teratogenic effects:** 2,4-D may cause birth defects at high doses. Rats fed 150 mg/kg/day on days 6 to 15 of pregnancy had offspring with increased skeletal abnormalities, such as delayed bone development and wavy ribs. This suggests that 2,4-D exposure is unlikely to be teratogenic in humans at expected exposure levels.

**Mutagenic effects:** 2,4-D has been very extensively tested and was found to be nonmutagenic in most systems. 2,4-D did not damage DNA in human lung cells. However, in one study, significant effects occurred in chromosomes in cultured human cells at low exposure levels. The data suggest that 2,4-D is not mutagenic or has low mutagenic potential.

**Carcinogenic effects:** 2,4-D fed to rats for 2 years caused an increase in malignant tumours. Female mice given a single injection of 2,4-D developed cancer (reticulum-cell sarcomas). Another study in rodents shows a low incidence of brain tumours at moderate exposure levels (45 mg/kg/day) over a lifetime. However, a number of questions have been raised about the validity of this evidence and thus about the carcinogenic potential of 2,4-D. In humans, a variety of studies give conflicting results. Several studies suggest an association of 2,4-D exposure with cancer. An increased occurrence of non-Hodgkin's lymphoma was found among a farm population associated with the spraying of 2,4-D. There remains considerable controversy about the methods used in the various studies and their results. Thus, the carcinogenic status of 2,4-D is not clear.

## SAFETY DATA SHEET

**Organ toxicity:** Most symptoms of 2,4-D exposure disappear within a few days, but there is a report of liver dysfunction from long-term exposure.

**Fate in humans and animals:** The absorption of 2,4-D is almost complete in mammals after ingestion and nearly all of the dose is excreted in the urine. The compound is readily absorbed through the skin and lungs. Men given 5 mg/kg excreted about 82% of the dose as unchanged 2,4-D. The half-life is between 10 and 20 hours in living organisms. There is no evidence that 2,4-D accumulates to significant level in mammals or in other organisms. Between 6 and 8 hours after doses of 1 mg/kg, peak concentrations of 2,4-D were found in the blood, liver, kidney, lungs, and spleen of rats. There were lower levels in muscle and brain. After 24 hours, there were no detectable tissue residues. Only traces of the compound have been found in the milk of lactating animals for 6 days following exposure.

2,4-D is Classified by SWA as a potential sensitiser by skin contact.

Ingredient	Risk Phrases
2,4-D (salts)	>=20%Conc<25%: Xi; R37; R41; R43
<ul style="list-style-type: none"><li>• Acute Toxicity – Category 4</li><li>• Eye Damage – Category 1</li><li>• Skin Sensitisation – Category 1</li><li>• Hazardous to the Aquatic Environment (Chronic) – Category 2</li></ul>	

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## Potential Health Effects

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**Persons sensitised to 2,4-D should avoid contact with this product.**

See section 11 for Chronic exposure studies.

### Inhalation:

**Short Term Exposure:** Available data shows that this product may be harmful, but symptoms are not available. In addition product may be mildly irritating, although unlikely to cause anything more than mild transient discomfort.

### Skin Contact:

**Short Term Exposure:** Classified as a potential sensitiser by skin contact. Exposure to a skin sensitiser, once sensitisation has occurred, may manifest itself as skin rash or inflammation, and in some individuals this reaction can be severe. However product is unlikely to cause any discomfort in normal use.

### Eye Contact:

**Short Term Exposure:** This product causes serious eye damage. Eye contact is expected to result in reddening, stinging and watering of eyes. If contact is brief and small quantities are involved, effects may be reversible but prolonged contact may result in long-term or permanent effects.

### 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. However, this product may be irritating to mucous membranes but is unlikely to cause anything more than transient discomfort.

### Carcinogen Status:

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

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

**IARC:** No significant ingredient is classified as carcinogenic by IARC.

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## SECTION 12 - ECOLOGICAL INFORMATION

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This product is biodegradable. It will not accumulate in the soil or water or cause long term problems.

**Effects on birds:** 2,4-D is harmful to wildfowl and slightly to moderately toxic to birds. The LD<sub>50</sub> is 1000 mg/kg in mallards, 272 mg/kg in pheasants, and 668 mg/kg in quail and pigeons.

**Effects on aquatic organisms:** Some formulations of 2,4-D are highly toxic to fish while others are less so. Limited studies indicate a half-life of less than 2 days in fish and oysters. Concentrations of 10 mg/L for 85 days did not adversely affect the survival of adult dungeness crabs. For immature crabs, the 96-hour LC<sub>50</sub> is greater than 10 mg/L, indicating that 2,4-D is only slightly toxic. Brown shrimp showed a small increase in mortality at exposures of 2 mg/L for 48 hours.

**Effects on other organisms:** Moderate doses of 2,4-D severely impaired honeybees brood production. At lower levels of exposure, exposed bees lived significantly longer than the controls. The honeybee LD<sub>50</sub> is 0.0115 mg/bee.

### Environmental Fate:

**Breakdown in soil and groundwater:** 2,4-D has low soil persistence. The half-life in soil is less than 7 days. Soil microbes are primarily responsible for its disappearance.

## SAFETY DATA SHEET

**Breakdown in water:** In aquatic environments, microorganisms readily degrade 2,4-D. Rates of breakdown increase with increased nutrients, sediment load, and dissolved organic carbon. Under oxygenated conditions the half-life is 1 week to several weeks.

**Breakdown in vegetation:** 2,4-D interferes with normal plant growth processes. Uptake of the compound is through leaves, stems, and roots. Breakdown in plants is by a variety of biological and chemical pathways. 2,4-D is toxic to most broad leaf crops, especially cotton, tomatoes, beets, and fruit trees.

### 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).**

**Not subject to the ADG Code when transported in Australia by Road or Rail in packages 500kg(L) or less; or IBCs (refer to SP AU01).**

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

**Hazchem Code:** •3Z

**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

**AICS:** All of the significant ingredients in this formulation are compliant with NICNAS regulations.

The following ingredient: 2,4-D, is mentioned in the SUSMP.

### SECTION 16 - OTHER INFORMATION

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

#### Acronyms:

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

This SDS summarises our best knowledge of the health and safety hazard information on the product, and how to safely handle and use the product in the workplace. Each user should read this SDS and consider the information in the context of how the product will be handled and used in the workplace, including in conjunction with other products. If clarification or further information is needed to ensure that an appropriate risk assessment can be made the user should contact Imtrade Australia Pty Ltd, or in the event of an emergency, 000. 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" (Feb 2016)

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### SAFETY DATA SHEET

<http://www.kilford.com.au/> Phone (02)8321 8866

End of Report

**SAFETY DATA SHEET**

Issued by: Imtrade Australia Pty Ltd

Phone: 1800 171 799

**Poisons Information Centre: 13 1126 from anywhere in Australia, (0800 764 766 in New Zealand)**