

FIFRA Minimum Risk Pesticides – 25(b) Product Label Guidance

EPA has 6 conditions that 25(b) products must follow in order to be registered. Connecticut requires registration of minimum risk pesticides under Connecticut state law. Applicants should review the federal guidance prior to submitting an application.

Applications for registration of pesticides must include the following: The application, the product label, a SDS for each product to be registered, and efficacy data if claims are being made. (*see link to application and instructions*). Additional information may be required as needed (see explanation below).

The following links may be helpful in applying for 25(b) product registration:

[EPA's Conditions to Qualify for Exemption for section 25\(b\) Minimum Risk Pesticides](#)

[EPA's Minimum Risk Pesticide Final Rule](#)

[Connecticut Pesticide Registration Application](#)

[Association of American Pesticide Control Officials FIFRA 25\(b\) Work Group](#)

Connecticut 25b Pesticide Product labeling Expectations

- 1) Products must comply with the 6 conditions outlined by EPA (see above link).
- 2) If a product is labeled for food use all ingredients (active and inert) must be accepted as such by the EPA.
- 3) Manufacturer specification sheet may be necessary on occasion to verify information.
- 4) If an item is not found on the inert list clarification may be needed from EPA.
- 5) Connecticut requires a label for each different size product to be distributed, but there is no additional fee if it is the same product.
- 6) Efficacy data will be requested of products claiming to control or repel public health pests.
 - a) If data does not support claims/ meet standards a statement "The efficacy of this products has not been reviewed by EPA" will be required on the label.
 - i) Standard for personal repellents: 0 confirmed landings or bites during complete protection time.
 - b) False and misleading claims must be removed from label.
- 7) If a product is deemed to detrimental to pollinators there must be a pollinator warning statement.
 - a) "Do not apply this product if bees or other pollinators are foraging in the treatment area"

Common Reasons for Label Rejections

- 1) All claims on the manufacture's website must comply with the 6 conditions outlined by EPA.
- 2) Non-toxic claims are not acceptable.
- 3) Claims such as "Safe" or "Safe around children and pets" are only acceptable when accompanied with a qualifying statement "...when used as directed".
- 4) "Natural" claims are not allowed if the product includes synthetic chemicals.
 - a) Ingredients such as but not limited to, sodium lauryl sulfate, isopropyl myristate, isopropyl alcohol, malic acid, potassium sorbate, citric acid, sodium benzoate, benzoic acid and xanthum gum are synthetic chemicals and are therefore not considered natural.
- 5) No images of children are acceptable on labels unless the product is intended for use on children or is a swimming pool product.
- 6) The terms "Organic" or "Certified Organic" in reference to the 25(b) product are unacceptable.
 - a) The use of USDA Organic logo is not acceptable on any labeling.
 - b) Individual ingredients in a 25(b) product may be listed as "grown organically". Proper paperwork may be required to substantiate this claim.
 - c) The use of the term "organic" is acceptable when used in connection with one of the following statements: "For use in organic production", "For use in organic gardening" "For use on organic turf" and "OMRI listed".

Application Process

- 1) Applications will only be reviewed if all required paperwork and proper fee is submitted, if not application packet will be returned.
- 2) If all documentation and labels are considered satisfactory the product will be registered and a certificate of registration will be e-mailed to the applicant.
- 3) If the label is unsatisfactory a checklist with notes will be sent to the applicant with a possible brief explanation of why we cannot currently register the product (by email).
- 4) 30 days will be given to the applicant to make the necessary changes.
 - a) The application will be rejected and fees lost if:
 - i) The applicant fails to make the changes in a timely fashion
 - ii) The applicant fails to make the requested changes