

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

Per FIFRA Section 25(b), EPA has exempted certain products from federal registration. However, these products are subject to registration by individual states. States are not required to permit the sale of an exempted product simply because it is exempted under federal pesticide law. Each state may have different label requirements which makes it difficult for companies to comply with all states. For this reason, the Association of American Pest Control Officials (AAPCO) created a 25(b) Workgroup. The following list is label guidance put together by the AAPCO 25(b) Workgroup to help companies comply with state regulations. This list is for guidance purposes and does not guarantee that your product will be accepted in all states.

### **25(b) Pesticide Product Labeling Expectations:**

1. Products must comply with the 6 conditions outlined by EPA.
  - a. Condition 1 – Active Ingredients
    - i. The product's active ingredients must only be those listed in 40 CFR 152.25(f)(1).
  - b. Condition 2 – Inert Ingredients
    - i. The product's inert ingredients must only be those listed in 40 CFR 152.25(f)(2) and 40 CFR 180.950(a), (b), (c), and (e).
  - c. Condition 3 – Ingredients Listed on Label
    - i. All ingredients in a 25(b) product must be listed by label display name on the label.
  - d. Condition 4 – Health-Related Claims
    - i. The label cannot state or imply that the product can or will control or reduce organisms that pose a threat to human health, or insects or rodents carrying specific diseases.
  - e. Condition 5 – Company Name & Contact Information
    - i. The name of the producer or the company for whom the product was produced and the company's contact information, which includes a street address or PO Box, must be displayed prominently on the product label.
  - f. Condition 6 – Label Statements
    - i. The label cannot include any false or misleading statements, as described in 40 CFR 156.10(a)(5)(i) through (viii).
2. Signal Word and Keep Out of Reach of Children statement are to be located prominently on the front panel of the label.

a. The Signal Word on the label should equal what is on the Safety Data Sheet (SDS) as the safety requirements for commercial use products.

3. Both Active and Inert Ingredients are to be listed in column form and total 100%.

4. Inert ingredients are to be listed on the label in order of highest percentage first.

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. All claims on the manufacturer's website must comply with the 6 conditions outlined by EPA.

7. Labels are to include specific use site locations.

8. Non-toxic claims are not acceptable.

9. The terms "Organic" or "Certified Organic" in reference to the 25(b) products are unacceptable.

a. The use of the 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".

10. "Natural" claims are not allowed if the product includes synthetic chemicals and those derived synthetically. 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 xanthan gum are synthetic chemicals and are therefore not considered natural.

11. Claims such as "Safe" or "Safe around children and pets" are acceptable only when accompanied by the qualifier "...when used as directed".

12. Data may be required to substantiate any claim that appears on the label or labeling.

**This list is to serve as guidance only. For specific registration requirements please contact the individual state department responsible for pesticide registration.**

**For more information:** <https://www.epa.gov/minimum-risk-pesticides>

**CHECK LIST OF REQUIRED SUPPORTING DOCUMENTS:**

Final marketplace label

Safety Data Sheet (MSDS)

Check or Money Order in the amount of \$600 per product made out to the **Alabama Department of Agriculture and Industries (ADAI)**.

STATE OF ALABAMA  
DEPARTMENT OF AGRICULTURE & INDUSTRIES  
Application for NEW REGISTRATION of **25(b)** Products  
**Company Names A-M For the year ending December 31, 2021.**

Pursuant to Section 2-27-9, Code of Alabama (1975), the undersigned hereby submits application for registration of the following pesticide products:

**1. COMPANY OFFERING PRODUCT FOR SALE:**

Company Name: \_\_\_\_\_

Address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_ Zip: \_\_\_\_\_

Phone No: \_\_\_\_\_ Company Website: \_\_\_\_\_

**2. COMPANY RESPONSIBLE FOR PRODUCT RENEWALS & MAINTENANCE:**

Company Name: \_\_\_\_\_

Point of Contact Name: \_\_\_\_\_

Address: \_\_\_\_\_ City: \_\_\_\_\_ State: \_\_\_\_ Zip: \_\_\_\_\_

Phone No: \_\_\_\_\_ E-mail Address: \_\_\_\_\_

**3. PRODUCT NAME:**

\_\_\_\_\_

**4. LIST EACH ACTIVE INGREDIENT AND INCLUDE PERCENTAGES:**

\_\_\_\_\_ % \_\_\_\_\_                      \_\_\_\_\_ % \_\_\_\_\_

\_\_\_\_\_ % \_\_\_\_\_                      \_\_\_\_\_ % \_\_\_\_\_

\_\_\_\_\_ % \_\_\_\_\_                      \_\_\_\_\_ % \_\_\_\_\_

**5. LIST ALL INERT/OTHER INGREDIENTS:**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_ TOTAL INERT/OTHER % \_\_\_\_\_

**6. TOXICITY CLASS:** \_\_\_\_\_ **7. USE OR TYPE:** \_\_\_\_\_

The undersigned hereby certifies that the information given on this application together with any additional form is true and correct according to the best of his/her knowledge and belief.

P.O.C. Signature: \_\_\_\_\_

---

This certifies that the registration fee has been paid for the above-named pesticide product(s) and such are duly registered for sale in the State of Alabama in compliance with the requirements of the pesticide law for the **Year Ending December 31, 2021.**

Product ID No: \_\_\_\_\_

Date: \_\_\_\_\_ Check No: \_\_\_\_\_

Transmittal No: \_\_\_\_\_ By: \_\_\_\_\_

Tony L. Cofer, Division Director