



Rick Pate
Commissioner

STATE OF ALABAMA
DEPARTMENT OF AGRICULTURE AND INDUSTRIES
1445 Federal Drive • Montgomery, Alabama 36107-1123

Policy for Multiple Products Packaged Together

There has been a proliferation of “multiple products packaged together” in the marketplace. These can consist of: Multiple containers of the same pesticide product, different pesticide products, pesticide(s) plus non-pesticide(s).

Examples of terms used for these combinations can include: kit, pack, multi-pack, value pack, twin pack, combo/combination pack, pallet, pallet pack, cube, cube pack, season pack.

Two or More Pesticides Packaged Together

Two or more pesticide products with different EPA registration numbers may be packaged in separate containers but sold together as a single unit. The user may be instructed on the label to tank mix the products that were packaged together just before application.

Each pesticide product must be registered separately. Only after each product is registered then will a combination be allowed to be registered. Each combination of registered products must be registered as a new pesticide product. The only exception to this policy is if the separate products were federally registered and approved as one product and EPA stamped and approved the Section 3 registration of that product to only be sold together.

Multi-Packs

A multipack is when two or more pesticide products with the same EPA Registration Number are packaged together. Each container must bear the full pesticide label. The product shall be registered by EPA and the State of Alabama. Multiple products packaged together with the same EPA registration number shall have the full label visible to the consumer. Shrink-wrapped multipack products are required to be registered in the State of Alabama as a separate product registration when the product bears any descriptor different from the original marketplace label.



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Pesticides Packaged with Non-Pesticides

A registered pesticide product, in one container, may be packaged with a non-pesticide component, such as an adjuvant, in a separate container (which is to be added to the pesticide during mixing). These two containers, combined in one package, shall be registered as a single product only if the adjuvant is referred to in the Directions for Use on the label.

The two containers are distributed and sold as a single product, and together comprise the pesticide product. If the two components are bound together with a shrink-wrap sleeve or in a box, the full label of the pesticide component must be visible through the wrapping, or the label must be attached to, or printed on, the outermost container. Each combination of pesticide and non-pesticide product constitutes a new separate product and shall be registered as separate individual and unique products.

The regulation at 40 CFR 152.3 states that the “pesticide product” includes the package intended to be distributed or sold. EPA and ADAI has jurisdiction over the packaging and labeling of any “non-pesticide” which is part of the package. This means that the Department reviews and accepts or disapproves of the non-pesticide that is packaged with the pesticide. The non-pesticide labeling shall not contain any language that conflicts with the pesticide label. An example of such a non-pesticide would be an activator (such as potassium permanganate) which accompanies a pesticide (sodium bromide). ADAI reviews the labels for both products and registers the pesticide product component as a unique product and any combinations of non-pesticide products each as separate unique products. If only one product combination exists, then only one product will be required to be registered.