



**STATE OF MAINE
DEPARTMENT OF AGRICULTURE, CONSERVATION & FORESTRY
BOARD OF PESTICIDES CONTROL
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Maine FIFRA Minimum Risk, 25(b), Product Label Requirements

Per FIFRA Section 25(b), EPA has exempted certain products from federal registration; however, the EPA has established specific conditions these products must meet to qualify as minimum risk pesticides. Companies had until February 26, 2019, to comply with the December 28, 2015, EPA final rule titled, "Pesticides; Revisions to Minimum Risk Exemption". FIFRA 25(b) products are subject to registration by individual states and states are not required to permit the sale of an exempted product.

Companies are expected to ensure 25(b) labels comply with these label requirements prior to submission of an application. Applications for registration also require the submission of a statement of formula and a Safety Data Sheet. Data may be required to substantiate any claim that appears on the label or labeling. Please contact our office at (207) 287-2731 if you have any questions.

25(b) Pesticide Product Labeling Expectations:

1. Products must comply with the 6 conditions outlined by EPA.
2. Signal Word and KEEP OUT OF REACH OF CHILDREN statement must be located prominently on the front panel of the label.
3. Ingredient statement must appear on the front panel of the label.
4. Both Active and Inert Ingredients are to be listed in column format and total 100%. Example:

Active Ingredients	
Castor Oil	12.25%
Geranium Oil	2.75%
Inert Ingredients	85.00%
(Water, Coconut oil)	
Total	100.00%
5. Inert ingredients are to be listed on the label in order of highest percentage first.
6. **NO** images of children are acceptable on labels unless the product is intended for use on children or is a swimming pool product.
7. All claims on the manufacturer's website must comply with the six conditions outlined by EPA.
8. Labels are to include specific use site locations.
9. Non-toxic claims are not acceptable.
10. The terms "Organic" or "Certified Organic" in reference to the 25(b) product are unacceptable.
 - a. The use of the USDA Organic logo is not acceptable on any labeling.

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- b. Individual ingredients in a 25(b) product may be listed as “grown organically”. Documentation may be required to substantiate this claim.
 - c. The use of the term “organic” is only 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”.
11. “Natural” claims are not allowed if the product includes synthetic chemicals and those derived synthetically. 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.
12. Claims such as “Safe” or “Safe around children and pets” are acceptable only when accompanied by the qualifier “...when used as directed”.

References

EPA Federal Register. Pesticides: Revisions to Minimum Risk Exemption.

<https://www.federalregister.gov/documents/2015/12/28/2015-32325/pesticides-revisions-to-minimum-risk-exemption>

EPA. Conditions for Minimum Risk Pesticides.

<https://www.epa.gov/minimum-risk-pesticides/conditions-minimum-risk-pesticides>

Maine Legislature Maine Revised Statutes. Tit 7, §607; Registration.

<http://www.mainelegislature.org/legis/statutes/7/title7sec607.html>