



Pyrethroid Label Changes Resulting from EPA Mitigation

Presentation to Distribution and End Users of Demand[®] and Demon[®] Products

Background to EPA Pyrethroid Risk Mitigation measures

- Changes to be made to labels of ALL pyrethroid products sold in PPM markets; affects ALL Registrants of pyrethroids
- Changes based on EPA mandates in PR Notice 2008-1, and letters to registrants in 2009
 - Addressed all products with outdoor, non-agricultural uses
 - Environmental Hazard statements and directions for use
 - Requested registrants revise labels by June 2010
- All products manufactured after 2/1/2012 must have the label changes
- Purpose of label changes: to reduce potential for runoff and other off-target movement of pyrethroids
 - Based on surface water concerns identified in CA
 - Applications to hardscapes - main concern
- Exact language depends on formulation type (liquid vs. granule)

PR Notice 2008-1

- Environmental Hazards statements
- Varies by formulation type (liquid or granule)

“To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent runoff to water bodies or drainage systems.”

Key Advisory Language (Best Practices) :

1. “Applying this product in calm weather when rain is not predicted for the next 24 hours will help ensure...”
2. “Rinsing application equipment over the treated area will help avoid run-off...”

Risk Mitigation Language for General Pest application

- Directions for Use: Surface and Space Sprays (except Foggers):
“All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:
 - (1) Treatment to soil or vegetation around structures;*
 - (2) Applications to lawns, turf and other vegetation;*
 - (3) Applications to building foundations, up to a maximum height of 3 feet.”*
- Do not water the treated area to the point of runoff.
- Do not make applications during rain.

“Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches, and structural surfaces (such as windows, doors and eaves) are limited to spot and crack-and crevice applications, only”

EPA Mitigation Language

- Directions for Use: Around or in Drains

- Use near floor drains

“Application is prohibited directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow product to enter any drain during or after application.”

- Products labeled for use in drains or sewers

“Application is prohibited directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur, except as directed by this label.”

Syngenta Products Affected

- Demand CS
 - Demand EZ
 - Demand G

 - Demon Max
 - Demon WP
 - Demon WSP
- Timing to implement changes to labels in marketplace will vary by product

Specific Changes to Demand and Demon Labels (except Demand G):

Environmental Hazards Section

- New Language:

Environmental Hazards

This product is extremely toxic to fish. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters, or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run-off to water bodies or drainage systems. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Apply this product only as specified on this label. When making applications, care should be used to avoid household pets, particularly fish and reptile pets.

Key Advisory Language (Best Practices) :

1. “Applying this product in calm weather when rain is not predicted for the next 24 hours will help ensure...”
2. “Rinsing application equipment over the treated area will help avoid run-off...”

Changes to Demand and Demon Labels (except Demand G): Directions for Use Section

New Language Inserted:

- All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:
 - 1 Treatment to soil or vegetation around structures;
 - 2 Applications to lawns, turf, and other vegetation;
 - 3 Applications to building foundations, up to a maximum height of 3 feet.
- Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches, and structural surfaces (such as windows, doors, and eaves) are limited to spot and crack-and-crevice applications only.
- Do not water treated area to the point of run-off.
- Do not make applications during rain.
- Do not apply directly to sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur, except as directed by this label.

Key Mandatory Language (Enforceable) :

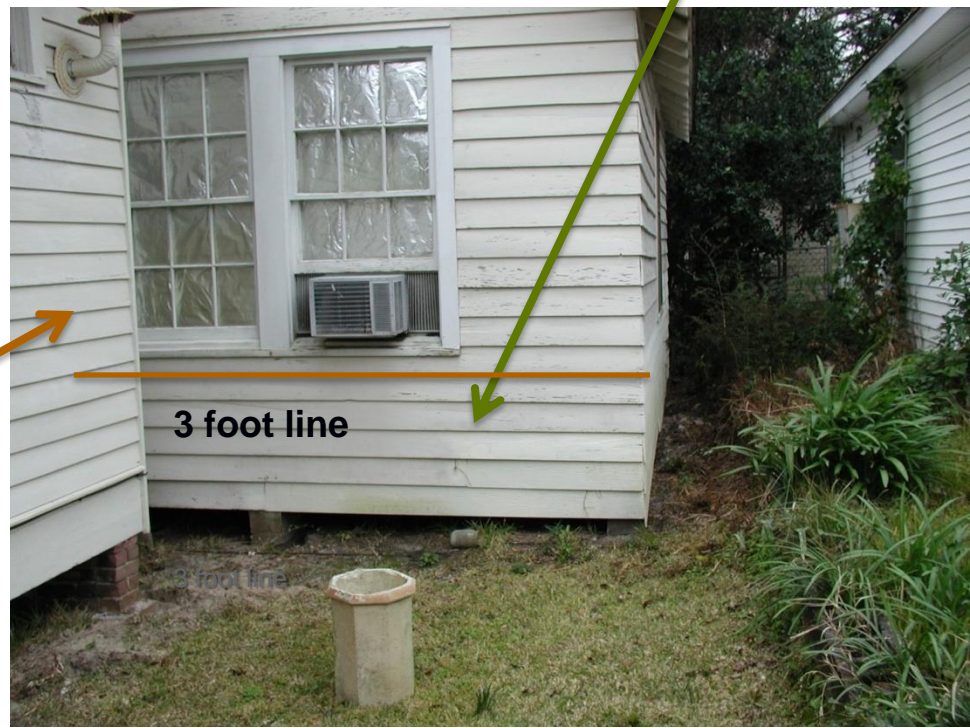
1. With key exceptions, outdoor application limited to crack & crevice, spot treatments
2. Watering limitation
3. Applications during rain
4. Application to sewers, drains & gutters

Application Limits Around a Structure: Examples



Areas Where Banded (Power Spray) Application Allowed

Spot or C&C Treatment Only



Clarification of Exceptions

- California Department of Pesticide Regulation asked EPA to clarify three of the label statements.
 - Limitation of treatment to crack and crevice and spot sprays except for
 1. Applications to building foundations, up to a maximum height of 3 feet.
 2. A “pin stream” application (treatment band of 1 inch or less) is often made to a surface where there is no crack-and-crevice. Does the term ‘crack-and-crevice’ include DPR’s definition of a pin stream application?
 3. DPR would like to allow broadcast application to ‘areas protected by a structure from precipitation.’ For example, under the eaves of a house or under a covered patio.

EPA's Response to request for clarification of label language

- 1) “The use of the word ‘foundation’ does not exclude application to the siding material of a building. It is the Agency's intention that the term ‘foundation’ used in this context applies to any material on the vertical side of the structure (ground up), not the foundation concrete slab specifically.”
- 2) “The term ‘pin stream’ to define limited surface applications where no crack or crevice is present, such as a one inch band application around windows or doors. The Agency believes that this type of use would fall within the intent of the exceptions for ‘crack and crevice’ and ‘spot treatment.’”
- 3) “The agency views treatments to the underside of eaves for the treatment of spiders, etc. to fall within the exceptions included in the 2009 pyrethroid labeling initiative.”

To band or not to band?

Some questions answered about specific use

- What falls under exemptions from C&C or spot treatment limitation?¹
 - Banded application still allowed around structures up 3 vertical feet from ground level and to soil or plants away from the structure per label specifications
 - Treatment of undersides of eaves (e.g. spider control)
 - Pin stream application up to 1 inch wide as a limited treatment where no crevice exists falls under C&C or spot treatment

- ¹Based on letter from EPA to CA-DPR, Oct 25, 2011

[http://www.pwg2pmp.com/pdf/US%20EPA%20Letter%20to%20%20DPR%20\(Oct.%2025,2011\).pdf](http://www.pwg2pmp.com/pdf/US%20EPA%20Letter%20to%20%20DPR%20(Oct.%2025,2011).pdf)

Changes to Demand G Environmental Hazards Section

Current Language

Environmental Hazards

This product is extremely toxic to fish and aquatic invertebrates.

For terrestrial uses: do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not apply when weather conditions favor drift from treated areas. Run-off from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment washwater.

New Language:

“To protect the environment, do not allow pesticide to enter or runoff into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway sidewalk, or street back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems”

Key Advisory Language (Best Practices) :

1. “Applying this product in calm weather when rain is not predicted for the next 24 hours will help ensure...”
2. “Sweeping any product that lands on a driveway, sidewalk...”

Risk Mitigation Language for Termiticide application

- Directions for Use: Preconstruction Termiticides

“The treatment site must be covered prior to a rain event in order to prevent run-off of the pesticide into non-target areas.”

[Applicator is responsible to cover treated area prior to rain event until foundation is poured. Responsibility of covering treated area can be transferred to contractor or other party, if done in writing.]

“Do not treat soil that is water saturated or frozen.”

“Do not treat when raining.”

“Do not allow treatment to runoff from the target area.”

“Do not apply within 10 feet of storm drains. Do not apply within 25 feet of aquatic habitats (such as, but not limited to, lakes; reservoirs; rivers; permanent streams; marshes or ponds; estuaries; and commercial fish farm ponds).”

“Do not make on-grade applications when sustained wind speeds are above 10mph (at application site) at nozzle end height.”

Implementation Time line

- Some manufacturers have already changed their labels
- All products manufactured after Feb 1, 2012 must carry the new label
- Any product in the channel (manufacturer, distributor, end user) produced prior to Feb 1, 2012 may be used following the directions on the container label.
- It may take several years for all pyrethroid products to carry the new language

- Remember – **The Label is the Law**
- Always read and follow the label

Labeling Requirements Consumer Information Benefits Company Sponsors Industry Resources

PWG2PMP

Essential Pyrethroids Information for Pest Control Professionals

New Label Requirements!

Professional pest control operators will soon be required to make changes in how they apply pyrethroid pesticides. The changes are the result of new label requirements at the federal level and new regulations being developed in California.

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Who We Are

The Pyrethroid Working Group (PWG) is an alliance of companies that manufacture pyrethroid insecticides. The industry has come together to address a wide range of issues specific to pyrethroids, a class of effective and widely used active ingredients for general pest and termite control. Click [here](#) to learn more about PWG member companies and links to their individual web pages tailored for Pest Management Professionals.

Why did we create this web site?

The Pyrethroid Working Group is dedicated to making available the most accurate, relevant and current information about pyrethroids. This site has been created especially for Pest Management Professionals as a way to keep them abreast of the latest research and regulatory issues involving pyrethroid insecticides.

Subscribe to Alerts

To keep abreast of the evolving pyrethroids regulatory environment, pest management professionals can sign up for instant notifications via email or text messages with more detailed information and deadlines. Because we respect your privacy, your information will only be used to alert you to new information concerning pyrethroids pesticides. It will not be used for marketing or any other purpose.

Educate Your Customers



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