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Label Review Manual

Chapter 3: General Labeling Requirements



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I. Introduction

This chapter addresses “labels and labeling”, labeling submission requirements, the sample label format, and guidance concerning specific label requirements versus preferred label language. The sample label format which appears at the end of this chapter is designed to illustrate the typical arrangement of information on a pesticide label. General labeling requirements can be found in *40 CFR 156.10*.

II. General information

A. Definition of “Label” and “Labeling”

FIFRA section 2(p) defines the terms as follows:

1. **Label.** The term “label” is defined as “the written, printed, or graphic matter on, or attached to, the pesticide or device or any of its containers or wrappers.”
2. **Labeling.** The term “labeling” is defined as “all labels and all other written, printed, or graphic matter:
 - (a) **accompanying** the pesticide or device at any time; or
 - (b) to which reference is made on the label or in literature accompanying the pesticide or device, *except* to current official publications of the Environmental Protection Agency, the United States Departments of Agriculture and Interior, and the Department of Health and Human Services, State experiment stations, State agricultural colleges, and other similar Federal or State institutions or agencies authorized by law to conduct research in the field of pesticides”.

B. Container Label Contents When Booklets Are Used

Registrants are allowed to provide part of the label text in the form of a booklet or other “pull off” type labeling, when it is not feasible or possible to literally “fit” the entire label on the container. However, the following label information must be on the label which is on or “securely attached” to the container, subject to the exceptions in 40 CFR 156.10.

- ▶ Name and address of the producer, registrant, or person for whom produced
- ▶ Restricted Use Statement (if required)
- ▶ Product Name, Brand or Trademark
- ▶ Ingredient Statement
- ▶ Signal Word, including Skull & Crossbones, if either are required
- ▶ “Keep Out Of Reach Of Children” (KOOROC)

- ▶ Precautionary Statements, including Hazards to Humans and Domestic Animals
- ▶ EPA Registration Number and EPA Establishment Number
- ▶ Storage and Disposal Statements
- ▶ Referral Statement to Directions for Use in booklet, if any
- ▶ Net weight or measure of contents

Other parts of the label may be placed in a booklet or other “pull off” type labeling. At a minimum, the booklet or “pull off” labeling should include the following:

- ▶ Name and address of the producer, registrant, or person for whom produced
- ▶ Restricted Use Statement (if required)
- ▶ Product Name, Brand or Trademark
- ▶ Signal Word, including Skull & Crossbones, if either are required
- ▶ “Keep Out Of Reach Of Children” (KOOROC)
- ▶ Precautionary Statements, including Hazards to Humans and Domestic Animals
- ▶ EPA Registration Number and EPA Establishment Number
- ▶ Directions for Use

The Agency’s regulation requires that words, statements, graphic representations, designs or other information that are legally required to appear on a label be clearly legible, and readily understood. In addition, all required label text must appear on a clear contrasting background and not be obscured or crowded. *40 CFR 156.10(a)(2)*

C. Collateral Labeling

Bulletins, leaflets, circulars, brochures, data sheets, flyers or other written, printed or graphic matter which are referred to on the label or which are to accompany the product are known in Agency practice as “collateral labeling”. Such labeling is subject to applicable requirements of FIFRA and the Agency’s regulations. In addition, collateral labeling may not bear claims or representations that substantially differ from those accepted in connection with registration of the product. (*FIFRA 12(a)(1)(B)*) Collateral labeling must be submitted along with the application for registration and must be accepted by EPA before it can be distributed. However, official publications of federal and state agencies referenced on or accompanying a label or labeling are excepted by FIFRA Section 2(p)(2)(B) from the definition of label and labeling, and therefore should not be submitted for review.

D. Safety Data Sheets (formerly called Material Safety Data Sheets or MSDS’s)

The Occupational Safety and Health Administration (OSHA), and not the Agency has direct authority over SDSs. However, when an SDS is distributed with a pesticide it becomes a part of the pesticide labeling because it is accompanying the product (*FIFRA 2(p)(2)(A)*). Because an SDS becomes part of the labeling, an SDS could render the pesticide misbranded if the it includes warnings, precautions or any other information that conflict with the

FIFRA-approved label. However, in 2012 OSHA adopted a revised Hazard Communication Rule for SDSs which utilizes the criteria for signal words adopted by multiple countries under the Globally Harmonized System (GHS) for hazard communication language and symbols. EPA has not adopted the GHS criteria, and thus an OSHA SDS may have a signal word that differs from the one EPA approved for a pesticide product label. PR Notice 2012-1 explains how a company can explain and justify such a difference if it occurs.

Note that although an SDS which accompanies a pesticide product is considered to be labeling, EPA required statements cannot be placed directly on the SDS instead of the label. For the purpose of labeling the Agency *does not review or approve* (stamp) SDSs. Also, under the terms of OSHA's rule, that agency has no jurisdiction to require that anything be placed on a pesticide product label.

E. Websites

If there is a reference to the company's website on the label, then the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on a product's label, claims made on the website may not substantially differ from those claims approved through the registration process.

F. Placement of Label

The label must appear on or be securely attached to the immediate container of the pesticide product. "Securely attached" means the label can reasonably be expected to remain affixed during the foreseeable conditions and period of use. (*40 CFR 156.10(a)(4)(i)*) Also, if the immediate container is enclosed with a wrapper or outside container through which the label cannot be clearly read, the label must also be securely attached to such outside wrapper or container, if it is part of the package as customarily distributed or sold. Requirements for placement of labels and labeling on tank cars and other bulk containers during transport and storage are described in *40 CFR 156.10(a)(4)(ii)*.

G. Web-distributed Labeling

Registrants can opt to make legally valid pesticide labeling accessible online. Web-distributed labeling allows pesticide applicators to download streamlined labeling, including instructions specific to the state and use site where an application will be made. The actual labeling on the container will not be shortened in any way with the addition of distributed labeling. [PR Notice 2014-1](#) includes information on what registrants need to submit and suggested label language statements for adding web-distributed labeling to a pesticide product.

III. Mandatory and advisory statements

Label and labeling statements need to be clearly stated in either a mandatory or advisory manner

in order to avoid confusing label/labeling language that may lead to applicator misuse and/or adverse effects to human health and the environment, and to avoid making key label and labeling statements unenforceable. See *PR Notice 2000-5* for additional guidance on mandatory and advisory statements.

A. Mandatory Statements

Mandatory statements relate to the actions that are necessary to ensure the proper use of the pesticide and to prevent the occurrence of unreasonable adverse effects on the environment, which is defined by statute. Mandatory statements include directions for use and precautions that direct the user to take or avoid specific actions. The directions and precautions specify where, when and how a pesticide is to be applied. Mandatory statements are generally written in imperative or directive sentences (e.g., “Wash application equipment...”, “Do not use ...”, “Users must...”, “Apply to corn at a maximum rate of one to two pounds per acre 30 days prior to harvest”). Either EPA or the registrant may develop mandatory labeling statements. When writing mandatory statements, both EPA and the registrant need to ensure that such statements meet the criterion above that the statement is *necessary* to ensure proper use of a pesticide and to prevent unreasonable adverse effects on the environment. The following directions and precautions are examples of mandatory statements:

- “Wear chemical resistant gloves”.*
- “If swallowed, call a doctor”.*
- “Do not induce vomiting”.*
- “Do not apply within 66 feet of wells”.*
- “Do not apply directly to water”.*
- “Keep away from heat, sparks and open flame”.*
- “Do not enter into treated areas for 12 hours”.*
- “Apply immediately after mixing”.*
- “Do not apply when wind speed exceeds 15 mph”.*

B. Advisory Statements

Advisory statements provide information to the product user on such topics as product characteristics and how to maximize safety and efficacy while using the product. Such statements are acceptable as long as they do not conflict with mandatory statements, and are not false or misleading, or otherwise violate statutory or regulatory provisions.

Advisory statements are best written in *descriptive or nondirective terms*. Phrasing advisory statements in straightforward, factual terms minimizes the possibility that they will conflict with mandatory statements. The use of certain words such as “should”, “may” or “recommend” in advisory statements has the potential to lead the product user to erroneously believe that he/she must comply with such statements, when in fact such statements do not have to be followed. These words may also give the user the erroneous impression that a use that is not recommended is still somehow permitted (that is, someone could believe that a particular use is permitted because a statement recommending against such use does not have to be followed). To avoid these potential problems, the best way to express advisory statements is to use descriptive or nondirective language. Nevertheless, EPA will allow the use of “should”, “may”, “recommend” or similar terms on a case-by-case basis as long as they do not appear to cause these kinds of problems. Note that the preferred advisory statement usually explains the purpose or benefit of doing something, instead of just asserting that it should be done.

- ▶ Following are hypothetical advisory statements followed by examples of how they can be rewritten using descriptive terms, which is EPA’s preference. The examples are paired. The first showing the problematic statement and the second showing the preferred statement in accordance with *PR Notice 2000-5*.

1. Precautionary Statements

Problematic Latex gloves are recommended.

Preferred Latex gloves provide the best protection.

2. Physical and Chemical Hazards

Problematic It is preferable to open containers of aluminum phosphide products in open air as under certain conditions they may flash upon opening. Containers may also be opened near a fan or other appropriate ventilation which will rapidly exhaust contaminated air.

Preferred Opening aluminum phosphide containers outdoors or indoors near an exhaust fan or other ventilation [helps to ensure/ensures] that the gas will be rapidly dispersed if the product flashes.

3. Directions for Use

Mixing

Problematic Tank mixtures should be applied immediately after preparation. If for any reason this is not possible, ensure that sufficient agitation has been provided to re-mix all products and check for complete resuspension prior to application.

Preferred Applying the product immediately after preparation [helps to ensure/ensures] that it is in suspension. If application is delayed, agitation to re-mix the products and checking for resuspension ensures proper blending.

Application

Problematic Factors such as depth to the drain system, soil type, and degree of compaction should be taken into account in determining the depth of treatment.

Preferred The depth of treatment depends on the depth of the drain system, soil type, and degree of soil compaction.

Problematic It may be necessary to treat along one side of interior partition walls if there are cracks in the slab, plumbing entry points, existing termite infestations, or other conditions which would make treatment appropriate.

Preferred Treatment along one side of interior partition walls where there are cracks in the slab, plumbing entry points, existing termite infestations, or evidence of other means of access prevents further infestation.

Problematic Rotary hoeing is recommended for preemergence applications which do not receive adequate rainfall or sprinkler irrigation to wet the top 2 inches of soil or to the depth of germinating weeds within about 10 days after application.

Preferred If rainfall or sprinkler irrigation does not wet the top 2 inches of soil or depth of germinating weeds within 10 days of a preemergence application, rotary hoeing will [help to ensure/ensure] soil incorporation.

Problematic The spray mixture should be directed to the soil around the base of the cotton plants. Care should be taken to prevent the spray from striking the cotton leaves as injury will occur. The use of leaf lifters or shields on application equipment is recommended to avoid spraying the cotton foliage.

Preferred Directing the spray mixture around the base of the cotton plants and using leaf lifters and shields on application equipment will help minimize foliage contact and plant injury.

Cleaning

Problematic It is recommended that the sprayer be thoroughly cleaned by flushing with a detergent solution at the end of each work day when any emulsifiable oil, oil concentrate, or other emulsifiable formulation has been used either alone or in tank mix combinations with other pesticide formulations, even if no obvious problems have been encountered. This precaution will ensure a clean sprayer and continued trouble-free operation.

Preferred *If an emulsifiable oil, oil concentrate, or other emulsifiable formulation has been used, flushing the sprayer with a detergent solution at the end of the workday will [help to ensure/ensure] a clean sprayer and trouble-free operation.*

IV. Types of labels and labeling

Types of labels and labeling include a Master Label, Sub-Label or Split-label, Distributor Label and Supplemental Labeling.

A. Master Label

The “Master Label” (reference label) is the label that contains all of the approved uses for a given product and all associated required labeling. All other labeling for a given product must not contain any text beyond that which is approved in the Master label. This label goes on file with the Agency once it is stamped “accepted”.

B. Sub-Label or Split-Label

A “Sub-Label” or “Split-Label” is a label which bears claims and directions for only a portion of the approved uses under a given Master label, but is a complete label in itself, containing all of the required labeling elements. Agency regulations allow a registrant to distribute or sell a product under a “Sub-Label” or “Split-Label” provided that in limiting the uses identified on the label, no changes would be necessary to the precautionary statements, use classification, or packaging of the product. (*40 CFR 152.130(b)*). Since Sub or Split labels only contain labeling text contained in the Master label, the Sub or Split labels are not stamped “accepted” separately. Final printed labeling must be submitted according to *40 CFR 156.10(a)(6)*. If these labels are intended to be distributed under a different product name, the Agency must approve the alternate brand name according to *40 CFR 156.10(b)(2)(ii)*.

Applicants if submitting a Sub-label or Split-label should clearly:

- ▶ Indicate when the Sub or Split-labels do not contain the entire use profile for the product.

- ▶ Annotate specific label changes in the Sub/Split labels.
- ▶ If proposed changes to a Sub/Split label require changes to the Master label, the registrant must submit a new “Master Label” incorporating and annotating any additions or changes.
- ▶ Indicate at the top of the label whether it is a “Sub-Label” or “Split-Label”, For example:

SUB/ SPLIT LABEL - Revises Master Label dated XX-XX-XX

A new “Master Label” containing all the uses currently approved under the product’s registration is required when a sub-label is submitted with additions not on the “accepted” Master label. Only the “Master Label” will be stamped “accepted”. Note: the previously approved labeling may be distributed or sold for a period of 18 months after approval of the revision, according to *40 CFR 152.130(c)*.

C. Distributor Labeling

Distributor labels are labels for a product which is registered to one company, but distributed by another company (sometimes referred to as a “sub registrant”). A distributor label must be the same as that of the registered product except for product name, name and address, registration number (EPA Reg. No. xxxx-xx-xxxx, where the third set of numbers refers to the distributor’s company number), and establishment number. Claims may be deleted but new claims cannot be added. (*40 CFR 152.132(d)(3)*). In addition, because warranty statements are not required by EPA to be on pesticide labels, the Agency will allow distributors to use their own warranty statements so long as such a change to the labeling is allowed by contract between the registrant and the distributor and the substitute warranty statement is not false or misleading. (Labeling Consistency Q&A LC08-136). Any revised warranty statement on a distributor’s label cannot expand upon, either explicitly or implicitly, the uses allowed on the basic registrant’s label and cannot conflict with the claims stated on the label (*Id.*). A distributor warranty statement that differs from that of the registrant is a type of registration amendment that may be accomplished by notification from the registrant. The Agency must be notified before distribution by submission of a Notice of Supplemental Distribution (*Chapter 4*, Section II.A.). Distributor labels are not submitted to the Agency. The EPA basic registrant is responsible for both the content of the distributor product and the content of the distributor label. (Note that the term “supplemental distributor labeling” although used by some people, is not proper terminology because it does not appear in EPA regulations, and creates confusion with a true supplemental label as described in section IV.D. below. A true supplemental label is used to add new uses or directions, while distributor labels are prohibited from adding any uses or directions that differ from the basic registration).

D. Supplemental Labeling

“Supplemental labeling” is a term used by the Agency to describe labeling which includes newly approved uses, use directions, or other instructions which have been added since the last accepted Master label. These are partial labels distributed with the product by the registrant or distributors. Since these are partial labels, they must bear a statement referring the user to the product label for complete directions, precautions and a statement that the labeling must be in the possession of the user. Both the product label and the supplemental labeling are required to safely and effectively apply the product.

The Section 3 supplemental labeling must be submitted and stamped “accepted” by the Agency. The Agency requires that these labels bear the following information:

- ▶ Misuse statement: “It is a violation of Federal law to use this product in a manner inconsistent with its labeling”.
- ▶ The labeling must be in possession of the user at the time of application.
- ▶ Read the label affixed to the container for (pesticide X) before applying.
- ▶ Use of (pesticide X) according to this labeling is subject to the use precautions and limitations imposed by the label affixed to the container for (pesticide X).
- ▶ Product Name
- ▶ EPA Registration Number
- ▶ Restricted Use Statement (if required)

Normally, supplemental labeling will be incorporated into the Master label at the next printing of the product label (final printed label) or within 18 months, whichever comes first. However, there are circumstances when this might not be done, for example if the directions for use on the supplemental labeling are subject to continual, frequent change, e.g., California aerial application county restrictions can change every six months or so. Note that just like other labels, supplemental labels must be accepted prior to distribution.

Supplemental labeling is also used for state registration of special local needs (SLN) under *section 24(c) of FIFRA*. For labeling requirements for supplemental labeling for State registrations, refer to *40 CFR 162.153(e)(3)*.

V. Non-FIFRA labeling

Some labels submitted to the Agency have information devoted to non-FIFRA issues, e.g., Department of Transportation (DOT) shipping rules, New York City fire code symbols, Hazardous Materials Identification System (HMIS) and National Paints and Coatings Association (NPCA) and National Fire Protection Association (NFPA) hazard codes and rating systems, Food and Drug Administration or State Department of Agriculture numbers, and bar codes. A registrant may choose to place such text on the label but may not replace, obscure,

conflict with, or supersede the FIFRA required text. For more information on non-FIFRA label statements, see LRM Chapter 12.

VI. Label submission requirements

Reviewers should only accept draft labeling for review that meets the regulatory requirements including those set out in (*40 CFR 152.50*.) The Agency has asked registrants to follow some of the other steps outlined below, that are not required by law.

Submissions for new registrations or amendments *must* include five copies of all draft labeling (typescript or mock-up). (*40 CFR 152.50*) For all amendments, the Agency asks that one copy of the draft proposed label be marked up or annotated in some way, such as Redline/Strikeout, to indicate what has been changed. The other four copies should be “clean” or not annotated in any way, but include all label changes for which the amendment is submitted.

All copies *must be legible* and should be of *suitable quality* for making legible photocopies. (*40 CFR 152.50*) OPP’s practice has been to request that draft labeling have print size of at least 12 characters per inch to aid in label review and to ensure that additional photocopies will be legible.

Registrants are asked to submit draft labeling on 8 1/2"x 11" paper.

If the draft labeling submitted by the applicant does not meet the above criteria, the reviewer should send a letter to the applicant describing the submission deficiencies and request the applicant revise its draft labeling.

The Agency encourages but does not require labels to be submitted in electronic form. For guidance on this topic, see [link to: <http://www2.epa.gov/pesticide-registration/electronic-submissions-pesticide-applications>]. The Agency is moving forward with several electronic submission initiatives. Labeling may be submitted electronically in two ways:

- 1) An e-label (in text searchable .pdf format) may be submitted on a CD-ROM or DVD along with a paper application. In this case, only one paper copy of the label needs to be submitted with the paper application.
- 2) The entire product application, including labeling, may be submitted in electronic format using an XML structured application on a CD-ROM or DVD. Again, the labeling is a text searchable .pdf file. No paper needs to be submitted with XML applications.

The use of electronic labels will help to increase EPA review efficiency and improve the quality of labeling. The submission of electronic labels by registrants is voluntary but

strongly encouraged. For more information on electronic submissions see:
<http://www.epa.gov/pesticides/regulating/registering/submissions/>

VII. Label format

Listed below are the various sections of the label in the *approximate* order they should appear on a label. Each section below corresponds to the chapter in this manual which discusses that particular part of the label in more detail. Note that somewhat different formats are used for certain classes of products (e.g., rodenticide baits).

A. Front Panel

1. Restricted Use Pesticide Statement (*Chapter 6*) if applicable

This section of the label, if applicable, includes the references to “restricted use”, which under *FIFRA Section 3 (d)(1)(c)* describes those pesticides that require “additional regulatory restrictions” to avoid potential unreasonable adverse effects on the environment.

2. Product Name, Brand or Trademark (*Chapter 12*)

3. Ingredient Statement (*Chapter 5*)

This section of the label identifies the name and the percentage by weight of each active ingredient and the percentage by weight of other/inert ingredients. If the size or form of the product package makes it impracticable to place the ingredient statement on the front panel of the label, permission may be granted for the ingredient statement to appear elsewhere. See *40 CFR 156.10(g)(2)*.

4. “Keep Out of Reach of Children” (KOOROC) Statement (*Chapter 7*)

This specific statement, which is commonly referred to as the KOOROC statement (“child hazard warning”), appears on almost all end use pesticide products except those pesticides that are intended for use on children or where it is demonstrated that children will not come in contact with the product. In these cases, a modified statement is allowed.

5. Signal Word (*Chapter 7*)

Signal words which correspond to the toxicity categories for product hazards (e.g., oral, dermal) appear on the front panel of the label.

6. First Aid (*Chapter 7*)

Each product must bear a first aid statement if the product has systemic effects in Category I, II or III, or skin or eye irritation effects in Category I or II. *40 CFR 156.68(a)* A first aid statement must appear on the front panel of all Toxicity Category I pesticides, but the agency may allow reasonable variations in the placement of the statement.

The front panel must include a reference such as “See First Aid statement on back panel” near the word “poison” and the skull and crossbones if the Agency allows the first aid information to appear on the back panel.

7. “Skull & Crossbones” Symbol  and the word “POISON” (*Chapter 7*)

These symbols identify pesticide products which are determined to be in Toxicity Category I based on at least one of the following acute toxicity studies: acute oral, acute dermal or acute inhalation or contains certain inert ingredients. (*40 CFR 156.10(h)(1)(i)(A); FIFRA 2(q)(2)(d).*)

8. Net Contents/Net Weight (*Chapter 17*)

This section identifies the weight or volume of pesticide in the container.

B. Front or Back Panel

1. EPA Registration Number & Establishment Number (*Chapter 14*)

The EPA Registration Number is the single most important piece of information for tracking pesticide products. **The EPA Registration Number must appear on the label of the product.** (*40 CFR 156.10(e)*). The format for the EPA Registration Number is specified in 40 CFR 156.10(e). The EPA Registration Number assigned to the product is to be preceded by the phrase “EPA Registration No.” or the phrase “EPA Reg. No.” The EPA Establishment Number identifies the final physical location where the pesticide product was produced or labeled. The EPA Establishment Number may appear on any suitable location on the label or immediate container; however, it must appear on the wrapper or outside container of the package if the number cannot be clearly read through the wrapper or container. (*40 CFR 156.10(f)*). The format for the EPA Establishment number is specified in 40 CFR 156.10(f). The producing establishment registration number is to be preceded by the phrase “EPA Est.”

2. Company Name & Address (*Chapter 15*)

This section of the label identifies the name and address of the producer, registrant or person for whom the product is produced.

3. Mode of Action Numerical Classification Symbol (*Chapter 11*)

When used, the mode of action (MOA) numerical classification symbol(s) is/are recommended to be placed in the upper right hand corner of the front-panel of end-use product labels, although the numerical classification symbol may be placed elsewhere on the label.

C. Back Panel

1. Precautionary Statements

a. Hazards to Humans and Domestic Animals (*Chapter 7*)

Where a hazard exists to humans or domestic animals precautionary statements that describe the particular hazard, route of exposure and precautions to be taken must appear on the label. See *40 CFR 156.10(h)(2)(i)*.

b. First Aid (*Chapter 7*)

This section of the label provides information to the pesticide user concerning

appropriate first aid for the various routes of exposure associated with accidental exposure. See *40 CFR 156.10(h)(1)(iii)*.

c. Environmental Hazards (*Chapter 8*)

Where a hazard exists to non-target organisms precautionary statements that identify the hazards and necessary precautions must appear on the label. See *40 CFR 156.10(h)(2)(ii)*.

d. Physical or Chemical Hazards (*Chapter 9*)

Hazards such as flammability or explosive characteristics, and the various precautions to be taken must be identified, as applicable. Warning statements pertaining to other physical/chemical hazards (e.g., oxidizing potential, conductivity, chemical reactions leading to production of toxic substances) may be required on a case-by-case basis. (*40 CFR 156.78*).

2. Directions for Use (*Chapter 11*)

This section of the label provides instructions to the user on how to use the product, and identifies the pest(s) to be controlled, the application sites, application rates or dosages, contact times, and any required application equipment. This section may also include certain worker protection issues such as a reentry statement which identifies the specific time period following treatment during which entry into a treated area is restricted. As further described in Chapter 11, other issues must be addressed in the directions for use. (*40 CFR 156.10(i)*).

3. Storage and Disposal (*Chapter 13*)

This section of the label provides instructions for storing the pesticide product and for disposing of any unused pesticide and the pesticide container. (*40 CFR 156.10(i)(2)(ix)*).

4. Warranty Statement (*Chapter 12*)

This is a disclaimer statement included *voluntarily* on most pesticide products by the registrant. When it is included it must conform to requirements in chapter 12.

5. Worker Protection Labeling (*Chapter 10*)

All WPS labeling requirements have been consolidated into this chapter. (*40 CFR 156 Subpart K*).

VIII. Final printed labels and labeling

Final printed labeling must be submitted prior to registration. However, final printed labeling need not be submitted until draft label texts have been provisionally accepted by the Agency. In some cases, reproductions of unusual labels (e.g., silkscreen) are acceptable. (*40 CFR 156.10(a)(6)*). The Agency requests two copies of the final printed labeling that will accompany the pesticide product when distributed or sold. The type size of final printed labels may be checked by using the template on the following page. Make a copy of the template on a transparency sheet (be sure to copy it using a 1:1 ratio or 100% setting on most photocopies-no enlargement or reductions). Overlay the template printed on a transparency on the final printed

label and compare the type size of the Signal Word, and the “Keep Out of Reach of Children” statement on the printed label with that of the template. The table at the top of the chart may be used to determine the appropriate type size based on the size of the label.

Label Type Point Chart

Size of Label on Front Panel in Square Inches	SIGNAL WORDS as Required Minimum Type Size (All Capitals)	“Keep Out of Reach of Children” as Required
5 and under	6 point	6 point
above 5 up to 10	10 point	6 point
above 10 up to 15	12 point	8 point
above 15 up to 30	14 point	10 point
over 30	18 point	12 point

NOTE: No type on any label can be less than 6 point.

18 point POISON DANGER WARNING CAUTION

12 point KEEP OUT OF REACH OF CHILDREN

12 point Keep Out of Reach of Children

14 point POISON DANGER WARNING CAUTION

10 point KEEP OUT OF REACH OF CHILDREN

10 point Keep Out of Reach of Children

12 point POISON DANGER WARNING CAUTION

8 point KEEP OUT OF REACH OF CHILDREN

8 point Keep Out of Reach of Children

10 point POISON DANGER WARNING CAUTION

6 point KEEP OUT OF REACH OF CHILDREN

6 point Keep Out of Reach of Children

6 point

POISON DANGER WARNING CAUTION

6 point

KEEP OUT OF REACH OF CHILDREN

6 point

Keep Out of Reach of Children