SAVIRONMENTED STATES - JONESPE

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Label Review Manual

Chapter 15: Company Name and Address



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What's changed in this version?

- > Added Table of Contents.
- > Added What's changed in this version? section.
- Updated hyperlinks.
- > Reformatted text to improve readability.
- > Removed *Foreign registrants* section containing non-label related address requirement.
- Added company address guidance for foreign registrants under new Using the correct name and address section.
- > Updated NPIC contact information including new hours of operation.
- Removed Company name and address changes section containing non-label related instructions to registrants for submitting change requests.

I. Introduction

Pesticide product labels must include the name and address of the producer, registrant, or person for whom the product was produced. 40 CFR 156.10(a)(1)(ii). For the purposes of this Chapter, this entity is presumed to be a "company" instead of an individual person.

II. Location and size

The name and address must be clearly legible in 6-point or larger type size and prominently displayed on the label. 40 CFR 156.10(a)(2). The name and address may be placed anywhere on the label; however, the front panel is preferred.

III. Using qualifiers

An unqualified name and address given on the label is considered to be the name and address of the producer.

A. Non-producer

If the name and address given is not the same as the producer's, then it must be qualified by appropriate wording such as "Manufactured for" or "Produced for." <u>40 CFR 156.10(c)</u>.

B. Supplemental distributor

Supplemental distribution allows a registrant to distribute or sell his/her registered product as a "distributor product" under a different name and address. The name and address of the distributor may be given on the distributor product's label instead of the registrant's, qualified by phrases such as "Packed for," "Distributed by," or "Sold by." <u>40 CFR 152.132(d)(2)</u>.

IV. Using the correct name and address

The name and address on the label provides a point of contact for the product. The name and address on the label should match the Agency's records as listed under the company (or distributor) number. For non-distributor products, this is the first set of numbers of the EPA Registration Number (ex. EPA Reg. No. **1234**-567). For distributor products, this is the last set of numbers of the EPA Registration Number (ex. EPA Reg. No. **1234**-567).

Note that:

- > If more than one company is given, appropriate qualifiers should be used.
- The company name cannot be abbreviated unless it is easily-recognizable as an abbreviation of its full name.
- If the company name is "a division of", "a subsidiary of", "c/o" (care of), or "dba" (d/b/a or doing business as) another company, the name(s) given on the label should match the Agency's records.
- The company address should include the street address and/or PO Box™, plus ZIP Code™ of the location where correspondence may be sent.
- An authorized, designated agent's name and address may be used instead of or in addition to the company's name and address.
- For foreign registrants, the United States address of record may be used instead of or in addition to the foreign address.

V. Non-emergency telephone number

The Agency strongly encourages that labels include a company telephone number or a toll-free hotline number that allows users to obtain additional product information. <u>PR Notice 97-4</u>. This is intended for non-emergency product information and is different from the emergency treatment information number (e.g. poison control) that is listed under the First Aid section.

As an option, the <u>National Pesticide Information Center (NPIC)</u> hotline number may be used, with the suggested statement:

"For information on this pesticide product (including general health concerns or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378, Monday through Friday, 8:00 AM to 12:00 PM Pacific Standard Time. In the event of a medical emergency, call your poison control center at 1-800-222-1222."

Note that the NPIC, formerly called the National Pesticide Telecommunications Network (NPTN), has decreased their hours of operation from 6:30 AM to 4:30 PM PST seven days a week to 8:00 AM to 12:00 PM PST Monday through Friday. However, NPIC staff will typically respond to all inquiries received through voice mail, email, or social media within one business day.