

Use of the term organic with respect to pesticide products

MEMORANDUM

DATE: July 2, 2007

TO: Registrants of Wood Preservative Pesticide Products

SUBJECT: Use of the term organic with respect to pesticide products

It has been brought to the Agency's attention that the use of the term "organic" is being considered for use or is being used in the marketing and/or sale of wood products treated with a number of registered pesticide products. The purpose of this memorandum is to clarify and reiterate the Agency's position with regard to the use of the term "organic" with respect to pesticide products.

Despite the fact that non-metallic preservatives may be considered "organic" in terms of their chemistry (i.e., organic v. inorganic chemistry), the Agency believes that this terminology has a much broader context in the marketplace and among the general population. Given this broader context, the use of the term "organic" is considered by the Agency to be a false and misleading statement as defined in 40 CFR 156.10(a)5. Therefore, the term "organic" or similar terms (e.g., "organically," etc.) are not allowed on pesticide product labeling nor can they be used in advertising or marketing materials associated with the pesticide or articles treated with the pesticide.

Should you have any questions or require additional information, please do not hesitate to contact Frank Sanders at 703-308-6411.