



Label Review Manual

Chapter 15: Company Name and Address



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I. Introduction

The company name and address of the registrant, the producer, or the person for whom the product was produced must appear on the pesticide product label. *40 CFR 156.10(a)(1)(ii)*. For the purposes of this Chapter, the detail required for company name and address is, at a minimum, the company name or qualified company name and the address (including street address and /or P. O. Box plus ZIP code, or unique ZIP code) of the location at which a particular organization or person may be found or reached.

II. Company name

A. Location and Size

The name and address must be displayed prominently and within the range of type size that is required for all label text. *40 CFR 156.10(a)(2)*. The company name and address may be placed anywhere on the label, however; the preferred placement for the company name and address is on the front panel.

B. Qualifying a Company Name

When the registrant's name appears on the label and the registrant is not the producer of the product, the registrant's name must be qualified by phrases such as "Manufactured for..." or "Produced for..." to show that the registrant is not the producer of the product. *40 CFR 156.10(c)*.

The need to qualify the name of a non-producer company also applies to pesticide products distributed under a supplemental registration agreement under *40 CFR 152.132* (i.e., "distributor agreement"). If the distributor is not the producer and the distributor name appears on the label, the name and address on the supplementally registered or "distributor brand" pesticide product must be qualified by phrases such as "Manufactured for..." "Distributed by..." or "Available exclusively from..."

The company's name cannot be abbreviated on the distributor label unless it is complete enough to enable a reader to identify the company so that he/she may contact the company. Company names must be clearly understood by the reader, so, for instance multiple company names may be confusing and would not be allowed on distributor labels unless properly qualified. See *40 CFR 156.10(c)*. The company name that appears on the distributor label must be a correct reflection of the company name on the supplemental registration form. If multiple addresses appear on the label, the first address listed should correspond with the address that is in the EPA Company Name and Address File and on the supplemental registration form. The label or container must show the "EPA Establishment Registration Number" of the final establishment at which the product was produced.

A company name appearing on the label without a qualifying phrase, such as those listed above, shall be considered as the name and address of the producer. *40 CFR 156.10(c)*.

III. Telephone numbers

The Agency encourages but does not require each registrant to include a company telephone number or toll-free hotline number along with its name and address. This number can be used by the pesticide product user to obtain additional product information. Registrants may also include the *National Pesticide Information Center (NPIC)* number for non-emergency information on the pesticide product label. The NPIC number, alone or along with a company phone number, should be placed on the front panel of the pesticide product label using the following 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, 7:30 AM to 3:30 PM Pacific time In the event of a medical emergency call your poison control center at 1-800-222-1222”. *PR Notice 97-4* for more information.

Note: The National Pesticide Information Center (NPIC) was previously called the National Pesticide Telecommunications Network (NPTN).

IV. Foreign registrants

All applicants for pesticide registrations must provide a U.S. address for correspondence. *40 CFR 152.50(b)(2)*. All correspondence concerning the pesticide product or any subsequent registration actions will be mailed to the address of record in the U.S. for foreign registrants. Generally a registrant not located in the United States will designate an authorized agent who resides in the United States. See *40 CFR 152.50(b)(3)*. When a U.S. agent is designated, the agent’s U.S. address is considered to be the U.S. address of record for the foreign registrant.

V. Name of record

In order to accurately track pesticide registrations the Agency must be able to link company names appearing on product labels with company names appearing on registration documents. Therefore, if a company changes its label to reflect that it is “a division of”, “a subsidiary of” or “doing business as” (DBA) another company, the Agency asks that the company also change its registration documents on record at the same time.

VI. Company name and address changes

Registrants are required to inform the Agency when there are changes to its company’s name or address. *40 CFR 152.122*. If a company changes its name or address, it must inform the Agency

of the change by sending a letter to the Document Processing Desk (Distribution Code **COADR**), Office of Pesticide Programs, 7504C, U.S. Environmental Protection Agency, Ariel Rios Building 1200 Pennsylvania Ave. NW, Washington, D.C. 20460-0001. This allows the Agency to accurately track ownership of pesticide registrations, which is critical to agency oversight of pesticide products. In practice, the Agency allows a registrant to start using the new name as soon as EPA approves the change. A registrant may use the existing label with the old name label until the next label printing or for 18 months, whichever comes first. *40 CFR 152.130*. If the registrant is also a producer, the registrant must also inform the Office of Enforcement and Compliance Assurance (OECA) (for foreign Establishments) and the EPA Regional Office where the company headquarters is located (for domestic Establishments) of the change of address in order to meet its obligations under *Section 7 of FIFRA* and *40 CFR Part 167*.