“MULTI-PACKS”

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EPA-registered pesticide packaged together with at least one:
  - non-pesticide product; or
  - additional pesticide product

Multi-packs are sold as a single unit – shrinkwrapped, boxed, etc.
Other possible names:

- Kits
- Co-packs
- Combo packs / Value packs / Pallet packs / Cube packs
- “Multiple products packaged together”
- Variations on spelling
Multiple market sectors / uses:

- Agricultural – crop treatments, seed treatments
- Non-agricultural – ornamental turf/golf, aquatic weeds, homeowner use, pool/spa
ApronMaxx Beans is a pallet pack of separately registered products for soybeans.

- four 1-gallon containers of Apron XL,
- eight quarts of Maxim 4FS, and
- eight gallons of blue colorant.

For commercial or retail application
Miticide/Insecticide + Fungicide for:
Golf Courses, Lawn and Landscape,
Ornamental Control, Sports Turf & Facility Turf,
Turf & Ornamentals

Includes sanitizer
Varying combinations of products inside
Labeling – what’s visible from outside of package
Differences between outer labeling and individual labels
EPA registration status
Multi-pack name may be different from individual products
  Name may be an ABN listed in PPLS tab or on EPA-stamped label
Pesticide(s) inside may (not) be sold separately
Seasonality / changing over time
Units of measure
Entity producing/marketing a multi-pack:
  Registrant vs supplemental distributor vs retailer
A. Pesticide Labeling Questions & Answers webpage

[https://www.epa.gov/pesticide-labels/pesticide-labeling-questions-answers](https://www.epa.gov/pesticide-labels/pesticide-labeling-questions-answers)

13. Multiple products packaged together

- “If the approved label(s) is visible through the outer packaging… or if the outer packaging is an exact replica of the approved label(s), EPA does not need to review the kit label. If, however, the kit is sold under a separate name from its previously registered contents, the kit must be registered as a separate product and the kit label must be reviewed.”

- “…if the kit is being sold as a unique product requiring separate registration or the individual product labels are not visible from the outer container or the previously approved labels are not used on the outer container in their entirety without modification, EPA must review the labeling through the registration (in the case of a new product) or registration amendment process.”
B. Label Review Manual – Chapter 18 – Unique Product Labeling

IV. Multi-packs / co-packs

➢ Does not mention registration.

➢ Are “Multi-packs / co-packs” different from “kits” and “multiple products packaged together” (terms used in Label Q&A webpage)?

C. Pesticide Registration Manual

➢ Does not mention multi-packs / co-packs / kits / multiple products packaged together (?)
Register the individual pesticide(s), the multi-pack, or both?

Sufficient labeling submitted for review?

Does the multi-pack require registration with EPA? Label review by EPA? How to determine?
- What can an SLA conclude from a multi-pack ABN listed in PPLS?

If multiple EPA Reg. Numbers, which to use for state registration?

States may vary
- application requirements, registration requirements, level of review

Sales reporting and sales/use reports can be impacted by:
- State registration status
- Database entry
- Variations in multi-packs
- Is it possible that many products on the market may require a separate registration with EPA and/or EPA label review?

- Clarification / consolidation of EPA requirements?

- Outreach / education needed?

- State variation?