



25(B) AUDIT DETAILS

Sarah K Caffery
Office of Indiana State Chemist
25(b) workgroup co-chair
scaffery@purdue.edu

AAPCO FIFRA 25(b) WORKGROUP

Workgroup consists of industry and State Lead Agencies.

The workgroup's mission is to facilitate the collaboration of states and industry in order to share information, provide guidance, foster label consistency, and reduce the duplication of efforts in the review and registration of Minimum Risk Pesticide products.

<https://aapco.org/2015/07/02/fifra-25b-workgroup/>

25(b) AUDIT - WHY

- **Industry Request:** provide standards and guidelines for State review process
- **States created:**
 - Label Guidance (2019)
 - Data Efficacy Guidance & Q&A document (2019)
 - Inert Ingredient Research Guidance (2019, updated 2020)
 - 25(b) Universal Statement of Formula Form
 - All forms available at <https://aapco.org/2015/07/02/fifra-25b-workgroup/>
- **Industry Concern:** how will previously registered products be held to the same standard?
- **States:** Indiana (OISC) – we'll do an audit.

COMMUNICATIONS

11/2019

OISC Informed registrants of 2021 25(b) audit. Provided details on what would be included (through 2020 renewals)

3/2020

OISC sent a reminder to registrants (email)

5/2020

OISC met with HCPA, discussed details. HCPA provided comments and recommendations

6/2020

OISC presented audit to 25(b) State Workgroup. Additional States identified desire to be involved

7/2020

OISC connected with 25(b) Industry workgroup chairs, provided details and received feedback

9/20

Goal: Provide final audit details to registrants

9/20

Scheduled: Provide presentation to American Chemist Council

25(b) AUDIT

Registrants supply CD, thumb drive or email to each State in the audit:

- Label
- Statement of Formula
- Efficacy
- SDS
- Excel document

**note: at least two states can only accept these documents through email

EXCEL DOCUMENT INCLUDES

- Company Name & EPA Company Number*
- Product Name
- Company* and SLA identification number
- Product details (specific use sites and formulation type)
- Product type (topical repellent, ag use, etc.)
- Active & Inert Ingredients

* If applicable

PROPOSED AUDIT TIMELINE

2021
Renewals

Registrants provide requested details to SLAs involved in the audit

2021-
2022

SLAs collaborate and complete audit

2023 -
2024

If audit identifies non-compliance, Registrants have two years to make revisions or provide additional information on the product



CONTACT

Sarah K Caffery
Office of Indiana State Chemist
25(b) workgroup co-chair
scaffery@purdue.edu