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Label Review Manual

Chapter 16: Graphics and Symbols



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What's changed in this version?

- Added *Table of Contents*.
- Added *What's changed in this version?* section.
- Updated hyperlinks and added new hyperlinks for symbol examples.
- Reformatted text and style to improve readability.
- Shortened chapter title to *Graphics and Symbols*.
- Combined previous *Other graphics and symbols which are acceptable* section into *Acceptable graphics and symbols* section.
- Combined all organic logo discussions under *Organic pesticide logos* section.

I. Introduction

Almost all graphics and symbols need Agency review, whether they are submitted as part of a label amendment or are made by notification ([PR Notice 98-10, Sections II.H](#)). There are only a limited number of graphics and symbols considered to be non-FIFRA elements that can be added by non-notification ([PRN 98-10, Section IV.C](#)).

Graphics and symbols are permitted on pesticide product labels, and cannot be false or misleading or otherwise cause the product to be misbranded. Graphics and symbols must be clear in their meaning to the reader and must not obscure or crowd required label language. Including explanatory text with the graphics and symbols, while not required, would help in preventing false and misleading labeling and misbranding. This Chapter provides guidance in determining the acceptability of graphics and symbols. ([PR Notice 98-10, Sections II.H](#))

II. Acceptable graphics and symbols

Acceptable graphics and symbols on product labels can serve to enhance the understanding of the accompanying text. Examples of acceptable graphics and symbols include the following ([PR Notice 98-10, Sections II.H](#)):

- Diagrams of how to open product containers.
- Pictures illustrating proper pesticide use.
- Graphics which display spray patterns of nozzles and/or application patterns.
- Pictograms located near the precautionary statements that illustrate the different exposure routes (oral, inhalation, or dermal) to pesticides.
- Pictures consistent with the label text showing examples of places where the pesticide may be used (e.g., a house or an office building).
- Child hazard drowning pictogram and labeling (a picture of a child turned upside down in a bucket within the universal negation symbol - a circle with a diagonal slash through it). Historically, the Agency has stated that the pictogram cannot be accompanied by the word “WARNING” as it may be confused with the human hazard signal word for the pesticide product. To avoid such confusion, the Agency generally recommends that registrants use the word “Precaution” or “Notice.” However, the Agency understands that often pesticide producers purchase buckets that already have the drowning hazard pictogram and the word “WARNING”

embossed or labeled on the container. If this is the case, then when labeling the bucket with FIFRA information, registrants should make every effort to separate the FIFRA information from the pictogram and associated word “WARNING” in order to avoid confusion with the human hazard signal word for the pesticide product.

- The “Mr. Yuk” symbol (a green frowning face with its tongue hanging out) on the label and/or outer container of the pesticide product. The “Mr. Yuk” symbol may be used with the skull & crossbones symbol for Toxicity Category I products used in or around the home or pool where children may be present.
- Pictures illustrating appropriate protective gear.
- Certification symbols (i.e., [NSF](#) and Kosher symbols), which must provide proof of certification.
- Hazardous Materials Identification System/National Paint & Coatings Association/National Fire Protection Association (HMIS/NPCA and NFPA) ratings systems for hazard codes.
- Use of a logo to indicate absence of chlorofluorocarbons (CFCs) in a pesticide product. The logo must use the universal negation symbol (a red circle with a diagonal red slash through it) with the statement “Contains no CFCs or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.” immediately next to the logo, and text set in at least 6-point font. [PR Notice 92-2](#).
- Use of the [GHS](#) (Globally Harmonized System for Hazard Communication) explosives symbol and the GHS flammability symbol. These symbols can be added to the label in addition to any warning statements on the flammability or explosive characteristics of pesticide products required under [40 CFR 156.78](#).
- The [Good Housekeeping Seal](#) is a limited warranty to consumers and promises to refund the purchase price or replace the product if defective. While the Agency allows this symbol to be placed on products, the Agency does not endorse the warranty message provided by this symbol.
- Department of Transportation symbols indicating the hazard and flammability of a particular pesticide product.

- The [USDA Certified Biobased Product label](#), which must provide proof of certification. A disclaimer statement must also be placed directly under or beside the label indicating that it does not imply safety of the product.
- Barcodes and QR codes which allow for easier scanning of prices in retail stores. QR codes for the purpose of providing directions for use of the pesticide product are considered [web-distributed labeling](#), which is discussed in Chapter 3.

III. Unacceptable graphics and symbols

Graphics and symbols are unacceptable if they violate [FIFRA 12\(a\)\(1\)\(F\)](#) or [FIFRA 2\(q\)\(1\)\(A\)](#) or the applicable regulations describing potential false and misleading statements in [40 CFR 156.10\(a\)\(5\)](#). Examples of graphics and symbols that would generally be considered unacceptable include the following:

- A food or flower pictured on a label which bears no directions for use on that food or flower. For example, a picture of cherries generally may not appear on a label if the product is not registered for use on cherries, or a picture of roses may not appear on a label if the product is not registered for use on roses.
- Pictures of users must be consistent with personal protective equipment (PPE) requirements on the label. For example, if the label requires that the applicator wear full chemical-resistant coveralls with goggles, the label illustration cannot show a person wearing shorts and no protective eyewear.
- Picture of a pest not claimed to be controlled by the product.
- Pictures that depict the fragrance of the product (except for antimicrobial products). Non-antimicrobial products are reviewed on a case-by-case basis.
- Pictures depicting food or food contact utensils, even in some cases where food-handling area treatments are allowed on the label. Use directions generally require that food items and food contact utensils be covered or removed before the pesticide is applied.
- Pictures of persons applying pesticides in areas accessible to children, pets, and other non-target organisms when such products may only be applied in areas inaccessible to such non-target organisms.

- Pictures of children, unless the product is registered for use on children or the product is registered for use in swimming pools. Reviewed on a case-by-case basis.
- Pictures of candy. Similarly, containers that look like food or candy are prohibited.
- Symbols implying safety or non-toxicity, such as the caduceus or rod of Asclepius symbols for medicine.
- Pictures of residential use sites when the label limits use of the product to commercial or industrial sites.
- Recycling symbol or any other symbol implying that the product and/or its container can be recycled if in fact it cannot be.
- EPA or any other agency logo which implies endorsement by a government agency.

IV. Organic pesticide logos

As discussed in Chapter 12, if the criteria described in [PR Notice 2003-1](#) are met, a pesticide product may bear the following phrases in logo format:

“For Organic Production”

“For Organic Gardening”

“For Organic Lawn Care”

“For Use in Organic Production”

Logos from other groups that review materials proposed for organic agriculture may also be considered, e.g., Organic Materials Review Institute (OMRI). However, the following example would generally be considered unacceptable:

- Symbols which contain the words “Slow Release Nitrogen” and “Organic” are not permitted if the prominence of the symbol, large type size of the word “organic” and its position relative to the words “Slow Release Nitrogen” make it unclear whether the word “organic” refers to the fertilizer component or to the entire product.

 Label reviewers should consult with the National Organic Program liaison in the Biopesticides and Pollution Prevention Division before approving any organic statements, logos, or claims.