



Updated February
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OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

Guidance for Submission of Trade Name Inert Ingredient Requests

EPA's Office of Pesticide Programs (OPP) has developed a list of trade names for inert ingredients used pesticide products registered under FIFRA. Tradenames may be added just to OPP's internal database, and they may be also added to the public facing "Trade Name Inert Ingredient" database.

The Trade Name Inert Ingredient database can be found on EPA's Public Access Web Site, <https://ordspub.epa.gov/ords/pesticides/f?p=inertfinder:mixtures>. Each entry in the public facing trade name inert ingredient list includes the trade name, the approval status for use in pesticide formulations, and the manufacturer's name.

A trade name inert ingredient may be a single component, or (more commonly) a mixture of components.

For a trade name inert ingredient to be approved, the following steps must be completed:

- Each individual inert ingredient in the trade name composition must have approval for use as an inert ingredient in pesticide products. Approval status for inert ingredients can be found in InertFinder (<https://ordspub.epa.gov/ords/pesticides/f?p=INERTFINDER:1::::1::>).
- A request consisting of a letter on company letterhead, signed and dated by an authorized company official, containing the EPA company number, and the full and complete composition of the trade name ingredient (adding to 100%) must be submitted to OPP via CDX (<https://cdx.epa.gov/>) in PDF format.
- This will be a non-PRIA action and there is no fee associated with it.
- **Only 1 trade name** inert ingredient may be submitted per request.
- There is an optional step to submit the "Statement of Non-confidentiality" found at the end of this guidance for listing of the trade name in the public facing database. The public listing does not include any information related to the composition of the trade name inert ingredient which in many cases is claimed as confidential business information (CBI) under section 10 of FIFRA. Nor would the list identify the specific pesticide products in which the ingredients are included.
- After review by the Agency, which may take up to 2-5 months, depending on the volume of requests, an email will be sent confirming approval, and the trade name will be added to the requested database(s).

If you are the manufacturer of a trade name inert ingredient and wish to have your trade name inert ingredient included in the publicly available "Trade Name Inert Ingredient" database please fill out the "Statement of Non-confidentiality" as indicated below, specifying the individual trade name inert ingredient products you wish to have included. EPA will not include on this list any trade names



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where the manufacturer has not consented to release. If you would like to participate, please copy the following text into a separate document, complete it and send it with your submission package.

Statement of Non-confidentiality

Company Name _____

As an authorized representative of the company specified above, I assert that the company does not claim as confidential the fact that the product(s) specified below is/are used as an inert ingredient in pesticides. I understand that EPA may include the product name(s) specified below in a public listing of inert ingredients by product name and approval status. This statement does not pertain to the use of the product(s) in any specific pesticide or to the composition of the product(s), which may or may not be claimed as confidential on a case-by-case basis.

Product Name(s): Name _____

Position _____

Date _____