

FIFRA Enforcement Update

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Office of Enforcement and Compliance Assurance

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Today's Topics

- **Scope of the Regulated Universe**
- **National Priorities**
 - **eCommerce**
- **Enforcement Trends**
- **Case Highlights**



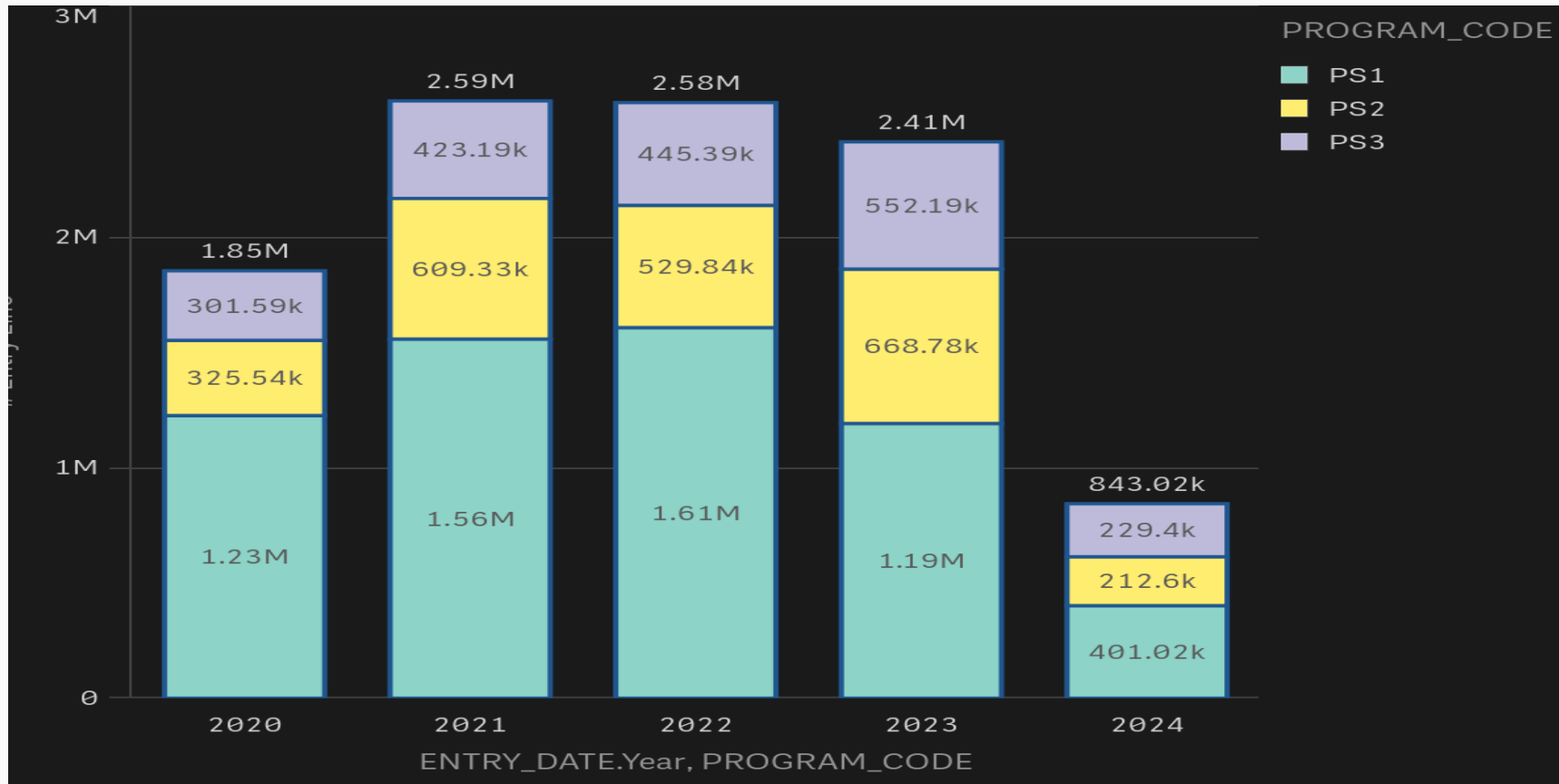
Scope of the Regulated Universe Under FIFRA

- ~19,075 Section 3 Registered Products
- ~39,015 Distributor Products
- >19,210 Active Registered Producing Establishments
- Unknown/Constantly Expanding Universe of Devices
- > 10M Notices of Arrival (NOA) Processed since beginning of 2020



Number of NOAs Processed

By entry line numbers, Program Code and Year



*As of May 8, 2024



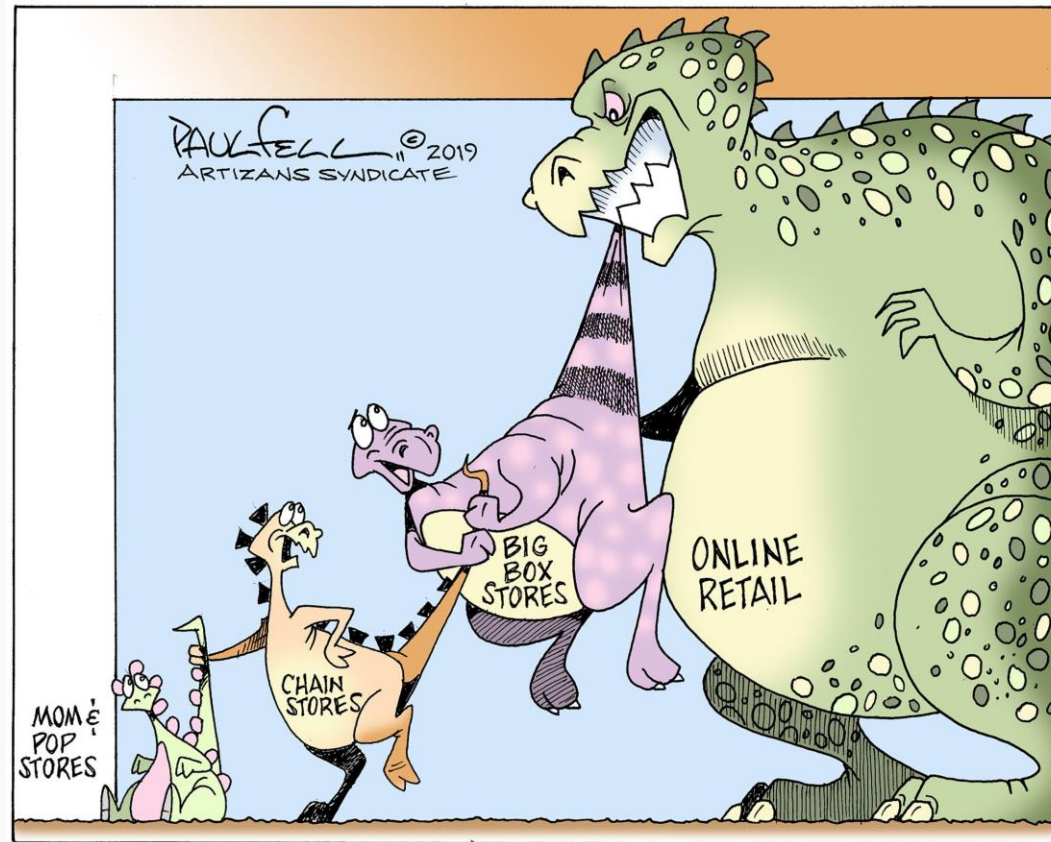
FIFRA Enforcement Priority Setting Process

<https://www.epa.gov/system/files/documents/2024-07/fy-2025-2026-oeca-npg.pdf>

- National Program Guidance establishing multi-year priorities under each major statute
 - FY25-26 FIFRA Focus Areas
 - Product Integrity
 - Import Compliance
 - eCommerce
 - Worker Protection Standard (WPS)



eCommerce



CartoonStock.com



State/EPA Collaboration

- Mid 1990's – Internet Surf Days
- Summer 2019 – eCommerce Becomes a National Priority
- 2022 – AAPCO Forms eCommerce Workgroup
- Spring 2023 – AAPCO Conducts eCommerce Survey
- Fall 2023 – eCommerce on Pre-SFIREG Meeting Agendas
- Early 2024 – AAPCO Develops Straw Cooperative Agreement Framework for Integrating eCommerce Compliance Monitoring Activities



General FIFRA Enforcement Trends ***Enforcement Actions by Type***

Enforcement Tool	2024	2023	2022	2021	2020
Administrative and Civil Judicial Penalty Orders	90	91	75*	93	113
Administrative Compliance Orders	26	38	20	38	29
Notices of Warning	379	560	345	297	392
Notices of Refusal of Admission	337	684	590	933	671

* Includes 1 Civil Judicial Case – Tzumi Innovations, LLC



FIFRA Enforcement Trends

Penalties Assessed and Environmental Benefits

Results	2024	2023	2022	2021	2020
Penalties	\$3.18	\$7.09M	\$6.7M	\$12.43M	\$4.42M
Environmental Benefits ¹	2.29M lbs ²	7.83M lbs	21.29M lbs	14.78M lbs	8.41M lbs

¹Ongoing Releases – Pesticides reduced, treated, or eliminated

²Does not include aggregate total for data reported as CBI




Canature Watergroup U.S.A., Inc.

[https://yosemite.epa.gov/oa/rhc/epaadmin.nsf/Filings/64665AA18E345AB185258A510073FE34/\\$File/FIFRA-05-2024-0002_CAF0_CanatureWatergroupUSAInc_CarmelIndiana_25PGS.pdf](https://yosemite.epa.gov/oa/rhc/epaadmin.nsf/Filings/64665AA18E345AB185258A510073FE34/$File/FIFRA-05-2024-0002_CAF0_CanatureWatergroupUSAInc_CarmelIndiana_25PGS.pdf)

WaterGroup®



- **Section 12(a)(2)(N) – Importation of 22 shipments of pesticide devices between June and November of 2021 without first submitting Notices of Arrival (NOA)**
- **\$102,080 Civil Penalty**

	United States ENVIRONMENTAL PROTECTION AGENCY Washington, DC 20460	OMB Control No. 2070-0020 Expires on 1/31/2025
	Notice of Arrival of Pesticides and Devices Send Completed Form to Appropriate Regional Office Listed in the Instructions for this Form. Note: Read instructions before completing form.	



Pallet Machinery Group, Inc

[https://yosemite.epa.gov/oa/rhc/epaadmin.nsf/Filings/221E33AC11EAFBCF85258AD3005D8B3F/\\$File/Pallet%20Machinery%20Group%20Inc_FIFRA%20CAFO_March%201%202024.pdf](https://yosemite.epa.gov/oa/rhc/epaadmin.nsf/Filings/221E33AC11EAFBCF85258AD3005D8B3F/$File/Pallet%20Machinery%20Group%20Inc_FIFRA%20CAFO_March%201%202024.pdf)

It's a new day.

Control mold
with peace
of mind.

WoodLock Bio-Shield Mold Inhibitor is safe for employees and machinery. It can be applied by spraying or dipping onto green cut boards, hardwoods, softwoods, pallets, crates and boxes.

WoodLock
BIO-SHIELD MOLD INHIBITOR

IPMG
Pallet Machinery Group, Inc.
palletmachinery.com | 540-644-9220
info@palletmachinery.com

NATURE'S
BACKBONE

The advertisement for WoodLock Bio-Shield Mold Inhibitor features a scenic background of a river flowing through a forest at sunset. The text is overlaid on the image, with the headline "It's a new day." in white and "Control mold with peace of mind." in yellow. Below this, a smaller line of text describes the product's safety and application. The bottom of the ad includes the WoodLock logo, contact information for IPMG (Pallet Machinery Group, Inc.), and a "Nature's Backbone" logo.

- 12(a)(1)(A) and (E) -- Unlawful distribution of an unregistered and misbranded pesticide between January 2019 and November 2021.
- Inspections conducted on behalf of EPA by federally credentialed inspectors with the Tennessee and Alabama Departments of Agriculture.
- \$120,000 Civil Penalty



Amerikal Products Corporation

[https://yosemite.epa.gov/OA/RHC/EPAAdmin.nsf/Filings/6CD59D74425CBB3485258B51005269BC/\\$File/FIFRA-05-2024-0010_CAF0_AmerikalProductsCorporation_WaukeganIllinois_11PGS.pdf](https://yosemite.epa.gov/OA/RHC/EPAAdmin.nsf/Filings/6CD59D74425CBB3485258B51005269BC/$File/FIFRA-05-2024-0010_CAF0_AmerikalProductsCorporation_WaukeganIllinois_11PGS.pdf)

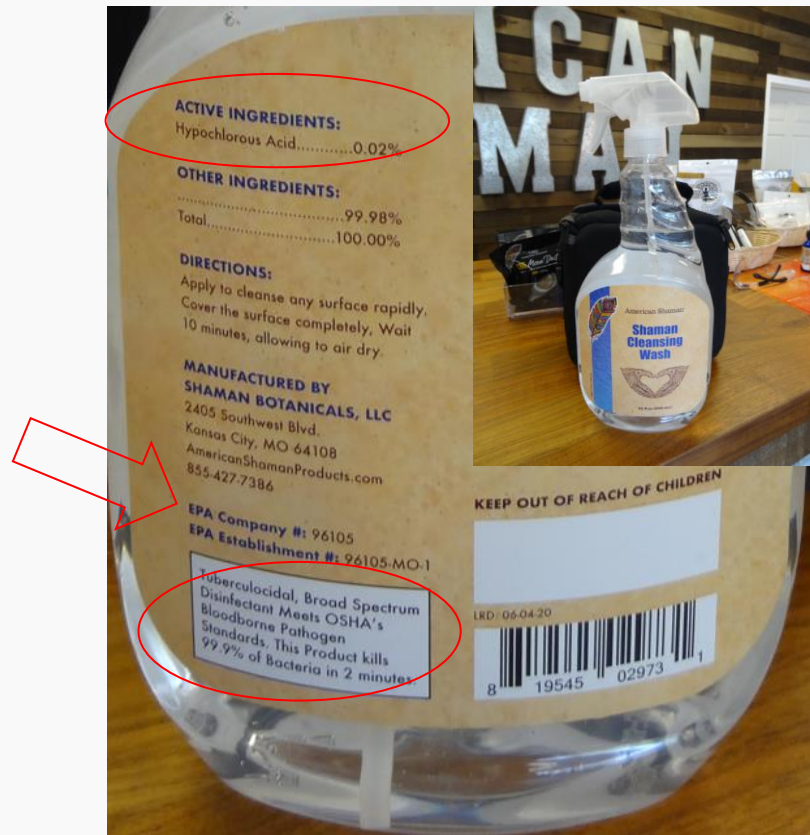


- **Unlawful distribution of an unregistered and misbranded pesticide, between January 2020 and June 2021.**
- **Product was introduced during the COVID pandemic and marketed with public health claims including antiviral claims**
- **\$138,762 Civil Penalty**



CBD American Shaman, LLC

[https://yosemite.epa.gov/oa/rhc/epaadmin.nsf/Filings/7537C90517AC3BC485258A4B004D389B/\\$File/CBD%20American%20Shaman%20Consent%20Agreement%20and%20Final%20Order.pdf](https://yosemite.epa.gov/oa/rhc/epaadmin.nsf/Filings/7537C90517AC3BC485258A4B004D389B/$File/CBD%20American%20Shaman%20Consent%20Agreement%20and%20Final%20Order.pdf)



- 12(a)(1)(A) - Unlawful distribution of to unregistered antimicrobial pesticides between March 2020 and June 2021
- Products were introduced during the COVID pandemic and marketed with public health claims
- \$120,720 Civil Penalty, \$250,000 Supplemental Environmental Project



RBL Products Inc.

[https://yosemite.epa.gov/OA/RHC/EPAAdmin.nsf/Filings/731385EB36757A1085258B6A007E743C/\\$File/FIFRA-05-2024-0013_CAF0_RBLProductsInc_DetroitMichigan_15PGS.pdf](https://yosemite.epa.gov/OA/RHC/EPAAdmin.nsf/Filings/731385EB36757A1085258B6A007E743C/$File/FIFRA-05-2024-0013_CAF0_RBLProductsInc_DetroitMichigan_15PGS.pdf)



- Unlawful distribution of unregistered pesticides between March 2020 and September 2020.
- Product were introduced during the COVID pandemic and marketed with public health claims including antiviral claims
- \$584,000 Civil Penalty



Pan Pacific Retail Management (USA) Co., et. al.

[https://yosemite.epa.gov/OA/RHC/EPAAdmin.nsf/Filings/2930679F5A2D070385258B35007E94A6/\\$File/Pan%20Pacific%20Retail%20Management%20\(USA\)%20Co.;%20QSI%20Inc.%20dba%20Times%20Supermarket%20\(FIFRA-09-2024-0021\)%20-%20Filed%20CAFO%20\(copy\).pdf](https://yosemite.epa.gov/OA/RHC/EPAAdmin.nsf/Filings/2930679F5A2D070385258B35007E94A6/$File/Pan%20Pacific%20Retail%20Management%20(USA)%20Co.;%20QSI%20Inc.%20dba%20Times%20Supermarket%20(FIFRA-09-2024-0021)%20-%20Filed%20CAFO%20(copy).pdf)



- Unlawful distribution of unregistered pesticides between April 2020 and April 2022.
- Violations identified through routine marketplace inspections
- \$663,081 Civil Penalty





Questions...?

