

IPM Continuum for Structural Pest Control

	No IPM	Level 1 IPM	Level 2 IPM	Level 3 IPM
	<i>Shifting Reliance from Treatment to Prevention →</i>			
Monitoring & Inspection	<ul style="list-style-type: none"> Casual inspection No monitoring 	<ul style="list-style-type: none"> Thorough inspection and report Occasional monitoring 	<ul style="list-style-type: none"> Thorough inspection and detailed report discussed with client Moderate monitoring w/sticky traps, rat monitoring blocks, or other tools 	<ul style="list-style-type: none"> Thorough inspection and detailed report discussed with client Regular monitoring w/sticky traps, rat monitoring blocks, or other tools
Record Keeping	<ul style="list-style-type: none"> Pesticide use records only 	<ul style="list-style-type: none"> Minimal monitoring records, no non-chemical treatment records Pesticide use records 	<ul style="list-style-type: none"> Consistent monitoring & non-chemical treatment records Pesticide use records 	<ul style="list-style-type: none"> Consistent monitoring & non-chemical treatment records Pesticide use records
Client Communication and Education	<ul style="list-style-type: none"> Little or no client education 	<ul style="list-style-type: none"> Some client education 	<ul style="list-style-type: none"> Regular communication & client education 	<ul style="list-style-type: none"> Extensive client communication & education Client and service provider form a n IPM partnership
Tolerance Levels	<ul style="list-style-type: none"> No tolerance levels/treatment thresholds 	<ul style="list-style-type: none"> No tolerance levels/treatment thresholds 	<ul style="list-style-type: none"> Determine tolerance level/treatment threshold with client 	<ul style="list-style-type: none"> Determine tolerance level/treatment threshold with client; adjust thresholds as needed
Pest Proofing and Sanitation	<ul style="list-style-type: none"> No improved sanitation No harborage reduction No pest-proofing 	<ul style="list-style-type: none"> Some sanitation efforts No harborage reduction No pest-proofing 	<ul style="list-style-type: none"> Good sanitation Harborage reduction Some pest-proofing 	<ul style="list-style-type: none"> Excellent sanitation Harborage elimination Extensive pest-proofing
Other Non-Chemical Treatments	<ul style="list-style-type: none"> No use of other non-chemical treatments 	<ul style="list-style-type: none"> Rare use of other non-chemical treatments 	<ul style="list-style-type: none"> Some use of non-chemical methods indoors (vacuuming, trapping) 	<ul style="list-style-type: none"> Extensive use of non-chemical methods indoors and out (vacuuming, steam-cleaning, trapping, encouraging natural enemies, customer education, etc.)
Pesticide Use & Application	<ul style="list-style-type: none"> Pesticides applied on a set schedule without evaluating site for need Indoors: baseboard and crack & crevice insecticidal sprays, some baits; rodenticide baits Outdoors: broadcast insecticidal perimeter sprays; rodenticide baits in bait stations No evaluation of effectiveness of treatments 	<ul style="list-style-type: none"> Pesticides used after evaluating need; never on a set schedule Indoors: primarily crack & crevice w/ insecticide baits & gels; spot sprays for emergencies only; no broadcast sprays; traps for rodents Outdoors: insecticidal baits or spot sprays for insects; traps for rodents; rodenticide baits in bait stations where traps not feasible Some evaluation of effectiveness of treatments 	<ul style="list-style-type: none"> Pesticides used only after evaluating need; never on a set schedule Pesticide treatments timed properly for greatest effect on target pest Indoors: primarily crack & crevice w/baits, gels; spot-spray w/ 25b-exempt products in emergency Outdoors: insecticidal baits, or spot-sprays w/ 25b-exempt products; no broadcast sprays except in emergency; rodent traps; rodenticides in bait stations only where trapping not feasible. On-going evaluation and fine-tuning of program 	<ul style="list-style-type: none"> All of Level 3 points plus: Indoors: no pesticides if possible; crack & crevice gels/baits if needed; spot spray w/ 25b-exempt product (see reverse for more info on the 25b list) in emergency Outdoors: insecticidal baits only; spot-spray with 25b-exempt product only if needed; rodent trapping only (rodents are monitored w/ non-toxic bait blocks in bait stations; when rodents are detected, bait block is replaced w/trap); rodenticide only in emergency
Pest Management Company Staff Training	<ul style="list-style-type: none"> Minimal training of staff—only that required by law 	<ul style="list-style-type: none"> More training of staff—occasional in-house training or attendance at seminars/workshops 	<ul style="list-style-type: none"> Extensive training of staff—extensive in-house and/or outside training 	<ul style="list-style-type: none"> Extensive training of pest management staff <i>and</i> office staff

Criteria for FIFRA 25(b) Exemption

Minimum risk pesticides that meet certain criteria are exempt from federal registration under section 25(b) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). The U.S. Environmental Protection Agency (EPA) does not review or register pesticides that satisfy the 25(b) criteria, though registration is required by most states. For information on minimum risk pesticides in your state, please contact [your state's pesticide registration office](#).

To satisfy the conditions required for federal minimum risk status, all five of the following conditions must be met:

- **Condition 1:** The product must contain **only** [active ingredients that are listed in the table](#) below. The active ingredient of a product is the ingredient that kills, destroys, mitigates, or repels pests named on the product label.
- **Condition 2:** The product must contain **only** those inert ingredients that have been classified by EPA as List 4A "Inert Ingredients of Minimal Concern." An explanation of the Inert Ingredients of Minimal Concern and links to List 4A are available on EPA's [Permitted Inerts](#) Web page.
- **Condition 3:** All of the ingredients (both active and inert) must be listed on the label. The active ingredient(s) must be listed by name and percentage by weight. Each inert ingredient must be listed by name.
- **Condition 4:** The label cannot include any false or misleading statements, and claims that minimum risk pesticides protect human or public health are prohibited. For example, since these products are exempt from federal registration, label language implying federal registration, review or endorsement, such as "It is a violation of federal law to use this product in a manner inconsistent with the label," or the use of an EPA registration or establishment number is not allowed.
- **Condition 5:** In general, public health claims are prohibited. Minimum risk pesticide labels may not bear claims to control rodent, insect or microbial pests in a way that links the pests with any specific disease. EPA recommends that anyone considering manufacturing, distributing, or selling minimum risk antimicrobial pesticide products first [contact the Pesticide Program's Antimicrobial Division ombudsman](#), who can assist in ensuring that proposed antimicrobial minimum risk products meet the strict requirements for exemption from registration.

Additionally, EPA requires the establishment of [maximum residue limits, which EPA calls tolerances, or exemptions from the requirement of a tolerance](#) for all pesticides intended for use in a manner that may result in residues in food or feed.

Active Ingredients Exempted Under 25(b) of the Federal Insecticide, Fungicide, & Rodenticide Act

* indicates exempt active ingredients that are also exempt from pesticide residue tolerance requirements

Castor oil (U.S.P. or equivalent)*	Cottonseed oil*	Linseed oil	Sesame (includes ground sesame plant) and sesame oil*
Cedar oil	Dried Blood	Malic acid	Sodium chloride (common salt) *
Cinnamon and cinnamon oil*	Eugenol	Mint and mint oil	Sodium lauryl sulfate
Citric acid*	Garlic and garlic oil*	Peppermint and peppermint oil*	Soybean oil
Citronella and Citronella oil	Geraniol*	2-Phenethyl propionate (2-phenylethyl propionate)	Thyme and thyme oil*
Cloves and clove oil*	Geranium oil	Potassium sorbate*	White pepper
Corn gluten meal*	Lauryl sulfate	Putrescent whole egg solids	Zinc metal strips (consisting solely of zinc metal and impurities)
Corn oil*	Lemongrass oil	Rosemary and rosemary oil*	