

## Orange Oil Controversies and 1991(a)(8)

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Some in the industry have been using questionable practices to aggressively market drywood termite treatments using orange oil (d-Limonene) products creating controversy and questions as to the legality and ethics of the claims being made. The intent of this short article is not to discourage you from using one of the d-Limonene products available to the industry, quite the contrary. PCOP encourages innovation and diversity of service options for California consumers, while promoting fair and honest competition and communication with the public. There are three main questions being raised about the representation being made about d-Limonene products for drywood termite control. These questions and concerns are not limited to d-Limonene, but also crop up with the way local treatment products for drywood termites in general are being marketed. Any of these local treatment active ingredients have some level of efficacy on a local level, and local treatments have an important role in termite control, but sadly some in our industry are misrepresenting the role and use of local treatment products for drywood treatments to the public, to the detriment of the public and the industry.

Here are three of the main misrepresentations we are seeing with d-Limonene and other local treatment active ingredients:

- 1: Comparing d-Limonene treatments as equivalent to fumigation
- 2: Safety Claims for d-Limonene
- 3: Efficacy of d-Limonene

**1: Comparing d-Limonene treatments as equivalent to fumigation.** This practice is clearly a violation of both §1991 (a)(8)(C)(3) which requires the disclosure of the limitations of such treatments, and §1999 (f)(4) and §1999 (f)(5) which prohibit claims that local treatments will offer the same control as treatments with a different scope such as fumigation, and prohibits claims that local treatments will control pests throughout the structure.

**2: Safety Claims.** Under FIFRA rules it is illegal to claim that any registered pesticide is "safe", but our own section §1999 from the Structural Pest Control Act further restricts safety claims. §1999(f)(6) makes it clear that we may not communicate that a product is "natural", "relatively non-toxic" or use other language which gives the public the impression that d-Limonene or any other product is anything other than potentially harmful.

**3: Efficacy of d-Limonene.** The author assumes that d-Limonene products and any other registered pesticide labeled for local treatment for drywood termites will have reasonable control on a local level. That said, local treatments are fairly ineffective in controlling drywood termites in structures with control at a local level ranging anywhere from 13% to 100%<sup>1</sup>. According to the University of California there are no known "no published studies that verify the efficacy of these materials [d-Limonene] in controlling drywood termites."<sup>2</sup>

Bottom line, there is no need to misrepresent the products or control strategies and services you offer by resorting to questionable or illegal claims, comparisons and scare tactics. Our industry should be proud of the innovation we pioneer in the control of termites and other pest in our state, and realize that there is a strong market for probably every innovative service strategy and products we can develop. By marketing and selling your products and service ethically you best represent yourself, your products, services and the industry as a whole.

<sup>1</sup>Drywood Termites PestNotes Published 9/02 University of California Statewide IPM Program Retrieved December 12, 2006 from <http://www.ipm.ucdavis.edu/PMG/PESTNOTES/pn7440.html>

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