

# **Pesticide Registration Branch Report**

## **Impacts of AB 1011 on Pesticide Registration Functions**

**February 2009**

**David Supkoff, Environmental Program Manager I  
Eileen Mahoney, Program Specialist  
Jonathan Sullivan, Environmental Scientist**

**Department of Pesticide Regulation  
California Environmental Protection Agency  
1001 I Street, Sacramento, California 95814-5624**

## **Executive Summary**

This report analyzes changes in the Department of Pesticide Regulation's (DPR's) pesticide registration program resulting from the enactment of Assembly Bill 1011 (Matthews, Chapter 612, Statutes of 2005) (AB 1011). The report covers the time period from 2004 to 2007, two years before and two years after the effective date of the legislation. This report expands upon DPR's August 2007 AB 1011 report, which assessed changes in the pesticide registration program between the years 2005 and 2006.

The Legislature enacted AB 1011 to close a loophole in the collection of the pesticide mill assessment (a fee on all pesticide sales), and to streamline the pesticide product registration process by eliminating the letter of authorization requirement. AB 1011 amended section 12811.5 and added section 12836.5 to the Food and Agricultural Code (FAC). Revised FAC 12811.5 authorizes DPR to rely upon previous evaluations of scientific data to support new and amended pesticide product registrations and to maintain the registration of pesticide products, regardless of data ownership. FAC 12836.5 requires that DPR accept all applications for registration of pesticide products containing new active ingredients concurrently with the applicant's submission of an application to the United States Environmental Protection Agency (U.S. EPA) for federal registration.

To determine the impact of AB 1011 on the Pesticide Registration Branch's (PRB's) business functions, staff analyzed the total number of packages submitted and the time that it took DPR to process these submissions in each calendar year. The data indicate that the total number of regular (non-new active ingredient) pesticide applications submitted to DPR in 2004, 2005, 2006 and 2007 varied over time, but did not display any general pattern (i.e., increase or decrease in the number of submissions). "Regular" submissions refer to applications to register and amend pesticide products containing active ingredient(s) found in currently registered pesticide products. DPR also looked at a subset of the submitted pesticide applications, those that did not require scientific evaluation, over the same four years and saw no general trends in the number of submissions.

In 2006, DPR experienced a large increase in the number of registration submissions for pesticide products containing new active ingredients, as compared to the other three years. The annual number of new active ingredient submissions in 2004, 2005, and 2007 remained relatively constant. DPR defines a new active ingredient as an active ingredient not found in any actively registered pesticide product in California. The 2006 increase in submissions appears to be due to the addition of Food and Agricultural Code (FAC) section 12836.5, which requires DPR to accept all applications for registration of pesticide products containing new active ingredients concurrently with submission to U.S. EPA. The 2006 surge of submissions was the result of companies with submissions already undergoing federal review, taking advantage of the enactment of FAC section 12836.5 to submit those applications to DPR. In the past, a company had to wait until their pesticide product was registered with the U.S. EPA before they could apply for registration in California.

Between 2004 and 2007, DPR experienced an overall 20.4 percent decrease (from 608 submissions in 2004 to 484 submissions in 2007) in the number of regular submissions requiring

scientific evaluation. DPR also noted a consistent pattern of decrease in the number of submissions entering most individual evaluation stations. DPR determined that this reduction in the number of products requiring scientific evaluation was a direct result of its ability to rely upon previously evaluated data, thereby reducing the number requiring scientific evaluation.

DPR based the information in this report, for all four years, on the status of data submissions in its electronic Tracking System as of June 2008. At the time the data were collected, DPR had not yet taken final actions on all submissions (both regular and new active ingredient) submitted in 2006 and 2007. The fact that the 2006 and 2007 data sets are incomplete means that the numbers provided in this report with regard to average processing times may increase once the data set is complete. However, in assessing changes in time frames for regular submission totals, due to the relatively small number of regular submissions still outstanding compared to the total number, DPR does not expect the overall average time frames for regular submission totals to change significantly.

The data indicate an overall decrease of approximately 27 percent in the average time that it took DPR to process all regular submissions from receipt of the submission to final action from 2004 to 2007 (from 91.3 days in 2004 to 67 days in 2007). Over the four year time period included in this analysis, DPR initiated changes in the processing of submissions leading to greater efficiency. These changes included greater supervisory coordination to ensure more uniform application of registration policies and procedures across regulatory staff, improvements in guidance documents for regulatory scientists, and additional staff training on registration procedures. These changes may be at least partly responsible for the overall decrease in processing time. For regular submissions that entered scientific evaluation, the data indicate that the average number of days from receipt of submission to final DPR action declined approximately 20 percent, from a high of 215 days in 2005 (the year before implementation of AB 1011) to a low of 167 days in 2007. The average processing time for 2007 submissions entering evaluation is considered preliminary due to the number of submissions for which final actions had not been taken at the time the data for the report was collected.

Due to the relatively long evaluation period needed for certain new active ingredient products, DPR is unable to provide an accurate average processing time for all 2006 and 2007 submissions containing new active ingredients. The data indicate that the overall average processing time for submissions with new active ingredients, from receipt of the submission to DPR's posting of the product either proposed for registration or denial of registration, appears to be decreasing over time. However, DPR cannot complete a final trend assessment until all registration decisions for 2006 and 2007 submissions have been posted.

The average number of registration applications submitted to each regulatory scientist for processing in the years 2004, 2005, 2006, and 2007 varied over time and did not show any particular trends. The average time it took regulatory scientists to conduct an initial assessment of each submission declined by 17.6 percent (from 58.2 days in 2004 to 47.9 days in 2007) in the years after the implementation of AB 1011. This decline in time was unexpected because AB 1011 created an increased workload for regulatory scientists. DPR had expected to see an increase in the average time it was taking regulatory scientists to process each submission. The registration process improvements described above, as well as the hiring and training of new

regulatory scientists appear to be responsible for decreases in the amount of time it took staff to conduct initial assessments of submitted pesticide products.

DPR also compared submissions from companies identified as having primarily agricultural products with those primarily identified as having non-agricultural products. Agricultural products include those pesticides used in production agriculture, as well as pesticides used on right-of-ways, waterways, parks, golf courses, commercial nursery production (including ornamentals), dairies, greenhouses, and forests. Non-agricultural use includes home and garden products, industrial, institutional, structural and vector control use products, and products used in pools and spas. The number of submissions from companies identified as having primarily agricultural products stayed relatively constant between 2004 and 2007, while the number of products submitted by companies identified as primarily non-agricultural, decreased 18.4 percent from 2004 to 2007. Despite this decline, it should be noted that DPR receives nearly twice the number of non-agricultural submissions as it does agricultural submissions. The data indicate that between 2005 and 2007 there was no difference in the average number of days that it took DPR to process agricultural and non-agricultural product submissions.

This report does not address the consequences of data cost-sharing or possible changes in the volume of “high hazard pesticides” sold in California. These topics will be addressed in a report to the Legislature due December 31, 2008.

## **Background**

This report examines the impact of AB 1011 on DPR's pesticide registration process two years before and two years after implementation. The amendment of Food and Agricultural Code section 12811.5 and adoption of section 12836.5 pertaining to pesticide registration became effective on January 1, 2006. The legislative changes resulted in significant modifications to DPR's pesticide registration process, including: 1) eliminating the need for DPR to obtain a letter of authorization (LOA) before using one company's data to support the registration of another company's product; 2) authorizing DPR to use "previous evaluations" of submitted scientific data to support new and amended product registrations regardless of data ownership; and 3) requiring DPR to accept all applications for registration of pesticide products containing new active ingredients concurrently with an applicant's submission of an application to U.S. EPA for federal registration.

FAC section 12811.5 authorizes DPR to rely upon the evaluations of previously submitted data to carry out its registration duties regardless of ownership of the data. Under AB 1011, DPR no longer needs to expend resources tracking and maintaining letters of authorization or reviewing duplicative data submitted to support the registration of new pesticide products that are similar to other currently registered pesticide products. The bill allows DPR to concentrate its limited resources on reviewing: 1) pesticide products containing new active ingredients; and 2) new uses not currently registered in California.

The report summarizes DPR's analysis of the impact of AB 1011 on PRB's business functions. The report compares the registration process in 2004 and 2005 with the same process in 2006 and 2007 (the two years before and after implementation of AB 1011) and documents changes in the registration process resulting from the legislation. It includes the number of regular and new active ingredient submissions processed each year along with an assessment of overall trends in the average time that it takes DPR to process those submissions.

## **Methods**

Developed in the early 1990s, the electronic Registration Tracking System enables staff to locate a submission and determine its status and history. Each submission is assigned a unique tracking identification (ID) number. Once a submission is received, the tracking system records all procedural information and significant actions from the initial date of entry into the system, to the time a final action is taken, including the dates associated with those actions. The data recorded by the tracking system are available to DPR for statistical analyses. For this report, the data were sorted by calendar year to allow for analysis of number of submissions and processing times prior to and following the implementation of AB 1011.

This report uses the term "regular" submissions to refer to applications to register and amend pesticide products containing active ingredient(s) found in currently registered pesticide products. After receipt, a regular submission is entered into the Registration Tracking System. Next, it is routed to either library indexing (if data are submitted) or directly to a regulatory scientist (if no data are submitted). If indexing is required, the submission is routed to the regulatory scientist after indexing. It should be noted that the term does not include other types

of submissions that regulatory scientists must also process, such as adverse effects disclosure submissions and submissions of additional data.

DPR's regulatory scientists are responsible for determining if an application is complete, and if DPR has previous scientific evaluations of data that support the product registration or amendment or if the product requires additional scientific evaluation. To determine whether previous evaluations support the application, regulatory scientists determine if there are any previously approved pesticide products containing the same active ingredient(s), the same or similar inert ingredients, and with the same or similar label claims, including applications rates, methods of application, pests, and sites, as are on the new product label. If the regulatory scientist finds a match, then no scientific evaluation is conducted. If the scientist finds that only some of the claims on a new or amended product label were previously approved, the new product or amendment may require scientific evaluation, but for only the new (not previously approved) claims. If further scientific evaluation is required, the regulatory scientist determines which scientific discipline(s) (e.g., chemistry, efficacy, fish and wildlife toxicity) need to evaluate the submission. All of these considerations go into the initial assessment conducted by the regulatory scientist.

If an application for registration of a new product or an amendment to a currently registered product requires scientific evaluation, the submission is routed sequentially from one scientific evaluation station to the next. Pesticide Registration Branch's (PRB's) technical support staff facilitate the transfer of submissions from one station to another, and record the recommendations of evaluation scientists in the Registration Tracking System.

If no scientific evaluation is required, the appropriate documentation is prepared and the product is licensed (or amended label approved) for sale and use in California. Once the product license has been sent to the registrant, PRB staff prepare a product file that is stored on-site for reference. For purposes of this report, "time to final action" for regular submissions includes the entire time between receipt and final action on the submission, regardless of whether that action is to approve or deny the product or amendment.

DPR defines a new active ingredient as an active ingredient not found in any actively registered pesticide product in California. Submissions containing new active ingredients are handled differently in that these submissions are routed simultaneously to all appropriate evaluation stations. Routing new active ingredient submissions in this manner allows for a more timely scientific review. For purposes of this report, "time to posting" for new active ingredient submissions includes the time between receipt of the submission and DPR's listing of its registration decision regarding the product for public comment in DPR's Weekly Notices of Proposed Decisions. DPR's weekly Notices of Proposed and Final Decisions are posted on DPR's website and e-mailed to interested parties. The time includes the scientific evaluation process. The time period does not include the time between posting of DPR's decision on a pesticide product and final registration or denial of the product. A pesticide product cannot be registered in California until it receives federal registration. Therefore, a pesticide product containing a new active ingredient that is submitted concurrently to DPR and U.S. EPA cannot be registered in California until DPR receives proof of federal registration and a copy of the

U.S. EPA stamped accepted label, and DPR accepts the final printed label. U.S. EPA may not complete its evaluation of the new active ingredient submission for several months, and because this completion date is beyond DPR's control, DPR decided not to use the date of its final action on new active ingredient submissions in this report.

DPR based the information in this report, for all four years, on the status of data submissions in its electronic Tracking System as of June 2008. At the time the data were collected, DPR had not yet taken final actions on all submissions (both regular and new active ingredient) submitted in 2006 and 2007. The fact that the 2006 and 2007 data sets are incomplete means that the numbers provided in this report with regard to average processing times may increase once the data set is complete. However, in assessing changes in time frames for regular submission totals, due to the relatively small number of regular submissions still outstanding compared to the total number, DPR does not expect the overall average time frames for regular submission totals to change significantly.

PRB's electronic Registration Tracking System does not include information as to whether the submission/product is agricultural or non-agricultural. Due to the large number of submissions included in this report, it was not feasible, or in some cases even possible, for PRB to review the labels of each product included in the report to determine if the product was intended for agricultural or non agricultural use. However, DPR's stakeholders expressed an interest in whether AB 1011 resulted in differences in the number or time to process agricultural versus non-agricultural submissions. In order to answer the question, PRB regulatory scientists identified individual companies as having either predominantly agricultural or nonagricultural use products. As the primary contact between DPR and each registrant, regulatory scientists have the most knowledge regarding the various companies and their product lines. Regulatory scientists were asked identify which of their registrants had primarily agricultural products (see Appendix I). While several registrants had a mix of agricultural and non-agricultural products, most were fairly distinct, agricultural or not. Agricultural products are not only those pesticides used in production agriculture, but also right-of-ways, waterways, parks, golf courses, commercial nursery production (including ornamentals), dairies, greenhouses, and forests. Non-agricultural use includes home and garden products, industrial, institutional, structural and vector control use products, and products used in pools and spas, and on boats.

## **Results and Discussion**

### **Regular Submissions**

The number of regular submissions that DPR received between 2004 and 2007 ranged from a high of 4,867 submissions in 2004 to a low of 4,177 submissions in 2005 (Fig.1). There were no obvious trends in the number of regular packages submitted between 2004 and 2007. It is not unexpected that the number of packages submitted to DPR would vary from year to year as the decision to submit a product is primarily the result of individual company business decisions.

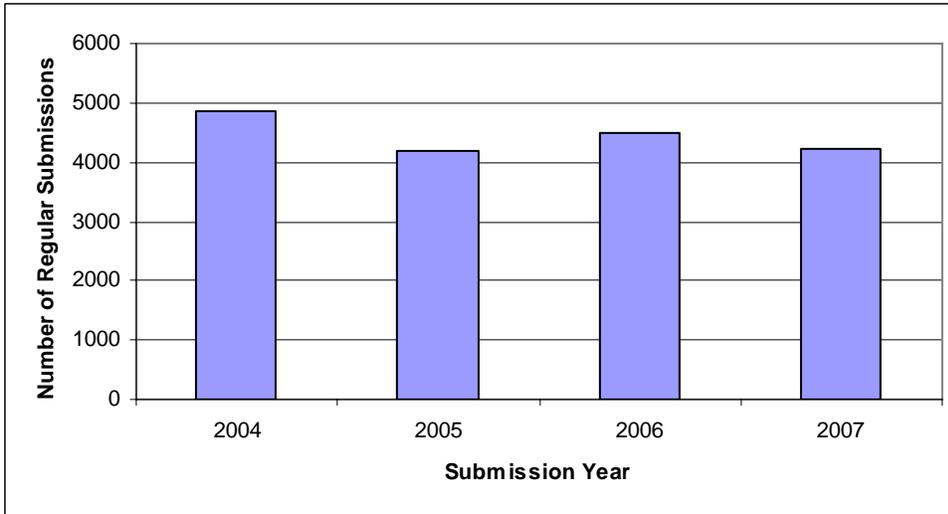


Fig. 1. Number of regular submissions received from 2004 and 2007.

Between 2004 and 2007, DPR’s overall average processing time from receipt to final action for regular submissions decreased by 24.3 days, from 91.3 days in 2004 to 67 days in 2007. This was an overall decrease of approximately 27 percent (Fig.2). Although the data indicate a drop in the overall processing time for all regular submissions after the implementation of AB 1011, the exact percentage of the drop will not be known until all submissions are finalized. At the time the data were collected (June 2008), DPR had not yet posted for final action 0.4 percent of 2006 regular submissions and 8.6 percent of 2007 regular submissions. Since the percentage of outstanding submissions is relatively small, DPR does not expect the overall decrease in processing times to change significantly. Over the four year time period included in this analysis, DPR initiated changes in the processing of submissions leading to increased efficiency. These changes included greater supervisory coordination to ensure more uniform application of registration policies and procedures, improvements in guidance documents for regulatory scientists, and additional staff training on registration procedures. The changes may be at least partly responsible for the overall decrease in processing time.

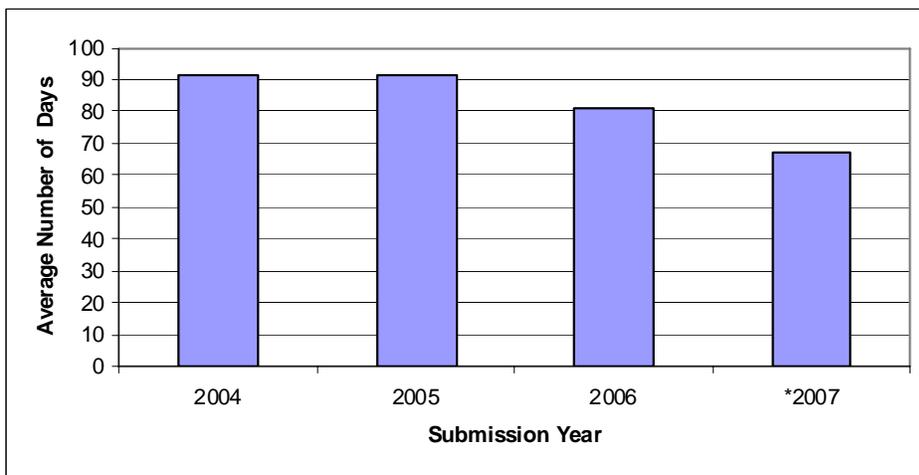


Fig. 2. Average number of days to final action for regular submissions received from 2004 to 2007. \* As of June 2008, 19 of 4484 submissions from 2006 and 365 of 4236 submissions from 2007 had not yet been posted for final action.

### New Active Ingredient Submissions

DPR experienced a marked increase in the number of new active ingredient submissions in 2006 relative to other years examined (Fig. 3). DPR received a high of 67 new active ingredient submissions in 2006 and a low of 42 submissions in 2005 and 2007. As is the case with regular registration submissions, the number of new active ingredients submitted to DPR is expected to vary from year to year as it is primarily the result of individual business decisions made by registrants. The marked increase in the number of submissions of products containing new active ingredients in 2006, as compared with the other years, appears to be due to FAC section 12836.5, which requires DPR to accept all applications for registration of pesticide products containing new active ingredients concurrently with the applicant's submission of an application to the U.S. EPA for federal registration. The surge of submissions in 2006 was the result of companies with submissions already undergoing federal review, taking advantage of the enactment of FAC section 12836.5 to submit those applications to DPR before federal registration. As might be expected, following this increase, the number of products containing new active ingredients submitted to DPR returned to normal levels.

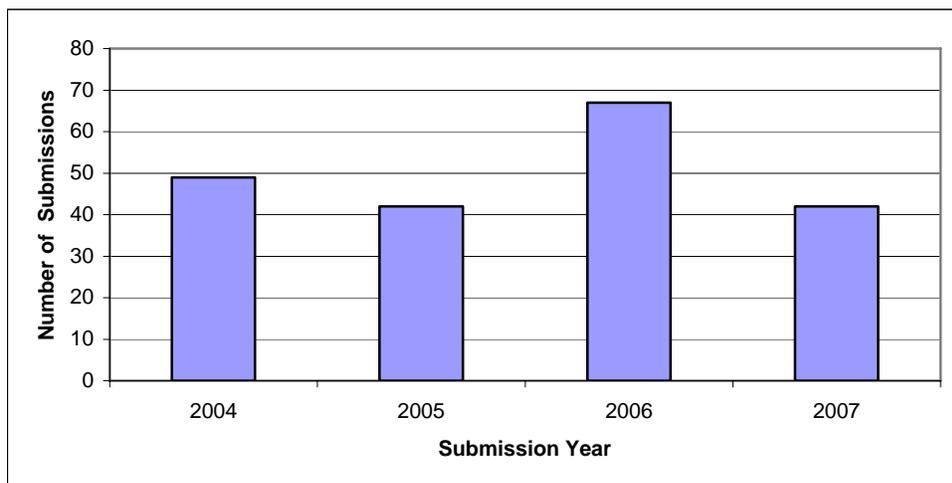


Fig. 3. Number of new active ingredient submissions from 2004 to 2007.

DPR is unable to provide average processing times for all submissions for all four years because the report data do not include a subset of new active ingredient submissions received in the years 2006 and 2007. As of June 2008, 3 out of 67 submissions (4.5 percent) received in 2006 and 13 out of 42 submissions (31 percent) received in 2007 had not yet been posted for public comment. Although the overall processing time for submissions with new active ingredients appears to be decreasing over time (Fig. 4), this appearance may be an artifact of the lag in the completion of packages.

In last year's AB 1011 report (dated August 2007); DPR stated that the processing time for submissions with new active ingredients was 271 days in 2005 and 157 days in 2006. These numbers did not account for incomplete submissions. We now know (with all submissions posted for 2005, and all but 3 submissions posted for 2006) that the processing time for products submitted in 2005 was 297 days, and for those in 2006, the processing time will be close to an average of 262 days, significantly higher than reported in the 2007 report. DPR will not be able

to ascertain trends in processing time for all four years until all new active ingredient submissions from 2006 and 2007 are posted for a registration decision. The factors which impact the processing times for products containing new active ingredients include the complexity and quantity of the data submitted, data quality and completeness, the results of the data, and the overall number of submissions to individual evaluation stations which can result in backlog. For example, it may take DPR much longer to evaluate a food-use fumigant containing a new active ingredient than it takes to evaluate a non-food use herbicide containing a new active ingredient.

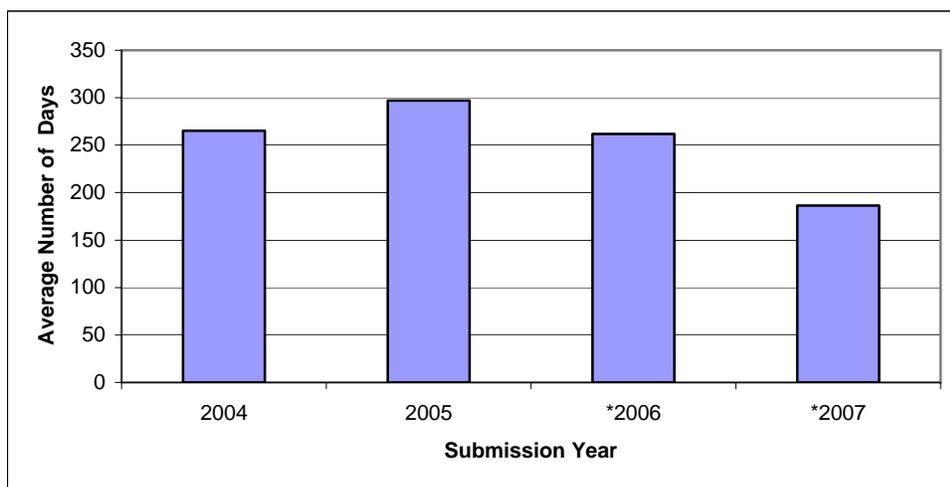


Fig. 4. Average number of days from receipt to first posting for new active ingredient submissions received from 2004 to 2007. \* As of June 2008, 3 submissions from 2006 and 13 submissions from 2007 had not yet been posted for public comment.

#### Regular Submissions Requiring Scientific Evaluation

The total number of regular submissions requiring scientific evaluation was higher in the years before the implementation of AB 1011 (Fig. 5). The percentage of regular submissions entering scientific evaluation declined from a high of 14.1 percent in 2005, just before implementation of AB 1011, to a low of 10.1 percent in 2006, the first year of AB 1011 implementation.

The average time that it took DPR to process regular submissions entering scientific evaluation in 2006 and 2007 appears to be decreasing when compared to time frames in 2005 (Fig. 6). The data indicate that the average number of days to process regular submissions from date of receipt to final action decreased approximately 20 percent, from a high of 215 days in 2005, to a low of 167 days in 2007. However, DPR will not have final results until all of the submissions from 2006 and 2007 are complete. At the time the data for this report were gathered, 3 percent of the packages (14 out of 453 packages) requiring additional scientific evaluation from 2006 and 39 percent of the packages (190 out of 484 packages) submitted in 2007 still required final action. Given the percentage of products submitted in 2007 for which final actions had not yet been taken as of June 2008, the decline in the average processing time for regular submission that entered evaluation is likely to end up being less than 20 percent.

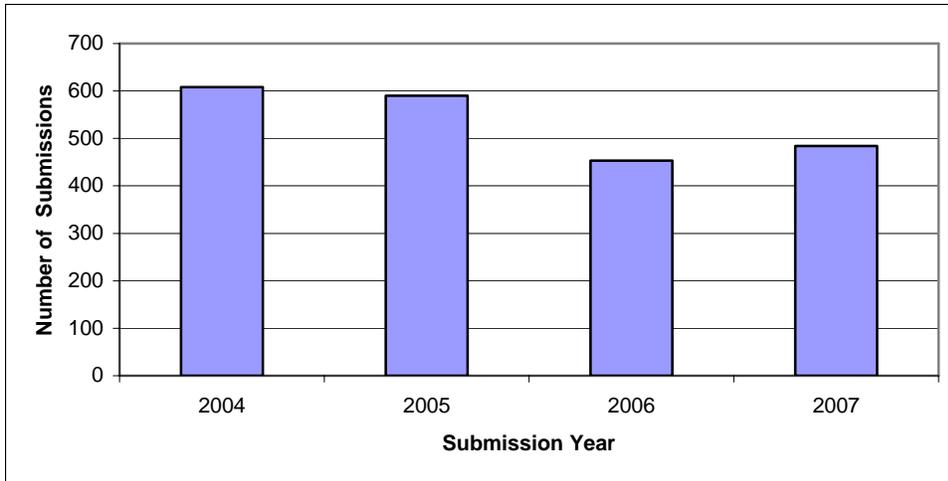


Fig. 5. The number of all submissions entering scientific evaluation between 2004 and 2007.

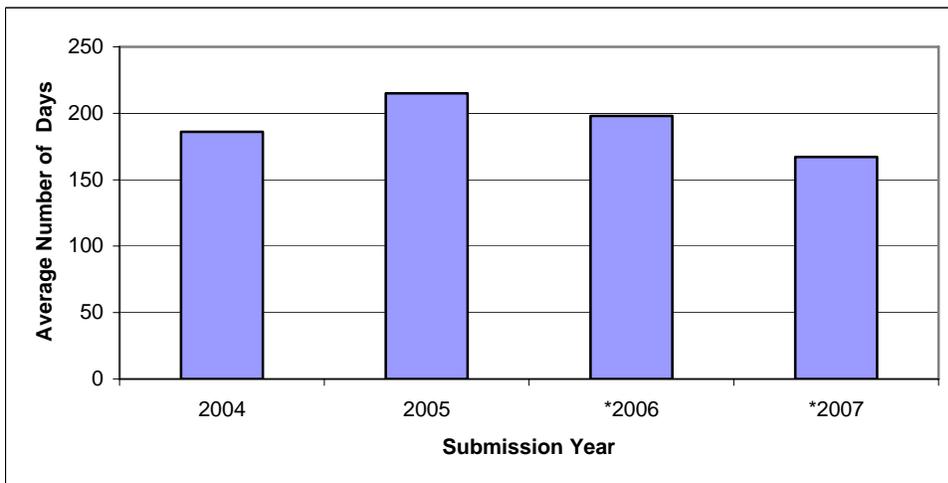


Fig. 6. Average number of days to final action for submissions entering scientific evaluation between 2004 and 2007. \* As of June 2008, final action had not yet been taken on 14 submissions from 2006 and 190 submissions from 2007.

DPR also divided regular submissions entering scientific evaluation into three different types to see if there were any differences related to AB 1011 implementation. DPR divided the submissions into new products (non-distributor registrations), distributor registrations, and label amendments. A distributor is a registrant that purchases a pesticide product from another registrant and then simply re-labels the product with the distributors name and sells the product in California without making any changes to the product’s formulation or fundamental changes to its label.

When divided by regulatory type, there was a consistent reduction between 2004 and 2007 in the number of submissions entering the scientific evaluation process for all types, with new products and label amendments showing the most reduction (Fig. 7). With regard to average processing times from receipt of the submission to final action, the timeframes for label amendments and distributor registrations remained fairly constant between 2004 to 2007 (i.e., no change as a

result of AB 1011). However, new regular product submissions entering scientific evaluation showed a consistent decrease in the number of days to final action between 2004 and 2007 (Fig. 8). It seems that the majority of AB 1011 time savings for products entering scientific evaluation came from new non-distributor products, rather than label amendments or distributor products. However, this result should be considered preliminary, as many of the submissions in 2007 that were not yet posted for final action were most likely new products. When final action is taken for these products, the overall average time for new products submitted in 2007 should rise.

These findings confirm many of DPR’s expectations. Previous to the enactment of AB 1011 most distributor registrants were able to obtain letters of authorizations. Therefore, AB 1011 has had very little impact on distributor registrations either in number or processing time. The biggest impact of AB 1011 on new products and label amendments has been a reduction in the number of new products and label amendments that require scientific evaluation. The reduction in processing time for new products is probably the result of packages being routed to fewer stations (Fig. 9). Since the majority of label amendments only go to one or two evaluation stations, one would not expect to see as much of a reduction in processing time for those that needed scientific evaluation.

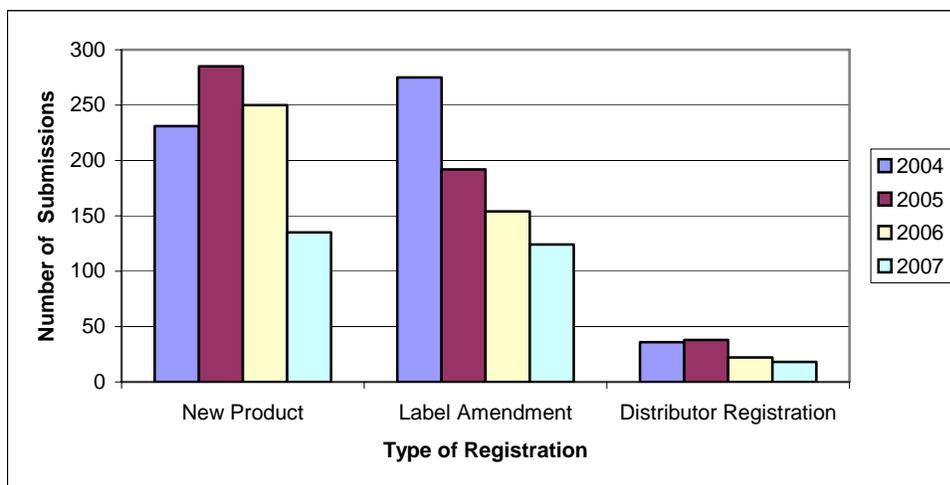


Fig. 7. The number of submissions entering scientific evaluation between 2004 and 2007 by registration type.

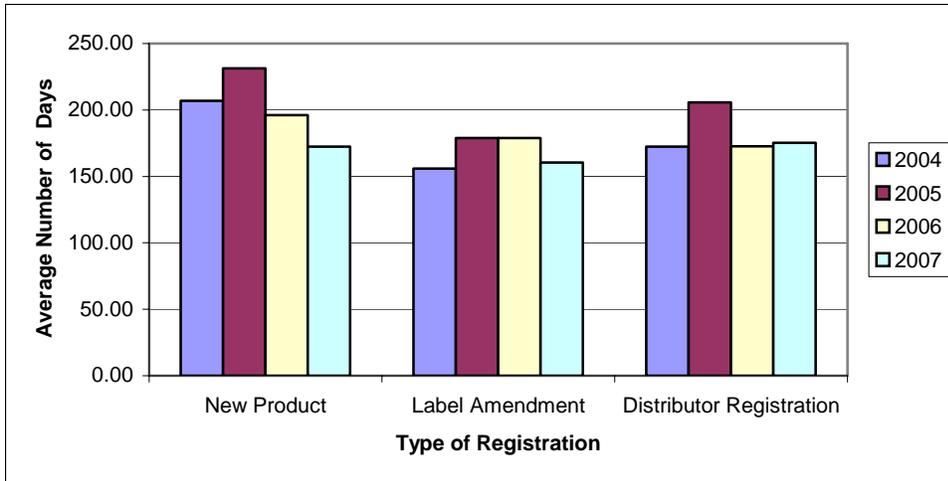


Fig. 8. Average number of days to final action for submissions entering scientific evaluation between 2004 and 2007 by registration type.

DPR looked at the data to see if there was a change in the average number of stations that submissions entered pre- and post AB 1011. We concluded that there was a decrease in the average number of scientific evaluation station submissions entered between 2004 and 2007 (Fig. 9), from a high of 2.31 stations in 2005 to a low of 1.93 stations in 2007. The number of times a package entered three or more evaluation stations declined from 2004 to 2007 (Fig. 10). By 2007, the number of packages entering only one station had increased to 52 percent from a low of 38 percent in 2005. The implementation of AB 1011 has resulted in packages being routed to fewer stations as data requirements are met by data already on file with DPR.

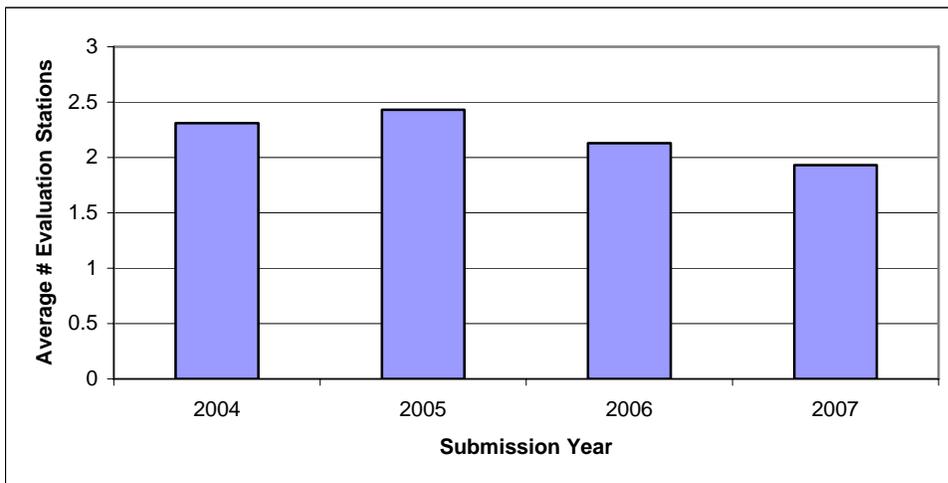


Fig. 9. The average number of evaluation stations entered for each product submitted between 2004 and 2007.

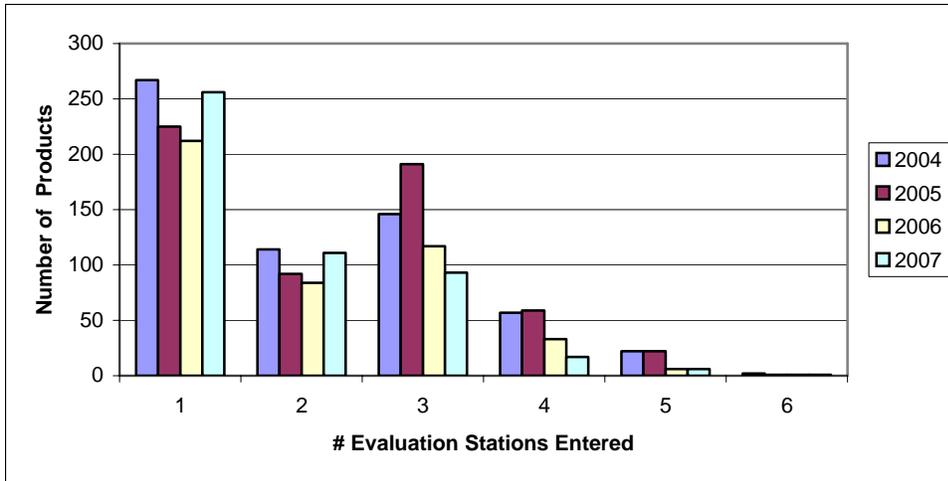


Fig. 10. The number of evaluation stations entered by each submitted product between 2004 and 2007.

Number of Submissions Routed to Individual Evaluation Stations

In addition to a decrease in the total number of submissions requiring any scientific evaluation, DPR considered whether there was a change in the total number of packages submitted to each individual scientific evaluation station between 2004 and 2007. After the implementation of AB 1011, the data show a general pattern of decrease in the number of submissions going into evaluation from 2004 to 2007 across most evaluation stations (Fig. 11).

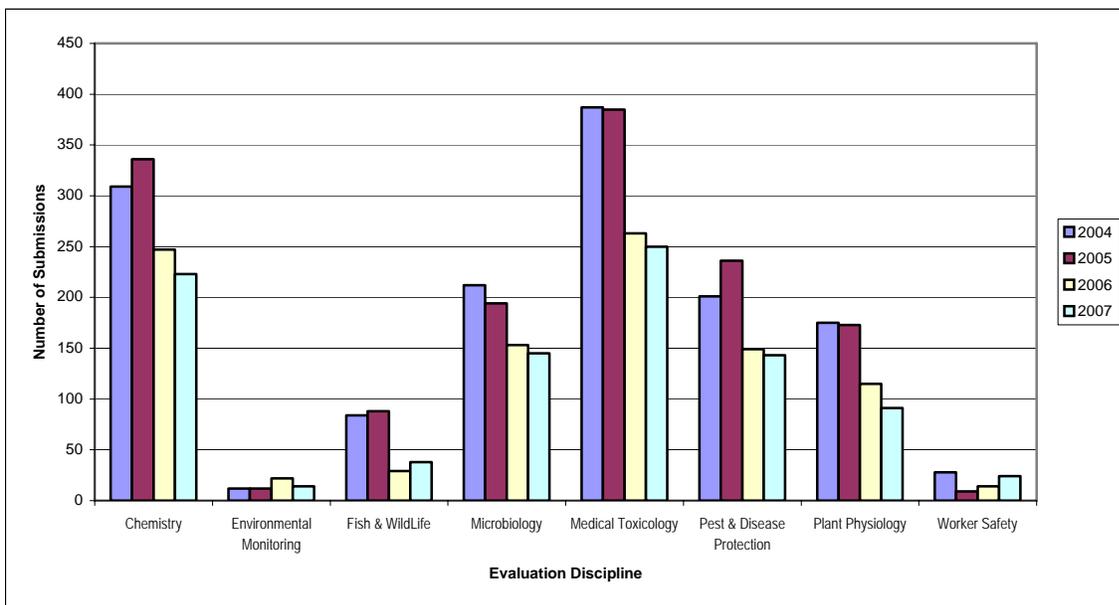


Fig. 11. Number of submissions routed to each evaluation station, by year of submission.

### Regular Submissions Not Requiring Scientific Evaluation

The number of regular submissions that did not require scientific evaluation fluctuated between 2004 and 2007 without showing any obvious overall pattern (Fig. 12). The data indicate that DPR's average processing time for such submissions from receipt to final action decreased approximately 26 percent, from a high of 76 days in 2004 to a low of 56 days in 2007 (Fig. 13). Because only a relatively small percentage of submissions, as compared to the total number of submissions in a year, require scientific evaluation, the processing time for submissions not entering scientific evaluation is similar to the processing time for all submissions. As mentioned earlier, from 2004 to 2007, DPR initiated changes in the processing of submissions leading to greater efficiency in the registration process. The changes included increased supervisory coordination to ensure more uniform application of registration policies and procedures, improvements in guidance documents, and additional staff training. These changes, in addition to the hiring and training of new regulatory staff, are all factors that may have impacted processing time.

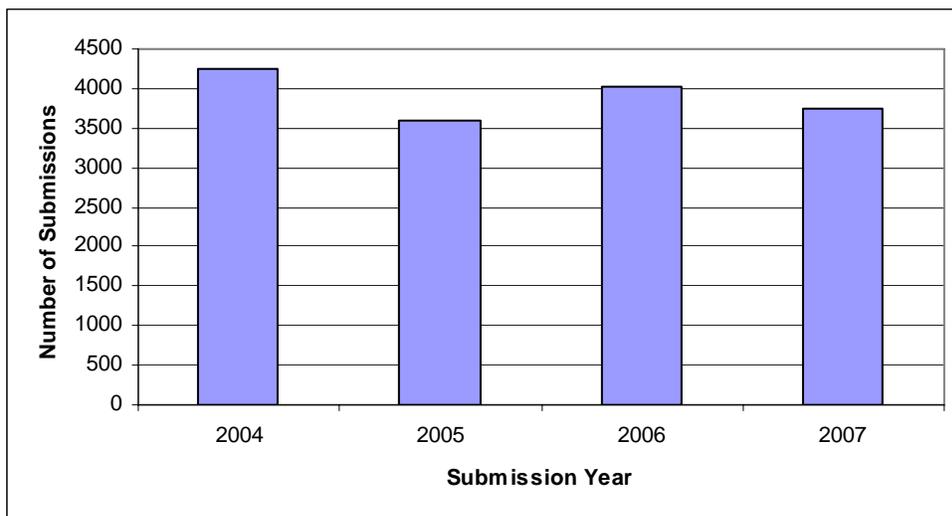


Fig. 12. The number of submissions not requiring scientific evaluation between 2004 and 2007.

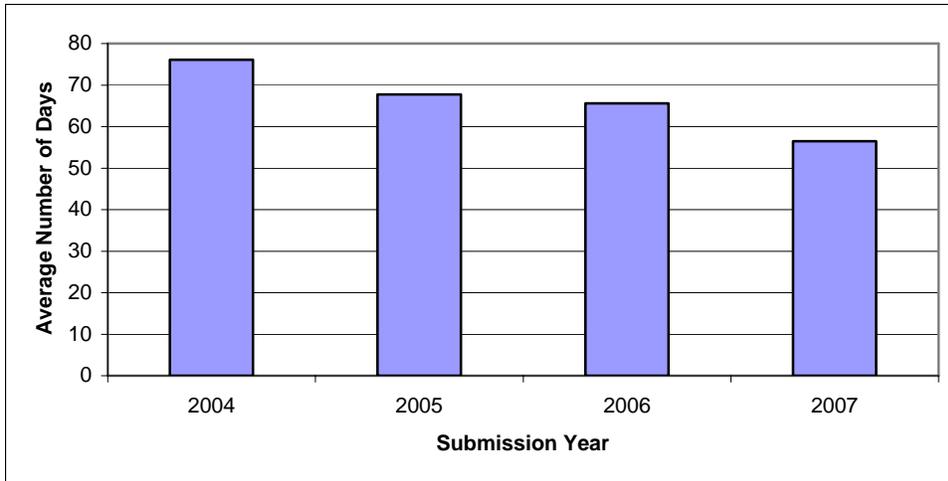


Fig. 13. Average number of days to final action for submissions not requiring scientific evaluation between 2004 and 2007. As of June 2008, 175 of 3752 submissions had not yet been finalized.

When divided up by submission type, there were no overall trends, over the four year study period, in the number of new product and distributor registrations received by DPR that did not go into scientific evaluation. However, the data indicate a slight decrease in the number of requests for label amendments received by DPR from 2004 to 2007 (Fig 14).

There appeared to be a consistent general decrease in the time it takes DPR to process submissions not requiring scientific evaluation across all product types including new products, label amendments, and distributor products (Fig.15). While there appeared to be a consistent drop in overall processing time from 2004 to 2007, at the cut off date for this report, final actions had not yet been taken for 4.7 percent of the 2007 regular submissions (175 out of 3752 products). Given the relatively small number of submissions that still require final action, DPR does not expect the average time to increase greatly.

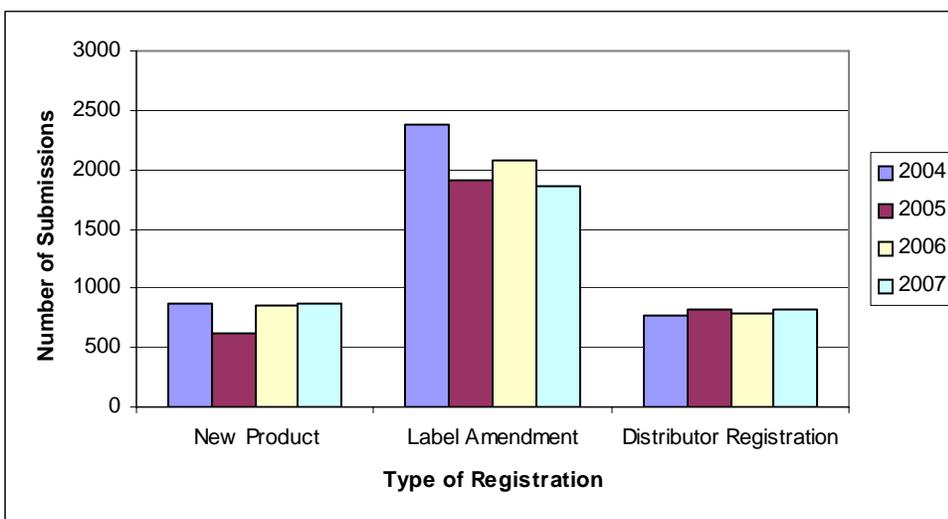


Fig. 14. The number of submissions not entering scientific evaluation between 2004 and 2007 by registration type.

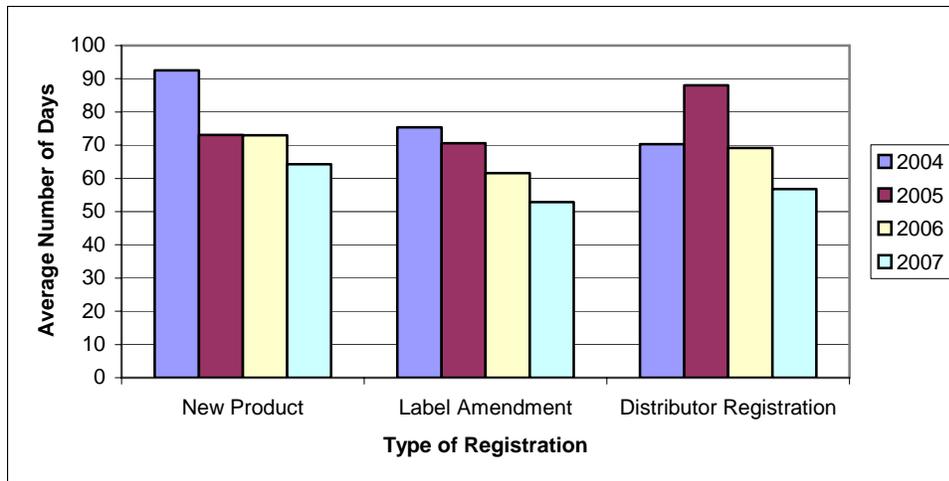


Fig. 15. Average number of days to final action for submissions not entering scientific evaluation between 2004 and 2007 by registration type.

### Regulatory Scientist Processing

DPR's regulatory scientists are responsible for processing all submissions received by DPR. Based on the data in DPR's electronic Tracking System, it appears that the average number of regular registration packages completed by each regulatory scientist in the years between 2004 and 2007 varied from a high of 234 packages per scientist in 2004 to a low of 189 packages per scientist in 2007 (Fig 16). These numbers do not represent all submissions handled by regulatory scientists as they do not include other types of submissions which must also be processed by them, including adverse effects submissions and other types of additional data submissions. The year to year variability in the number of packages processed by each regulatory scientist is due to fluctuations in the number of regulatory scientists working in PRB in a given year (vacancies and turnover rate), differences in experience among regulatory scientists (training time and skill level), and the complexity of individual submissions.

Our analysis indicated that the average time that it takes a regulatory scientist to conduct an initial assessment of each submission differed in the years before and after the implementation of AB 1011 (Fig. 17). In 2004 and 2005 it took regulatory scientists an average of 58.2 and 56.6 days to process each submission, respectively. In 2006 and 2007 average processing times for regulatory scientists decreased to 48.1 and 47.9 days to process each submission, respectively. The average time it took regulatory scientists to conduct an initial assessment of each submission declined by 16.3 percent in the years after the implementation of AB 1011. This decline in time was unexpected because AB 1011 created an increased workload for regulatory scientists. DPR had projected an increase in the average time it would take regulatory scientists to process submissions. As mentioned earlier, from 2004 to 2007, DPR initiated changes in the processing of submissions leading to greater efficiency in the registration process. These changes, in addition to the hiring and training of new regulatory staff, are factors that may have resulted in overall changes in processing time.

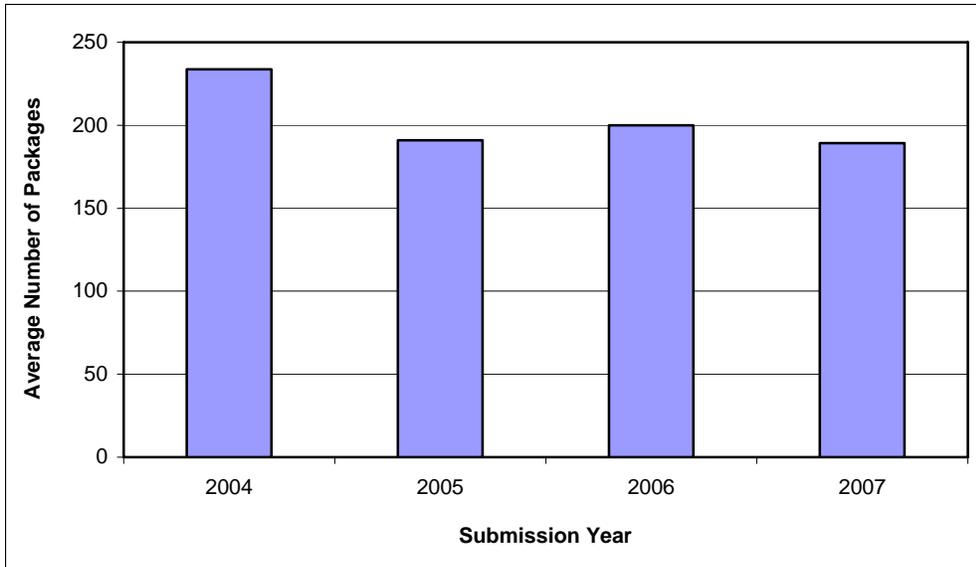


Fig. 16. Average number of packages completed by regulatory scientists between 2004 and 2007.

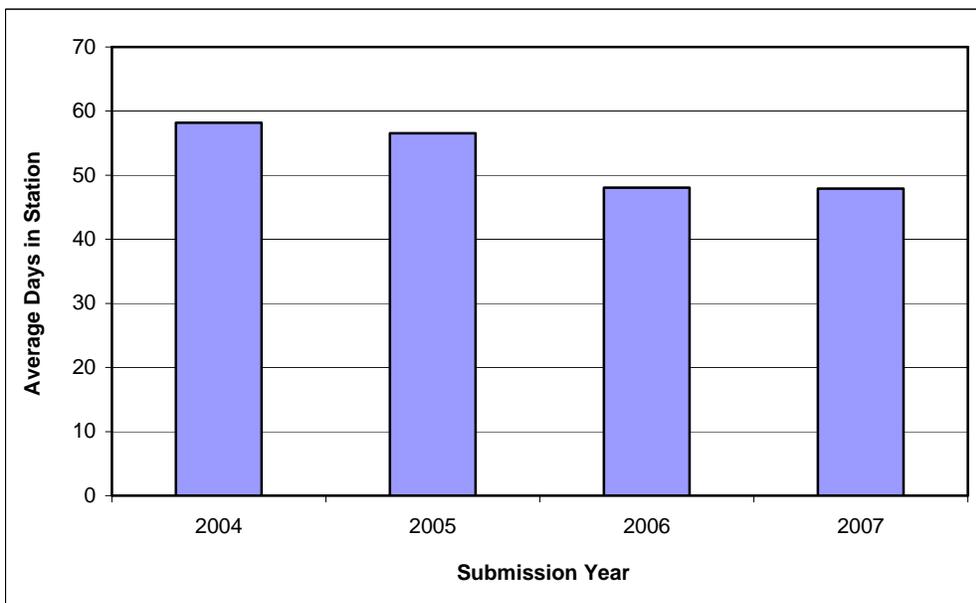


Fig. 17. Average number of days for regulatory scientists to complete the initial process of submission assessment per submission year between 2004 and 2007.

### Agricultural vs. Non-Agricultural Submissions

DPR also compared the number of regular submissions from primarily agricultural companies with the number submitted by primarily nonagricultural companies. The number of submissions from companies identified as having primarily agricultural products stayed relatively constant from 2004 to 2007 (Fig. 18). The number of products submitted by companies identified as primarily non-agricultural decreased 18.4 percent from a high of 3369 submissions in 2004 to a low of 2750 submissions in 2007. The proportion of non-agricultural products to total

submissions showed a consistent pattern of decline from a high of 69.2 percent to a low of 64.9 percent. Despite this decline, it should be noted that DPR receives nearly twice as many non-agricultural submissions as agricultural submissions.

While the average processing time for submissions from companies having primarily non-agricultural products was higher in 2004, from 2005 to 2007, the average time that it took DPR to process agricultural submissions was nearly identical to the time it took DPR to process non-agricultural submissions (Fig. 19). It is unclear why DPR's processing time was longer for non-agricultural products in 2004. General efficiency changes in DPR's registration business process may have created more consistency across product types.

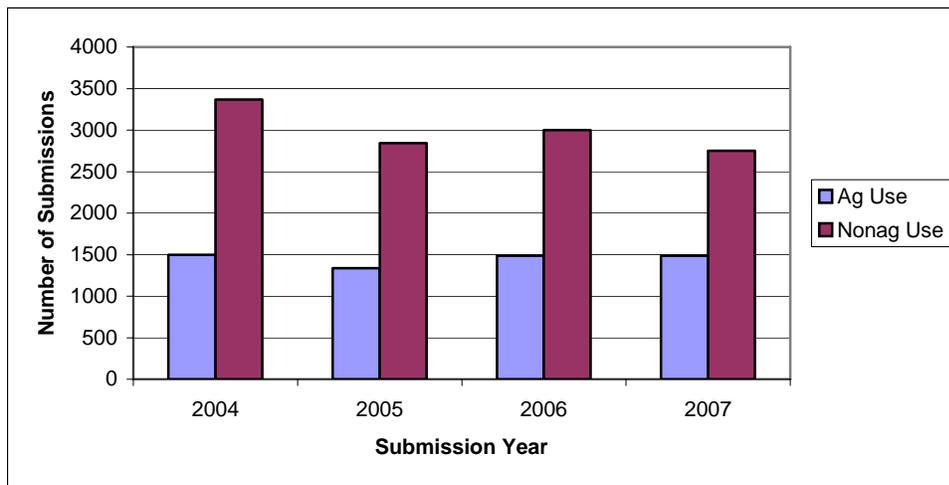


Fig. 18. The number of agricultural or non-agricultural product submissions received from 2004 to 2007.

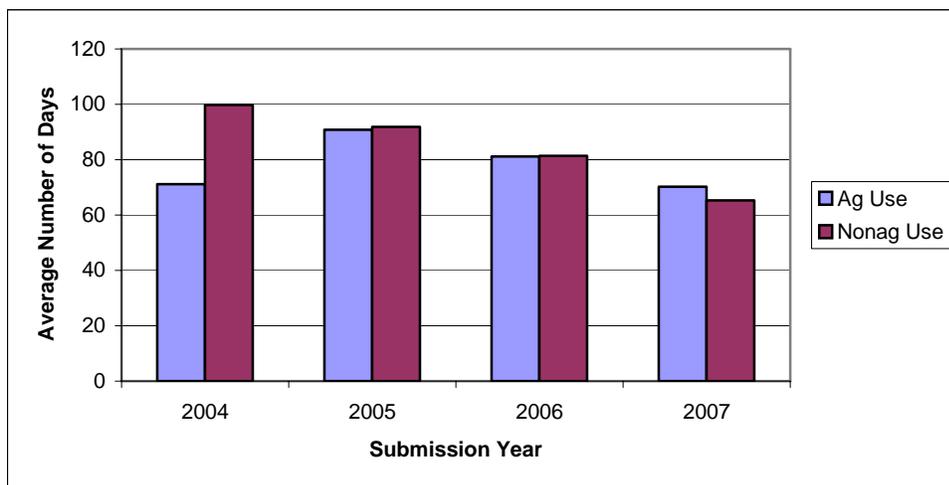


Fig.19. Average number of days to final action for regular agricultural or non-agricultural product submissions received from 2004 to 2007.

## Conclusions

The total number of regular (non-new active ingredient) pesticide submissions received by DPR between 2004 and 2007, as well as the subset of those submissions not requiring evaluation, varied over time and did not seem to display any general pattern. Thus, there was no change in the overall number of regular submissions received by DPR before and after the implementation of AB 1011. This is not surprising since the decision to submit a pesticide product for registration is based primarily on individual company business decisions. The timing and number of pesticide product submissions is driven by registrant needs, and will vary, in the aggregate, on collective business decisions made by these companies.

The number of pesticide product submissions containing new active ingredients appears stable in all years except 2006, the first year of AB 1011 implementation. The increase in submissions for 2006 appears to be due to the implementation of FAC section 12836.5, which required DPR to accept all applications for registration of pesticide products containing new active ingredients concurrently with the applicant's submission to the U.S. EPA for federal registration. The 2006 surge of submissions is the result of companies with submissions already undergoing federal review, taking advantage of the enactment of FAC section 12836.5 to submit all of those applications to DPR. In the past, a company had to wait until their pesticide product was registered with the U.S. EPA before they could apply for registration in California

Between 2004 and 2007, DPR experienced an overall 20.4 percent decrease in the number of submissions requiring scientific evaluation, and a consistent pattern of decrease in the total number of submissions into each evaluation station. Thus, following implementation of AB 1011, fewer submissions needed scientific evaluation and those that entered evaluation were routed to fewer stations. The percentage of total submissions entering evaluation declined from a high of 14.1 percent in 2005, the year before implementation of AB 1011, to a low of 10.1 percent in 2006.

Based on the data collected as of June 2008, there appears to be an overall decrease of approximately 27 percent in the average processing time for all regular submissions from 2004 to 2007 (from 91.3 days to 67 days) from receipt of submission to final action. For submissions entering scientific evaluation the average number of days to final action showed an average decline of approximately 20 percent, from a high of 215 days in 2005 (the year before implementation of AB 1011) to a low of 167 days in 2007. The average number of days to action for submissions not entering scientific evaluation (not going through a posting process) declined approximately 26 percent, from a high of 76 days in 2004 to a low of 56 days in 2007. Only after final action is taken on all 2007 submissions will DPR be able to make a final assessment regarding trends in processing time for all four years. Given the percentage of products submitted in 2007 for which final actions had not yet been taken as of June 2008, the decline in the average processing time for regular submissions that entered evaluation is likely to end up being less than 20 percent. However, the decline in overall processing time for all regular submissions, as well as for the subset that did not enter evaluation, is not likely to change as the percentage of incomplete submissions is relatively low. These reductions in average processing time may have resulted from greater supervisory coordination to ensure more uniform application of registration policies and procedures across regulatory staff, improvements in

guidance documents for regulatory scientists, additional staff training on registration procedures, and the hiring of new regulatory staff.

Due to the relatively long evaluation period needed for certain new active ingredient products, DPR is unable to provide an accurate average processing time for all 2006 and 2007 submissions containing new active ingredients. The data indicate that the overall average processing time for submissions with new active ingredients, from receipt of the submission to DPR's posting of the product, either proposed for registration or denial of registration, appears to be decreasing over time. However, DPR cannot complete a final trend assessment until all registration decisions for 2006 and 2007 submissions have been posted. The factors which impact the processing times for products containing new active ingredients include the complexity and quantity of the data submitted, data quality and completeness, the results of the data, and the overall number of submissions to individual evaluation stations which can result in backlog. For example, it may take DPR much longer to evaluate a food-use fumigant containing a new active ingredient than it takes to evaluate a non-food use herbicide containing a new active ingredient.

The average number of regular packages submitted to each regulatory scientist for processing between 2004 and 2007 varied from a high of 234 packages per scientist in 2004 to a low of 185 packages per scientist in 2007. The average time taken by regulatory scientists to conduct the initial assessment of each submission differed in the years before and after the implementation of AB 1011, declining an average of 16.3 percent. In 2004 the initial average processing time per package for a regulatory scientist was 58.2 days per submission. By 2007, the average initial processing time per package for regulatory scientists had decreased to an average of 47.9 days per package. Reductions in the average initial processing time for regulatory scientists has a direct effect on the overall time it takes to register a pesticide product, since every day saved out front reduces the time to final action by one day in the end.

The number of submissions from companies identified as having primarily agricultural products stayed relatively constant from 2004 to 2007. However, the number of products submitted by companies identified as primarily non-agricultural decreased 18.4 percent from a high of 3369 submissions in 2004 to a low of 2750 submissions in 2007. Despite this decline, DPR receives nearly twice the number of non-agricultural submissions as agricultural submissions. While the processing time for product submissions from companies having primarily non-agricultural products was higher in 2004, from 2005 to 2007 the average number of days to action for both agricultural and non-agricultural product submissions was nearly identical.

This report constitutes an analysis of changes in the registration process from 2004 to 2007. Ongoing statistical analyses of tracking system data will allow DPR to gain further insight into registration process changes resulting from the passage of this legislation. PRB expects to perform similar analyses including 2008 submissions beginning in January 2009.

## Appendix I. List of registrants identified as having predominantly agricultural use products.

3M COMPANY  
 ACETOAGRICULTURALCHEMS.CORP.  
 ACTAGRO LLC  
 ADJUVANTS UNLIMITED, INC.  
 ADVAN LLC  
 ADVANCED FOLIAR NUTRIENTS SYSTEMS  
 AG FORMULATORS, INC.  
 AGANICHEMICAL MFG. LTD.  
 AGBOCHEM INC.  
 AGRACREST, INC.  
 AGRICULTURAL INSTALLATIONS INC.  
 AGRIFARSA  
 AGRIMR LLC  
 AGROFRESH, INC. A WHOLLY OWNED SUBSIDIARY OF  
 AGRIOLOGISTICS SYSTEMS, INC.  
 AGROVALLEY ENTERPRISES, INC.  
 AGROSOLUTIONS LLC  
 AGROSOURCE, INC.  
 AGSAVER LLC  
 ALBAUGH, INC.  
 ALLIGARE, LLC  
 AMERBROM, INC.  
 AMERICAN EXTRACTS  
 AMERICAN PENEIR LLC  
 AMVAC CHEMICAL CORPORATION  
 ANFOMANUFACTURING CO.  
 AQUASHADE  
 AQUATROLS CORPORATION OF AMERICA  
 ARIZONA CHEMICAL GROUP, INC.  
 ARIZONA COTTON RESEARCH AND PROTECTION COUNCIL  
 ARYSTALIFE SCIENCE NORTH AMERICA CORP.  
 ATLANTIC PACIFIC TRADING CO., LLC  
 AUSTIN GRANT, INC. DBA UETH HARVEST SOLUTIONS  
 AVA CHEMICAL VENTURES, LLC  
 AZOHEM TROSTBERG GMBH  
 BASF CORPORATION  
 BASF CORPORATION  
 BAYER CROPS SCIENCE LP  
 BAYER ENVIRONMENTAL SCIENCE  
 BECKER MICROBIAL PRODS, INC.  
 BECKER UNDERWOOD, INC.  
 BEDOUKIAN RESEARCH, INC.  
 BIOWORKS, INC.  
 BIO CARE TECHNOLOGY PTY, LTD  
 BIOGRO, INC.  
 BIO REPARATY CO., LTD.  
 BIODX, INC.  
 BREWER INTERNATIONAL, INC.  
 BRITZ FERTILIZERS INCORPORATED  
 BROMINE COMPOUNDS LTD  
 BROOKER CHEMICAL  
 CALHIDRA DESONORA, SA DE CV.  
 CALIFORNIA DEPT. OF FOOD & AG.  
 CALIFORNIA ORGANIC FERTILIZERS, INC.  
 CALIFORNIA WATER SERVICES  
 CALTEC AGRIMARKETING SERVICES  
 CANEXUS, INC.  
 CEREX AGRINSSO LLC  
 CERTISUS LLC  
 CHEMION LTD.  
 CHEMICAL PRODUCTS TECHNOLOGIES  
 CHEMINOVA AS  
 CHEMINOVA INC.  
 CHEMSTARR LLC  
 CHEMTECH LTD  
 CHEMITREAT, INC.  
 CLARK MOSQUITO CONTROL  
 CLEARY CHEMICAL CORP.  
 COGNIS CORPORATION  
 COMPTON VAG SERVICES, LLC  
 CONFIRM MONITORING SYSTEMS, INC.  
 CONKUN COMPANY, INC.  
 CONTINENTAL SULFUR COMPANY, LLC  
 CONTROL SOLUTIONS, INC.  
 COULSTON PRODUCTS INCORPORATED  
 CREATIVE MARKETING & RESEARCH, INC.  
 CREATIVE MKTG & RESEARCH, INC.  
 CROMPTON MANUFACTURING CO., INC.\*  
 CUPROQUIM CORP. SUB OF HELENACHEMCO.\*  
 CUSTOM AGRICULTURAL FORMULATORS  
 CUSTOM CHEMIDES  
 CUTTING EDGE FORMULATIONS, INC.  
 DAIRY SOLUTIONS, INC.  
 DEANGELO BROTHERS, INC.  
 DECO CEREX AGR INC.  
 DEGLUSSA CORPORATION  
 DELAVAL, INC.  
 DESANGOSSEUK  
 DINTEC AGRICHEMICALS  
 DIPNGROW, INC.  
 DOW AGR SCIENCES LLC  
 DOW CHEMICAL COMPANY, THE  
 DREXEL CHEMICAL COMPANY  
 DUNHILL CHEMICAL COMPANY  
 E.C. GEGER, INC.  
 ELDU PONT DENEMOURS & CO., INC.  
 EID PARRY INDIA LTD. (CO PARRY AMERICA INC)  
 EARTH SCIENCE LABORATORIES INC  
 EBOX LTD.  
 EDEN BIOSCIENCE CORPORATION  
 EDM INDUSTRIES INCORPORATION  
 EDM TECH NOLGIES, INC.  
 ELANCO ANIMAL HEALTH  
 EMBALAJES PROEM LTDA  
 EMERALD BIO AGRICULTURE CORPORATION  
 EMERALD FOAM CONTROL, LLC  
 ENDURA SPA  
 ENGELHARD CORPORATION  
 ENTEK CORPORATION  
 ENVIRONMENTAL INSECT  
 ERCO WORLDWIDE  
 ETIGRA  
 ETIGRALLC  
 EXACTO, INC.  
 EXO SECT LTD  
 EZJECT, INC.  
 FABRICA DE SULFATO EL AGUILAS A DE CV.  
 FARMSAVERCO, LLC  
 FGSPACKING SERVICES  
 FBERM B, INC.  
 FINE AGRICHEMICALS LTD.  
 FINE AMERICAS, INC.  
 FLOKEM, INC.  
 FLORIDA SILVICS, INC. DBA TREE TECH  
 FMC CORP. ACTIVE OXIDANTS DIV.  
 FMC CORPORATION  
 FMC CORPORATION  
 FMC CORPORATION, CITRUS SYSTEMS DIVISION\*  
 FORT DODGE CHEMICAL COMPANY  
 FROST TECHNOLOGY CORPORATION  
 FRUIT GROWERS SUPPLY  
 GBBIOSCIENCES CORPORATION  
 GEORGIA GULF SULFUR  
 CHARDACH CHEMICALS LIMITED  
 GOLD COAST CHEMICAL PRODUCTS  
 GOLDEN WEST CHEMICAL DIST. INC.  
 GOLDSCHMIDT CHEMICAL CORP.  
 GOWAN COMPANY  
 GRAPETEK (PTY) LTD. ATTN: CAROLINE ADAMS  
 GREAT LAKES CHEMICAL CORP.  
 GREEN LEAF CHEMICAL LLC  
 GRIFFIN CORPORATION\*  
 GROTEC, INC.  
 H&I AGRITECH, INC.  
 HACC, INC.  
 HACC, INC.  
 HARVEST TEC  
 HBB PARTNERSHIP  
 HDH AGRIPRODUCTS, LLC  
 HELENACHEMICAL COMPANY  
 HELMAGROUS, INC.  
 HERCON ENVIRONMENTAL  
 HESS & CLARK, INC.  
 HONDO CHEMICAL, INC.  
 HUBBARD FEEDS, INC.  
 IOPRODUCTS, LLC  
 IVALTDA  
 IMPACT PRODUCTS LLC  
 INDEPENDENT AGR BUSINESS PROFESSIONALS  
 INNOLYTICS, LLC  
 INNOFOS, INC.  
 INNOVATIVE PEST PRODUCTS  
 INSECTA MARKETING, INC.  
 INSUMOS FRUIT CO. ASSOCIADON CIVIL FRUTASA  
 INTEGRO, INC.  
 IRVIA PLANT PROTECTION NV  
 ISAGRO SPA  
 ISK BIOSCIENCES CORPORATION  
 ISPMINERALS, INC.  
 JRS SIMPLOT COMPANY  
 J.J. MAUGET CO.  
 JANSSEN PHARMACEUTICA  
 JHBIO TECH, INC.  
 JMS FLOWER FARMS, INC.  
 K&W AGRICHEMICALS, INC.  
 KAVAC, INC.  
 KALO, INC.  
 KEVIN INDUSTRIES, INC.  
 KICHEMICAL USA, INC.  
 KIKO CUSTOM PRODUCTS, INC.  
 KING BERN, UH, INC.  
 KNAPP MANUFACTURING  
 KNOX FERTILIZER COMPANY, INC.  
 KOCH MEMBRANE SYSTEMS, INC.  
 LAND LAKES PURINA FEED LLC  
 LESCO, INC.  
 LG INTERNATIONAL (AMERICA), INC.  
 LG LIFE SCIENCES LTD.  
 LIBERTAS NOW, INC.  
 LDCO CHEM INC.  
 LIQUID FERTILIZER PTY, LTD. (TRADING AS AGRICHEM)  
 LIQUINOX COMPANY  
 LOVELAND INDUSTRIES, INC.  
 LOVELAND PRODUCTS, INC.  
 LUXEMBOURG PAVOL, INC.  
 M&R DURAN CO, INC.  
 MAKHESHIM CHEMICAL WORKS LTD.  
 MAKHESHIM AGAN OF NORTH AMERICA, INC.  
 MANNILAKET, LTD.  
 MANNA PRO CORPORATION  
 MANNA PRO PRODUCTS LLC  
 MARTIN OPERATING PARTNERSHIP LP.  
 MATERIA, INC.  
 MATERIALES DE EMBALAJES (MATESA)  
 MCLAUGHLIN GORMLEY KING COMPANY  
 MERA LIMITED  
 METRO BIOLOGICAL LABORATORY  
 MEYER CORPORATION  
 MICRO FLO COMPANY LLC  
 MICROGEN, INC.  
 MIDCAL FARMS, INC.  
 MILLER CHEM. & FERTILIZER CORP.  
 MITSUBISHI CHEMICALS, INC.  
 MODEC, INC.  
 MOINC.  
 MONSANTO CO./  
 MONTEREY AGR RESOURCES  
 MOORE AGRICULTURAL PRODS. CO., INC.  
 MORSE ENTERPRISES, LTD., INC.  
 MOTOCO, LTD.  
 MPACT ENVIRONMENTAL SOLUTIONS, LLC  
 NATIONAL CHELATING CORPORATION  
 NATIONS AG, LLC  
 NATURAL CHEMISTRY, INC.  
 NATURAL INDUSTRIES, INC.  
 NETAFIM USA  
 NICHINO AMERICA, INC.  
 NIKLOR CHEMICAL CO INC  
 NIPPON SODA COMPANY, LTD.  
 NISSO MILLC.  
 NODAPARY PRODUCTS USA, INC.  
 NICHOME PRODUCT DEVELOPMENT LTD.  
 NORDOX INDUSTRIES AS  
 NORSCHEMICAL CORPORATION  
 NORTHWEST AGRICULTURAL PRODUCTS  
 NOVOZYMES BIOLOGICALS, INC.  
 NUFARM AMERICA, INC.  
 NUFARM LIMITED  
 NUFARM, INC.  
 NUTRABEND LLC

## Appendix I. List of registrants identified as having predominantly agricultural use products.

NUTRAG LTD.  
 OCULUS INNOVATIVE SCIENCES INC.  
 O-P INC.  
 OLDBRIDGE CHEMICALS INC.  
 OLIVER CHEM COMPANY INC.  
 OMEGA INDUSTRIAL SUPPLY INC.  
 ORANGE GUARD INC.  
 ORCAL INC.  
 ORGANIC LABORATORIES INC.  
 ORGANIC BIOTECH INC.  
 ORO AGRIC INC.  
 OSVOSE INC.  
 OTSUKA CHEMICAL CO. LTD.  
 OXONIT ALU SPA  
 PBT INC.  
 PACE INTERNATIONAL LLC  
 PACIFIC BIO CONTROL CORPORATION  
 PACIFIC COAST DISTRIBUTING INC.  
 PACKERS CHEMICAL INC.  
 PBIGORDON CORPORATION  
 PERVA CHINK SYSTEMS INC.  
 PETRO CANADA  
 PHELPS DODGE REFINING CORP.  
 PHIBRO TECH INC.  
 PHOENIX ENVIRONMENTAL CARE LLC  
 PHYTON CORPORATION  
 PINNIP INC.  
 PLANT HEALTH CARE INCORPORATED  
 PLANT HEALTH TECHNOLOGIES  
 PLANT PROTECTANTS LLC  
 POKON & CHRYSAL BV.  
 POC CORPORATION  
 PRAXAIR INC.  
 PRECISION GENERATORS LLC  
 PREMIER HORTICULTURE  
 PRENTISS INCORPORATED  
 PRESERV/BALANCE INC.  
 PRODUCTOS QUIMICOS Y ALIMENTOS OSK USA  
 PROKOZ INC.  
 PROMICHEM LTD.  
 PROTECH LIVESTOCK CORP.  
 PUNYA INNOVATION APS  
 PURSELL TECHNOLOGIES INC.  
 PYRANHA INC.  
 PYTECH CHEMICALS GMBH  
 QUIVASSA  
 QUIMETAL INDUSTRIAL SA  
 RT VANDERBILT CO INC.  
 RAGAN AND VASSEY INC.  
 RAPID GROW INDUSTRIES  
 RCO INTERNATIONAL INC.  
 REPAIR CORPORATION  
 RICE COLLIC  
 RICHARDSON CHEMICAL PRODS CO.  
 RITTER CHEMICAL LLC  
 RIVERDALE CHEMICAL COMPANY  
 RIVA CORPORATION  
 ROTAM NORTH AMERICA INC.  
 ROTAM USA INC.  
 SRF LLC  
 SCENTRY BIOLOGICALS INC.  
 SOMETRICS LTD CORP.  
 SCOTT'S SIERRA CROP PROT. CO.  
 SEPRO CORPORATION  
 SETRE CHEMICAL CO. SUBSIDIARY OF  
 SEYMERS SCIENCES INC.  
 SEYHELLE ENVIRONMENTAL TECHNOLOGIES INC.  
 SHADOW MOUNTAIN PRODUCTS CORP.  
 SHARDA USA LLC  
 SIERRA INDUSTRIES INC.  
 SPCAMAGRO USA INC.  
 SNOWDEN ENTERPRISES INC.  
 SOL CHEMICALS CORPORATION  
 SOLSERV INC.  
 SOUTHERN AGRICULTURAL INSECTICIDES  
 SOUTH WEST CHEMICAL COMPANY  
 SPECKOZ INC.  
 SPRAY TECH INC.  
 SSS CORPORATION  
 STANDARD LIME PRODUCTS CO. INC.  
 STOLLER ENTERPRISES INC.  
 STRATECHEM  
 SULPHUR MILLS LIMITED  
 SUMITOMO CHEMICAL COMPANY LTD.  
 SUNGRO PRODUCTS LLC  
 SUNOCO INC. (R&M)  
 SUTERRA LLC  
 SUTERRA LLC  
 SYNGENTA CROP PROTECTION INC.  
 TAKASAGO INTERNATIONAL CORPORATION (USA)  
 TAINCO INC.  
 TENKOZ INC.  
 TESSENDERLO KERLEY INC.  
 THE HIDE GROUP INC.  
 TOAGOSEI CO. LTD. COAGRMET INC. DIV. OF ARYSTA  
 TRECE INC.  
 TRICORPORATION  
 TRICAL INC.  
 TRINITY MANUFACTURING INC.  
 TROY BIOSCIENCES INC.  
 TURF CARE SUPPLY CORP.  
 USAG ASSOCIATES INC.  
 US DEPARTMENT OF AGRICULTURE  
 UNITED PHOSPHORUS INC.  
 UNIVERSAL CROP PROTECTANT ALLIANCE LLC  
 VALENT BIOSCIENCES CORPORATION (ESD)  
 VALENT USA CORPORATION  
 VEGETATION MANAGEMENT LLC  
 VERDERA OY  
 VICTORIAN CHEMICAL CO. PTY LTD  
 VITA (EUROPE) LIMITED  
 WATERBURY COMPANIES INC.  
 WEBB WRIGHT CORPORATION  
 WESTAGRO INC.  
 WEST BRIDGE AGRICULTURAL PRODUCTS  
 WESTERN FARM SERVICE INC.  
 WESTERN FARM SERVICE INC.  
 WESTERN LIME INC.  
 WESTFALIA SURGE INC.  
 WESTLINK AG  
 WILBURELLS COMPANY  
 WILCO DISTRIBUTORS  
 WINFELD SOLUTIONS LLC  
 WINFELD SOLUTIONS LLC  
 WINFELD SOLUTIONS LLC  
 YARA PHOSYN LTD.  
 ZHEJIANG TIDE CROP SCIENCE CO. LTD

## Appendix II. List of registrants identified as having predominantly nonagricultural use products.

2XL CORPORATION  
3M  
3M COMPANY  
3V INC.  
8 IN 1 PET PRODUCTS INC  
ABBOTT LABORATORIES DIAGNOSTICS DIVISION  
ABBOTT LABORATORIES, DIAGNOSTICS DIVISION  
ABCANA CHEMICAL CO  
ABERCO INC  
ACCESS BUSINESS GROUP INTERNATIONAL LLC  
ACME DIV. PBI-GORDON CORP.\*  
ADCHEM (AUSTRALIA) PTY LTD  
ADIOS PRODUCTS  
ADM ALLIANCE NUTRITION, INC.  
ADVANCED CHEMICAL POOL SOLUTIONS, INC.  
ADVANTIS TECHNOLOGIES, INC.  
AEGIS ENVIRONMENTAL MGT., INC.  
AERIS TECHNOLOGIES, LTD.  
AEROXON, INC.  
AERUS LLC  
AERVOE INDUSTRIES INC.  
AFFLAB, AFFILIATED LABORATORIES  
AGRISEL USA, INC.  
AIR GUARD CONTROL CORPORATION  
AIREX LABORATORIES  
AIRGAS SPECIALTY GASES, INC.  
AIRKEM PROFESSIONAL PRODUCTS  
ALBEMARLE CORPORATION  
ALBERTSON'S, INC.  
ALBERTSONS, INC.  
ALCO CHEMICAL  
ALDEN-LEEDS INC.  
ALISTAGEN CORPORATION  
ALLCHEM PERFORMANCE PRODUCTS, LP  
ALLERGOPHARMA JOACHIM GANZER KG  
ALLERGY TECHNOLOGIES, LLC  
ALLIANCE TRADING INC.  
ALPHA CHEMICAL SERVICES INC.  
ALPHA TECH PET, INC.  
ALPHA WATER SYSTEMS INC.  
ALPHARMA INC.  
ALTAWOOD, INC.  
AMBER CHEMICAL INC.  
AMBRANDS  
AMCOR MFG, INC.  
AMERICAN BIOPHYSICS CORPORATION\*  
AMERICAN CHEMET CORPORATION  
AMERICAN HERITAGE GROUP, INC.  
AMERICAN INDUSTRIAL SUPPLY INC  
AMERICAN MOLDGUARD  
AMERICAN SUPPLY COMPANY  
AMERICAN TAR CO  
AMERIFOODS TRADING COMPANY  
AMERIKLEEN CORPORATION  
AMERISOURCEBERGEN  
AMERON PROTECT. COATINGS DIV\*  
AMREP, INC.  
AMTECO, INC.  
ANABEC, INC.  
ANDERSEN STERILIZERS INC.  
ANDERSON CHEMICAL COMPANY  
ANDIS COMPANY  
ANIMAL DERMATOLOGY LABS.  
AP&G CO., INC.  
APOLLO TECHNOLOGIES, INC.  
APPLIED BIOCHEMISTS  
AQUA CLEAR INDUSTRIES, INC.  
AQUA PROCESS INC.  
AQUA SYSTEMS, INC.  
AQUA TRI  
AQUAMIRA TECHNOLOGIES, INC.  
AQUARIUM PHARMACEUTICALS INC  
AQUARIUM PRODUCTS, INC.  
AQUASCAPE DESIGNS, INC.  
ARAGONESAS DELSA S.A.  
ARBORJET, INC.  
ARBORSYSTEMS  
ARC SPECIALTY PRODUCTS,  
ARCH CHEMICALS, INC.  
ARCH CHEMICALS, INC.  
ARCH TREATMENT TECHNOLOGIES, INC.  
ARCH WOOD PROTECTION, INC.  
ARCHER MANUFACTURING  
ARI  
ARJO, INC.  
ARMATRON INTERNATIONAL, INC.  
ARROW CHEMICAL COMPANY  
ARTESIAN SPAS  
ASEPSIS, INC.  
ASSOCIATED LEISURE PRODUCTS INC  
ASSOCIATED REGISTRATIONS  
ATLANTIC MILLS, INC.  
ATLAS CHEMICAL CORP  
AUGUST SUPPLY INC.  
AUSTIN CHEMICAL COMPANY  
AUTO-CHLOR SYSTEM  
AVISTA TECHNOLOGIES  
AVITROL CORPORATION  
AVON PRODUCTS, INC.  
B & L NEELEY, INC.  
B&B CHLORINATION  
B2E BIOTECH LLC  
BACKSCRATCHERS NAIL CARE  
BAKER PETROLITE CORPORATION  
BALK FAMILY TRUST  
BASF CORPORATION  
BASIC CHEMICAL SOLUTIONS, LLC  
BASIC CHEMICALS COMPANY, LLC  
BAYER ADVANCED, LLC\*  
BAYER HEALTH CARE LLC  
BAYER HEALTHCARE LLC  
BBJ ENVIRONMENTAL SOLUTIONS, INC.  
BEACHCOMBER HOT TUBS PLUS, INC.  
BEAUMONT PRODUCTS, INC.  
BEAUTY SYSTEM GROUP INC.  
BECKER UNDERWOOD, INC.  
BECKER UNDERWOOD, INC.  
BECKER-UNDERWOOD INC.  
BECKETT CORP.  
BEHR PROCESS CORPORATION  
BELL LABORATORIES, INC.  
BENCO DENTAL  
BENGAL PRODUCTS INC.  
BERNARD I. SEGAL  
BERNARDO CHEMICALS, INC.  
BEST SANITIZERS, INC.  
BETCO CORPORATION  
BFR PRODUCTS  
BIG D INDUSTRIES, INC.  
BIKEL COMPANY, LTD  
BIO-CIDE INTERNATIONAL, INC.  
BIO-DERM LABORATORIES, INC.  
BIO-DEX LABORATORIES  
BIO-LAB INC.  
BIOMIST, INC.  
BIO-PLANET PRODUCTS LLC  
BIOSAFE SYSTEMS LLC  
BIOSENSORY, INC.  
BIOSENTRY LABORATORIES  
BIOSENTRY, INC.  
BIO-SOURCE, INC.  
BIOTROL INTERNATIONAL  
BIOVERSE, INC.  
BIRD B GONE, INC  
BIRD SHIELD REPELLENT CORP.  
BISSELL HOMECARE, INC.  
BLACK FLAG BRANDS, LLC  
BLUE DIAMOND EXTERMINATING &  
BLUE MAGIC PRODUCTS INC  
BLUE RHINO GLOBAL SOURCING, LLC  
BLUE WATER MARINE PAINT  
BOC GASES  
BOEHRINGER INGELHEIM VETMEDICA INC.  
BONIDE PRODUCTS, INC.  
BOU-MATIC LLC  
BRAMTON COMPANY, THE  
BREEN LABORATORIES  
BROMITRON CORPORATION  
BRULIN & COMPANY, INC.  
BRUNSWICK BOWLING & BILLARDS  
B'S POOL SUPPLY  
BUCKEYE INTERNATIONAL, INC.  
BUCKMAN LABORATORIES, INC.  
BUGGUYS.COM LLC  
BURGESS PRODUCTS INC.  
BURNISHINE PRODUCTS COMPANY  
BUSHWACKER BACKPACK AND SUPPLY CO., INC.  
BUTCHER COMPANY, THE  
BUTLER CHEMICALS, INC.  
BUZZ OFF INSECT SHIELD, LLC  
B-V ASSOCIATES, INC.  
BVA OILS (B-V ASSOCIATES, INC.)  
BWA WATER ADDITIVES US LLC  
C&S PRODUCTS COMPANY, INC.  
C.C.I.  
C.M.A. OF SACRAMENTO  
CALI CHEM INC.  
CALIFORNIA INTERNATIONAL  
CALIFORNIA SODA COMPANY  
CALIFORNIA TAN, INC.  
CALTECH INDUSTRIES, INC.  
CALUMET LUBRICANTS CO.  
CANBERRA CORPORATION  
CARDINAL HEALTH INC.  
CARDINAL LABORATORIES INC  
CAR-MAC PRODUCTS, INC.  
CARROLL COMPANY  
CASCADE DESIGNS, INC.  
CASCADE WATER SERVICES  
CATALYTIC GENERATORS, LLC  
CDC PRODUCTS CORP  
CDR CHEMICAL, INC.  
CELEX, DIVISION OF  
CENTRAL CALIFORNIA CHEMICAL CO.  
CENTRAL SANITARY SUPPLY  
CENTRAL SOLUTIONS, INC.  
CERTOL INTERNATIONAL, LLC  
CETYLITE INDUSTRIES, INC.  
CH2O INC.  
CHAMPION CHEMICAL COMPANY  
CHAMPION TECHNOLOGIES, INC., REG. AFFAIRS -  
CHANGING PARADIGMS LLC  
CHASE PRODUCTS CO.  
CHATTEM, INC.  
CHEM LAB PRODUCTS, INC.  
CHEM PRO LABORATORY, INC.  
CHEM WEST  
CHEM-AQUA, INC.  
CHEMCO CORPORATION  
CHEMCO PRODUCTS COMPANY  
CHEMCOR CHEMICAL CORPORATION  
CHEMICAL COMPOUNDING COMPANY  
CHEMICAL LIME COMPANY  
CHEMICAL SPECIALTIES, INC.  
CHEMICALS INC.  
CHEMIFAX  
CHEMLINK LABORATORIES LLC  
CHEMORSE, LTD.  
CHEMPRO, INC.  
CHEMSICO, DIVISION OF UNITED INDUSTRIES CORP.  
CHEMSTATION INTERNATIONAL  
CHICOPEE, INC.  
CHURCH & DWIGHT CO, INC.  
CHURCH & DWIGHT CO., INC.  
CIBA SPECIALTY CHEMICALS CORP.  
CLAIRE MANUFACTURING COMPANY  
CLARIANT CORPORATION  
CLARIANT CORPORATION  
CLARIANT CORPORATION  
CLAWEL SPECIALTY PRODUCTS, A DIVISION OF BRANDT  
CLEAN CONTROL CORPORATION  
CLEAN SOURCE  
CLEANING SOLUTIONS GROUP  
CLEANWELL COMPANY  
CLEAR SOURCE ONE, LLC  
CLEARON CORP.  
CLEARWATER INTERNATIONAL, LLC  
CLORDISYS SOLUTIONS, INC.  
CLOROX COMPANY, THE  
CLOROX PROFESSIONAL PRODUCTS COMPANY

## Appendix II. List of registrants identified as having predominantly nonagricultural use products.

CNS INDUSTRIES  
COATING SYSTEMS LABORATORIES, INC.  
COGHLAN'S LTD.  
COLGATE ORAL PHARMACEUTICALS  
COLGATE-PALMOLIVE COMPANY  
COLTENE/WHALEDENT INC.  
COMBAT INSECT CONTROL SYSTEMS  
CONOCOPHILLIPS COMPANY  
CONTEC, INC.  
CONTECHEM INC.  
CONTINENTAL CHEMICAL CO.  
CONTINENTAL CHEMICAL CO.  
CONTINENTAL RESEARCH CORP.  
CONTRACT PACKAGING, INC.  
COPPER BRITE INCORPORATED  
COPPER CARE WOOD PRESERVATIVES, INC.  
CORAL SEAS, A DIVISION OF  
CORETEX PRODUCTS, INC.  
CORPORATE EXPRESS US, INC.  
COTTRELL, LTD.  
CRAMER PRODUCTS, INC  
CRC INDUSTRIES, INC.  
CREATIVE SALES INC.  
CROSSTEX INTERNATIONAL, INC.  
CRYPTON CARE  
CRYSTAL CLEAR POOL AND SPA  
CSI PRODUCTS, INC.  
CURRENT TECHNOLOGIES, INC.  
CUT HEAL ANIMAL CARE PRODUCTS, INC.  
CVS PHARMACY, INC.  
CWE PROPERTIES LTDS, LLC  
CYTEC INDUSTRIES, INC.  
D & D HOLDINGS INC.  
D B K, INC.  
DAIRYPRO  
DAMON INDUSTRIES, INC.  
DAVID WILLIAMS & CO.  
DBA DEKKO MANUFACTURING  
DEER NO NO, LLC  
DEL PHARMACEUTICALS, INC.  
DELAVAL CLEANING SOLUTIONS  
DESERT STAR COMPANY  
DEXOL, A DIV. OF VERDANT BRANDS, INC.\*  
D-1-1-4, INC  
DIACON TECHNOLOGIES LTD.  
DIAL CORPORATION, THE  
DIAMOND WIPES INT'L  
DIASOURCE, INC.  
DIATECT INTERNATIONAL, INC.  
DIMENSION ONE SPAS  
DIONNE PRODUCTS  
DIVERSEYLEVER\*  
DIVERSEYLEVER\*  
DIVERSIFIED WATERSCAPES, INC.  
DM RESOURCES, INC.  
DO IT BEST CORPORATION  
DOBER GROUP  
DOCTOR'S FOSTER & SMITH  
DOMINO'S PIZZA INC.  
DOUG BROWN & ASSOCIATES  
DOUGLAS PRODUCTS AND PACKAGING  
DPC INDUSTRIES, INC.  
DR. WOLMAN GMBH  
DRAEGER MEDICAL INFANT CARE, INC.  
DREW AMERIOD MARINE DIVISION  
DREW INDUSTRIAL DIV., ASHLAND CHEM. CO.,  
DRI-EAZ PRODUCTS INC.  
DRUMMOND AMERICAN CORPORATION  
DUCHEM INDUSTRIES WEST, INC.  
DURVET, INC.  
DVM PHARMACEUTICALS, INC.  
E PAINT CO.  
E T S, INC.  
E. W. SMITH CHEMICAL COMPANY  
E.B. STONE & SON, INC.  
E.I. DUPONT DE NEMOURS AND COMPANY  
EARTH CITY RESOURCES, INC.  
EARTH FRIENDLY CHEMICALS, INC.  
ECO CONCEPTS, INC.  
ECOHEALTH, INC.

ECOLAB INC.  
ECOLOGICAL LABORATORIES, INC.  
ECOLOGY WORKS INC., THE  
ECONOMIC ALTERNATIVES, INC.  
ECOSMART TECHNOLOGIES, INC.  
EDWARDS-COUNCILOR CO., INC.  
EFFECTIVE PRODUCTS, INC  
EKA CHEMICALS, INC.  
EKO PEROXIDE LLC  
EMCO INDUSTRIES, INC.  
ENERGIA ARAGONESAS S.A.  
ENFORCER PRODUCTS, INC.\*  
ENSYSTEX II, INC.  
ENSYSTEX III, INC.  
ENSYSTEX IV, INC.  
ENSYSTEX, INC.  
ENTECH SYSTEMS CORPORATION  
ENVIRO TECH CHEMICAL SERVICES, INC.  
ENVIROAQUA CONSULTANTS, INC.  
ENVIROCARE CORPORATION  
ENVIROGUARD SCIENCES LLC  
ENVIROKLEEN, LLC  
ENVIROMAN, INC.  
ENVIRONMENTAL SOLUTIONS INTERNATIONAL  
ENVIRONMENTALLY SAFE SYSTEMS, INC.  
ENVIROSAFE TECHNOLOGIES  
ENVIROX, LLC  
ESBRO CHEMICAL  
ESPREE ANIMAL PRODUCTS, INC.  
ESSENTIAL INDUSTRIES, INC.  
ESSENTIALS  
ETEX LTD.  
ETI H2O  
EVERGREEN PET SUPPLY INC.  
EXCEL MARKETING  
EXSL/ULTRA LABS, INC.  
FALCON SAFETY PRODUCTS INC.  
FAMILY PRODUCTS SDN. BERHAD  
FARNAM COMPANIES, INC.  
FAULTLESS STARCH/BON AMI CO.  
FEED SOLUTIONS  
FIBERLOCK TECHNOLOGIES, INC.  
FIEBING COMPANY, INC.  
FIRST MEDICA  
FITZPATRICK BROTHERS, INC.  
FLEXABAR CORPORATION  
FLEXDEL CORP.  
FLORALIFE, INC.  
FLORIDA POOL PRODUCTS, INC.  
FMC CORP., LITHIUM DIVISION  
FOCUS BRANDS, INC.  
FOOD SERVICES OF AMERICA, INC.  
FOOTHILL ORANGE COAST CHEMICAL  
FORESTS ALIVE INC.  
FORRESTVILLE SUPPLY  
FORT DODGE ANIMAL HEALTH  
FORT DODGE ANIMAL HEALTH  
FORTECH PRODUCTS  
FORTUNE BIOTECH LTD.  
FOUR PAWS PRODUCTS LTD.  
FOUR STAR CHEMICAL  
FPPF CHEMICAL COMPANY INC.  
FRANKLIN CLEANING TECHNOLOGY  
FUEL QUALITY SERVICES, INC.  
FULLER BRUSH COMMERCIAL PRODS.  
GARDENS ALIVE!, INC.  
GARDENWAY, LLC  
GARRATT-CALLAHAN COMPANY  
GAZOONTITE LLC  
GC AMERICA INC.  
GE ADVANCED MATERIALS-SILICONES  
GE BETZ, INC.  
GENERAL CHEMICAL COMPANY  
GENICS, INC.  
GENLABS  
GEOGLOBAL PARTNERS  
GETINGE USA, INC.  
GLASBY MAINTENANCE SUPPLY CO.  
GLB POOL & SPA  
GOJO INDUSTRIES, INC.

GPMI COMPANY  
GPS GROUP  
GRAHAM PROFESSIONAL  
GRANT LABORATORIES, INC.  
GREEN LIGHT COMPANY  
GREEN PRODUCTS COMPANY  
GREENLINE LABORATORIES  
GRIFFIN BROS., INC.  
GROW MORE, INC.  
GUARDSMAN PRODUCTS  
H & S CHEMICALS DIVISION  
H&S CHEMICAL CO., INC.  
HALLIBURTON ENERGY SERVICES  
HALOSOURCE INC  
HAMMONDS FUEL ADDITIVES, INC  
HAPPY JACK INC.  
HARTZ MOUNTAIN CORP, THE  
HASA INC.  
HBC CHEMICAL, INC.  
HEALTH TECHNOLOGY PROFESSIONAL PRODUCTS, INC.  
HEALTHLINK  
HEATQUIP  
HEDLEY TECHNOLOGIES (USA) INC.  
HEMPEL COATINGS (USA) INC.  
HENRY SCHEIN, INC.  
HERCULES CHEMICAL COMPANY INC  
HERCULES INC, PULP & PAPER DIV.  
HERITAGE BRANDS, LLC  
HERITAGE SYSTEMS INC.  
HH PLUS, LLC  
HILLYARD INDUSTRIES INC.  
HOME SAVING TERMITE CONTROL, INC.  
HOMECARE LABS  
HOMEGUARD DISTRIBUTORS INC.  
HOMS, LLC  
HONEYWELL  
HOT FOOT INTERNATIONAL PTY.LTD  
HOT PEPPER WAX INC.  
HOUGHTON CHEMICAL CORPORATION  
HOUSECHEM, INC.  
HOUSEHOLD PRODUCTS DIVISION \*  
HOWARD JOHNSON'S ENTERPRISES, INC.  
HUB STATES CORPORATION  
HUNTINGDON SUPPLY COMPANY  
HUNTINGTON PROFESSIONAL PRODUCTS  
HYDRITE CHEMICAL CO.  
HYDROX CHEMICAL COMPANY  
I LOVE MY PUPPY, DIVISION OF  
IBA INC  
ICA TRINOVA, LLC  
ICT INFECTION CONTROL  
IFF CHEMICAL HOLDINGS INC.  
IGUANA LLC  
IMCOR  
IMS TRADING, LLC  
IN THE SWIM  
INCIDE TECHNOLOGIES, INC.  
INDEPENDENT MARKETING ALLIANCE  
INNOPEC FUEL SPECIALTIES LLC  
INSIGHT PHARMACEUTICALS CORP  
INTELLIGENT BIOCIDES LLC  
INTER VALLEY POOL SUPPLY  
INTER-AMERICAN PRODUCTS, INC.  
INTERCON CHEMICAL CO.  
INTERFACE RESEARCH CORPORATION  
INTERMATIC INC.  
INTERNATIONAL CHEMTEX CORP.  
INTERNATIONAL DIOXIDE, INC.  
INTERNATIONAL PAINT LLC  
INTERNATIONAL PAINT, LLC  
INTERNATIONAL PAINT, LLC  
INTERNATIONAL PAINT, LLC  
INTERNATIONAL SPECIALTY PRODUCTS  
INTERNATIONAL TEXTILE GROUP, INC.  
INTERVET INC.  
INVACARE CONTINUING CARE GROUP  
IQ PRODUCTS COMPANY  
IRON OUT, INC.  
ISI-POLY  
ISK BIOCIDES, INC.

## Appendix II. List of registrants identified as having predominantly nonagricultural use products.

ISOLYSER COMPANY, INC.  
 ISP CHEMICALS, INC.  
 ITW DYMON  
 ITW MILITARY PRODUCTS  
 J. C. CHEMICAL COMPANY  
 J.F. DALEY INTERNATIONAL, LTD.  
 J.H. BAXTER  
 J.T. EATON & COMPANY INC.  
 JACAM CHEMICALS, LLC  
 JACKS MAGIC PRODUCTS, INC.  
 JACUZZI HOT TUBS  
 JAMES VARLEY & SONS INC.  
 JASCO CHEMICAL CORP.  
 JAWS INTERNATIONAL LTD.  
 JC PAPER  
 JCI JONES CHEMICALS, INC.  
 JOHNSON DIVERSEY, INC.  
 JOHNSON DIVERSEY, INC.  
 JOMAPS COMPANY, THE  
 JOTUN PAINTS, INC.  
 JUNGLE LABORATORIES CORP.  
 JUSTICE BROTHERS, INC.  
 KATADYN PRODUCTS, INC.  
 KAY CHEMICAL COMPANY  
 KAZ, INC.  
 KDS NAIL INTERNATIONAL  
 KEMIRA CHEMICALS, INC.  
 KEN ALTA, INC.  
 KENNEDY INDUSTRIES, INC.  
 KIK INTERNATIONAL INC.  
 KIMBERLY-CLARK GLOBAL SALES, INC.  
 KIM-C1, LLC  
 KING CHEMICALS CO., LTD.  
 KING RESEARCH, INC.  
 KING TECHNOLOGY, INC.  
 KITTRICH CORPORATION  
 KLEIN TOOLS, INC.  
 KOP-COAT INC  
 KROGER COMPANY, THE  
 KURITA AMERICA, INC.  
 L & R MANUFACTURING  
 LANE LABORATORIES INC  
 LANXESS CORPORATION  
 LAWN AND GARDEN PRODUCTS, INC.  
 LAWSON PRODUCTS, INC.  
 LEBANON SEABOARD CORPORATION  
 LEISURE TIME  
 LESLIE'S POOL BRITE, INC. \*  
 LHB INDUSTRIES  
 LILLY MILLER BRANDS  
 LILLY MILLER BRANDS  
 LILLY MILLER BRANDS\*  
 LINE GUARD, INC.  
 LIPHATECH, INC.  
 LIQUID FENCE CO., INC.  
 LO-CHLOR, LLC  
 LOEFFLER CHEMICAL CORPORATION  
 LONGS DRUG STORES  
 LONZA INC.  
 LOS ANGELES CHEMICAL COMPANY  
 LT BIOSYN, INC.  
 LUCAS PRODUCTS CORP.  
 LUNDMARK, INC.  
 LUSEAUX LABORATORIES INC  
 M & S RESEARCH  
 M.C.M ENVIRONMENTAL TECHNOLOGIES, INC.  
 MADA EQUIPMENT COMPANY, INC.  
 MAID BRANDS, INC.  
 MAINTENANCE SUPPLIES AND  
 MAINTEX INC.  
 MAKIKI ELECTRONICS  
 MALLINCKRODT VETERINARY, INC. \*  
 MANI PEDI, INC.  
 MANITOWOC ICE, INC  
 MAREVA, INC.  
 MARIL PRODUCTS, INC.  
 MARINE DEVELOPMENT & RESEARCH CORP.  
 MARQUIS CORP.  
 MARTEX GROUP, THE  
 MARTHA STEWART LIVING OMNIMEDIA, INC.

MASON CHEMICAL COMPANY  
 MATSON, LLC  
 MBL INDUSTRIES, INC.  
 MC GRAVEL COMPANY  
 MC NEIL RIVER ENTERPRISES  
 MCB, LLC  
 MCKESSON CORP., MCKESSON MEDICAL-SURGICAL INC.  
 MCKESSON CORPORATION  
 MEDICAL CHEMICAL CORP.  
 MEDLINE INDUSTRIES  
 MEDO INDUSTRIES, INC.  
 MEDTROL, INC.  
 MELALEUCA INC.  
 MERICHEM CHEMS & REFINERY SRVCS LLC  
 MERIDIAN ANIMAL HEALTH  
 METERPAK INC.  
 METREX RESEARCH CORP.  
 MICROBAN SYSTEMS, INC.  
 MICROPHOR, INC.  
 MICROPHOR, INC.  
 MICRO-SCIENTIFIC INDUSTRIES, INC.  
 MIDLAB, INC.  
 MIDLAND RESEARCH LABS., INC.  
 MINE SAFETY APPLIANCES COMPANY  
 MIRACLE SEALANTS COMPANY  
 MIRACLE-GRO LAWN PRODUCTS, INC  
 MISSION KLEENSWEPT PRODS. INC.  
 MISSION LABORATORIES  
 MLPC INTERNATIONAL  
 MOMAR INCORPORATED  
 MONSANTO CO. LAWN & GARDEN PRODUCTS  
 MORGAN-GALLACHER INC.  
 MRLB INTERNATIONAL, INC.  
 MT. HOOD CHEMICAL CORPORATION  
 MULTI-CHEM GROUP, LLC  
 MULTI-CLEAN  
 N.B. SALES AND MARKETING, LLC  
 NANO-D ORGANIC PRODUCTS LLC  
 NASHVILLE CHEMICAL & EQUIPMENT  
 NATIONAL BORAXX CORPORATION  
 NATIONAL CHEMICALS INC.  
 NATIONAL SAFETY ASSOCIATES INC  
 NATURAL SOLUTIONS  
 NATURAL TRENDS, LLC.  
 NATURE'S SPECIALTIES MFG  
 NAVA WATER PRODUCTS  
 NCH CORPORATION  
 NDS SURGICAL IMAGING  
 NECESSARY ORGANICS INC.\*  
 NEOFORCE GROUP INC.  
 NEUTRON INDUSTRIES INC.  
 NEW NAUTICAL COATINGS, INC.  
 NEXGEN  
 NICE-PAK PRODUCTS, INC.  
 NISSAN CHEMICAL AMERICA, CORP.  
 NISUS CORPORATION  
 NIX, INC.  
 NOBLE PINE PRODUCTS COMPANY  
 NORTH SAFETY PRODUCTS  
 NORWALK WASTEWATER EQPT. CO.  
 NOVALEK, INC.  
 NOVARTIS ANIMAL HEALTH US, INC.  
 NU-CALGON WHOLESALER, INC.  
 NYCO PRODUCTS COMPANY  
 O.P.I. PRODUCTS, INC.  
 OAKITE PRODUCTS, INC.  
 OCCIDENTAL CHEMICAL CORP.  
 OLIN CHLOR ALKALI PRODUCTS  
 OMG AMERICAS, INC.  
 OMG BELLEVILLE LIMITED  
 OMNI CONSULTANTS, INC.  
 ONDEO NALCO COMPANY\*  
 ONDEO NALCO ENERGY SERVICES\*  
 ORANGE GLO INTERNATIONAL C/O CHURCH & DWIGHT COMPANY, INC.  
 ORCHEM CORPORATION  
 ORECK  
 OREQ CORPORATION  
 OSHA REVIEW, INC.  
 OSMEGEN, INC.  
 OSMONICS/AUTOTROL

OSMOSE RAILROAD SERVICES, INC.  
 OSMOSE UTILITIES SERVICES, INC  
 OSTER PROFESSIONAL PRODUCTS  
 OUTI INTERNATIONAL, INC.  
 OUTDOOR SOLUTIONS, INC.  
 OXFORD & HILL HOME PRODUCTS, LLC  
 P.F. HARRIS  
 PALMERO HEALTH CARE  
 PARADISE VALLEY SPAS  
 PARAGON HOUSEHOLD PRODUCTS, INC.  
 PARAGON PROFESSIONAL PEST  
 PARISER INDUSTRIES, INC.  
 PARKER-HANNIFIN CORP./RACOR DIVISION  
 PATCO MANAGEMENT INC.  
 PATTERSON DENTAL SUPPLY, INC.  
 PAX COMPANY\*  
 PDI - THE HEALTHCARE DIVISION OF  
 PEARSON DENTAL SUPPLY CO.  
 PEGASUS INTERNATIONAL, INC.  
 PENETONE CORPORATION  
 PENN CHAMP, A DIV. OF BISSELL HOMECARE, INC.  
 PERSONAL CARE PRODUCTS, INC.  
 PESTCON SYSTEMS, INC  
 PET GOLD PRODUCTS  
 PET SAVR PRODUCTS  
 PFIZER, INC.  
 PHARM SOLUTIONS INC.  
 PHARMACAL RESEARCH LABS.  
 PHARMACIA & UPJOHN COMPANY  
 PHELAN NATURAL CHEMICALS CO.  
 PHICHEM USA  
 PHYSICIAN SALES AND SERVICE  
 PIC CORPORATION  
 PINE GLO PRODUCTS, INC.  
 PINEBELT PROCESSING, INC.  
 PIONEER AMERICAS, LLC  
 PIONEER CHEMICAL COMPANY  
 PIONEER ECLIPSE CORPORATION  
 PIONEER MANUFACTURING COMPANY  
 PITNEY BOWES INC.  
 PM RESOURCES, INC.  
 POLARIS POOL SYSTEMS, INC.  
 POOL CHLOR COMPANY  
 POOL PAL PRODUCTS  
 POOL PRODUCTS PACKAGING CORP., A DIV. OF  
 PORTIONPAC CHEMICAL CORP.  
 POWER RESEARCH, INC.  
 POWER SERVICE PRODUCTS, INC.  
 POWERCHEM TECHNOLOGY  
 PPG ARCHITECTURAL FINISHES INC  
 PPG INDUSTRIES, INC.  
 PPG INDUSTRIES, INC.  
 PREDDETER LLC  
 PRESERVE INTERNATIONAL  
 PRIME SOURCE  
 PRINOVA CO., INC.  
 PRISON INDUSTRY AUTHORITY  
 PRO PRODUCTS  
 PRO PRODUCTS LLC  
 PRO SPA, INC  
 PROCLEAN OF ARIZONA, INC.  
 PROCTER & GAMBLE  
 PROFESSIONAL PET PRODUCTS, INC  
 PROFORCE INC.  
 PROGRESSIVE PRODUCTS, LLC  
 PROGUARD, INC.  
 PRO-LINK  
 PROMCHEM AG  
 PRO-PLANET INDUSTRIAL SUPPLY  
 PROSALL PRODUCTS  
 PRO-SERVE, INC.  
 PROTECH INDUSTRIES, INC.  
 PURAC AMERICA, INC.  
 PULVEX PRODUCTS COMPANY  
 PURE CHEM PRODUCTS COMPANY, INC.  
 PURE LINE TREATMENT SYSTEMS  
 PUREGREEN, LLC  
 PUREWORKS, LC  
 PURINA MILLS, INC.  
 PURITAN SERVICES INC.

## Appendix II. List of registrants identified as having predominantly nonagricultural use products.

PURONICS WATER SYSTEMS, INC.  
 QUADRUAL, LLC  
 QUALITY BORATE COMPANY  
 QUANTUM BIOCHEMICAL  
 QUANTUM, INC.  
 QUEST CHEMICAL CORPORATION  
 QUEST PRODUCTS CORPORATION  
 QUIP LABORATORIES, INC.  
 QVS, INC.  
 R.P.S. PRODUCTS, INC.  
 RAINBOW POOL SERVICE & REPAIR  
 RAINBOW TECHNOLOGY CORPORATION  
 RAINBOW TREECARE SCIENTIFIC ADVANCEMENTS  
 RAMSEY COMPANY, THE  
 RBR PRODUCTIONS, INC.  
 REALEX, DIVISION OF  
 RECKITT BENCKISER, INC.  
 RECKITT BENCKISER, INC.  
 RECREATIONAL WATER PRODUCTS, INC.  
 REESE PHARMACEUTICAL COMPANY  
 REGAL CHEMICAL COMPANY  
 REI  
 RELIANCE PRODUCTS L.P.  
 RENAL SYSTEMS, ATTN: RICHARD M. ORMSBEE  
 RH2O ENGINEERING, INC.  
 RHODIA UK LIMITED  
 RHODIA, INC.  
 RHODIA, INC., (HPCI)  
 RITE AID CORPORATION  
 ROBARB  
 ROCHE DIAGNOSTICS CORPORATION  
 ROCHESTER MIDLAND CORPORATION  
 ROCKLINE INDUSTRIES  
 ROCKWELL LABS LTD  
 ROEBIC LABORATORIES INC.  
 ROHM AND HAAS COMPANY  
 ROHM AND HAAS COMPANY  
 ROLL, LLC  
 ROOTO CORPORATION, THE  
 ROTO-ROOTER CORPORATION  
 ROXIDE INTERNATIONAL, INC.  
 ROYAL PAPER CORPORATION  
 RSA MICRO TECH, INC.  
 RUDOLPH INTERNATIONAL INC.  
 RUST-OLEUM CORPORATION  
 RX FOR FLEAS, INCORPORATED  
 RX VETERINARY PRODUCTS \*  
 S.C. JOHNSON & SON, INC.  
 SACRAMENTO CHEMICAL CORP.  
 SAFER, INC. A WHOLLY OWNED SUBSIDIARY  
 SAFER, INC., A WHOLLY OWNED SUBSIDIARY  
 SAFETEC OF AMERICA, INC.  
 SAFEWAY INCORPORATED  
 SAN JOAQUIN CHEMICALS, INC.  
 SAN JOAQUIN SUPPLY CO  
 SANCO INDUSTRIES, INC.  
 SANI-CARE SALON PRODUCTS INC.  
 SANITEK PRODUCTS INC  
 SANITIZED INC.  
 SANTEC PRODUCTS  
 SAVE-A-LOT FOOD STORES, INC.  
 SAVOGRAN COMPANY OF CALIFORNIA  
 SAWYER PRODUCTS, INC.  
 SCHAEFFER MANUFACTURING COMPANY  
 SCHERING-PLOUGH HEALTHCARE PRODUCTS, INC.  
 SCHIRM USA, INC.  
 SCHULTZ COMPANY  
 SCICAN LTD.  
 SCM METAL PRODUCTS, INC.  
 SCOTCH CORPORATION  
 SCOTT'S LIQUID GOLD - INC.  
 SCRYPTON SYSTEMS, INC.  
 SCS LABORATORIES, INC.  
 SEABRIGHT LABORATORIES  
 SEACO TECHNOLOGIES INC.  
 SEALIFE MARINE PRODUCTS, INC.  
 SEARLES VALLEY MINERALS OPERATIONS, INC.  
 SEARS ROEBUCK AND COMPANY  
 SECURITY EQUIPMENT CORPORATION  
 SELECTIVE MICRO TECHNOLOGIES, LLC

SELIG INDUSTRIES, A DIVISION OF  
 SENORET CHEMICAL COMPANY, INC.  
 SENSIBLE LIFE PRODUCTS  
 SENSUOUS SOLUTIONS, LLC  
 SEPTODONT, INC.  
 SERGEANTS PET PRODUCTS, INC.\*  
 SERVICEMASTER CLEAN  
 SEVEN C'S SAFETY AND  
 SHAKLEE CORPORATION  
 SHARE CORPORATION  
 SHEPARD BROS., INC.  
 SHERWIN-WILLIAMS CONSUMER GP.  
 SHERWIN-WILLIAMS CONSUMER GP.  
 SHIELD INDUSTRIES, INC.  
 SHIKOKU CHEMICALS CORPORATION  
 SIAMONS INTERNATIONAL, INC.  
 SIERRA CHEMICAL CO  
 SIGMAKALON USA LLC  
 SII-CHEM TECH, A BUSINESS UNIT OF  
 SK CORPORATION  
 SKASOL INCORPORATED  
 SKLAR INSTRUMENTS  
 SMARTPOOL, INC.  
 SMS SERVICES, LLC  
 SOFTUB, INC.  
 SOLUTIONEX, A MARINIZE PRODUCTS CORP.  
 SOLVAY CHEMICALS, INC.  
 SOSTRAM CORPORATION  
 SOUTHWEST ENGINEERS  
 SPA GIENE, LLC  
 SPARTAN CHEMICAL COMPANY INC  
 SPECIALTY CHEMICAL MANUFACTURING  
 SPECIALTY CONSTRUCTION BRANDS INC.  
 SPECTRUM GROUP  
 SPECTRUM, DIVISION OF  
 SPEER PRODUCTS, INC.  
 SPLASHES INC.  
 SPORICIDIN COMPANY, THE  
 SPRAY CHEM CHEMICAL CORP.  
 SPRAY NINE CORPORATION  
 SPRAYWAY INC  
 SPURRIER CHEMICAL CO'S., INC.  
 SRC  
 SSDC, INC.  
 SSI MAXIM COMPANY, INC.  
 ST. AUBREY VETERINARY LABS  
 ST. GABRIEL LABORATORIES  
 STANLEY HOME PRODUCTS  
 STAR HORSE PRODUCTS NV INC.  
 STARCHEM, INC.  
 STATE INDUSTRIAL PRODUCTS  
 STEARNS PACKAGING CORPORATION  
 STEPAN COMPANY  
 STERILEX CORPORATION  
 STERIS CORPORATION  
 STERIS CORPORATION  
 STERISIL, INC.  
 STINGER, A DIVISION OF KAZ INC.  
 STONE CARE INTERNATIONAL, INC.  
 SULTAN HEALTHCARE, INC.  
 SUMMIT CHEMICAL CO.\*  
 SUMMIT VET PHARM  
 SUNBEAM PRODUCTS, INC.  
 SUNBURST CHEMICALS, INC.  
 SUNDANCE SPAS, INC.  
 SUNNYSIDE CORPORATION  
 SUNRISE ENVIRONMTL. SCIENTIFIC  
 SUNSHINE MAKERS INC.  
 SUNSHINE PRODUCTS, INC.  
 SUPERIOR POOL PRODUCTS \*  
 SUPERVALU INC.  
 SUPPLY SYSTEMS  
 SUPREME CHEMICALS OF GEORGIA INC  
 SURECO, INC.  
 SURETY LABORATORIES, INC.  
 SURTEC INC.  
 SWEETLIX  
 SWISS FARMS PRODUCTS, INC.  
 SYNERGYLABS  
 SYSCO CORPORATION, MNGR., NON-FOOD REGULATORY/VALUE PRODUCTS INC

T & R CHEMICALS, INC.  
 TANGLEFOOT COMPANY, THE  
 TARGET CORPORATION  
 TASKEM, INCORPORATED  
 TECHPAC, LLC  
 TEC-LABS, INC.  
 TENDER CORPORATION  
 TERAND INDUSTRIES, INC.  
 TERRA NOVO, INC.  
 TETRA HOLDING (US), INC.  
 TETRADYNE LLC  
 TEXAS GULF INDUSTRIES INC  
 THATCHER COMPANY  
 THE SCOTTS COMPANY  
 THE ANDERSONS LAWN FERTILIZER DIVISION, INC.  
 THE COLEMAN COMPANY, INC.  
 THE ESPOMA COMPANY  
 THE FULLER BRUSH COMPANY  
 THE ORTHO GROUP  
 THE RUHOF CORPORATION  
 THE SCHAWBEL CORPORATION  
 THE SHERWIN-WILLIAMS CO./  
 THE SHERWIN-WILLIAMS COMPANY  
 THE SPIC AND SPAN COMPANY  
 THE SPIC AND SPAN COMPANY  
 THE TERMINIX INTERNATIONAL COMPANY L.P.  
 THE YANKEE CANDLE COMPANY, INC.  
 THERMOSPAS, INC.  
 THETFORD CORPORATION  
 THOMSON RESEARCH ASSOCIATES  
 THOR GMBH  
 TITAN WATER TECHNOLOGY, INC.  
 TMM LLC  
 TOMLYN PRODS. A DIVISION OF VETOQUINOL USA INC.  
 TOPCO ASSOCIATES LLC  
 TOTAL SOLUTIONS  
 TPE ASSOCIATES, LLC  
 TRACE CHEMICALS LLC, SUBSIDIARY OF  
 TRADEWINDS, INC.  
 TRANS CHEM, INC.  
 TRAVEL MEDICINE, INC.  
 TRIDENT TECHNOLOGIES, INC.  
 TRINOVA MEDICAL WASTE SOLUTIONS  
 TRIPLE S  
 TROY CHEMICAL COMPANY LTD.  
 TROY CHEMICAL CORPORATION  
 TRUE VALUE MFG, COMPANY  
 TRUOX, INC  
 TU-K INDUSTRIES, INC.  
 TYCO HEALTHCARE GROUP, LP  
 U.S. BORAX INC.  
 U.S. CHEMICAL CORPORATION  
 U.S. NONWOVENS CORP.  
 U.S. WATER SERVICES  
 UDAP INDUSTRIES, INC.  
 ULTRA CHEM INDUSTRIES LTD.  
 ULTRAMAX CHEMICAL CO.  
 ULTRASOL INDUSTRIES LIMITED  
 ULTRONICS INC., DIV. OF  
 UNICHEM, A DIVISION OF\*  
 UNICORE TECHNOLOGIES, INC.  
 UNISOURCE WORLDWIDE, INC.  
 UNISOURCE WORLDWIDE, INC.  
 UNIT CHEMICAL CORPORATION  
 UNITED CHEMICAL CORP.  
 UNITED COMPOST & ORGANICS, INC.  
 UNITED LABORATORIES, INC.  
 UNIVAR USA INC  
 UNIVAR USA INC.  
 UNIVERSAL  
 UNIVERSAL LABORATORIES-DIV OF  
 UNIVERSAL PEST SOLUTIONS, LLC  
 UPM CORPORATION  
 US CHEMICAL CORPORATION  
 US FILTER/STRANCO A SIEMENS BUSINESS  
 USA DETERGENTS, INC.  
 USDA FOREST SERVICE  
 VALSPAR CORPORATION, THE  
 VALUE GARDEN SUPPLY, LLC

## Appendix II. List of registrants identified as having predominantly nonagricultural use products.

VALUE SMART PRODUCTS  
VELTEK ASSOCIATES, INC.  
VENUS LABORATORIES, INC.  
VERDICON, INC.  
VERICHEM, INC.  
VERIDIEN CORPORATION  
VERTELLUS PERFORMANCE MATERIALS, INC.  
VET SOLUTIONS  
VETERINARY PRODUCTS LABORATORIES  
VETOQUINOL USA INC.  
VIANCE, LLC  
VINGRO AG ENTERPRISES, INC.  
VIRBAC AH, INC.  
VIROX TECHNOLOGIES, INC.  
VIRTERRA PRODUCTS CORPORATION  
VISTA RESEARCH GROUP, LLC  
VISTA SOLUTIONS, INC.  
VITA INT'L A DIVISION OF  
VITAL DEFENSE COMPANY  
VITAL TECHNOLOGIES, INC.  
VOLUNTARY PURCHASING GROUPS,  
VULCAN CHEMICALS\*  
W. F. YOUNG INC.  
W. NEUDORFF GMBH KG  
W. R. RAYSON CO., INC.  
W. W. GRAINGER, INC.  
W.W. GRAINGER, INC.  
WAHL CLIPPER CORPORATION  
WALCO-LINCK CO.  
WALGREEN COMPANY  
WALLA WALLA ENVIRONMENTAL, INC.  
WAL-MART STORES, INC.  
WALSH DOLMAN SOUTHEAST, LLC  
WASHBURN AND SONS, INC.  
WATER & ENERGY SYSTEMS TECHNOLOGY, INC.  
WATER TECHNIQUES, INC.  
WATER-TECH SPECIALTIES, INC.  
WATKINS INCORPORATED  
WATKINS MANUFACTURING CORP.  
WAXIE'S ENTERPRISES INC.  
WAYNE CHEMICAL INC.  
WD-40 COMPANY  
WELLMAN, INC.  
WELLMARK INTERNATIONAL  
WEST MARINE PRODUCTS  
WESTERN FAMILY FOODS, INC.  
WESTERN FAMILY FOODS, INC.  
WESTWAY FEED PRODUCTS  
WETCO, INC.  
WEXFORD LABS, INC.  
WHITE CAP INC.  
WHITMIRE MICRO-GEN RESEARCH LABORATORIES, INC.  
WILLERT HOME PRODUCTS, INC.  
WILLIAM BLYTHE LIMITED  
WILLIAM MARVY CO., INC.  
WISCONSIN PHARMACAL CO., LLC  
WOODSMART SOLUTIONS  
WOODSTREAM CORPORATION  
WOODSTREAM CORPORATION  
WOODSTREAM CORPORATION  
WPC BRANDS, INC.  
XTERMITE, INC.  
Y-TEX CORPORATION  
ZELAM LTD.  
ZEP MANUFACTURING COMPANY\*  
ZIMEK TECHNOLOGIES  
ZINSSER COMPANY, INC.  
ZIP-CHEM PRODUCTS  
ZOBELE INDUSTRIE CHIMICHE  
ZODIAC POOL CARE, INC.  
ZOO MED LABORATORIES