

Don't Say Non Toxic

I still hear PCOs refer to some of our more innocuous materials such as boric acid products as "non-toxic". Boric Acid materials and in fact virtually all materials we use are toxic. Unfortunately I hear and read statements from well intentioned PCOs that are untrue, and potentially damaging to our industry. We must always be forthright and honest with the public and our customers.

A few years ago the issue of PCOs using misleading language in their advertising caught the attention of both the Federal Trade Commission and Federal EPA. The objections raised primarily address advertising, but extends to all forms of communication coming from pest control companies. Federal EPA holds the position that all pesticides are by their nature toxic and therefore it is inappropriate to state that a pesticide is "non toxic" or "safe". The EPA also objects to statements indicating that the pesticides you use are "EPA Approved" or even "EPA Registered". The Federal Trade Commission has also gotten into the act and objects to the word "safe" being used in conjunction with pesticides. The Federal Trade Commission also objects to language such as "environmentally safe", "environmentally sound" or "environmentally friendly".

Later this lead to lawsuits within California against structural pest control companies, and eventually the creation of the Structural Pest Control Board False and Misleading Advertizing Regulation §1999.5.

The best way to address this issue is to avoid using the above discussed language. There will be a few exceptions to this rule. If a consumer were to ask about the use of a particular pesticide, a PCO could and should explain that before any product can be used as a pesticide it must first be registered with the EPA. An explanation of what is required to register a product with Federal EPA and the more difficult process of registering a product With California EPA would also be appropriate. The key is not to say anything that could be construed as misleading. By misleading you customer you are asking for problems down the road.

When answering customers questions and concerns about pest control be honest but avoid inflammatory words; Don't use the word poison, say "treated" as opposed to "sprayed", and when possible use language such as "product" or "material" as opposed to "chemical" or "pesticide".

Take the time to educate your customers when they ask if a particular product is toxic, or requests that a non-toxic material be used. Explain that all pesticides are inherently toxic but that when properly applied, pesticide exposure is minimal and should have no ill effects. Almost everything in our environment is at some level toxic. The decision to use a toxic substance should be based on two things; the dose (exposure), and the risk vs the benefit. Aspirin, and other over the counter drugs are toxic, but we decide to use them because we have a minimal exposure, and the benefits of using such drugs outweigh the risks. This type of decision justifies the use of everything from aluminum cookware, soaps, pesticides, disinfectants, celery, salt, peanuts to the water we drink.

Tell your customers that what you use is "toxic" but the manner in which you are using the product is such that there is no expected hazard to the consumer. If there is potentially an odor warn the consumer. Explain that the odor does not equate to hazard or toxicity.