This guidance document is intended to help school governing bodies and Integrated Pest Management (IPM) coordinators determine what pesticide products qualify as a low-impact pesticide under ORS 634.700(4). Please note that each school governing body can adopt a school IPM plan that places additional restrictions on what pesticides can be used on their own school campus (ORS 634.710).

What is a “low-impact pesticide” under the school IPM law?

ORS 634.700(4) “Low-impact pesticide” means a product that does not contain a pesticide product or active ingredient described in ORS 634.705(5).

ORS 634.705(5) A governing body shall adopt a list of low-impact pesticides for use with the integrated pest management plan. The governing body may include any product on the list except products that:

(a) Contain a pesticide product or active ingredient that has the signal words “warning” or “danger” on the label;
(b) Contain a pesticide product classified as a human carcinogen or probable human carcinogen under the United States Environmental Protection Agency 1986 Guidelines for Carcinogen Risk Assessment; or
(c) Contain a pesticide product classified as carcinogenic to humans or likely to be carcinogenic to humans under the United States Environmental Protection Agency 2003 Draft Final Guidelines for Carcinogen Risk Assessment.

How can I determine whether a pesticide is a “low-impact pesticide”?

A flowchart of the overall process is provided below. More detailed information and resources are provided on the next page.

1. Is the pesticide EPA-registered? OR Does the pesticide meet EPA criteria for minimum-risk pesticides?

YES

2. Is Signal Word “WARNING” or “DANGER”?

YES

Pesticide does not qualify as “low impact”

NO

3. Are ingredients listed on the label classified by EPA as:
   • “Human Carcinogen”
   • “Carcinogenic to Humans”
   • “Probable Human Carcinogen”
   • “Likely to be Carcinogenic to Humans”

YES

Pesticide does not qualify as “low impact”

NO

Unknown whether pesticide qualifies as “low impact”

Additional Considerations:
1) Verify that the pesticide label allows for the desired use.
2) Confirm School IPM plan allows use of particular pesticide product

This pesticide meets the criteria for a low-impact pesticide (ORS 634.700(4))
**Step 1: Has the pesticide been evaluated for a signal word by the Environmental Protection Agency?**

To qualify as a “low-impact pesticide” the pesticide product must have been evaluated for a signal word (i.e. registered) by the Environmental Protection Agency (EPA), or it must meet the EPA criteria for minimum risk pesticides under FIFRA Section 25(b). If at least one of these criteria are not met, the product cannot be evaluated to determine whether it may meet the criteria for low-impact pesticides.

Example: A product that is marketed as a glass cleaner has not been evaluated as a pesticide by the EPA, and therefore is unable to be designated as a “low-impact pesticide.”

Oregon-registered pesticide products are either EPA-registered or classified as minimum risk pesticides by EPA. Therefore, if the product is registered in Oregon move on to Step 2 below. Oregon-registered products can be found at http://oda.direct/PesticideProducts.

For more information about minimum risk pesticides, see https://oda.fyi/MinimumRiskPesticides.

**Step 2: Determine the Signal Word.**

On the front panel of any pesticide label, the signal word will be displayed adjacent to the statement “KEEP OUT OF REACH OF CHILDREN”. If the signal word is DANGER or WARNING, the product does not meet the criteria for low-impact pesticides. If the signal word is CAUTION or is not listed, move on to Step 3 below.

For more information about signal words, see https://oda.fyi/SignalWords

**Step 3: Determine the EPA cancer classification.**

The EPA evaluates pesticides for their potential to cause cancer and classifies them according to the weight of evidence. The cancer classification for a pesticide can change as new scientific evidence becomes available, so it’s best to verify the current classification of a particular pesticide by confirming with an expert.

1. Check the EPA cancer classification for each ingredient listed on the label using the following EPA resource: https://oda.fyi/EvaluatedChemicals.
2. Contact the National Pesticide Information Center to confirm that there have been no changes since the last update of the above resource. NPIC can be reached at 1-800-858-7378 or npic@ace.orst.edu.

If any ingredient listed on the pesticide label has the following classifications, the product does not qualify to be a low-impact pesticide:

- “Human Carcinogen” or “Carcinogenic to Humans”
- “Probable Human Carcinogen” or “Likely to be Carcinogenic to Humans”

If the pesticide was not excluded in Steps 1-3, then it is a “low-impact” pesticide.

**Additional Considerations:**

- **Label:** The pesticide label is the law. Review the entire label to ensure that it can be used as desired (correct use site, application method, etc). Please note that “non-crop areas” do not include ornamental sites, turf, or sports fields. For assistance with label interpretation, please contact the Oregon Department of Agriculture at (503) 986-4635.

- **School IPM Plan:** Review the school IPM plan adopted by your school’s governing body to ensure that use of the pesticide is compliant with that plan.

- **Other School IPM Requirements:** Please see the school staff checklist for a review of several additional requirements of the school IPM law. http://oda.direct/IPMSchools