



STATE OF MAINE
DEPARTMENT OF AGRICULTURE, CONSERVATION & FORESTRY
BOARD OF PESTICIDES CONTROL
28 STATE HOUSE STATION
AUGUSTA, MAINE 04333

JANET T. MILLS
GOVERNOR

AMANDA E. BEAL
COMMISSIONER

Memorandum

TO: Board of Pesticides Control
FROM: Julia Vacchiano, Pesticide Registrar & Water Quality Specialist
Re: Proposed Policy Framework for 25(b) Citronella Candle Registration and Soft Claims

July 10, 2026

Background

As the BPC registrar, I would like to establish a standardized regulatory policy to improve the review and registration process for citronella candles that qualify for an exemption from FIFRA under Section 25(b). This policy is proposed to ensure regulatory consistency for products that do not make explicit claims to mitigate public health pests but have a colloquial understanding and use for repellency or “soft claims.” In Maine, registration is required for products with 3% or more citronella because they are considered pesticides according to FIFRA Section 3. Current Section 3 registrations exist, implying that the EPA has found the efficacy for these products to be sufficient. Therefore, this policy is proposed to allow for citronella candles to be marketed with soft repellency claims without the submission of efficacy data.

Defining a “Soft Claim”

A soft claim, in this policy, would be defined as a non-specific, marketing or performance claim about a pest. Soft claims can be made against “odor-causing bacteria” or could claim to make an environment less favorable for pests. They do not claim to directly mitigate or improve a potentially harmful pest situation. AAPCO standards, which Maine requires 25(b) products to uphold for registration, demand efficacy data for products that claim to mitigate public health pests (ticks, mosquitoes, bed bugs). This proposed policy would create a narrow and targeted exception of efficacy requirements for citronella candles that only make soft claims. The EPA has established the efficacy of products with identical active ingredient concentrations, proving efficacy of a 3% or higher citronella concentration. “Soft claims” may also mean a complete lack of any claim on a product that is understood by the public to “repel mosquitos.”

Any explicit claims of mosquito repellency will continue to require the submission of efficacy data that meets AAPCO efficacy standards for 25(b) products while products that explicitly state they are “citronella scented” only or NOT for the repellency of mosquitos will not require registration (when below 3% citronella.)



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Product	Registration Required?	Efficacy Data Required?	Efficacy Standard
>3% citronella with no claims	Yes	No	N/A
<3% citronella or explicit labeling "not for repellency"	No	No	N/A
>3% citronella with soft claims	Yes	No	Exempt from AAPCO 75% threshold; accepted based on EPA 3% active ingredient justification
>3% citronella with explicit repellency claims	Yes	Yes	Must meet AAPCO 75% Threshold

Proposal

I request that approval be granted by the Board to enact this memo as registration policy for BPC registration staff going forward. Many citronella candle producers are not advertising with any repellency claims and are not attempting to imply that they will repel mosquitoes. However, due to a long-standing idea among the public that they do effectively protect people from bites when near the candles, a soft claim still inherently exists. The process of registering citronella candles would be improved by allowing registrants of candles with no explicit claims and 3% or greater citronella to register their minimum-risk product without submitting efficacy data. It will also prevent registrants from testing products to prove claims that are not stated.