



**REGION 8**

DENVER, CO 80202

**FILED**

**Feb 28, 2025**

**2:17 pm**

**U.S. EPA REGION 8  
HEARING CLERK**

**SENT VIA EMAIL**

**DELIVERY RECEIPT REQUESTED**

**SUBJECT:** Requested action to be taken regarding the STROXX - Moist Cleaning Wipes in shipment with entry number EI5-31197546 FIFRA-08-2025-0012

**FROM:** David Cobb  
Supervisor, Toxics Enforcement Section  
Enforcement and Compliance Assurance Division

**Cobb,  
David**

Digitally signed  
by Cobb, David  
Date: 2025.02.28  
10:15:29 -07'00'

**TO:** U.S. Department of Homeland Security  
Bureau of Customs and Border Protection  
Salt Lake City, Utah 3303

By this memorandum, the U.S. Environmental Protection Agency, Region 8, is informing the Bureau of Customs and Border Protection of the U.S. Department of Homeland Security (CBP) that the products in the import shipment described below should be **Denied Entry-Refused Delivery** pursuant to the authority of section 17(c) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 7 U.S.C. § 136o(c), and the implementing regulations at 19 C.F.R. section 12.114. The entry was marked "Hold Intact," "Refused," and "Re-Export" in the Automated Commercial Environment (ACE) by the EPA on February 26, 2025. The following information pertains to the shipment:

- The importer is Fentro Technologies Inc., 150 Grant Street, Modern, Manitoba R6M1Y4 Canada.
- The consignee is Las Vegas Convention Center, 3150 Paradise Road, Las Vegas Nevada 89109-9096.
- The broker is Russell A Farrow (US) Inc., Karen Piper [Karen.Koch@farrow.com](mailto:Karen.Koch@farrow.com).
- The bill of lading number: TMBM9059889.
- The entry file date was February 18, 2025.
- The product in this shipment is STROXX - Moist Cleaning Wipes.
- The port of entry is Salt Lake City, Utah 3303.

Section 2(t) of FIFRA, 7 U.S.C. § 136(t) defines "pest" as "(1) any insect, rodent, nematode, fungus, weed, or (2) any other form of terrestrial or aquatic plant or animal life or virus, bacteria, or other micro-organism (except viruses, bacteria, or other micro-organisms on or in living man or other living animals) which the Administrator declares to be a pest under section 136w(c)(1) of this title."

Under FIFRA section 2(u), 7 U.S.C. § 136(u), a pesticide is any substance (or mixture of substances) intended for a pesticidal purpose, i.e., use for the purpose of preventing, destroying, repelling, or mitigating any pest or use as a plant regulator, defoliant, or desiccant. 40 C.F.R. § 152.15 states: “A substance is considered to be intended for a pesticidal purpose, and thus to be a pesticide requiring registration, if... [t]he person who distributes or sells the substance claims, states, or implies (by labelling or otherwise) ... [t]hat the substance... can or should be used as a pesticide.”

Section 2(p) of FIFRA, 7 U.S.C. § 136(p), defines “label” as “the written, printed, or graphic matter on, or attached to, the pesticide or device or any of its containers or wrappers” and defines “labeling” in part, as “all labels and all other written, printed, or graphic matter – (A) accompanying the pesticide or device at any time; or (B) to which reference is made on the label or in literature accompanying the pesticide....”

Under 40 C.F.R. § 156.10, a pesticide’s labeling must meet the following requirements:

(a) General -

(1) Contents of the label. Every pesticide product shall bear a label containing the information specified by the Act and the regulations in this part. The contents of a label must show clearly and prominently the following:

- (i) The name, brand, or trademark under which the product is sold as prescribed in paragraph (b) of this section;
- (ii) The name and address of the producer, registrant, or person for whom produced as prescribed in paragraph (c) of this section;
- (iii) The net contents as prescribed in paragraph (d) of this section;
- (iv) The product registration number as prescribed in paragraph (e) of this section;
- (v) The producing establishment number as prescribed in paragraph (f) of this section;
- (vi) An ingredient statement as prescribed in paragraph (g) of this section;
- (vii) Hazard and precautionary statements as prescribed in subpart D of this part for human and domestic animal hazards and subpart E of this part for environmental hazards.
- (viii) The directions for use as prescribed in paragraph (i) of this section; and
- (ix) The use classification(s) as prescribed in paragraph (j) of this section.

On February 21, 2025 the consignee for this shipment sent the following website where this product is offered for sale, <https://www.meesenburg.com/en/stroxx-mehrzweck-reinigungstuecherantibakteriell-100-767-0009123121#content>. That website had the following language:

- “STROXX - moist cleaning wipes (bucket of 250 pieces) in dispenser bucket 100-767”
- “The wipes are not only highly effective but also gentle on surfaces of all kinds.”

- “The antibacterial cleaning wipes effortlessly remove even the most stubborn dirt such as oils, fats, adhesives, paints, tar, and grease. Each bucket contains 250 wipes”

These statements demonstrate a pesticidal intent pursuant to the definitions above.

STROXX - Moist Cleaning Wipes are not registered with the EPA pursuant to section 3 of FIFRA, 7 U.S.C. § 136a. Based on the information provided, importation of the STROXX - Moist Cleaning Wipes is a violation of FIFRA section 12(a)(1)(A), 7 U.S.C. § 136j(a)(1)(A), which states that it is unlawful for any person to distribute or sell any pesticide that is not registered under section 3 of FIFRA, 7 U.S.C. § 136a.

The shipment that arrived at the border for import is also in violation of FIFRA section 12(a)(2)(N), 7 U.S.C. § 136j(a)(2)(N), because a registrant, wholesaler, dealer, retailer, or other distributor failed to correctly file reports required by the Act. As required by 19 C.F.R. § 12.114, a Notice of Arrival of Pesticides and Devices (NOA), EPA form 3540-1, and a copy of one product label must be submitted. Therefore, these pesticide products in the shipment referenced above should not be allowed entry into the United States.

The EPA hereby notifies CBP that this merchandise should be refused admission pursuant to the authority of FIFRA § 17(c), 7 U.S.C. § 136o(c), and the implementing regulations at 19 C.F.R. § 12.114. The importer should export this merchandise or dispose of the products under supervision of the CBP within ninety calendar days from the date of this memorandum or within such additional time as the District Director of CBP specifies. Failure to do so may result in either the destruction of the merchandise as authorized by FIFRA or in any action necessary to enforce the terms of any bond under which the shipment has been released to the consignee. Alternatively, CBP may elect to seize the products as a prohibited importation pursuant to their authorities as set out at 19 U.S.C. § 1595a(c)(2)(A).

On February 26, 2025, the EPA informed the CBP Cargo Chief in Salt Lake City, Utah, that it would deny entry of this shipment. Please contact Christine Tokarz, the import enforcement coordinator, by email at [tokarz.christine@epa.gov](mailto:tokarz.christine@epa.gov), if you have any questions concerning this matter.