



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8

1595 Wynkoop Street  
DENVER, CO 80202-1129  
Phone 800-227-8917  
<http://www.epa.gov/region08>

2013 AUG -1 PM 3:09

FILED  
EPA REGION VIII  
HEARING CLERK

AUG 01 2013

Ref: 8ENF-L

David Doxey, Corporate Counsel  
doTerra International, LLC  
370 W. Center Street  
Orem, UT 84057

Re: **Vacation of Stop Sale, Use or Removal Order (Docket No. FIFRA-08-2013-0004)**

Dear Mr. Doxey:

On July 25, 2013, the United States Environmental Protection Agency (EPA), Region 8 issued a Stop Sale, Use or Removal Order (Order) to doTerra, LLC, for three products distributed by doTerra: doTerra On Guard Protective Blend; doTerra Terra Shield Repellent Blend; and doTerra On Guard Cleaner Concentrate (collectively referred to as "the three products"). The Order was issued because pesticidal claims were being made as part of doTerra's advertising for distribution or sale of the three products on doTerra's internet website. In addition to the internet website claims, doTerra's On Guard Cleaner Concentrate made the pesticidal claim "hardworking, concentrated cleaner that acts as a defense against surface-dwelling microbes" on its label.

During the week of July 29, 2013, the EPA Region 8 enforcement personnel have discussed the pesticidal claims made regarding the three products with you and others. doTerra has demonstrated to the EPA that the pesticide claims referred to in the Order have been eliminated from its internet website and doTerra's On Guard Cleaner Concentrate label. doTerra has also made changes to the Terra Shield Repellent Blend's label and its internet website references for this product to comply with the requirements of 40 C.F.R. §152.25(f). doTerra also assured the EPA enforcement personnel that it will inform its distributors of changes in the website internet content and encourage its distributors to adopt such website internet content which should help avoid distributors making pesticidal claims for the three products in the future.

Based on the actions taken by doTerra to remove the pesticidal claims from its internet website and label changes indicated in this letter, the Order is hereby vacated for all sizes and quantities of the three products, which had been covered by this Order, and is EFFECTIVE IMMEDIATELY. Thank you for your response to the Order.

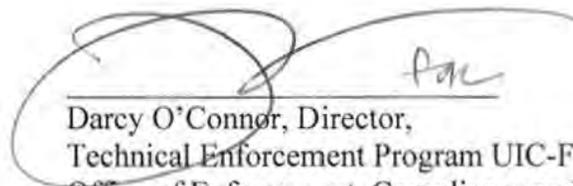
We offer this comment in the spirit of compliance assistance and guidance in future distribution of products. doTerra's internet website contains a substantial amount of information that the EPA Region 8 Enforcement Personnel was unable to review. It is possible that pesticidal claims remain in the internet website. It is doTerra's responsibility to monitor the website and other

printed or written materials to ensure doTerra is not making pesticidal claims for any unregistered pesticide products in any of these sources.

doTerra's actions with regard to distribution or sale of the three products, and making pesticidal claims for the products on the doTerra's internet website and the On Guard Cleaner Concentrate label, constitutes distribution and misbranding of an unregistered pesticide, unlawful acts under section 12(a)(1)(A) and section 12(a)(1)(E) of FIFRA, 7 U.S.C. § 136j(a)(1)(A) and 7 U.S.C. § 136j(a)(1)(E). The EPA is evaluating what further action, if any, it will pursue regarding the FIFRA violations.

No reply to this letter is required. If, at any time, you have questions about specific pesticidal language that may (or may not) be used on the facility internet website or on product labeling, including explanations of pesticidal terms defined in FIFRA or pesticide regulations implemented and regulated by the EPA, please contact Eduardo Quintana, Senior Enforcement Attorney by phone: 303-312-6924 or by email at [quintana.eduardo@epa.gov](mailto:quintana.eduardo@epa.gov), who can assist you with these and other pesticide issues.

Sincerely,



Darcy O'Connor, Director,  
Technical Enforcement Program UIC-FIFRA-OPA  
Office of Enforcement, Compliance and  
Environmental Justice (8-ENF-UFO)  
U.S. Environmental Protection Agency, Region 8

cc. Tina Artemis, Regional Hearing Clerk  
Daniel Webster, ENF-UFO  
Eduardo Quintana, ENF-L

