



# Impregnated Fertilizers:

## Mixing fertilizers and pesticides

Wisconsin Department of Agriculture, Trade and Consumer Protection – Bureau of Agrichemical Management

*An impregnated fertilizer is one that has been mixed with one or more pesticides.*

*If you are mixing a general, non-restricted use pesticide and a fertilizer for your own use on your own property, there are no requirements beyond those on the product labels.*

*If you are mixing products for sale or distribution, there are legal requirements if you are making impregnated fertilizers for commercial use. The requirements depend on whether you are mixing a custom blend for a single customer, or manufacturing a pesticide-fertilizer mixture – that is, creating a product that you will distribute to multiple customers, either in sales or as part of a lawn-care or landscaping business.*

### Manufacturing Impregnated Fertilizers

#### Custom blends

- A custom blend is one you make at a customer's request, per the customer's specifications, for use on his/her own property. You must attach the pesticide label to the product, and cannot keep any of the product in inventory.
- If the blend contains a restricted-use pesticide, you must hold a pesticide dealer/distributor license, and the customer must be a certified as either a private or commercial pesticide applicator or be a licensed pesticide application business.

#### Manufactured blends

If you are mixing fertilizer and pesticides as products that you will keep in inventory to sell to customers, or will use in your lawn-care or landscaping business, you may need to meet at least one of these three requirements:

- **Enter a repackaging agreement with a company that makes an identical product.**  
This does not allow you to blend the product yourself; you could only bag the finished product with your company name. The company that makes the product will provide you with the labeling and other information you need to repackage it. You will need a pesticide-producing establishment number from the U.S. Environmental Protection Agency (EPA) for the facility where you do the repackaging, and will need to comply with all pesticide producing and container requirements.
- **Become a sub-registrant under an existing Section 3 pesticide registration.**  
This allows you to do the blending and the repackaging. You will need to work with the registrant of a product with an identical final active ingredient in the concentration you want. They will describe the sub-registrant process. Again, you will need a pesticide-producing establishment number from the U.S. Environmental Protection Agency for the facility where you do the repackaging, and will need to comply with all pesticide producing and container requirements. You will also need to register it to sell or distribute it in Wisconsin.

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## Using Impregnated Fertilizers

- **Pursue your own Section 3 pesticide registration through the EPA.**  
This is a lengthy and expensive process. Once your product is registered with the EPA, you also need to register it to sell or distribute it in Wisconsin.

Remember, the label is the law. Applicators must follow all label directions for the pesticide mixed with the fertilizer. In addition, they must know and follow any fertilizer restrictions specified in nutrient management plans, such as nitrogen-phosphorus-potassium (N-P-K) amounts or setbacks from streams or lakes.

### Pesticide applicator certification and licensing

- If the pesticide-fertilizer mixture contains a general-use pesticide and you are applying it to your own property, you do not need certification or license.
- If the mixture contains a general-use pesticide and you are being paid to apply it to someone else's property, you need to be certified and licensed as a commercial applicator.
- If the mixture contains a restricted-use pesticide and you are applying it to your own property to grow a crop, you need to be certified as a private applicator.
- If the mixture contains a restricted-use pesticide and you are being paid to apply it to someone else's property, you need to be certified and licensed as a commercial applicator.

### Fertilizer licensing

- If you mix fertilizer with other ingredients, including pesticides or water, you are manufacturing fertilizer and must follow the regulations in Wisconsin Administrative Rule ATCP 40.
- With few exceptions, you will need a commercial fertilizer license, whether you are making a custom blend for one customer or a blend that becomes part of your product line.
- If the percentages of N-P-K guarantees in the product are less than 24 percent, you will also need a permit.

## Learn more

- [Supplemental registration](#)
- [Section 3 registration](#)
- [Pesticide-producing establishment numbers](#)
- [Registration in Wisconsin](#)
- [Pesticide applicator certification and licensing](#)
- [Commercial fertilizer licensing](#)
- [ATCP 40](#)

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