



BEYOND PESTICIDES

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December 21, 2007

The Honorable Stephen Johnson
Administrator
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: Request for Extension of Comment Period; Draft Guidance for Pesticide Registrants on Label Statements Regarding Third-Party Endorsements and Cause Marketing Claims (EPA-HQ-OPP-2007-1008)

Dear Mr. Johnson:

Beyond Pesticides appreciates the opportunity to comment on the proposed rule concerning label statements regarding third-party endorsement and cause marketing claims. Because this EPA proposal constitutes a major change in long-standing EPA policy regarding allowable pesticide product labeling and symbols, we believe that the agency should seek greater public involvement in its deliberations on this matter and provide for at least a 90- to 120-day public comment period. Therefore, we request and petition the agency to extend its deadline on the aforementioned Federal Register notice for an additional 30 to 60 days.

We are requesting an extension of the comment period in order to fully participate in this process and to enable full public participation. We are making this request due to the short comment period outlined in the October 31, 2007, *Federal Register*, the complexity of this issue, and need for the agency to receive input from a wide variety of perspectives, such as public interest groups, health professionals and others.

We appreciate your consideration of this request. Best wishes for the holiday season and new year.

Sincerely,

Jay Feldman
Executive Director