



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

JUN 11 2007

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Ms. Laura Hepting  
Beyond Pesticides  
701 E St., N.E.  
Washington, D.C. 20003

Dear Ms. Hepting:

As promised in our letter of March 7, 2007, we are providing further information on the issues you raised in your February 2, 2007, letter to Administrator Stephen Johnson on behalf of Beyond Pesticides and other groups concerning the display of the Red Cross logo on pesticide labels such as Clorox.

As you know, the Agency has received comments from a number of organizations expressing concerns similar to those articulated in your February letter. To provide a fuller, open forum for discussion of the range of issues associated with the use of cause marketing labeling on pesticide products, the Agency brought this topic to our advisory committee, the Pesticide Program Dialogue Committee (PPDC), on May 10. We appreciated the participation of Beyond Pesticides, as well as that of the American Red Cross, Clorox, and the American Association of Pesticide Control Officials in a panel presentation that initiated the dialogue amongst committee members. The Agency explained at that session the basis for its decision that the use of the labeling approved for the Clorox products was neither false nor misleading. Our decision relied on an assessment of the likely health consequences were the products to be misused as a result of the presence of the cause marketing labeling and consideration of whether such labeling would alter consumer behavior in ways that could lead to misuse. Based on the information provided by Clorox, we decided to approve this particular cause marketing labeling for use on select Clorox products.

The discussion at the PPDC meeting was thoughtful and constructive with a candid sharing of concerns and perspectives. As a result, the Agency plans to develop a framework and guidelines for evaluating these types of labeling proposals. We expect this guidance to establish a high standard for approval. The label of a registered product must be effective in providing both use instructions and necessary safety information. We currently expect to publish this guidance for comment in Fall 2007 and will place your comments and the others we have received in the docket at that time.

Again, thank you for your letter and your organization's contributions to the PPDC discussion. If you have any further questions or concerns in the meantime, please let me know.

Sincerely,

A handwritten signature in black ink that reads "Debra Edwards". The signature is fluid and cursive, with the first name "Debra" and the last name "Edwards" clearly distinguishable.

Debra Edwards, Ph.D., Director  
Office of Pesticide Programs

cc: PPDC Committee Members