



May 4, 2007

The Pesticide Stewardship Alliance  
11327 Gravois Road, #201  
St. Louis, MO 63126

Stephen Johnson, Administrator  
US Environmental Protection Agency  
Ariel Rios Building – Mail Code 1101A  
1200 Pennsylvania Avenue, NW  
Washington DC 20460

**RE: Pesticide Stewardship and “Cause-Related Marketing”**

Dear Mr. Johnson:

The Pesticide Stewardship Alliance (TPSA) is dedicated to promoting pesticide stewardship, which includes any activity in the pesticide life cycle that has a positive impact on the safety and efficacy of pesticides. This life cycle includes manufacture, marketing and commerce, through storage and use, and ultimately the disposal of unwanted or unusable products and the management of emptied containers. The recent approval of “cause-related marketing” statements on federally registered pesticide products labels by the Office of Pesticide Programs (OPP) has raised concerns regarding the potentially negative effects of those changes on pesticide stewardship.

While TPSA acknowledges the activities of the American Red Cross and applauds support of the organization by The Clorox Company, utilization of the federally approved pesticide label as advertisement of this relationship and support is inappropriate. Most obviously, the product label is a legal document. As the “label is the law”, inclusion of this type of language on the label implies approval of this product over any other like product. In addition, the American Red Cross is an institution that is synonymous with health and safety. Allowing this “cause-related marketing” which includes the statements “Dedicated to a Healthier World” and “Help Clorox raise \$1 million for the American Red Cross” on the product label, has the effect of inferring to the intended user that the product is endorsed by the American Red Cross and is therefore “safe” or “safer” than another product. Taken together, the inferred approval of the product by the EPA and the endorsement of the product by the American Red Cross may result in a consumer that not only fails to read and follow the label since they could consider it “safe” to use, but, in addition, purchases this product as an impulse item solely to support a cause.

Central to pesticide stewardship is the legal and appropriate use of pesticides. Along with State Lead Agencies, Extension, and the regulated industry, TPSA promotes safety education for pesticide users. The most difficult segment of the user group to reach is homeowners. Thus, the label becomes even more significant in ensuring product stewardship through proper legal use. Adding additional information to the label, specifically, information that implies the product is approved and safe, provides the user with a false sense of security when using the product.

Closely related are issues regarding pesticide stewardship and marketing and commerce. TPSA feels that the additional label language will encourage consumers to buy the product. While The Clorox Company has provided the EPA with the results of a consumer survey indicating that “cause-related marketing” did not affect consumer preference, this survey was conducted by the company itself and lacks the validity of independent study.

TPSA would expect that other companies will seek to participate in “cause-related marketing” for specific products. Prior to more products entering the channels of trade, this issue needs to be resolved. TPSA encourages the Environmental Protection Agency to reconsider their decision to allow such label amendments and would like to participate in future discussions.

In conclusion, TPSA acknowledges the efforts of The Clorox Company in their support of the American Red Cross. However, TPSA firmly believes that pesticide stewardship dictates that any “cause-related marketing” be separate from and not appear on the federally approved pesticide label. Inclusion of this language on the label implies both government endorsement of the product and the safety of the product. These products are pesticides, and such, require federal registration and specific use instructions to ensure they are both safe for use and efficacious. The inclusion of “cause-related marketing” language on the label has the potential to negatively effect pesticide stewardship by adding information that is not germane to the use of this product and may actually cloud the users perception of the importance of reading and following the label to ensure the safe and legal use of the product.

Sincerely,

A handwritten signature in blue ink that reads "Carol Ramsay".

Carol Ramsay  
TPSA President