

From: Athena Honore
To: UPC
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Subject: UPC: EPA changes course on "cause marketing"

For the UPC,

In late 2006, U.S. EPA's approval of a bleach label with the Red Cross logo ignited controversy as to whether such marketing programs (commonly referred to as "cause marketing") are appropriate for pesticides. In 2007, U.S. EPA responded to the controversy by drafting guidance for determining acceptability of proposals for labeling pesticide products with cause marketing elements. Today, U.S. EPA announced that it will abandon the draft guidance and that it intends to discourage use of cause marketing on pesticide labels. U.S. EPA's summary of its decision is below; the full decision is available in the Federal Register for September 30, 2008 (link below).

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----- Original Message -----

1) EPA Will Discourage Cause Marketing and Third-Party Claims

In October 2007, EPA issued a draft Pesticide Registration Notice (PR Notice) titled "Label Statements Regarding Third-Party Endorsements & Cause Marketing" for public comment. The draft contained a description of the Agency's proposed framework for evaluating proposed statements and graphic material on pesticide labeling regarding third-party endorsements or a relationship between the pesticide registrant and a charity ("cause marketing claims"). It also discussed the information EPA would expect to receive in applications to determine whether the types claims outlined in the draft PR Notice were appropriate for pesticide labeling.

After reviewing public comments, the Agency has determined that the types of cause marketing claims and third-party endorsements outlined in the draft PR Notice generally would not contribute meaningfully to improving protection of human health and the environment. The addition of such label statements is not likely to better inform the user about how to use the product safely and effectively. In fact, the addition of such statements could interfere with that goal. In addition, EPA recognizes that its resources are limited and should be targeted towards activities that will enhance protection of human health and the environment from pesticides. Although EPA will review any future application it receives, EPA is now generally discouraging the submission of applications to add cause marketing claims or third-party endorsements.

Thus, EPA will not continue work on developing a framework to evaluate such claims and will not issue guidance on what information is needed to evaluate such applications. If it receives such an application, the Agency expects to decide on a case-by-case basis both what information would be necessary to carefully evaluate the proposed claims and whether

a product containing such a claim could meet the applicable statutory and regulatory standards for approval.

The Federal Register Notice of this action can be found at <http://www.epa.gov/fedrgstr/EPA-PEST/2008/September/Day-30/p22938.htm>.

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