



April 22, 2009

Ms. Marty Monell, Deputy Director for Management  
Office of Pesticide Programs  
USEPA Headquarters  
Ariel Rios Building  
1200 Pennsylvania Avenue, N. W.  
Mail Code: 7501P  
Washington, DC 20460

Dear Ms. Monell:

The American Association of Pesticide Safety Educators (AAPSE) is a professional society representing those concerned with educating pesticide applicators, handlers, and others about the safest ways to use pesticides. Our membership includes state and county Extension pesticide safety educators, State Lead Agency applicator certification management personnel, and associate members from the agricultural industry, pest control companies, and non-governmental agencies.

AAPSE currently has a member serving on EPA's Comparative Safety Statements or Logos for Pesticide Product Labeling Workgroup. As a result we have followed the developments regarding the proposed program with interest. We understand the Agency's objectives in this initiative are to facilitate informed purchaser choices and to move the market as a whole toward "safer" or reduced-risk products.

We appreciate the Agency's commitment to protecting human health and the environment utilizing sound science, policies and regulations developed with openness and transparency, and consideration of expert opinion. With our members' broad experience in pesticide education and related issues, we offer the following comments on the subjects under consideration. It is our hope this perspective will be useful to EPA as it continues to consider this initiative.

AAPSE supports EPA's desire to initiate the program (logo- or statement-based) with institutional products such as antimicrobials, disinfectants, and sanitizers. However, we believe the benefits from this labeling process will not necessarily transfer to the conventional pesticides marketplace, either consumer-oriented products or agricultural products. Both of these markets can be very different than institutional users, with different pest management goals, educational backgrounds of applicators, etc.

If a logo system is established, our organization believes we may see increased pressure from various public entities (towns, school systems, etc.) to use only logo-bearing products. Our membership is particularly concerned about the burden this may place on both SLAs and Extension. It could necessitate increased regulatory and outreach efforts (personnel, time, funding) at the local level.

Additionally, AAPSE is also concerned about efficacy issues with the proposed program. In some cases, the non-logo-bearing products may be more effective for a particular situation than logo-bearing products. The rate of development of pest resistance to various classes of pesticides might increase as a result of a logo program and/or label statements. As an example, OP insecticides would unlikely meet the criteria for "safer" in many cases. Whether retailers limit their stock or users themselves avoid using non-logo products, such a program might end up hastening development of resistance as applicators limit the classes of pesticides through which they rotate. Similarly, if users consistently choose products based on label statements claiming a higher level of safety, without a concern for efficacy, pest pressure could increase and resistance development may be hastened.

Label restrictions on various aspects of a pesticide's use provide a means of risk reduction when using a product. Pesticide safety educators understand that risk is dependent not only on the inherent toxic properties of an active ingredient, but also on the overall way the product is used. How would the use of PPE, REIs, barrier strips, setbacks, rate reductions, restrictions on timing and method of application, etc. be incorporated into a logo system? Would applicators take the time to evaluate the risk reduction measures for a relatively higher risk product or simply choose a product with a logo that indicates it is safer or "greener"?

Finally, AAPSE is concerned about how this program or any external pilot program will be monitored and evaluated. Once a logo-type program has been launched, it cannot be recalled easily. It is therefore critical to ensure such a program would actually accomplish the stated objectives of the Agency with a minimum of unforeseen and/or undesirable effects. AAPSE supports EPA's proposed internal pilot test but strongly urges the Agency to build in a sound external pilot test as well. The objectives of the external pilot test should be clearly stated and it must be scientifically designed to evaluate whether the objectives are met and to identify additional outcomes. Such a program should test the feasibility of both a logo system and statements for the label. Some questions of interest for the evaluation could include the following:

- Are purchasers/users relying primarily on the logo to choose a pesticide product regardless of their pest problem and crop/site? If so, is the product still legal and effective for their intended use?
- Do users read and follow label directions on a logo-bearing product less often, less fully, or otherwise differently than non-logo-bearing products?
- Is product misuse minimized, increased, or not affected by statements or a logo program?
- Do purchasers/users perceive a logo-bearing product is safer for all applications?
- Do label statements for claims unrelated to the active ingredient affect whether an appropriate product is purchased for an appropriate site? For example, would purchasers choose a product that is actually less safe for use around pollinators or water sources because of a logo that indicated a higher content of recyclable packaging?

In summary, AAPSE commends EPA for recognizing the trends among manufacturers, retailers, and consumers toward a "greener" marketplace. We think it is understandable and proper that the Agency consider whether and how to incorporate pesticide product labeling within this trend.

Another clear trend is the recent emphasis by federal and state agencies on demonstrating measurable impacts toward meeting stated objectives. AAPSE foresees there could be a disconnection between the Office of Pesticide Programs' objectives and the actual impact of statements or logos. We urge EPA to carefully design and appropriately test any statements and/or logo system envisioned.

Yours truly,

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