

Comment Info: =====

General Comment: Thank you for the opportunity to comment on Draft Guidance for Pesticide Registrants on Label Statements Regarding Third-Party Endorsements and Cause Marketing Claims (Docket # EPA-HQ-OPP-2007-1008).

It is hard to imagine how EPA could even consider allowing third-party endorsements and marketing claims on pesticide labels, since it so blatantly violates FIFRA law which prohibits false and misleading advertising of pesticide products.

Having a term like American Pee Wee Soccer "developing healthy minds and bodies" on the label is clearly misleading and illegal. FIFRA law is clear in stating that no pesticide advertising can state or imply that a product is "safe, nonpoisonous, noninjurious, harmless or nontoxic to humans and pets."

This proposal is a step in the completely wrong direction. EPA should not be encouraging or endorsing more misleading advertising. Instead, it should be cracking down on existing misleading advertising, such as Scott's TV ads showing children doing cartwheels with bare hands and feet or babies lying on 2,4-D laden lawns.

In addition, EPA has no business collaborating with pesticide manufacturers to enhance their sales. The mission of the EPA is to protect human health and the environment, not the bottomline of pesticide manufacturers.

This proposal should be soundly rejected.

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