How to Implement the DfE Logo Pilot

April 23, 2009

Discussion Points

- Scope/Duration
- Application Process
- Conditions of Labeling

Scope/Duration

- The Pilot would be open to all indoor, hard, non-porous surface products that have no outstanding FIFRA 6(a)(2) issues or efficacy failures.
- The Pilot would run for 1 year. If, at that time, the Agency determines not to continue the Pilot, no new production of labeling would be permitted that bore the DfE logo for pesticides.
- The Agency would permit the limited sale and distribution of products already in the channels of trade.

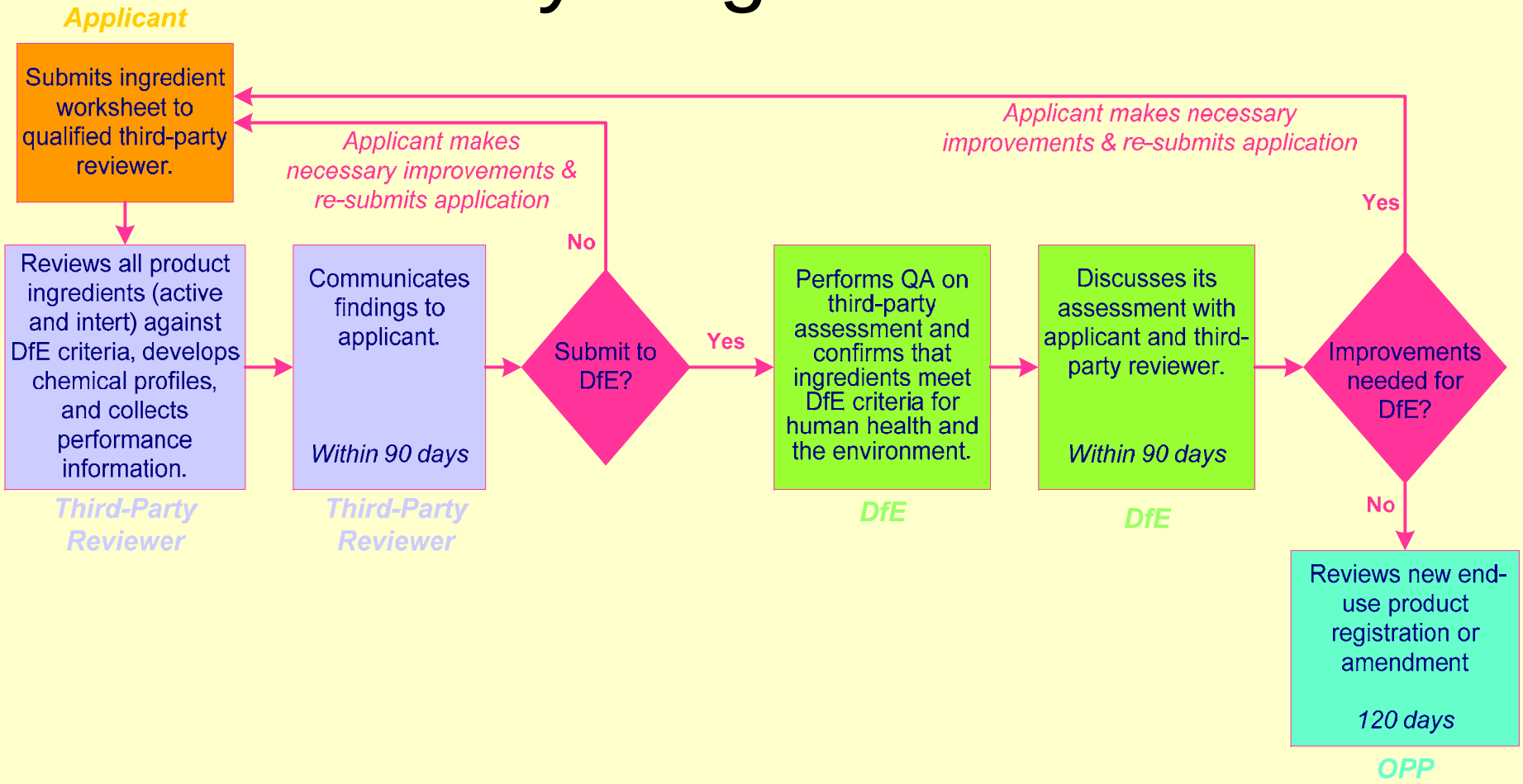
Application Process

- Registrants would contact DfE and complete their process to obtain DfE certification.
- Upon receipt of DfE certification, submit a PRIA amendment to the corresponding regulatory Division within OPP.
- Clearly indicate on the cover page of the submission that the action is related to voluntary DfE Pilot.
- Include 5 copies of draft labeling that include the DfE logo and acceptable marketing claims as defined by OPP.

Application Process (cont'd)

- Registrant also includes a certification statement that makes reference to the voluntary pilot and agrees with provisions thereof.
- OPP reviews the acute tox classification of the product.
- OPP reviews the formulation to ensure that the active ingredients are not deemed "chemicals of concern".
- OPP evaluates the marketing claims.
- The process must be completed each time the formulation changes.

Steps to Obtaining DfE Logo for a Currently Registered Product



Conditions of Labeling

- No reference made in the marketing of the product involving terms that violate 40 CFR Part 156.10(a)(5).
- No comparisons with other registered products.
- Citation only of the DfE website for pesticides (to be created).
- AD will provide the only marketing statements permitted under the pilot.
- At any time a marketing violation occurs under this pilot, the registrant immediately issues a voluntary recall of violative products or be found in violation of FIFRA Section 12(a)(1)(B) and Section 12(a)(1)(E).

Questions?