US ERA ARCHIVE DOCUMENT



#### Pesticide Program Dialog Committee May 25, 2004

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Consumers do change their behavior for the benefit of the environment when they understand the impact of their actions.

- Pollution
- Recycling
- Oil disposal
- Forest fires



Consumers do not understand many EPAmandated environmental label instructions.

- "Do not apply when weather conditions favor drift from target areas."
- "Drift or runoff may adversely affect non-target plants."
- "Do not contaminate water when disposing of equipment washwaters."



Our goal is for the consumer to select the right product, and to read, understand, and follow label directions.

Technical information that does not instruct a behavior discourages the consumer from reading the entire label.



- Calls to Scotts helpline (800,000+/year) tell us "Do Not" instructions are not as reliable in promoting environmental stewardship as positive statements.
  - "Do not contaminate water when disposing of equipment washwaters."

-VS.

 "Rinse spreader over a patch of healthy turf so that the runoff does not flow to a curb, gutter, or stream."



We expect the most positive environmental impact will be achieved by addressing environmental issues using consumer language.

- Get the reader's attention
- Convey that their actions make a difference
- Explain the actions that should be followed









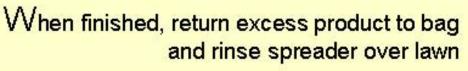


Always follow directions



Sweep up any product from hard surfaces &

Keep clippings & leaves off streets or sidewalks







Next steps to facilitate stewardship statements on product labels:

- EPA guidance is necessary, and can be developed through a stakeholder work group.
  - OR
- Registrants could be given the opportunity to seek approval of environmental claims from a policy level within EPA to avoid conservative denials at the label review level.