



Bayer HealthCare

Animal Health Division



“Safety” Claims on Pesticide Labels: Presentation to the PPDC

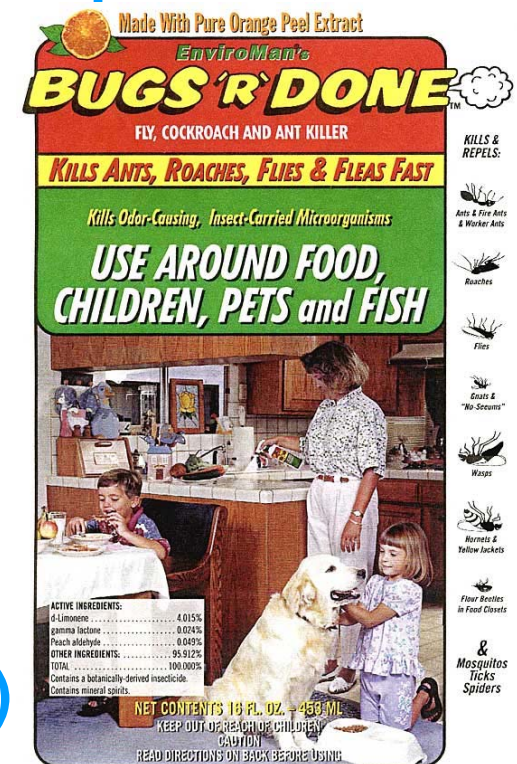
J.M. Spagnoli

May 25, 2004

Consumer Labeling Initiative – Survey

For the three product categories survey, respondents indicated that the following information is important, and they would like to locate it easily:

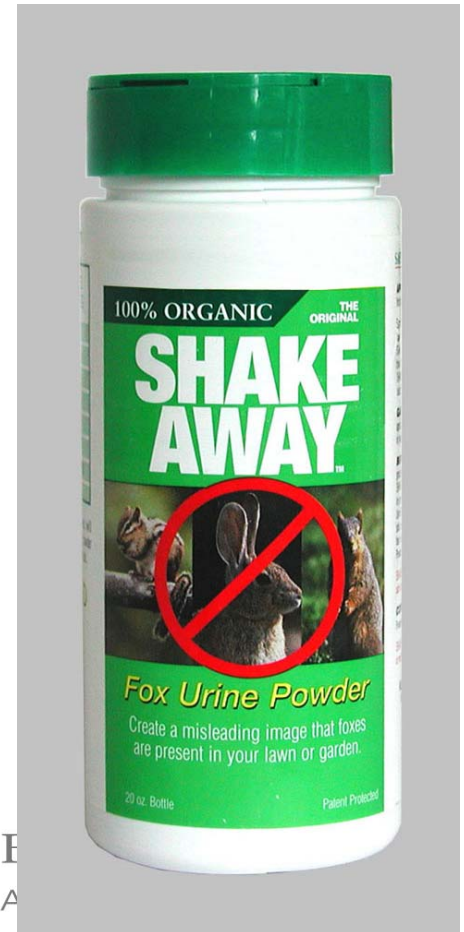
- Directions for use,
- Description of what the product does,
- Description of where not to use the product
- Information about effects on personal and children's health (except for cleaners)
- Emergency information



Consumer Labeling Initiative – Survey

In all three product categories, respondents always indicated that the least important information to them on current labels was:

- **Positive environmental claims statements**
- The name of the manufacturer
- Storage & disposal
- Ingredients
- Consumer information phone number



When Deciding Which Product to Purchase, Which of the Following Types of Information, If Any, Do You Look for?

Indoor Insecticide	Household Cleaner	Outdoor Pesticide
Product characteristics, such as non-staining, non-corrosive, won't scratch surface, low odor, etc. 63%	Product characteristics, such as non-staining, non-corrosive, won't scratch surface, low odor, etc. 81%	Will not harm wildlife, pets, fish 52%
Will not harm wildlife, pets, fish 56%	Non-flammable 44%	Low potential for harming plants 49%
Non-flammable 42%	Container or packaging characteristics 23%	Low potential for contaminating ground water 48%
Low potential for harming plants 41%	No phosphates 17%	Packaging allows for reduced contact with the product 40%
Packaging allows for reduced contact with the product 33%	No CFCs 13%	Non-flammable 36%

(Base = All Respondents)

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What's wrong with the word SAFE?

Regulations at 40 CFR Part 156.10(a)(5) state that any claims made with regard to the safety of the product or its ingredients are considered false and misleading.

This may be true of the product itself, as nothing is safe, even water, under every circumstance.

But this does not preclude, nor would it be false and misleading to indicate that a particular use of the product is safe for what it is intended.

By telling consumers what is a safe use of the product it can help insure proper product use.

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Current labels

***For monthly use on dogs and
puppies 7 weeks of age and older
DO NOT USE ON CATS***



But What if....

***SAFE for monthly use on dogs and
puppies 7 weeks of age and older
DO NOT USE ON CATS***



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Consumers want to know where and how products can be used safely – How best to communicate?

With claims that are specific, factual, and verifiable:

- Use of this product will not harm bees
- Safe for use on roses
- Safe to use on hardwood floors and cabinets



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What to avoid?

General, unqualified claims regarding the product itself or its benefits – as FTC has already indicated:

“Environmentally Friendly Product”

“Reduced Risk”

“Naturally Safe”

“Good for Mother Earth”



Why pursue?

- To provide consumers and other users with information that helps them choose the products that best suit their needs and concerns
- To help consumers use products properly
- Setting guidelines for specific types of claims will help insure consistency and clarity as opposed to current use of innuendo and fluff.
- A more level playing field for products with similar attributes

