

# Cause Marketing

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# Agency Authority

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- FIFRA
- Regulations
  - 40 CFR 156.10(a)(5)



# Clorox Proposal



Dedicated to a Healthier World  
Help Clorox raise \$1 million  
for the American Red Cross.  
See details on back.

# Pine-Sol® Spray 19054

**Kills 99.9%  
of Germs**

**BLEACH FREE**

ACTIVE INGREDIENTS:  
n-Alkyl (60% C14, 30% C16, 5% C12, 5% C18) dimethylbenzyl ammonium chloride ..... 0.1375%  
n-Alkyl (60% C12, 32% C14) dimethyl ethylbenzyl ammonium chloride ..... 0.1375%  
OTHER INGREDIENTS: ..... 99.7250%  
TOTAL: ..... 100.0000%  
CONTAINS NO PHOSPHORUS

KEEP OUT OF REACH OF CHILDREN  
**WARNING:** SEE BACK LABEL FOR ADDITIONAL  
PRECAUTIONARY STATEMENTS.

MANTÉNGASE FUERA DEL ALCANCE DE LOS NIÑOS  
**ADVERTENCIA:** VEA LA ETIQUETA POSTERIOR PARA  
DECLARACIONES PREVENTIVAS ADICIONALES.  
Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.

1.88 PT (30 FL OZ) 887 mL



# Clorox Proposal



American  
Red Cross

## Dedicated to a Healthier World

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **To Clean and Deodorize:** Rotate nozzle to FOAM or to SPRAY. Spray 6-8 inches from the surface and allow product to penetrate dirt and soap scum. Wipe with a wet sponge or cloth and rinse with water. No scrubbing required. For tougher jobs, use FOAM option. Spray and let product stand on surface for several minutes before wiping. For best results, use regularly to prevent soap scum buildup. **To Disinfect:** Thoroughly clean the surface to be disinfected by following the above directions (remove excess dirt first in heavily soiled areas); reapply, spraying entire surface until completely wet. Let stand 10 minutes before wiping. **Hard, nonporous surfaces:** glazed ceramic tile, shower doors, outside of toilet, plastic, chrome, fiberglass, glazed porcelain and synthetic marble. Do not use on natural marble, brass or varnished wood. Spot test all other surfaces in an inconspicuous area.

### PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

**WARNING:** Causes substantial but temporary eye injury. Harmful if absorbed through skin. Avoid breathing spray mist. Do not get in eyes, on skin or on clothing. Wear safety glasses or goggles. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. **FIRST AID: IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. **IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. **IF SWALLOWED:** Have person sip a glass of water if able to swallow. Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. **PHYSICAL AND CHEMICAL HAZARDS:** Do not use or mix with bleach-containing products. To do so will release hazardous gases.

**STORAGE AND DISPOSAL:** Keep container closed. Store in the original container in an area inaccessible to children and pets. Offer empty container for recycling. If recycling is not available, discard container in trash.

Kills *Staphylococcus aureus*, *Salmonella choleraesuis*, Influenza A virus (Hong Kong) and Rhinovirus Type 37

**MODO DE EMPLEO:** El uso de este producto de una manera diferente a la especificada en la etiqueta constituye una violación a la ley federal. **Para Limpiar y Desodorizar:** Gire la boquilla a ESPUMA "FOAM" o ROCIAR "SPRAY". Rocíe de 6-8 pulgadas de la superficie y permita que el producto penetre la mugre y la espuma de jabón. Limpie con una esponja o paño mojado y enjuague con agua. No es necesario frotar. Para limpiezas más difíciles, use la opción de ESPUMA "FOAM". Rocíe y deje que el producto repose sobre la superficie por varios minutos antes de limpiarlo. Para mejores resultados, use regularmente para evitar la acumulación de la espuma de jabón. **Para Desinfectar:** Limpie completamente la superficie que va a ser desinfectada siguiendo las instrucciones de arriba (remueva primero el exceso de mugre en áreas muy sucias); vuelva a aplicar rociando toda la superficie hasta que esté completamente mojada. Deje reposar 10 minutos antes de limpiarlo. **Superficies duras y sin poros:** azulejo de cerámica barnizada, puertas de ducha, parte exterior de inodoros, plástico, cromo, fibra de vidrio, porcelana barnizada y mármol sintético. No lo use en mármol natural, cobre o madera barnizada. Para todas las otras superficies haga una prueba pequeña en un área desapercibida.

### DECLARACIONES PREVENTIVAS: RIESGOS PARA LOS SERES HUMANOS Y ANIMALES DOMÉSTICOS.

**ADVERTENCIA:** Causa lesiones considerables pero temporales a los ojos. Nocivo si se absorbe por la piel. Evite inhalar vapor. Evite el contacto con los ojos, la piel o la ropa. Use gafas de seguridad o gafas protectoras. Lávese completamente con agua y jabón después de usar. Quite la ropa contaminada y lávela antes de volverla a usar. **PRIMEROS AUXILIOS: CONTACTO CON LOS OJOS:** Mantenga los ojos abiertos y enjuague con agua lentamente, con cuidado, durante 15-20 minutos. Si hay lentes de contacto, retírelos después de los primeros 5 minutos, luego continúe enjuagando los ojos. **CONTACTO CON LA PIEL O LA ROPA:** Quite la ropa contaminada. Lávese inmediatamente la piel con abundante agua durante 15-20 minutos. **SI SE INGERE:** Si la persona puede tragar, haga que beba a tragos un vaso de agua. Llame a un médico o a un centro de control de envenenamiento para obtener asesoría sobre el tratamiento. Cuando llame a un centro de control de envenenamiento o a un médico, a informe obtener tratamiento, traiga a la mano el envase o la etiqueta del producto. **RIESGOS FÍSICOS Y QUÍMICOS:** No lo utilice ni mezcle con productos que contengan blanqueador. El hacerlo causará la emisión de gases tóxicos.

**ALMACENAMIENTO Y ELIMINACIÓN:** Mantenga el envase cerrado. Almacene en el envase original en un área inaccesible a niños y mascotas. Entregue el envase vacío para que sea reciclado. Si no hay servicio de reciclaje disponible, tire el envase a la basura.

### QUESTIONS OR COMMENTS? ¿PREGUNTAS O COMENTARIOS?

Please visit/ Por favor visite a [www.clorox.com](http://www.clorox.com) or call/ llame al 1-800-227-1860.

Mfd. for The Clorox Company, 1221 Broadway, Oakland, CA 94612.

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U.S. Patents 5,972,876, 6,245,728 and 6,399,555. EPA Reg. No. 5813-40.

EPA Est. No. 5813-CA-3; G6-1 (actual EPA Est. No. in code above or below)



H0639-4



# Factors Considered

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- False and Misleading/Implied Safety Claim
  - National Capital Area Poison Control Center presentation
  - Clorox consumer market research survey
  - Label review manual – “Symbols implying safety or nontoxicity, such as the Red Cross or a medical seal of approval (caduceus)”
- Perception of Cause Marketing
  - Clorox consumer market research survey
- Endorsement Concerns
  - Disclaimer on label



# Future Factors To Consider

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- Is logo or philanthropic text potentially false and/or misleading
  - May need consumer market research survey
    - Could consumer use of product be altered?
    - How serious might the consequences be?
  - Survey questions submitted to third-party independent entity
  - Possible need for post market survey

# Future Factors To Consider

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- Impact of logo or philanthropic text to the consumer
  - Different age groups
  - Different cultural backgrounds
  - People of limited reading abilities

# Future Factors To Consider

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- Consequences that logo or philanthropic text may pose to consumers if they are misled
  - Discussion and examples submitted with application
  - Mitigation potential



# Future Factors To Consider

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- Must be submitted as label amendment
- Not by notification



# Agency Discussion Questions

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- What kinds of information should EPA receive from applicants to support the inclusion of “cause marketing” statements on pesticide labels?
- What factors should EPA consider in deciding whether or not to approve applications to add “cause marketing” statements to pesticide product labels?
- What mechanisms for public participation should EPA use to solicit views on “cause marketing” issues?

