



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

SEP 4 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Ms Brigid D. Klein
Vice President and General Counsel
Consumer Specialty Products Association
900 17th Street, NW, Suite 300
Washington, DC 20006

Dear Ms. Klein:

Thank you for your comments on the proposed Information Collection Request (ICR) "Use of Consumer Research in Developing Improved Labeling for Pesticides" (EPA ICR No. 2297.01, OMB Control No. 2070-*new*).

An ICR is a set of documents that describe reporting, record keeping, survey, or other information collection requirements imposed on the public by the Environmental Protection Agency or any other federal agency. It also estimates the cost and time for the public to respond. The ICR is a mechanism to approve the collection of information and to detail the estimated burden, not the actual means to do the research. For this reason, the request for comment on this ICR focused on cost and burden estimates. The comments submitted by CSPA on behalf of the DEET Task Force (DTF) were related to the ultimate research EPA might do under the ICR, in addition to related EPA insect repellent projects. Therefore, your comments will not be addressed when the ICR is published.

However, I wanted to assure you that we received, read, and considered your input on our ongoing projects. EPA appreciates the DTF support for the objectives outlined in the proposed ICR and values private and public sector cooperation, especially in the area of pesticide labeling. With respect to the DTF comment related to stakeholder participation in the design of the consumer surveys, EPA plans to conduct stakeholder consultations with public and private sector stakeholders during the design of the surveys. The DTF recommendation for a three-tiered research program (exploratory phase, propose labeling and refinement phase, and implementation phase) clearly reflects DTF experience with consumer research. We look forward to working with the DTF and other stakeholders to use that expertise to its fullest extent.

EPA will continue open communication with DTF regarding the finalization of the Agency's efficacy testing guidelines for repellents, any potential actions related to the FIFRA 25(b) exemption, and our consideration of protection times on product labeling.

EPA strongly believes that all of these related initiatives will have a positive impact on public health. EPA looks forward to the continued dialogue with DTF in pursuing this shared public health goal.

Sincerely,

A handwritten signature in black ink, appearing to read "Debra Edwards". The signature is fluid and cursive, with a long horizontal stroke at the end.

Debra Edwards, Ph.D., Director
Office of Pesticide Programs