

EPA ICR No. 2487.01; OMB Control No. 2070-NEW

ATTACHMENT G

Response to Comments

EPA's Design for the Environment (DfE) Logo Redesign Consultations

**OMB Control No. 2070-NEW
Approval expires XX/XX/XX**

RESPONSE TO COMMENTS

EPA's Design for the Environment (DfE) Logo Redesign Consultations

Commenter #1:

September 23, 2013

David DiFiore
Pollution Prevention Division (7406-M)
Office of Pollution Prevention and Toxics
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW.
Washington, DC 20460-0001

Re: EPA-HQ-OPPT-2013-0403 EPA's Design for the Environment (DfE) Logo Redesign Consultations

The Consumer Specialty Products Association (CSPA) is the premier trade association representing the interests of companies engaged in the manufacture, formulation, distribution and sale of more than \$100 billion annually in the U.S. of familiar consumer products that help household and institutional customers create cleaner and healthier environments. CSPA member companies employ hundreds of thousands of people globally. Products CSPA represents include disinfectants that kill germs in homes, hospitals and restaurants; air fresheners, room deodorizers and candles that eliminate odors; pest management products for home, lawn and garden, and pets; cleaning products and polishes for use throughout the home and institutions; products used to protect and improve the performance and appearance of automobiles; aerosol products and a host of other products used every day. Through its product stewardship program, Product Care®, and scientific and business-to-business endeavors, CSPA provides its members a platform to effectively address issues regarding the health, safety and sustainability of their products. For more information, please visit www.cspa.org.

Many CSPA member companies manufacture cleaning products and participate in the DfE Safer Product Labeling Program. These companies have decided that the additional resources needed to apply for, receive, and maintain the DfE logo on their product labels are a sound investment in furthering their sustainability efforts. CSPA and our member companies provided stakeholder input into DfE's successful efforts to increase the program's transparency and robustness through a series of enhancements to program procedures and requirements. These enhancements include an ingredient communication component that is more expansive than any other third party certification program in the United States. In addition, the program added audit procedures, created a criteria document, and initiated other changes that had a dynamic impact on DfE and its stature among third party certification programs.

CSPA members view DfE's efforts to redesign its logo and messaging as the next logical step in the program's efforts to reduce risks to people and the environment. Redesigning the DfE logo will enable the program to communicate its human and environmental health protection

mission with more clarity and conviction. This, in turn, will add value to the label and provide further incentive for product manufacturers to reformulate to meet DfE's highly protective chemical ingredient and product criteria.

Soliciting public feedback through the planned focus groups and surveys is valuable, since it provides a gauge of the public's awareness and understanding of the DfE mission and logo. That feedback also will provide guidance about the equally important next stage of DfE's efforts--public education about the mission and logo.

CSPA appreciates the opportunity to provide these comments on the ICR.

Respectfully submitted,

Beth L. Law
Assistant General Counsel and
Vice President for International Affairs
(202) 833-7307

EPA Response: EPA thanks CSPA members for noting that efforts to redesign the DfE logo and messaging are the next logical step. EPA agrees that redesigning the DfE Logo will enable the program to better communicate on its human and environmental health protection mission. EPA also thanks CSPA for pointing out the value of the approach for soliciting consumer feedback in the Information Collection Request (ICR).

Commenter #2:

what a waste of taxpayer dollars this plan is. there is absolutely zero need to have a new logo. who cares about using the same logo a second time. nobody. especially not when this agency wastes our tax dollars on this crap. profiteers will never work for safer. their focus is profits and money and greed. the govt has to mandatorily demand safety. the laxness and negligence of the fda, epa and usda is notorious. they seem to be privy to bribe taking and political pimping.

EPA Response: EPA thanks this reviewer for their comment. There are expected benefits of this ICR for consumers, businesses, and the environment through the design of safer chemical-based products resulting from the use of an effective logo. The current logo was developed over twenty years ago and does not adequately represent DfE's mission. A new logo and new messaging would enhance communications and allow the program to reach its full potential.