



December 3, 2009

Dr. Debbie Edwards  
Director  
Office of Pesticide Programs  
Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460-0001

**Re: Request for a New Comment Period for Pesticide Registration (PR) Notice  
2002-X Draft: False or Misleading Pesticide Product Brand Names**

Dear Dr. Edwards:

The undersigned associations collectively represent most manufacturers, formulators, and distributors of pesticide products in the United States.

We all submitted comments on Pesticide Registration (PR) Notice 2002-X Draft: False or Misleading Pesticide Product Brand Names [Docket Control Number OPP-2002-0084] on October 25, 2002. That Pesticide Registration Notice was never issued.

Now, we understand that the Agency is sending letters to registrants directing them to remove certain words from their approved pesticide labels and to also remove these words from the product name (e.g., "professional (Pro), maximum (Max), super, general, plus, ultra, etc..."). This direction by the Agency represents the implementation of a new policy on behalf of the Agency, a policy that was not vetted with the regulated community.

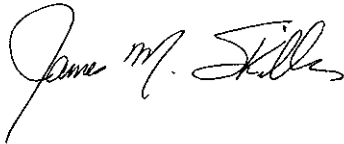
There are costs associated with removing words from pesticide labels but those costs pale in comparison to changing the brand name of a product. Some of these products have been in the marketplace for decades and our members have spent considerable sums of money on advertising to market the brand and build brand loyalty.

The importance of this potential policy change and its impact on our members' financial interests warrant EPA re-submitting the draft PR Notice 2002-X Draft: False or Misleading Pesticide Product Brand Names for public comment. We also request that OPP suspend current efforts to change brand names or remove misleading words until a formal, vetted policy is in place.


This action, will allow for a meaningful dialogue with the regulated community and the public on this very important issue.

We appreciate your consideration of this request.

Sincerely,



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