



# Questions & Answers

## The Consumer Labeling Initiative

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### 1. What is the CLI?

EPA, Industry, and other federal and state agencies and private groups have been working together voluntarily to learn how to make important health, safe use, and environmental information on household product labels easier to find, read, understand, and use. We call this project the Consumer Labeling Initiative. To make sure that labels are doing the best possible job of providing consumers with the information they want and need, we have been going, and will continue to go, to consumers around the country to learn their needs and wishes regarding labels. We're also talking to health professionals and to consumer interest and environmental groups. We're using that information to design label changes and additional research that will lead to more improvements over the next few years.

### 2. Why was the CLI project initiated?

Labels already contain a lot of important information. Because consumer products are regulated by different laws, with different objectives, the information is presented in a variety of ways. The end result is that, even on similar products, consumers can't always find the information they want, or find specific information in the same place on the label. Pesticide products, for example, are labeled under rules that originated with agriculture, and we've learned from consumers that they often don't work as well in the consumer market.

### 3. How is the CLI different from other EPA efforts?

Putting the consumer's needs first will make all labels better and easier to use. By working together in a voluntary, cooperative program, EPA, its industry partners, and state participants are doing more, and doing it much faster than we could through a traditional regulatory process. This is true government reinvention, a public interest partnership to improve health, safety, and the environment by making certain that people have the information they need to choose products and to store, use, and dispose of them safely.

### 4. What action is the Agency announcing?

EPA, with its CLI partners, is announcing the first CLI label improvements now, only a year after we started our research on what consumers want. Those improvements include: (1) encouraging companies to put toll-free telephone numbers that consumers could call for emergency information on all product labels, and allowing pesticide companies to use the EPA-funded National Pesticide Telecommunications Network number for that purpose; (2) encouraging the use of more common names in place of long and complicated chemical names for active ingredients; (3) encouraging the use of the heading "First Aid" in place of the old heading "Statement of Practical Treatment" on pesticide labels; and (4) replacing the pesticide label heading "Inert Ingredients" with the less confusing heading "Other Ingredients."

The Agency and its partners are also announcing the beginning of a year-long effort to identify meaningful ways to convey information on product ingredients to consumers, as well as to find ways to convey useful storage and disposal information that will not conflict with waste management and recycling programs developed by local communities. They are also announcing the beginning of a longer-range effort to implement consumer education through the creation of a Task Force.

## **5. Why are we taking this action now?**

The Agency is implementing labeling recommendations of the Consumer Labeling Initiative Phase I Report. The CLI project has several phases. In 1996, EPA invited people to submit their comments and ideas on how to improve consumer product labels. EPA also went directly to individual consumers to learn what they thought about existing labels on indoor insecticides, outdoor house and garden pesticides, and household hard surface cleaners, including ant and roach products, weedkillers, and floor and basin, tub, and tile cleaners. In addition, EPA collected label research already done by others. That preliminary work is summarized in the *Consumer Labeling Initiative Phase I Report*, completed on September 30, 1996. Pesticide Regulation Notices will be issued very shortly encouraging registrants to make Phase I recommended interim label changes to their labels as soon as possible.

## 6. What Interim Label Changes are being implemented and why?

### a. *Telephone Numbers on Product Labels*

In emergencies, consumers need to know whom to call for help. Our CLI goal is to have an emergency telephone number -- or, at a minimum, simple instructions on how and where to get emergency information -- on every product label. EPA knows that smaller companies can't afford the expense of maintaining a 24-hour, toll-free emergency line so the Agency has increased funding to the National Pesticide Telecommunications Network to allow the toll-free NPTN number to be used on pesticide product labels as an emergency contact. We are also encouraging companies to provide a telephone number for people to use to obtain answers to their everyday questions on product use, performance, ingredients, health and safety, and other information.

### b. *Common Names, Not Formal Chemical Names*

Consumers told us during the first phase of this project that complex chemical names in a list of ingredients weren't understandable to them. To simplify that information, we are encouraging companies to use the shorter common names for chemical ingredients approved by the American National Standards Institute, and to develop common names for many more chemicals.

### c. *"Other Ingredients," Instead of "Inert Ingredients"*

Pesticide labels have always identified ingredients as either "active" or "inert." Active ingredients kill or control pests, and must be named on the label. Inert ingredients contribute to the function and efficiency of the product but are not generally named on the label. We learned from consumers that the word "inert" is not generally understood, and is sometimes interpreted as meaning "inactive" or "water." To correct this misapprehension, we are encouraging companies to remove the term "inert" from pesticide product labels, and to replace the heading with the identification "Other Ingredients."

### d. *"First Aid," Instead of "Statement of Practical Treatment"*

Most pesticide product labels use the heading "Statement of Practical Treatment" to identify instructions on what to do if someone accidentally swallows the product or gets it in their eyes or on their skin. During Phase I of the project, the Agency learned that many companies did not realize that they could use the simpler, more readily understandable heading "First Aid" instead. The Agency wants to encourage this change.

## 7. What other label changes are resulting from this project?

a. *Simplified, Medically Correct First Aid Statements*

When an accident happens, you need to know right away what to do. That information has not always been easy to find or understand. With the help of our industry partners and health care professionals, including Poison Control Centers, we're testing with consumers simpler, more direct instructions to follow in an emergency. By next spring, you may begin seeing those statements on some product labels.

b. *Meaningful Ingredient Identification*

EPA believes that consumers have a right to know about the ingredients used in the products they buy. At the same time, however, we've already learned that long lists of chemical names aren't understandable to most people, so listing ingredients that way on a label may not help the average consumer. Today, in company with our industry partners and other interested groups, we are announcing the start of a one-year effort as part of Phase II of the CLI to identify what specific information consumers want and need about household product ingredients, as well as when and where they want it. This effort will also explore the best avenues for providing that information, which may well go beyond the label.

c. *Consistent Storage and Disposal Information*

We learned in Phase I that many people don't realize that labels often give information on how to store products safely and how best to dispose of leftover product or empty containers, so that information often isn't consulted. In addition, many local communities have developed very different programs for dealing with recyclable materials and with household wastes. During the next year, we will be exploring with communities and our partners how best to provide storage and disposal information that gives people clear and appropriate directions to follow, no matter where they live.

## 8. What is the advantage of using common names on labels?

Using the common names, instead of the formal chemical names, on the labels will make it much easier for a consumer to recognize a product's active ingredient. For example, currently, a consumer can be faced with the following chemical name in an ingredient statement: **1-((6-Chloro-3-pyridinyl)methyl)-N-nitro-2-imidazolidinimine**. With the changes being implemented today, they will see just the easily recognizable common name: **Imidacloprid**.

Another example would be currently consumers see the chemical name:

**N-(phosphonomethyl)glycine**.

Under the new system they would see the American National Standards Institute (ANSI)

name: **Glyphosate**

**9. What is the National Pesticide Telecommunications Network and what services does it provide?**

NPTN is an EPA-funded toll-free telephone service that provides the caller a wide variety of pesticide information, including: emergency human and animal treatment; pesticide products; recognition and management of pesticide poisoning; toxicology; and chemical/ health/ and environmental topics. NPTN helps callers interpret and understand toxicology and environmental chemistry information about pesticides and furnishes general information on the regulation of pesticides in the United States. They also direct callers to appropriate sources for pesticide incident investigation, safety practices, clean-up and disposal, and laboratory analyses. NPTN can be contacted by calling 1-800-858-7378; accessing the World Wide Web at: <http://ace.orst.edu/info/nptn/>; or by FAX at: 1-541-737-0761. On June 28, 1997, NPTN began operating seven days a week from 6:30 a.m. to 4:30 p.m. (Pacific Time).

**10. When will consumers see these new changes on labels?**

While some of these changes may appear on labels within the next year, most will appear as product labels are routinely reprinted within two years. Our partners are committing to that timeframe today. Additional label improvements identified during Phase II of the project will be implemented on a similar timeframe; i.e., within two years after they are announced. This allows companies to time their label revisions as stocks of existing labels are used up.

**11. Are there benefits to the consumer from this action?**

Yes. Consumers will begin to see labels that will be easier to read, understand, and use. Improved understanding will foster awareness of hazards and safer use.

**12. Will the public have an opportunity to comment on this action?**

Consumers are encouraged to provide input into the CLI process using any of the following means:

- a. Writing to the administrative record at: OPPT Document Control Officer (7407), AR-139 - Consumer Labeling Initiative, Environmental Protection Agency, 401 M St, SW, Washington, DC 20460
- b. Providing comments through the CLI website at:  
<http://www.epa.gov/opptintr/labeling>
- c. Calling one of the following CLI team members: Amy Breedlove at 703-308-9069, Mary Dominiak at 202-260-7768, Julie Lynch at 202-260-4000, or Jean Frane at 703-305-5944.

**13. What are the contents of the *Phase I Report*?**

The *Report* includes an Executive Summary, an Introduction and Background, a Summary of Stakeholder Comments, a Summary of the Literature Review, a Summary of the Qualitative Consumer Research, a Summary of Findings, and a section with proposed Next Steps and Recommendations. There are also a number of appendices which provide more detail and background on the research: for example, an annotated bibliography, the screeners and discussion guides used for the interviews, lists of people and organizations who provided comments, etc. You can read the Executive Summary, Introduction and Background, and Next Steps and Recommendations sections of the *Report* on the Internet at:  
<http://www.epa.gov/opptintr/labeling>.

**14. How can I obtain the *CLI Phase 1 Report*?**

Printed copies are available by calling the Pollution Prevention Information Clearinghouse at 202-260-1023. The report is also available on the Internet as a downloadable ASCII file at the following address: <http://www.epa.gov/opptintr/labeling>.