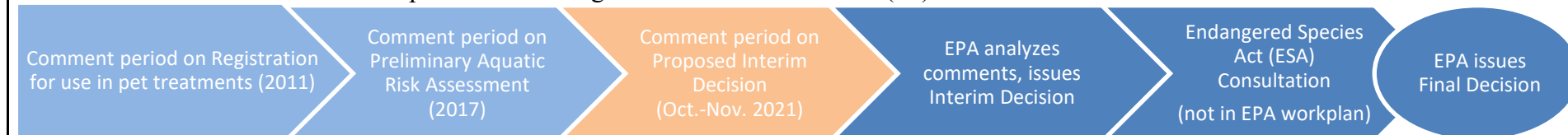


Pesticides: Pyrethrins – EPA-HQ-OPP-2011-0885
Use: Insecticide- related to pyrethroids, but less stable and less toxic. Indoor and pet uses.
Why we care: Often used as an alternative to pyrethroids.
Actions taken: BACWA submitted a comment letter on the Preliminary Ecological Risk Assessment (July 2017) and the Ecological Risk Mitigation (February 2020).
Status: EPA released the Proposed Interim Registration Review Decision (ID).



Next steps: ESA will release the Interim Decision.

Recommendation: BACWA will prepare a comment letter on the Proposed Interim Decision to submit to EPA.

BACWA Comments to USEPA (11/02/2020)	USEPA Response	Did USEPA consider BACWA's comments?
<p>EPA Proposed Label Clarifications – Pictograms, Stewardship Statement, and Spanish Language – Support with Modifications- BACWA supports the concept of a graphic showing an image of an “X” – or better the “do not” symbol– over a drain on product packages. We have extensive experience with regard to graphically communicating “do not discharge” to various audiences and have found this approach to be very effective, if the graphic is properly designed. We appreciate EPA’s example (shown to the right) but cannot support the use of the EPA graphic due to lack of clarity, particularly when the image is reduced in size to fit on smaller packaging.</p> <p>We request that EPA please select a clear, schematic graphic that is very obvious as to what is prohibited. We would be pleased to work with EPA, our national association NACWA, and registrants toward selecting an appropriate graphic.</p> <p>To ensure that these label elements completely and effectively address products that may be discharged “down-the-drain” into municipal wastewater collection systems, we request that EPA modify the “label table” in Appendix B to: 1.</p>	<p>EPA incorporated BACWA’s comments, including the use of BACWA’s pictogram, submitted by a member agency.</p>	<p>Yes.</p>

Identify a specific graphic and require the same graphic be used on all products. 2. Establish minimum size for the graphic, to ensure that it is legible, i.e., no smaller than 1.5 square centimeters unless this size is greater than 10% of the size of the label.		
Include addition of Spanish translation on label.	EPA incorporated BACWA's comments.	Yes.
<p>BACWA also supports EPA's proposal to add drain discharge prohibitions ("stewardship statement") and the Spanish translation of the stewardship statement to product labels. For those products labeled for use directly inside pipes/sinks, instead of EPA's proposal ("Do not allow to enter indoor or outdoor drains unless labeled for drain treatments."), we request that EPA instead require the following language, which is more clear and complete:</p> <p>"Do not pour down-the-drain or sewer except when following treatment instructions for [drains] [sewers]". Call your local solid waste agency for local disposal options."</p>	EPA incorporated BACWA's comments.	Yes.