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Office of Pesticide Programs (OPP)  
Environmental Protection Agency  
1200 Pennsylvania Ave., NW  
Washington, DC 20460-0001

**Re: Enable the Label Discussion Forum; Issue Paper: “New” on Pesticide Product Labels**

The ANIMAL HEALTH INSTITUTE (“AHI”) submits these comments to the Issue Paper: “New” on Pesticide Product Labels. AHI is the national trade association representing manufacturers of animal health products -- the pharmaceuticals, biological products and feed additives used in modern food production, and the medicines that keep livestock and pets healthy. AHI member companies represent the majority of animal pharmaceuticals and animal insecticides, as well as serving a significant segment of the world market.

AHI would like to thank EPA for the opportunity to provide public comments on the suggestion to change the way the term “new” is approved. Overall, AHI is supportive of EPA’s consideration to allow registrants to request the use of the term “new” for a 6-month time period starting on the projected date of marketing; however, we request that EPA consider a longer duration and the ability for the term “new” to apply at the time of first distribution to cover both basic registrants and supplemental distributors and labeling. Additionally, a time period of one year would allow for promotional materials to account for seasonality issues with varying crop and pesticide life cycles.

Thank you in advance for your consideration of these comments. Should you have any questions, please do not hesitate to contact AHI at (202) 637-2440.

Sincerely,



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