



OPP Labeling Initiative: Web-Based Distribution

Presentation for The Pesticide
Stewardship Alliance

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Overall Labeling Strategy

- Many current labeling problems exist because of an antiquated system of product-by-product reviews
- OPP has a 3 pronged approach:
 - Electronic submission & review
 - Improving content systematically
 - Electronic dissemination of labeling

Web-Based Labeling Background

- Substantial work done by States, industry, and other stakeholders
- At Summer 2007 AAPCO meeting States presented the topic to OPP's new Office Director, Debbie Edwards
- Web Label Workgroup went active in November – Bill Jordan lead;

Web-Based Labeling: What It Is Not

- It is not referring to electronic submission or review of labels by the Agency (but that effort is underway)
- Would not require standardized labeling
- Would not diminish legal procedures that EPA must follow to change labeling
- Would not change process registrants use to amend product labeling
- Would not change users' duty to follow labeling requirements

Web-Based Labeling: What It Is ***

- Web-based distribution of electronic labeling is a system which would make the most current version of pesticide labeling available to purchasers and users electronically on an EPA-maintained Web site.
 - Simplify label on container
 - Allow for rapid updating of the labeling
- *** current thinking – not cast in stone

Web-Based Labeling: Changes to Container Label

- A URL would be placed on the container label, directing users to the Web site.
- May replace virtually all of the Directions for Use on the physical container.
- Container label would still have all FIFRA mandated elements, e.g., product name, registration number, net contents, ingredient statement, etc.
- Container label could have other key information.

Web-Based Labeling: Process to Obtain Labeling

- Distributors, purchasers or users would visit EPA's Pesticide Labeling website.
- After entering the product registration number, the product labeling would appear in a printable format.
- Dealers could distribute printed labeling.
- An alternative method of obtaining labeling, e.g., a toll-free phone number, would be available for those without access to the necessary technology.

Web-Based Labeling: Enforcement

- Users would need to have a copy of the web labeling at the time of application. (Like supplementals do now)
- Labeling would be good for a specified duration of time (e.g., 6 – 12 months) from the date of “printing”; labeling lifespan would not affect the registration.
- Archival system would allow verification of the version of the labeling posted on any date.

Web-Based Labeling: Anticipated Benefits

- Enhanced protection of human health and the environment by providing pesticide users with the most current, accurate information available.
- Anticipated benefits to all stakeholders
 - Users
 - Industry
 - NGOs
 - States
 - International
 - EPA

Web-Based Labeling: Anticipated Benefits for Users

- Labeling information is always current
- New uses available very quickly
- PDFs are electronically searchable
- Printable in large font
- Simplified container label
 - Health and safety information is more noticeable
 - Should increase comprehension
- Level playing field
 - Users would not have to worry about dealing with existing stocks of products having different mitigation measures or use directions (e.g., lower rates, longer pre-harvest intervals)

Web-Based Labeling: Anticipated Benefits for Industry

- Easy to modify labeling
 - Add newly registered use (no need for “supplemental labels”)
 - Make other labeling amendments
- Reduces printing costs
- No need to re-sticker or recall when changes must be made quickly but do not affect the container label
- Promotes a level playing field
 - All products could make a regulatory change at the same time

Web-Based Labeling: Benefits to EPA

- Show improvements in protection of human health and the environment
 - Communicate labeling changes quicker
 - Faster market entry of reduced-risk uses
 - Earlier implementation of risk mitigation measures
 - Greater ability to make revisions based on user feedback
 - Accuracy of final printed labeling
 - Labeling on the website will be the version that is EPA-approved

Web-Based Labeling: Enhancements to the Basic System

- Labeling Links to:
 - Endangered Species Bulletins
 - State requirements
 - Site-based regulatory decisions
 - Advisory information (e.g., rate calculator, demonstration videos, MSDSs, hotline numbers)
 - NAFTA labels
- Easy, direct way for users to provide feedback on labeling issues

Web-Based Labeling: Further Enhancements

With e-submission, additional enhancements become possible:

- Customize printed labeling
 - Crop and site specific
 - Reduces time necessary to understand use directions
 - Reduces potential for user error or confusion
 - Labeling in different languages
- Searchable database
 - Search on many parameters, e.g., use sites or products with groundwater concerns

Web-Based Labeling: What are the next steps?

- Discuss concept with stakeholders
 - Discussion meeting already underway
 - 15 done or scheduled soon; full range of stakeholders
- Develop set of proposals based on feedback, including: elements of scope; necessary rulemaking; implementation issues (e.g., timing, transition)
- Put proposals out for broad-based public comment
- Initial proposals this year; perhaps a pilot in 2009