Web-Based Pesticide Labels for Product Stewardship

Jim Gray
North Dakota Dept of Agriculture
TPSA Meeting
February, 2008

Agenda

- Defining "e-labeling"
- Background and history of the issues
- Use of web-based labeling for pesticide stewardship
- Some questions & issues

E-Labels: Two Overlying Issues

- Use of electronic labeling as part of the pesticide registration process
 - Mostly process issues, not regulatory issues
- Distribution of electronic labeling to pesticide users & dealers
 - Includes regulatory issues
 - Commonly called "web-based" labeling

The E-Label Distribution Model

- Base container with "essential" label components
- URL directing users to site for downloading the rest of the labeling
 - Most likely the use directions
- Appropriate reference language on base container to make e-label enforceable

Background & History

E-labeling has been discussed and addressed by states, EPA, industry, and others

SFIREG POM E-Label Task Force recommended that EPA and SFIREG continue exploring possibilities for downloading electronic labels

This Isn't Uncharted Territory...

- Electronic versions of labeling are readily available on the internet
- Electronic versions of supplemental labeling are widely distributed to dealers and users
- Model of base container label and URL reference language will be utilized for ESPP Bulletins

How Can Web-Based Labeling Improve Stewardship

First we need to admit that we have a problem.....

The Cold, Hard Truth

In general, pesticide labels are....

- Long
- Difficult to read & understand
- Difficult to find directions for specific use sites or crops
- Expensive & difficult to modify
- A single type of media to communicate to users

Why Web-Based Labels?

- Instantaneous release of label and label revisions
 - Eliminates multiple label versions in marketplace
 - Economic savings for registrants
- Improved user friendliness
- Increased label compliance
- Increased enforceability & compliance verification

Imagine the Possibilities...

- Rate calculators
- Search & sort functionality
- Use of video, photos, and other media
- Links to relevant sites & resources
 - ESPP homepage, PPE suppliers
- Immediate availability of other documents
 - MSDSs, draft Fumigation Management Plans
- Q & A sections

Imagine the Possibilities...

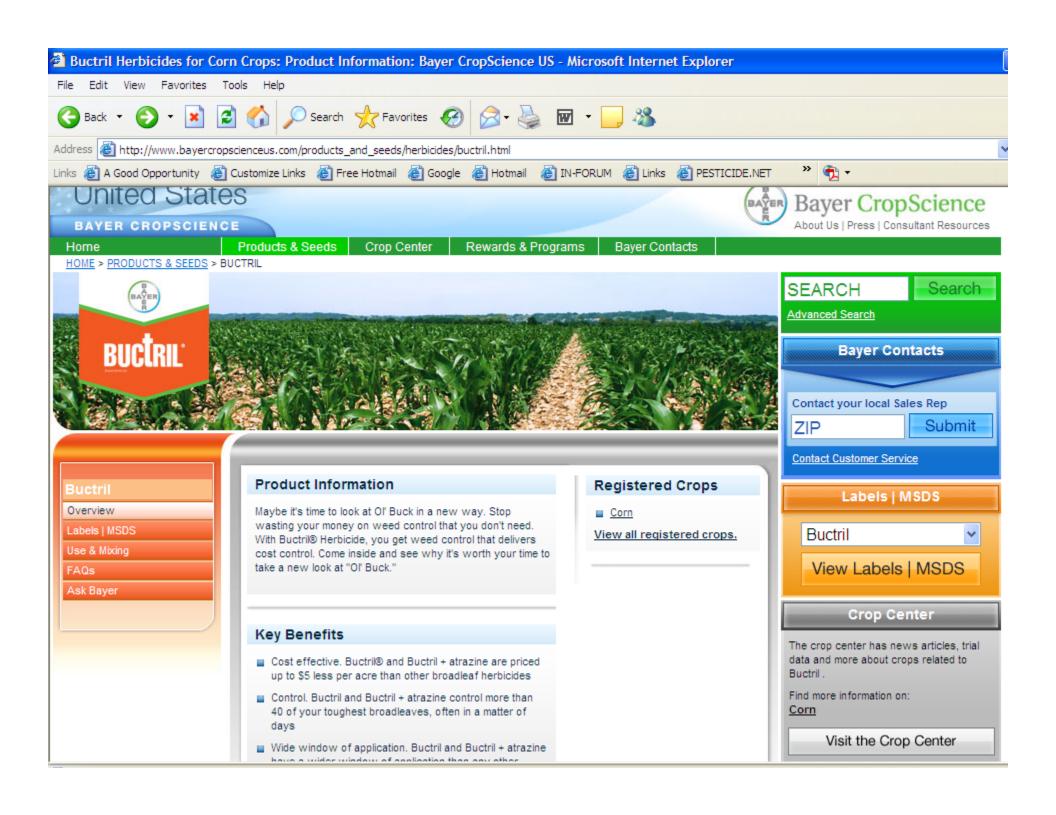
- Technical bulletins and site-specific recommendations for timing, tank mixes, etc
- Access to state-specific Section 18 exemption use directions and Section 24(c) supplemental labeling
- Information on container recycling & disposal
- Information on state clean sweep programs

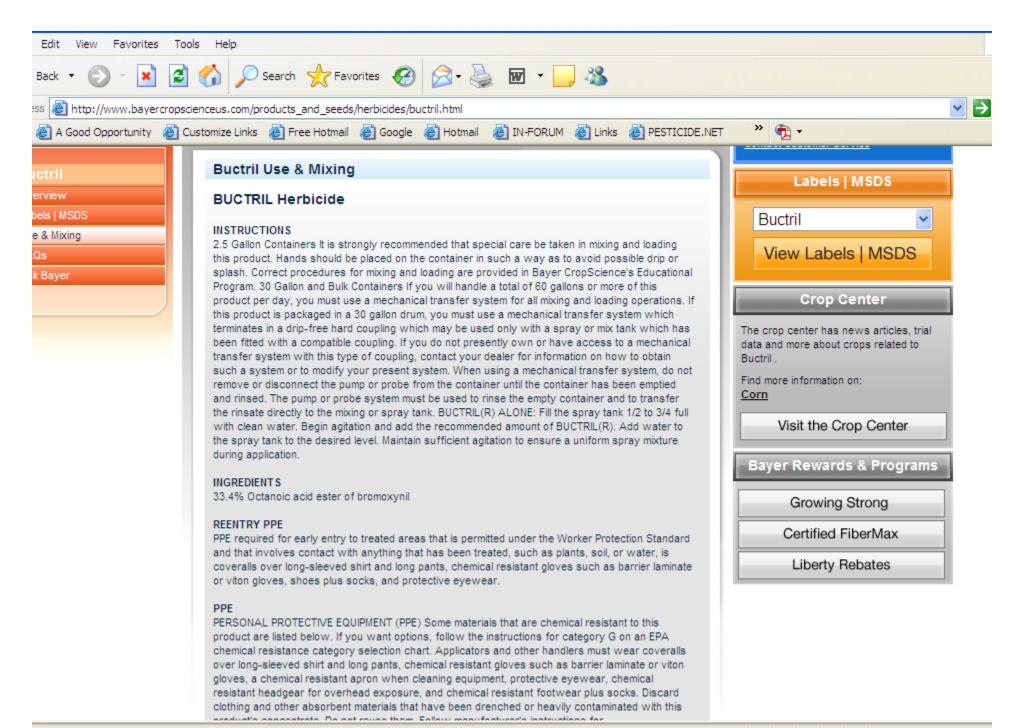
Imagine the Possibilities...

- Information pesticide drift
 - Nozzle selection, sprayer setup

- Sprayer calibration
- Resistance management

Web-Based Pesticide Information is not Uncharted Territory Either...











op protection US

luicts. els& MSDS cial Labels vants Finder ersity Info

ia Center loyment

ited Sites ources

onmental Stewardship tact Us

SYNGENTA CROP PROTECTION

Syngenta Crop Protection is a leading agribusiness in North America. We offer the most comprehensive and high-quality portfolio of weed, insect and disease control products in the industry, all designed to make growers and ranchers more successful.

PRODUCTS

This area contains information about Syngenta products by product type or crop needs.

ENVIRON, STEWARDSHIP

Syngenta Crop Protection is a leading partner in many Crop Protection products. Locate environmental stewardship initiatives throughout the country.

More >

LABELS & MSDS



Syngenta Crop Protection 📰 product labels and MSDS's. 🖠

FARMASSIST

FarmAssist® is a suite of and influencers with timely, credible knowledge that enables better

More >

More >

resources providing growers agronomic/agribusiness decisions.

More >

What's New?

- · Rich Grever Named National Professional Farm Manager of the Year read more...
- Four Honored as Exceptional Innovators at the Annual National No- read more...
- Endigo Insecticide Registered for Use in Potatoes read more...
- Syngenta's Dale Nicol Named CAPCA Member of the Year read more

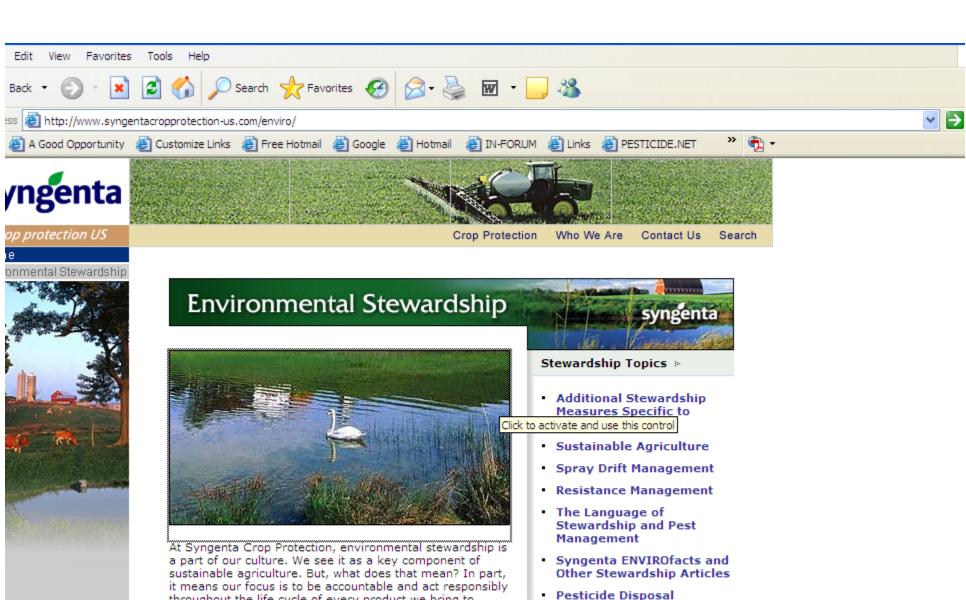










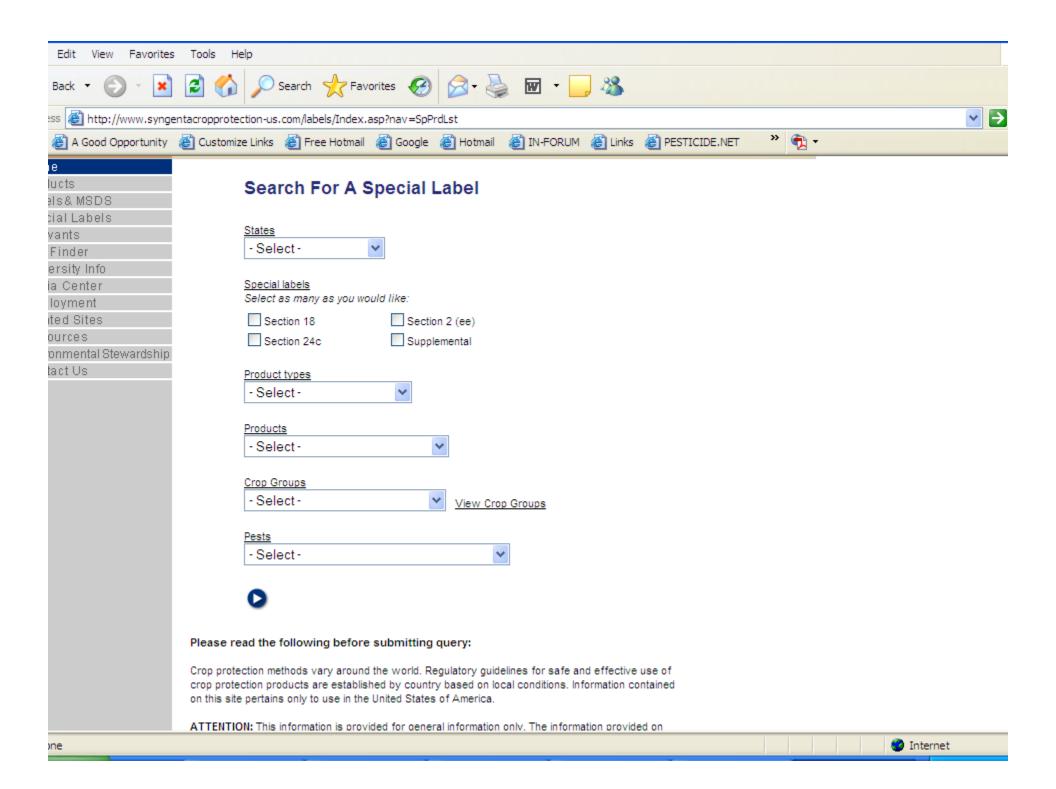


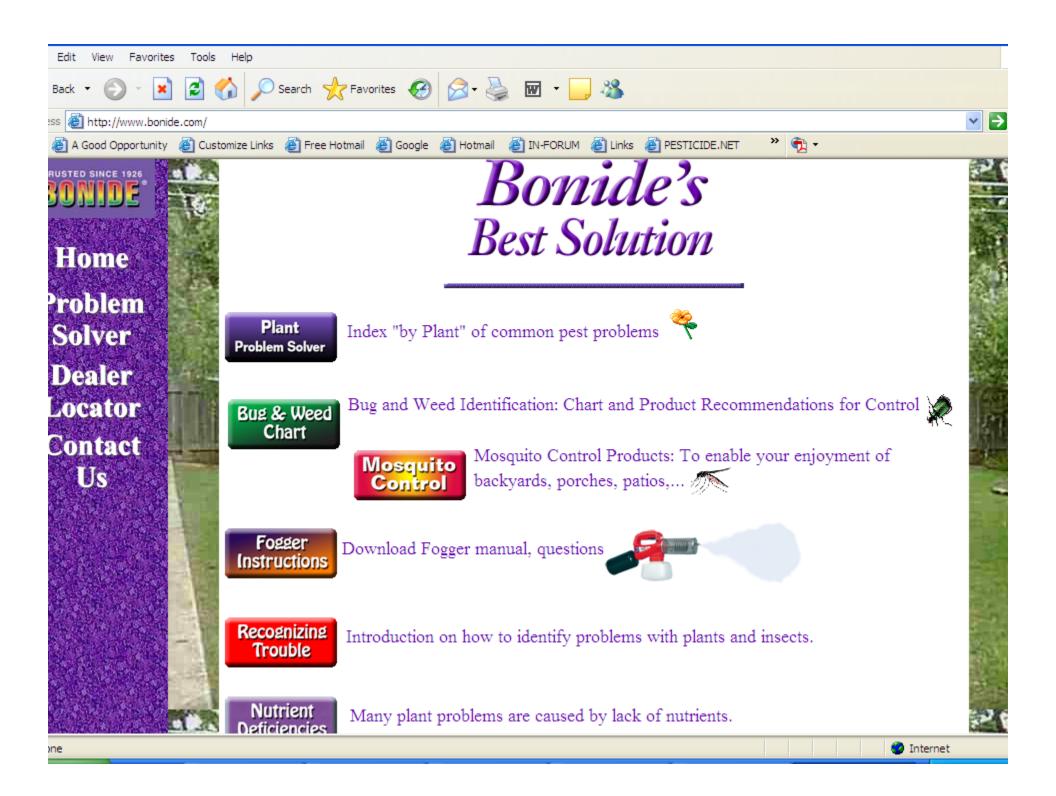
At Syngenta Crop Protection, environmental stewardship is a part of our culture. We see it as a key component of sustainable agriculture. But, what does that mean? In part, it means our focus is to be accountable and act responsibly throughout the life cycle of every product we bring to market. Our approach to manufacturing and distribution coupled with our partnerships with dealers, growers, government agencies, and organizations in stewardship and environmental programs lead the industry. We believe that stewardship works best when developed and implemented by partnerships at the local level.

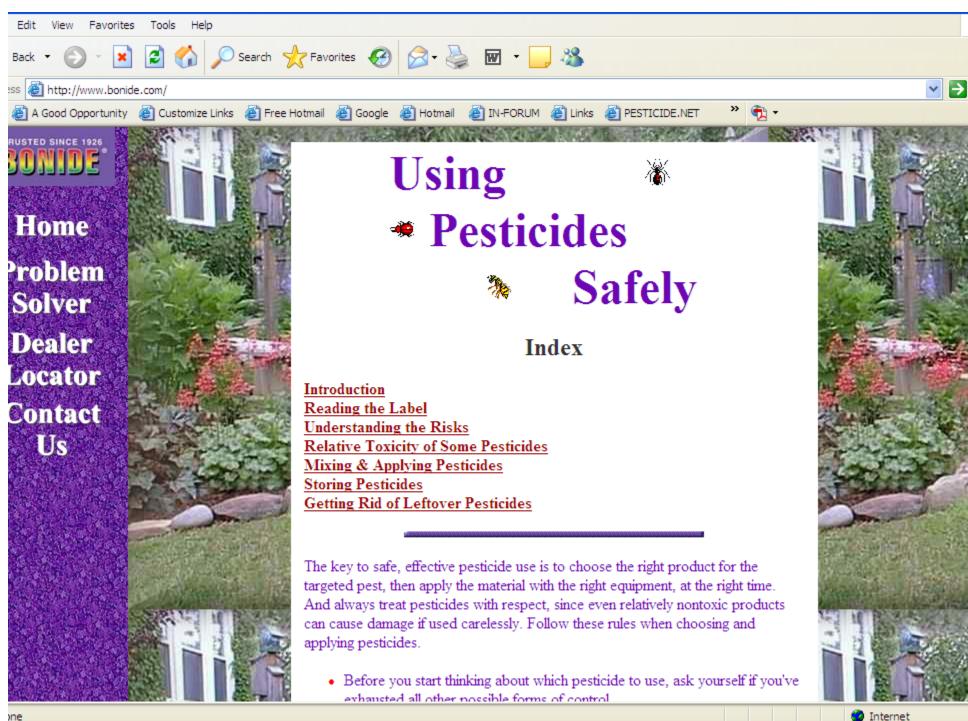
To find out more about Syngenta Crop Protection's stewardship effort choose one of the links at right.

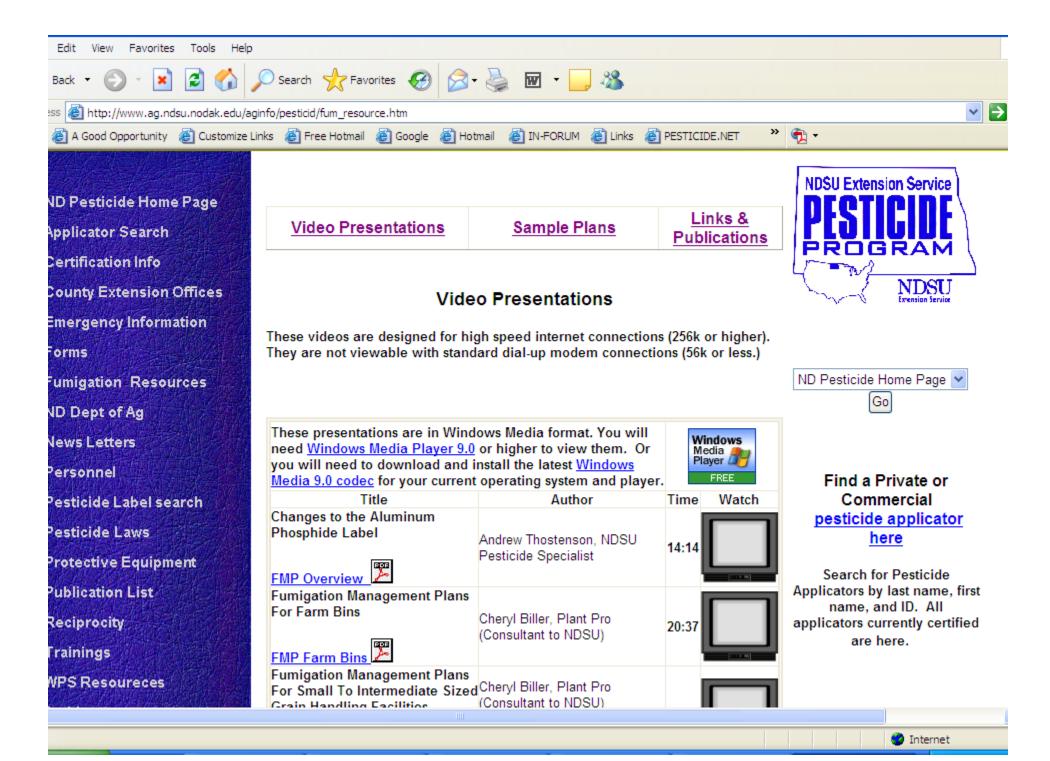
- Agricultural Biotechnology
- Water Quality
- Integrated Pest Management
- Partnerships











PULL HERE TO OPEN -







Fungicide

For control of certain diseases in listed vegetable crops

Active ingredient:

 Mandipropamid (CAS No. 374726-62-2)
 23.3%

 Other Ingredients:
 76.7%

Spray Drift Management: To avoid spray drift, do not apply when conditions favor drift beyond the target area. The interaction of many equipment and weather related factors determine the potential for spray drift. AVOIDING SPRAY DRIFT AT THE APPLICATION SITE IS THE RESPONSIBILITY OF THE APPLICATOR AND THE GROWER. More information on managing spray drift can be found on the SYNGENTA CROP PROTECTION website under Stewardship (http://www.syngentacropprotection-us.com/erwiro/driftmanagement/index.asp?nav=drift_management).

■ What information will be available at the URL referenced on the container label?

- Just a digitized copy of the labeling?
- Other enhancements like video, rate calculators, etc?
- Links to other sites?

Where will the e-labels be posted?

- EPA homepage?
- Registrant homepage?
- Independent third party?
- A mixed model.... URL to EPA's page for the label & registrant's page for other info

Will web-based labeling be an option for all pesticides, or just a sub-set?

What do we do about users who are not comfortable with technology or that don't have internet access?

Will web-based labeling need to have an expiration date?

Will web-based labeling necessitate the development of unique identifiers for labeling?

■ If EPA hosts the web-based labeling website, will the Agency manage web-based labeling for supplemental distributor and/or Section 25(b) pesticides?

Is downloading or emailing e-labeling considered pesticide production?

Would we need to make any changes to federal regulations or statutes to make the distribution of web-based labeling legal?

What are the obligations of registrants in a web-based label world?

What are the obligations of retailers in a web-based label world?

How will web-based labeling be regulated?

Will web-based labeling affect label enforceability?

Will web-based labeling affect label compliance?

Will any states need to change their state pesticide laws and/or rules to allow for the distribution web-based pesticide labeling?

E-Label Benefits Deserve Some Serious Consideration

- Timely access to the most current label
- More user-friendly labeling
- Better communication on how to legally & safely use the product
 - INCREASED COMPLIANCE
- Better tracking of who is reading & accessing labeling