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November 19, 2010

Mr. Bill Jordan
Environmental Protection Agency
Office of Pesticide Programs
1200 Pennsylvania Ave., NW
7506C
Washington, DC 20460
Jordan.william@epa.gov

RE: Web-distributed labeling (WDL)

Dear Mr. Jordan:

The undersigned organizations have participated in the discussions and debate over the WDL concepts, and we have openly shared with EPA our view of the pros and cons of this initiative. However, after careful consideration, we have concluded that we do not support EPA pursuing either voluntary or mandatory WDL, and strongly recommend that the Agency discontinue work on the user acceptance pilot project. Pesticide registrants, distributors, applicators, and customers are not asking us for this information option and, in fact, many customers have told us they do not want to move to WDL.

EPA's major stated goals of WDL are timely dissemination of information and improved reading and understanding of pesticide labels by applicators and users. However, we do not believe that WDL will significantly enhance access to label information or demonstrably enhance the understanding of labels by the users. Moreover, there exist today several ways that stakeholders can obtain an electronic label. We do not see a need at this time for another mechanism to retrieve an electronic version of a label.

At a time when all of us, including the Federal Government, face limits on our resources, we do not think WDL is a priority for industry, its customers, and other users and therefore should not be a priority for EPA. It is our recommendation that EPA suspend work on WDL at this time, including the recently proposed user acceptance pilot. Ultimately, some improved means of communicating label information might be needed and demonstrate clear benefits in the marketplace. Should that need arise, we would hope to work with EPA at that time.

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Signed,

Agricultural Retailers Association
American Chemistry Council Biocides Panel
American Farm Bureau Federation
Biopesticide Industry Alliance
Chemical Producers & Distributors Association
Consumer Specialty Products Association
CropLife America
National Agricultural Aviation Association
National Alliance of Independent Crop Consultants
National Cotton Council
National Potato Council
RISE (Responsible Industry for a Sound Environment)
United Fresh Produce Association

Cc: Dr. Steve Bradbury, Director, Office of Pesticide Programs, EPA

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