

US EPA ARCHIVE DOCUMENT

Web-Distributed Labeling

Presentation for PPDC Workgroup
October 2, 2008

1

Web-Distributed Labeling: Overview of Presentation

Overview	Mechanics	Benefits	Progression
Background	Changes to Container Labeling	Users	Enhancements
What It Is Not	Process to Obtain Labeling	Industry	Activities to Date
What It Is	Enforcement	EPA	PPDC Role
			Next Steps

2

Web-Distributed Labeling Background

- Substantial work done by States and other stakeholders on researching elements of electronic submission and distribution of labeling
 - 2005 and expanded 2007 SFIREG Issue Papers submitted by POM E-label Subcommittee
 - OPP E-label Review Work Group
- At Summer 2007 AAPCO meeting States presented the topic to OPP's new Office Director, Debbie Edwards

3

Web-Distributed 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
- Would not return EPA master labeling

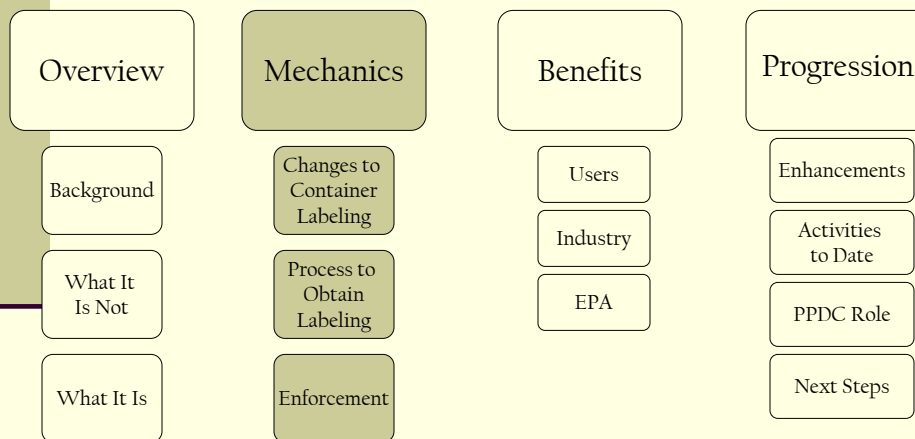
4

Web-Distributed Labeling: What It Is

- Web-distributed labeling is a system which would make current versions of the state-approved marketed pesticide labeling available to purchasers and users electronically.
- Web-distributed labeling will result in simplified container labels.
- Web-distributed labeling will allow for rapid updating of the labeling.

5

Web-Distributed Labeling: Overview of Presentation



6

Web-Distributed Labeling: Changes to Container Label

- A URL would be placed on the pesticide label, directing users to the website.
- Container label would still have all FIFRA mandated elements (product name, registration number, net contents, ingredient statement, etc.).
- Container label could have other key information, e.g., directions for use, warranty statements

7

Web-Distributed Labeling: Process to Obtain Labeling

- Distributors, purchasers or users would visit the web-distributed labeling website referenced on the container
- After entering the product registration number or other unique identifier, the approved marketed product labeling for the state in which the product would be used would appear in a printable format
- An alternative method of obtaining the web-distributed labeling, a toll-free phone number, would be available for those without access to the necessary technology

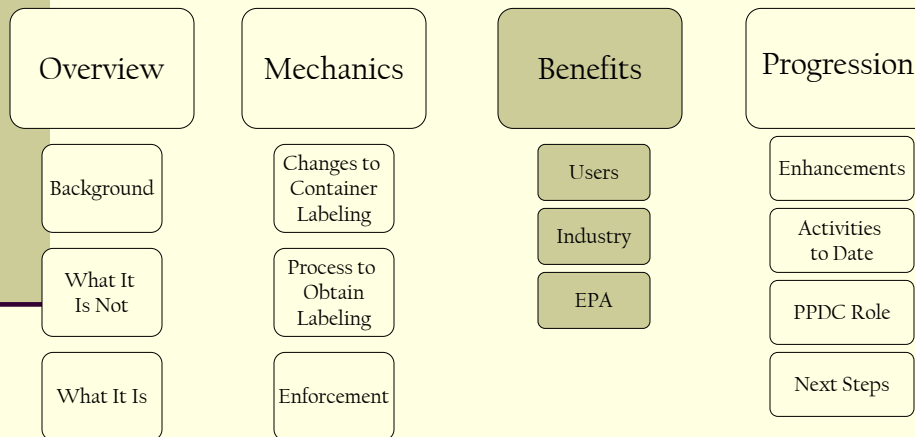
8

Web-Distributed Labeling: Enforcement

- The label would require users to have a valid copy of the labeling from the website at the time of application
- Labeling would be valid for a specified duration of time (e.g., six to eighteen months) from the date of download
- A user's failure to follow all label and labeling instructions or to have a valid copy of the labeling at the time of application would be considered a violation
- The most current and accurate version of labeling would be available through the website and a responsive alternate delivery mechanism
- System would allow States and EPA access to historical labeling to facilitate enforcement actions

9

Web-Distributed Labeling: Overview of Presentation



10

Web-Distributed Labeling: Anticipated Benefits

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

11

Web-Distributed 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

12

Web-Distributed Labeling: Anticipated Benefits for Users

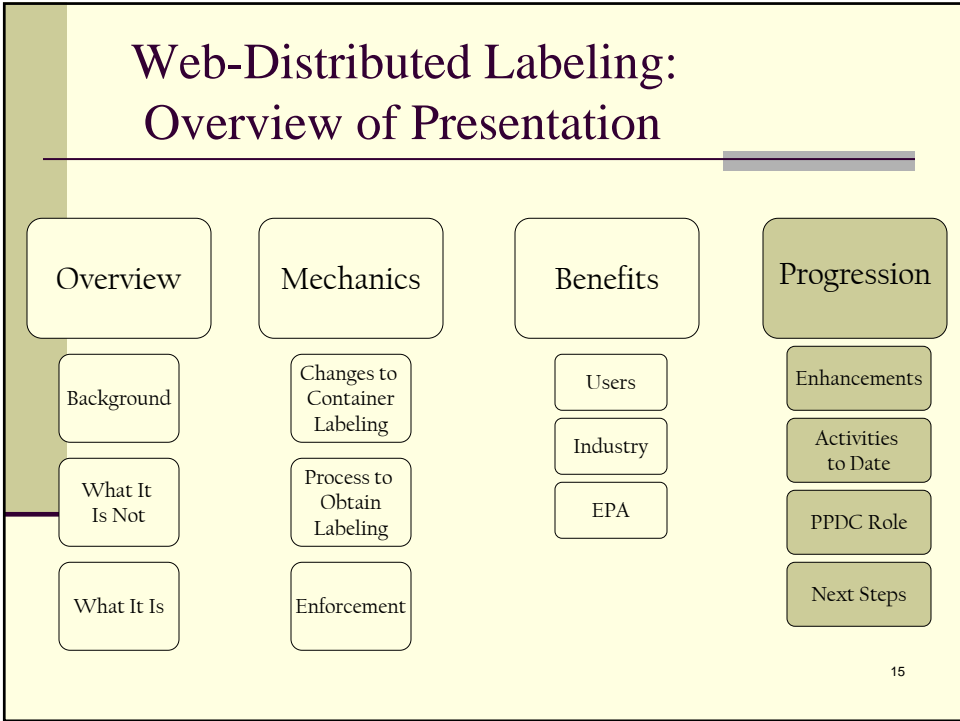
- Labeling information is always current
- Labeling is electronically searchable
- Printable in large font
- Simplified container label
 - Health and safety information is more noticeable
 - Should increase comprehension
- More concise labeling directions
 - State, crop/site specific
 - Reduces time necessary to understand use directions
 - Simplifies labeling content
- 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)

13

Web-Distributed Labeling: Benefits to EPA

- Measurable 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, state-approved, and authorized by the registrant for release

14



- ## Web-Distributed Labeling: Enhancements to the Basic System
-
- Labeling links to Endangered Species bulletins, State requirements, site-based regulatory decisions, advisory information, NAFTA labels, MRLs
 - User feedback on labeling issues
 - Download WPS requirements for posting
- 16

Web-Distributed Labeling: Further Enhancements

With e-submission, additional enhancements become possible:

- Customize printed labeling
 - Highlight changes to labeling within a given timeframe
 - Labeling in different languages
- Searchable database
 - Search on many parameters, e.g., use sites or products with groundwater concerns

17

Web-Distributed Labeling: Activities to Date

- Engaged a number of stakeholders
 - Individual stakeholders & associations; PPDC
 - Continue to refine details of web-distributed labeling
- EPA workgroup developed discussion papers
- Formed PPDC workgroup for formal feedback to the Agency

18

Web-distributed Labeling: Role of the PPDC Workgroup

- Provide additional feedback on the concept
- Review and provide comments on the discussion papers
- Provide advice to EPA through recommendations to the full PPDC

19

Web-Distributed Labeling: PPDC Workgroup Discussion Areas

Topics under consideration

- What types of products would be covered?
- What content should be on the label and what should be on the labeling?
- How will stakeholders be educated about the change in distribution of labeling?
- How will users without internet access obtain the current labeling?
- Where should the website should be hosted and what content should be included?
- If web-distributed labeling should have a lifespan, and how long it should be?
- What metrics will be used to measure the effectiveness of the pilot?

20

Web-Distributed Labeling: PPDC Workgroup Process

- Series of meetings/conference calls to provide comments on discussion papers developed by EPA workgroup
 - 2 discussion papers per meeting/conference call
 - Monthly meetings
- Provide input based on experience
- Report back to full PPDC in Spring 2009

21

Web-Distributed Labeling: What are the next steps?

- Engage PPDC Workgroup
- 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
- Develop, implement, and assess a pilot project

22