

US EPA ARCHIVE DOCUMENT

PPDC Consumer Labeling Workgroup

**Washington, D.C.
June 15, 2006**



Stakeholder Participation



- American Bird Conservancy
- BBL Sciences
- Beyond Pesticides
- California Department of Pesticide Regulation
- Clorox Services Company
- CSPA
- Consumer Federation of America
- EPA: Field and External Affairs Division
- Maryland Department of Agriculture
- North American Hazardous Materials Association
- Oregon State University
- PBI Gordon
- RISE
- The Accord Group
- The Scotts Company
- Spectrum Brands
- Syngenta Crop Protection
- University of District of Columbia Cooperative Extension Service



Mission Statement Summary

Established under the auspices of the (PPDC) the workgroup is charged to provide recommendations to the Agency on ways to improve consumer labels with two goals in mind:

- 1) Improve consumer understanding of safe use, storage, disposal and environmental and health information on household pesticide product labels
- 2) Recommend a Label Improvement Program that can be easily implemented by EPA and the registrant community to ensure that registration transaction costs are minimized



Environmental Hazard Statements

- Identified as an area where significant improvement is warranted and where user behavior can be impacted through simplified, actionable statements
- Previous efforts have yielded positive results
 - First Aid Statements
 - Ingredient Statement
 - Storage & Disposal
- Current statements do not promote action, do not address residential use patterns or product forms, and are replete with technical jargon



Environmental Hazards: Current State

- For terrestrial uses, do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark...
- Do not contaminate water when disposing of equipment washwater
- Most cases of ground of groundwater contamination involving phenoxy herbicides such as 2,4-D and MCPP have been associated with mixing/loading and disposal sites...
- Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas



Environmental Hazards: Future State

- Use of Actionable statements
- Consumer focused – provide direction, change behavior
- Ensure enforceability (“do not...”)
- Specific to the product type/hazard potential
 - Liquid, Dust, Granule, Broadcast or spot treatment
- Promote desirable actions/ discourage undesirable actions specific to the use pattern



PPDC Recommendation

- Granular Products

Environmental Hazards: (This product is toxic to fish.)
Do not apply product near water, storm drains, or drainage ditches. Do not apply if heavy rainfall is expected. Apply this product only to your lawn/garden, and sweep any product that lands on the driveway, sidewalk, or street back onto your lawn/garden.



PPDC Recommendation

- Liquid Broadcast Products

Environmental Hazards:

Do not apply near water, storm drains, or drainage ditches. Do not apply when windy or when heavy rainfall is expected. Rinse applicator over lawn or garden area only.

*Last sentence applies to concentrates that require mixing/loading in application device



PPDC Recommendation

- Ready-to-Use and Dust Products

Environmental Hazards: Do not apply when windy or when heavy rainfall is expected. Do not apply near water or storm drains.



PPDC Recommendations

- Adopt proposed statements for homeowner use products
 - Baseline statements based on product form and use pattern
 - 40 CFR 156.10 Toxicity statements added incrementally to baseline statements as needed. (toxic to fish, toxic to bees, etc)
- Optional adoption by registrants as label Amendments
 - Update in conjunction with DCI, new registration, or other amendment submissions
 - Voluntary adoption by registrants
 - Issue PR Notice



Other Labeling Issues Considered



- Environmental Stewardship statements
- Bilingual Labeling considerations
- Promoting safe use and proper use
- Environmental surfaces/objects
 - Safe for use on...
- The workgroup was either unable to reach consensus on future direction or felt the issue was beyond its scope. The workgroup maintained a narrow focus to efficiently and effectively achieve its mission



Consumer Labeling Workgroup...



- Mission statement followed with focus on Environmental Hazard
 - Improve consumer understanding
 - Ease of implementation
- Should the model be replicated
 - Address other label issues?

