

US EPA ARCHIVE DOCUMENT

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

November 19, 2010

RE: Web-distributed labeling (WDL)

Dear Bill:

The undersigned organizations are concerned about several issues related to web-distributed labeling that have yet to be resolved. A major stated goal of WDL is to improve the 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.

After careful consideration, we collectively conclude that we do not support EPA pursuing WDL on either a voluntary or mandatory basis, and strongly recommend that the Agency discontinue its pursuit of the user acceptance pilot project. The reaction we are hearing for the WDL concept is almost universally negative. Pesticide applicators and customers are not asking us for this option, in fact just the opposite as many have told us they do not want to move to web-distributed labeling.

There exist today several ways that stakeholders can obtain an electronic label. We have yet to see a need for yet another mechanism by which users can retrieve an electronic version of a label. Ultimately, some improved means of communicating label information might evolve and demonstrate clear benefits in the marketplace and we look forward to working with EPA at that time.

In a time of limited resources for all of us, including the Federal Government, we do not think this is a priority for industry, its customers, and other users, and therefore should not be a priority for U.S. EPA. It is our recommendation that EPA stop the pursuit of web-distributed labeling at this time, including the recently proposed user acceptance pilot.

Signed,

Ag Agronomy Center
Ag Management and
Consulting

AG RX
Agrian Inc.
Applegate Orchards
Arysta LifeScience North
America
Asmark Institute
Barnards Soil Service,
LLC
Beachner Grain, Inc.
BEI Hawaii
Cameron Nursery
Central Valley Ag
Cooperative
Central Valley Coop
Ellendale MN
Central Valley Co-op,
Austin, MN
CDMS, Inc.
Coastal AgroBusiness,
Inc.
Crop Production Services
CropLife Media Group
Daranda Orchards Inc.
Dow AgroSciences
Drexel chemical
Company
Farmer's Supply CO-OP
First Cooperative
Association
FMC Corporation
Genoa Ag Center, Inc
Golden Furrow Fertilizer,
inc
Gowan
GROWMARK, Inc.
GVM Inc.
Harvest Land Co-op
Harvest Land
Cooperative
Heartland Ag Inc.
Helena Chemical Co
Hewitt Brothers Inc.

HINTZSCHE
FERTILIZER
J.R. Simplot Co.
Land O'Lakes, Inc
Loveland Products, Inc.
Matt Hamel Ag Products,
Inc.
Max Yield Cooperative
MFA Incorporated
Murray Equipment, Inc.
Natural Nutrients LLC
Orange Belt Supply Co.
Poole chemical company
Precision Laboratories,
Inc.
Premier Ag
Prinsburg Farmers Coop
Ramsdell F & M, Ltd
River Valley Cooperative
Rothsay Farmers Coop
South Dakota Wheat
Growers
Southern States
STRATTON SEED CO
Stratton Seed Company,
Carlisle, AR
The McGregor Company
The Mill
United Suppliers, Inc.
W.B. Johnston Grain Co.
Wilbur-Ellis Company
Willowood USA
Winfield Solutions, LLC
Wisconsin River Coop

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