Hello Ray,

Thank you for your note. I apologize my response is slow in coming.

First I'll address your concerns regarding the "streamlined" label sample output. The items you identify as missing are clearly not included in the current WDL label sample. They are maintained in the Greenbook data set but not as discrete items. It was brought up early in our development process that these items were not included in the deliverable and would require some additional time and expense to Greenbook to create discrete values. At that time it was decided that the effort was not necessary since the deliverable item was not what was being evaluated. It's our understanding that the User Acceptance Pilot was meant to test the viability of receiving "streamlined" labeling and the functionality of the retrieval system. It was not our understanding that the elements of the "streamlined" label would be evaluated. We completely agree that if this were to move past the User Acceptance Pilot phase there would be have be significant fine tuning and probably some additional work to our dataset…assuming we have any involvement. Much to your point about resources and priorities, we simply weren't ready to make the financial and significant resource commitment to further the actual deliverable item…again because we didn't think it was what was being tested here. I've checked in with Bill and Michelle and they are in agreement on this issue.

Regarding the idea of consulting with registrants and gaining their approval for use in the pilot. We will be the first to admit that we don't have 100% participation in Greenbook programs from the marketplace. We have established 1 on 1 relationships with many of the registrants and are growing that number. These participation relationships ensure that we have timely labels and complete documentation from the registrants. In the development of our version of WDL we made a decision to put all products in our database into the system to give the user what we thought was the most robust scenario for a user functionality experience (again what we thought was being tested). However we do have product labels in our system that are older or registrants with whom we do not have the 1 on 1 relationship. It is very possible that the product evaluated by your unnamed registrant may have been from a registrant we do not partner with directly   These products are covered under a secondary update process which we do not guarantee 100% coverage or up to date information. Again in the event of a full launch where registrants are voluntarily participating, their products would show up exclusively in the system.

So we offer this scenario. We can limit the products to only those registrants where we have a 1 to 1 relationship. We believe this will provide the freshest set of products completely updated according to the Greenbook standard. This will trim the list of products down a bit but we would still have a very robust set of products to work with and should provide a solid user experience and test. Additionally we will seek out further approval from our registrant partners.

Please let me know if you have further thoughts or questions.

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From: Ray McAllister [mailto:RMcAllister@croplifeamerica.org]
Sent: Wednesday, December 01, 2010 2:43 PM
To: Dick Hanson; AnnMarie Wills
Cc: Jordan.William@epamail.epa.gov; Devaux.Michelle@epamail.epa.gov; Barbara Glenn; Karen Cain; Doug Nelson
Subject: FW: WDL vs Specimen, actual comparison

Dick and Ann Marie:

As we discussed this morning, several CLA member companies have indicated to me that they do not want their labels used in a pilot project for web-distributed labeling. They are reiterating today their strong opinion that registrants should expressly approve the use of their product labels in any WDL pilot project. Admittedly, we have not heard from all of our members, and the CLA membership does not include all companies whose product labels appear in the Greenbook database. But given the strong opinion of a number of registrants, each registrant should be consulted individually before his labels are used for or accessible in the WDL Pilot.

One of our members quickly did a detailed comparison of a sample "streamlined" label from the WDL web site to the corresponding specimen label from the registrant's web site. The significant discrepancies listed below were discovered. These details are

essential for the applicator to have in planning use of a pesticide and complying properly with FIFRA requirements.

The points above are strong arguments for not pursuing the WDL pilot project at this time.

Ray S. McAllister, PhD
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This is a summary of the differences:

- WDL Label Version does not match (it is older) what is on web sites of the registrant and other label vendors
- WDL uses abbreviated product name
- WDL missing product description
- WDL missing signal word and warning statements
- WDL missing emergency phone number statements
- WDL missing Hazards to Humans and Domestic Animals
- WDL missing Engineering Controls Statements
- WDL missing User Safety Recommendations
- WDL missing Spray Drift Management statements
- WDL missing Mixing and Loading Requirements
- WDL missing No-Spray Zone Requirements
- WDL missing Runoff Management
- WDL missing Endangered Species Notice
- WDL missing Resistance Management statement
- WDL missing Ag Use Req box (EPA required)
- WDL missing S&D box (EPA recommended)
- WDL missing portions of Storage and Disposal statement
- WDL missing Application Directions pertinent to all types of applications
- WDL missing Mixing, Compatibility Instructions pertinent to all types of applications
- WDL missing Chemigation instructions pertinent to all use sites
- WDL missing Rotational crop section
- WDL restates application directions
- WDL missing specific example crop
- WDL missing specific example pest
- WDL missing application rate conversion chart

The WDL version is 1322 words (about 3.5 pages at 10 point). More complete subsetting of the label for a single use amounts to 4499 words (about 10 pages at 10 point).