SFIREG Survey of States on Web-Distributed Labeling

Overview of Web-Distributed Labeling
OPP is working to develop an approach that would make the most current version of pesticide labeling available to purchasers and users electronically. The container label would be streamlined, including primarily health and safety related statements, with more detailed instructions available via the internet. With this new approach, users will need to contact either the official pesticide labeling website or a toll-free telephone number from which they can obtain the detailed use instructions that previously were attached to the product container. Web-distributed labeling will provide simplified container labels and rapid distribution of up-to-date product labeling. EPA expects that benefits from using this system will include faster access to new pesticide uses, quicker implementation of protective measures for public health and the environment, improved compliance with label directions, and lower costs for industry and EPA. Not all products are expected to benefit from web-distributed labeling and the approach is expected to be voluntary for agrochemical companies.

1. EPA does not think WDL would require any changes to a state's pesticide product registration process. If you disagree, please explain how your process would be affected.

2. Would you have to change your state laws or regulations to make web-distributed labeling enforceable? If yes, explain why this is different from a paper label.

3. During pesticide use*, does your state require that an applicator possess a paper copy of the label, an electronic version, either a paper or an electronic version of the labeling, or neither? *Use, in this case, is considered mixing, loading or applying a pesticide.

4. At the SFIREG meeting, there was discussion of whether, at the time of application, the applicator needed to posses the web-distributed labeling or if the applicator only needed to comply with the labeling. Should the applicator be required to possess the web-distributed labeling or if the applicator only needed to comply with the labeling at the time of application?