PPDC Web-Distributed Labeling Workgroup Discussion Paper
Establishing a Web-Distributed Pesticide Labeling Virtual Pilot

Issue

The PPDC Web-Distributed Labeling (WDL) Workgroup is exploring the feasibility of implementing a system to make the most current version of marketed pesticide labeling available via the internet. Many logistic and regulatory issues need to be identified and resolved before WDL becomes an accepted form of pesticide labeling.

As an alternative to a full scale pilot, the PPDC WDL workgroup is exploring the use of a virtual WDL pilot project to solicit feedback from end users, to allow stakeholders to test the system without liability concerns, and to identify remaining process and regulatory barriers to the use of WDL. The virtual pilot would include a website with sample web-distributed labeling that would allow users to retrieve crop- and state-specific labeling for informational purposes only. The purpose of this discussion paper is to describe a virtual pilot in order to drive discussions and identify remaining issues with WDL.

Scope & Design of the Virtual WDL Pilot

A full scale pilot would require significant resources and commitment from registrants, users, regulators, and other stakeholders to change the current system without fully understanding the proposed alternative. Registrants would have to re-label a subset of products to reflect the requirement for users to obtain web-distributed labeling. Outreach would need to be conducted in order to make users aware of the new requirements. Both registrants and users would be liable for providing and obtaining web-distributed labeling, respectively.

Many process and regulatory issues with WDL accessed through the internet could be identified via a virtual pilot; a separate pilot would have to be developed to test the feasibility of alternate delivery mechanisms such as fax-on-demand. In a virtual pilot, users would access a model website and limited database to perform searches and access WDL for informational purposes, rather than as a regulatory requirement tied to labeling. The primary advantage of a virtual pilot is that users and other stakeholders would be able to offer feedback on the website(s) and the resulting WDL before the full system is developed. However, a virtual pilot would save registrants the cost of relabeling containers with new container labeling and would not create a regulatory concern because no containers in the marketplace would be relabeled.

It is proposed that products used for the pilot meet the following criteria:
1. Registered for several use on several different crops
2. Registered in multiple states
3. Registered by a registrant willing to participate in a pilot project
4. Have recent or pending changes to the market labeling
5. Have a defined group of users and/or retailers that can be educated prior to the pilot and survey at the pilot's conclusion

It will be difficult to identify barriers to WDL adoption and outstanding issues if only one product is used under the WDL pilot. Therefore, it is proposed that a pilot be initiated for both a broad-spectrum insecticide and an herbicide meeting the criteria above, at a minimum.

The website for the virtual pilot would need to be designed to reflect the functionality and critical elements discussed to date by the PPDC Workgroup. For example, the user would need to be able to access an active URL and perform necessary searches for state- and crop-specific labeling, and the website would need to be able to generate WDL that applies to that state and use site(s). The labeling provided under the virtual pilot should be stamped with an expiration date and/or unique identifier as discussed in the paper *Lifespan of Web-Distributed Labeling*.

In a virtual pilot project, users of the WDL website would be supplied with a container label that includes the label elements discussed in *Content of Container Label vs. Web-Distributed Labeling*. Participants in the pilot would then be asked to access the WDL website referenced on the container label to access the labeling specific to a given state and use site.

It should be noted that the WDL website for a virtual pilot would only need to be populated with enough data to allow for the necessary product-, state-, and site-specific searches. Therefore, the virtual WDL database could be populated with minimal data, or it could be populated with available registration data to serve as a surrogate for labeled uses. Much of these surrogate data are already available, although the Workgroup would need to explore whether technology current exists to generate the state- and site-specific labeling.

Virtual pilot stakeholder groups
There are key stakeholder groups that should be surveyed before, during, and after participating in a virtual pilot. Evaluations should include key questions and capture information on identified issues for each stakeholder group.

End users
A virtual pilot exercise should be conducted with a given subset of the users of the products in the pilot. Users in several geographic areas should be selected if possible to minimize respondent bias. For example, users' facility with computers and the internet varies considerably around the U.S. Volunteers could be recruited from state or national grower associations or other defined groups of applicators. Ideally, the virtual pilot and resulting survey would coincide with an established meeting of the user group.

A standard evaluation form should be developed so that data can be compared among user groups. Questions for WDL users would focus on logistic concerns, ease of use, and user reactions to streamlined WDL. Example questions could include:

1. Could you easily find the WDL website address on the container labeling?
2. Could you easily search by each parameter specified (e.g., crop and state) to obtain the information you would need to make an application?
3. Was the WDL website easy to use? What elements worked well? What would you like to see changed?

4. Is the WDL an improvement over current pesticide labeling? (For example, easier to read, easier to locate information, less paper, more current information available, larger font, etc.)
5. Would you be more likely to read the entire streamlined WDL document than the current labeling that accompanies the pesticide container?
6. What other features would you like to see on a WDL website? (For example, optional features such as rate calculators, technical bulletins, information on choosing nozzles, online video, etc)
7. Do you have high speed internet access and printing capability at your home or place of business?
8. Do you have internet access in the field?
9. Could you access the internet and print documents at another location? (For example, dealership, county extension office, library, school)
10. Would you primarily use the internet to access WDL or an alternative delivery mechanism such as a toll-free telephone number or fax?
11. Would you be interested in receiving WDL in other languages besides English?

Regulators
State and tribal pesticide regulators could participate in a virtual WDL pilot during upcoming meetings of such groups as the Association of American Pesticide Control Officials (AAPCO), the State FIFRA Issues Research and Evaluation Group (SFIREG), or the Tribal Pesticide Program Committee (TPPC). Regulators could conduct WDL searches themselves or they could receive a presentation on the functionality of a model website. Regulators could then be supplied with an example of a container label and state-/site-specific web-distributed labeling, and asked to complete a survey.

Survey questions for regulators would focus on enforceability of WDL. Example questions include:

1. Could you enforce WDL as presented in this virtual pilot? If not, why not?
2. Would you need to change your state laws or regulations to make WDL legal in your state?
3. What specific concerns do you have with enforceability of WDL and how could they be addressed?
4. How would you verify that the WDL matches what has been approved in your state? Would you need to?
5. Do regulatory staff in the field have internet access? Would they need it to enforce WDL?
6. Are you comfortable an end user would be able to access all the information about the product they would need to use it safely and effectively?
7. What concerns does your state have after the pilot process that should be addressed before implementing a WDL system?

Dealers
Pesticide dealers could participate in a virtual WDL pilot since they are a key link between registrants and end users. As with end user groups, dealers would participate in a pilot exercise

using a model WDL website or by being provided with examples of containers labeled for WDL and the corresponding WDL.

A survey of dealers would likely need to be facilitated by the Agricultural Retailers Association (ARA) or registrants. Questions of dealers could include such things as:

1. Do you have high-speed internet access at your place of business?
2. Do you routinely make internet access available for your customers?
3. If WDL becomes available, would you envision providing internet access as a service for your customers?
4. How would WDL impact your business?
5. What percentage of your customers would likely ask you as a dealer to access and download WDL for them as a service? Would you do so as a service to your customers?

Registrants
Registrants' participation is critical to implementing any web-distributed labeling system. Registrants will likely be involved in the development and implementation of the virtual pilot, but it is important to solicit formal feedback from participants on their experience with the database, sample labeling, and the potential amendments to container labels.

1. Did you encounter any challenges in creating the container label or putting web-distributed labeling information into the database?
2. Are you comfortable an end user would be able to access all the information about the product they would need to use it safely and effectively?
3. What concerns does your company have after the pilot process that should be addressed before implementing a WDL system?

There are likely other groups (e.g., pesticide safety educators) that could also be surveyed through a virtual WDL pilot. As the virtual pilot develops, these groups would be identified and specific questions would be developed.

Summary
A virtual WDL pilot would be an effective and economical means to gather pertinent information on benefits and challenges of WDL without raising regulatory concern with re-labeled containers or user access to or compliance with product labeling.