



Web-Based Distribution of Electronic Labeling

Presentation for PPDC

October 17-18, 2007

Web-Based Labeling: Overview of Presentation

Overview

Background

What It
Is Not

What It Is

Mechanics

Changes to
Container
Labeling

Process to
Obtain
Labeling

Web
Distribution

Paper
Distribution

Enforcement

Benefits

Users

Industry

NGOs

States

International

EPA

Progression

Issues to
Explore

Enhancements

Next Steps

Web-Based Labeling Background

- Substantial work done by States and other stakeholders on researching elements of electronic submission and distribution of labeling
 - 2005 and expanded 2007 SFIREG Issue Papers submitted by POM E-label Subcommittee
 - OPP E-label Review Work Group
- At Summer 2007 AAPCO meeting States presented the topic to OPP's new Office Director, Debbie Edwards

Web-Based Labeling: What It Is Not

- It is not referring to electronic submission or review of labels by the Agency (but that effort is underway)
- Would not require standardized labeling
- Would not diminish legal procedures that EPA must follow to change labeling
- Would not change process registrants use to amend product labeling
- Would not change users' duty to follow labeling requirements

Web-Based Labeling: What It Is

- Web-based distribution of electronic labeling is a system which would make the most current version of pesticide labeling available to purchasers and users electronically on an EPA-maintained Web site.
 - Simplify label on container
 - Allow for rapid updating of the labeling

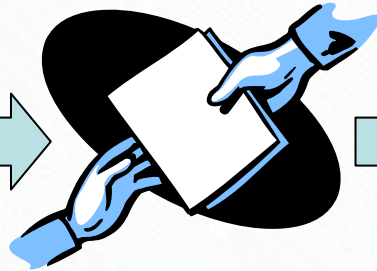
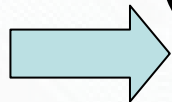
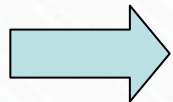
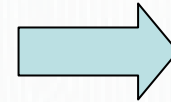
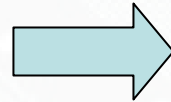
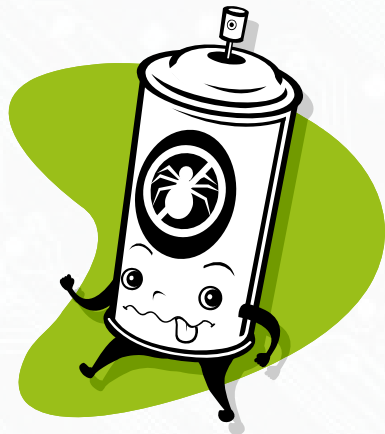
Web-Based Labeling: Changes to Container Label

- A URL would be placed on the pesticide label, directing users to the Web site.
- May replace the Directions for Use on the physical container.
- Container label would still have all FIFRA mandated elements, e.g., product name, registration number, net contents, ingredient statement, etc.
- Container label could have other key information.

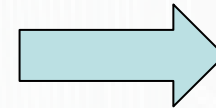
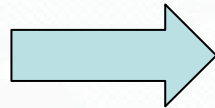
Web-Based Labeling: Process to Obtain Labeling

- Distributors, purchasers or users would visit EPA's Pesticide Labeling website.
- After entering the product registration number, the product labeling would appear in a printable format.
- Dealers could distribute printed labeling.
- An alternative method of obtaining the web-based labeling, a toll-free phone number, would be available for those without access to the necessary technology.

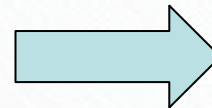
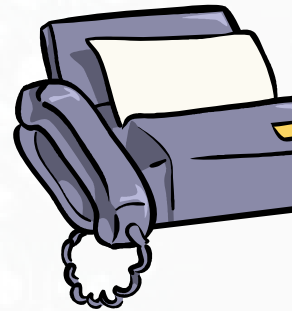
Web-Based Labeling: Web Distribution



Web-Based Labeling: Paper Distribution



Or



Web-Based Labeling: Enforcement

- Users would need to have a copy of the labeling from the website at the time of application.
- Labeling would be good for a specified duration of time (e.g., six months) from the date of “printing”.
- Archival system would allow verification of the version of the labeling posted on any date.

Web-Based Labeling: Anticipated Benefits

- Enhanced protection of human health and the environment by providing pesticide users with the most current, accurate information available.
- Anticipated benefits to all stakeholders
 - Users
 - Industry
 - NGOs
 - States
 - International
 - EPA

Web-Based Labeling: Anticipated Benefits for Users

- Labeling information is always current
- PDFs are electronically searchable
- Printable in large font
- Simplified container label
 - Health and safety information is more noticeable
 - Should increase comprehension
- Level playing field
 - Users would not have to worry about dealing with existing stocks of products having different mitigation measures or use directions (e.g., lower rates, longer pre-harvest intervals)

Web-Based Labeling: Anticipated Benefits for Industry

- Easy to modify labeling
 - Add newly registered use
 - Make other labeling amendments
- Reduces printing costs
- No need to re-sticker or recall when changes must be made quickly
- Promotes a level playing field
 - All products could make a regulatory change at the same time

Web-Based Labeling: Anticipated Benefits for NGOs

- Significant reduction in time to achieve risk mitigation on labeling in the field
- No long-term existing stocks with old labeling on the market
- Will ultimately allow for searchable data base of pesticide uses registered in the U.S.
- Increased transparency of Agency risk-mitigation actions

Web-Based Labeling: Anticipated Benefits for States

- Readily available, authoritative source of labeling
- Simplify existing stocks enforcement
- Enforceable labeling is always available for application date

Web-Based Labeling: Anticipated International Benefits

- Reduces potential for tolerance violations and shipment rejections as foreign growers and suppliers will be able to see registered use patterns in the U.S. upon which tolerance was based (rate, PHI, applications, etc.)
- Foreign governments without substantial resources could use system for informational purposes
- Facilitate cross-border purchasing (e.g., NAFTA labeling)

Web-Based Labeling: Benefits to EPA

- Show improvements in protection of human health and the environment
 - Communicate labeling changes quicker
 - Faster market entry of reduced-risk uses
 - Earlier implementation of risk mitigation measures
 - Greater ability to make revisions based on user feedback
 - Accuracy of final printed labeling
 - Labeling on the website will be the version that is EPA-approved

Web-Based Labeling: Major Issues to Explore

- Voluntary or mandatory?
- Should it cover all products?
 - If not, which products?
- Enforcement
 - Compliance assurance
 - How long is “printed” labeling valid?
- Implementation issues
 - Timing
 - Pilot project
 - Training necessary

Web-Based Labeling: Major Issues to Explore

- Content of container label
- Legal
 - Definition of “production”
 - Regulation changes to labeling rules
- Technology
 - Technical format
 - Submission method
 - Labeling archives
 - Site security

Web-Based Labeling: Enhancements to the Basic System

- Labeling Links to:
 - Endangered Species Bulletins
 - State requirements
 - Site-based regulatory decisions
 - Advisory information (e.g., rate calculator, demonstration videos, MSDSs, hotline numbers)
 - NAFTA labels
- Easy, direct way for users to provide feedback on labeling issues

Web-Based Labeling: Further Enhancements

With e-submission, additional enhancements become possible:

- Customize printed labeling
 - Crop and site specific
 - Reduces time necessary to understand use directions
 - Reduces potential for user error or confusion
 - Labeling in different languages
- Searchable database
 - Search on many parameters, e.g., use sites or products with groundwater concerns

Web-Based Labeling: What are the next steps?

- Feedback from PPDC
- Discuss concept with stakeholders
 - Numerous bi-lateral meetings to collect feedback
- Develop set of proposals based on feedback, including: elements of scope; necessary rulemaking; implementation issues (e.g., timing, transition)
- Put proposals out for broad-based public comment