



END-USER/GROWER COMMENTS ON WEB- DISTRIBUTED LABELING INITIATIVE

Teung F. Chin, Ph.D.

USDA Office of Pest Management Policy

EPA Pesticide Program Dialogue Committee
Meeting

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End User/Grower Group Members

- Lori A. Berger, Ph.D., California Specialty Crops Council
- Daniel Botts, Florida Fruit & Vegetable Association
- Cannon Michael, California Cotton Growers Association
- Robert Rosenberg, National Pest Management Association
- Scott Schertz, Schertz Aerial Service, Inc. & National Agricultural Aviation Association
- James Thrift, Agricultural Retailers Association
- Tyler Wegmeyer, American Farm Bureau Federation

Web-Based Labeling (Pluses)


- Easy, 24/7 access to label info
- Additional info a plus: e.g. endangered species, site-specific issues (e.g. buffers), notifications, database downloads of products (e.g. PCOs use dozens of products in 100s of locations), crop /pest search
- Will facilitate compliance
- ~125,000 farmers produce 75% the Nation's food and fiber. ~ 80 % have internet access and of those that have it, ~ 70 % have high speed internet

Web-Based Labeling (Minuses)

- Only 55% of all farms have internet access (NASS 2007) (47% of farms with internet access still use dial-up).
- The Cooperative State, Research & Extension Service found large files problematic; spottiness in broadband access around the country.
- ~75% penetration in household incomes > \$150,000 but ~ 30% at \$29,999 and ~12% in households earning \$10,000 - \$12,499 (USDA ERS Feb 2009)
- Most states require a paper label
- Label longevity



US Govt Broadband Initiative

- In March 2009, USDA announced a \$2.5 billion dollars available from the Farm Bill to fund broadband access to rural America.
 - The Department of Commerce received \$4.7 billion from the stimulus package.
 - The Depts. will work together on how to spend the funds as part of a rural broadband strategy.
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Alternative Delivery Mechanisms Also Needed if Web-Based Labels are Required

- Hotline to call for receiving labeling information in the mail
- Email delivery (most labels are 1-2 megabytes)
- Fax-on-demand service
- Access to local Cooperative Extension Service Offices to receive labels via their broadband network.




Labeling Longevity

- Support for labeling linked to production date
 - Support for labeling w/o expiration, approved at the time of manufacture - Similar to the historical system, avoiding confusion. (But some states require paper labels on containers.)
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Labeling with a Limited Lifespan Linked to the Download Date -

Drawbacks

- Growers/PCOs must know what will be the label's lifespan at the time of purchase in order to make business decisions
- Many label changes are not due to risk reduction requirements so needing the most current label to apply is unnecessary. e.g. notifications
- New crops or new wording (new equipt. added) can be added which do not increase risk
- Crops may be dropped for economic reasons by the registrant and not per risk reduction needs.
- Food safety concerns could be unnecessarily raised if a crop is no longer on a label. But big liability issues.



Labeling with a Limited Lifespan Linked to the Download Date - Drawbacks

- Most growers do not store pesticides for long periods of time:
 - Money cannot be tied up in long-standing inventory.
 - The cost of storage is significant
 - Pesticide efficacy can decrease with time in storage
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Conclusion

- End-Users generally support a virtual Pilot Project web-based labeling delivery system plus alternate delivery mechanisms (mail, email, etc.)
- Labeling good for the life of the container
- The new system should be easier for end users than the current system in order to be effective.
- Critical details still need to be worked out