

## **Smart Label and Web-distributed Labeling for Pesticides**

### **PPDC Meeting November 1, 2017 – Session 5**

#### **Smart Label**

To improve efficiencies in the submission, review, and approval of pesticide label information, OPP initiated development of an electronic pesticide label, named SmartLabel. EPA has worked collaboratively with stakeholders to develop the requirements for the structured information collected via SmartLabel. The structured information approach will greatly improve the accuracy and clarity of pesticide label information and will allow it to be maintained in a flexible electronic environment.

To facilitate submission of the SmartLabel information, EPA is developing a SmartLabel builder. EPA has initiated the final phase of the SmartLabel builder software development, which consists of the following:

- The SmartLabel Content Builder, which allows users to input pesticide label content by category, such as precautionary statements or directions for use, using standardized vocabulary.
- The SmartLabel Use Index Builder, which compiles the underlying pesticide product use information in structured electronic data.

The SmartLabel Content and Use Index information will be used in conjunction with the structured information from the SmartLabel Content to support label reviews. Information from both the SmartLabel Content and SmartLabel Use Index will be used to populate a searchable database of standardized label content and use data for all products, which can be used in support of risk assessments and registration decisions. All of the documentation related to SmartLabel requirements, vocabularies, and software tool are published on our website <https://www.epa.gov/pesticide-registration/pesticide-smartlabel-pilot>.

The final phase of the implementation of the SmartLabel project will involve testing with the SmartLabel pilot participants before release. The SmartLabel portal is expected to launch via the EPA Central Data Exchange (CDX) portal in 2018, for voluntary use by pesticide registrants. SmartLabel is a major step toward realizing OPP's vision of a fully digital, paperless workplace.

#### **Web-distributed Labeling for Pesticides**

A web-based labeling distribution system is one part of EPA's step-wise approach to improve pesticide product labeling. This approach includes three major components:

- Smart labeling - A system that enables EPA to receive labeling submissions from pesticide companies in electronic form and to process them more efficiently and consistently.
- Web-distributed labeling - A system for electronic dissemination of the most current approved version of product labeling to users.
- Internal agency procedures to improve clarity and enforceability of labeling content.

Although versions of pesticide labeling are available online (e.g., specimen labeling), they are not legally valid for using a pesticide. Legally valid labeling available online - called web-distributed labeling - will allow pesticide applicators to download streamlined labeling, including instructions for the state in which an application will be made and the use site. Labeling accompanying pesticide products in

stores can include more than 30 pages of instruction. Web-distributed labeling should improve compliance with the instructions on pesticide labels, by making labels easier to access, read and comprehend. This new process will allow users to visit the website listed on the container label, enter information about the product (identifying information, when it was released for shipment, state and site of intended application), and retrieve streamlined labeling tailored to the applicator's specific needs.

In 2014, issued a Pesticide Registration (PR) Notice on web-distributed labeling (PRN 2014-1) that outlines a new, voluntary process by which registrants can opt to make legally-valid pesticide labeling available online to users. <https://www.epa.gov/pesticide-registration/prn-2014-1-web-distributed-labeling-pesticide-products> With the inclusion of a website and other specific information on the pesticide container's label, an enforceable link is created between the container-based label and the web-distributed labeling that the user obtains. Registrants are responsible for the websites where users can access their products' labeling. Users are responsible for following all instructions on the labeling of pesticides they purchase and use, whether traditional paper-based labeling or web-distributed labeling. By allowing users to access streamlined labeling, EPA expects to see the following benefits:

- Faster access to new pesticide uses.
- Quicker implementation of public health and environmental protective measures.
- Improved compliance with label directions.
- Lower costs for industry and EPA.

Web-distributed labeling is a completely voluntary initiative. EPA has engaged with several pesticide registrants interested in making their product labeling available to users electronically. As of October 2017, EPA has not approved any product labels for web-distributed labeling. When EPA receives an application, we plan to engage state regulatory agencies as appropriate, and to notify stakeholders when a product with web-distributed labeling is approved.