WSSA Label Workgroup
Structured Label Format for PPDC

June 17, 2025

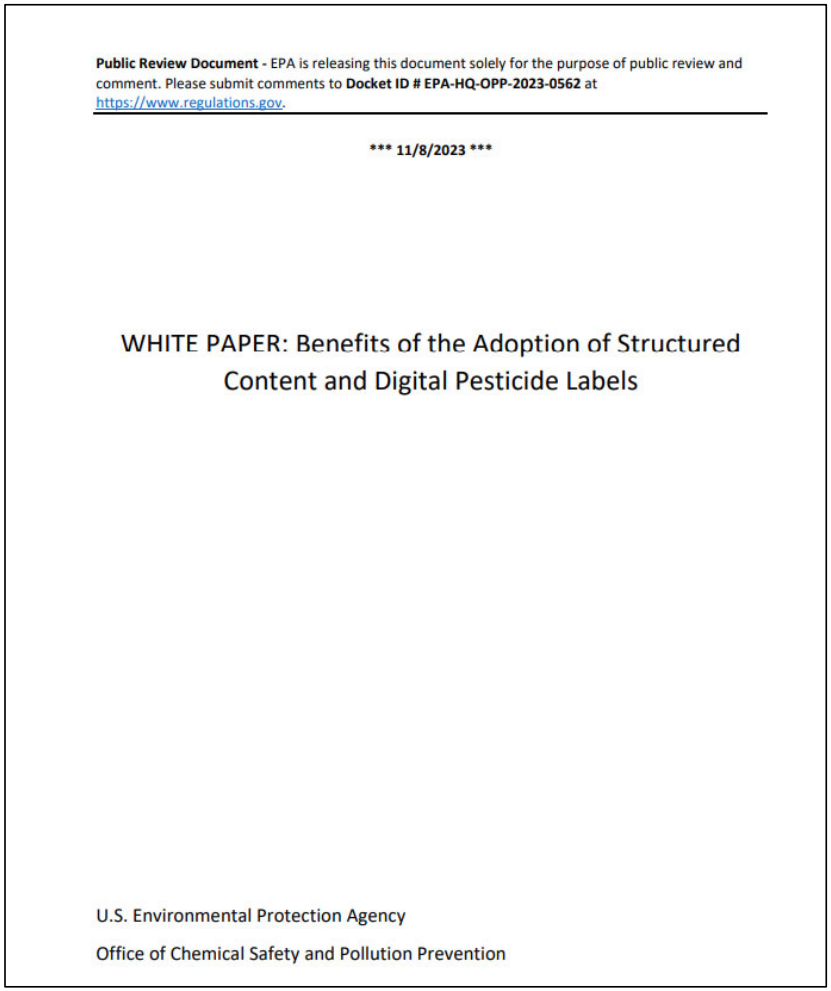
Stanley Culpepper, Ph.D., Univ. of GA, Past President of WSSA
Bill Chism, Ph.D., Chair of WSSA Endangered Species Act Committee

WSSA's ESA Label Structure Sub Committee – 2023/2024

Baughman, Todd	Oklahoma State University
Byrd, John	Mississippi State University
Burke, Ian	Washington State University
Cahoon, Charlie	N. C. State University
Chism, Bill	**Chair of the WSSA's ESA Committee**
Culpepper, Stanley	**Past President of WSSA**
Dotray, Peter	Texas Tech and Texas A&M Universities
Hager, Aaron	University of Illinois
Hanson, Brad	UC Davis
Lancaster, Sarah	Kansas State University
Prostko, Eric	University of Georgia
Sprague, Christy	Michigan State University
Steckel, Larry	University of Tennessee
Sosnoskie, Lynn	Cornell University
Young, Bryan	Purdue

Timeline - Objectives

- WSSA Extension Weed Scientists assist in the creation/adoption of uniform label structures to be adopted across herbicide labels. (Sept – Dec 2023)
- Meet with WSSA industry partners to further the objective of implementing the uniform herbicide label structure approach. (Jan-Feb 2024)
- Provided comments to the U.S. EPA



Public Review Document - EPA is releasing this document solely for the purpose of public review and comment. Please submit comments to **Docket ID # EPA-HQ-OPP-2023-0562** at https://www.regulations.gov.

*** 11/8/2023 ***

WHITE PAPER: Benefits of the Adoption of Structured Content and Digital Pesticide Labels

U.S. Environmental Protection Agency

Office of Chemical Safety and Pollution Prevention

Extension Weed Scientists – Input Summary

- **In-Dept Logical Table of Contents:** The core table of contents should exist with the exact same layout (numbering) on **ALL labels**; details that need to be added for a specific product go after the core table of contents.

- **Cover Page:** Trade name, common name, labeled crops, REI, EPA Reg Number, date of approval, formulation type, registrants name, MOA (color code Blue for all herbicides to help applicators avoid grabbing the incorrect container – avoiding red/green color blind concerns).

- **Tables** are strongly preferred over text and should provide all pertinent data.

- **Individual crops** should be listed, not just crop groups.

- Great effort is needed to improve **Tank-Mix** communication!

- Format: all labels, same font, table format, general layout.

- Input is designed with ESA and electronic labels in mind.

Examples for each point are shared in the following slides!

WSSA Herbicide

EXAMPLE - COVER PAGE

Note: This block for all herbicide labels would be blue – reduce mistakes when mixing

Weedsci 3,4-9	Group	57	Herbicide

Active Ingredient:
weedsci; 3,4-9mangeweeds……99.00%

Other ingredients……1.0%

Total: 100.00%

WSSA Herbicide is formulated as a SL formulation and contains 2.00 lb weedsci per gallon.

- **Labeled crops:** A postemergence herbicide for use in cucumber, squash, tomato, and watermelon.
- **Re-entry Interval (REI):** 12 hours
- **Rain-free Period:** 3 hours
- **Restricted Use Pesticide:** No
- **Formulation:** Liquid Flowable *(if encapsulated include those details here)*
- **Sale, use, and distribution of this product** is available in all U.S. States except Hawaii.
- **Label approved:** March 14, 2024
- **EPA Registration #:** 222-222

Note: if there are too many labeled crops or its too complex to fit here then provide page/table the information is provided

KEEP OUT OF REACH OF CHILDREN
CAUTION
HOTLINE NUMBER: FOR EMERGENCY MEDICAL INFORMATION CALL 1-800-XXX-XXXX

Brevis™ SC – Fruit Thinner from Adama
Table of Contents – TOC Differs from WSSA Herbicide Version

Brevis™ SC – Fruit Thinner from Adama
Example of Tables and Text

2.3 User Safety Recommendations
Users should: • Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. • Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. • Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

3.0 Environmental Hazards	
This chemical has properties and characteristics associated with chemicals detected in groundwater.	
3.1 Groundwater Advisory	This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow.

If the information if very simple it may not need a table

4.0 Physical or Chemical Hazards

No physical or chemical hazards indicated by currently available data.

Brevis™ SC – Fruit Thinner from Adama

Directions for Use, Product Info, Conversion Chart, Use Sites

6.0 Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

6.1 Product Information
BREVIS™ SC, a photosystem II inhibitor, reduces photosynthesis and may put the tree into carbon stress, causing excess fruit to fall, thus contributing to an increase in the quality of fruit production. BREVIS SC is applied to apple and pear trees, post-bloom, to thin fruit when fruit set is higher than optimal. BREVIS SC is applied to apple and pear to fruit with a diameter from late petal-fall (5-7 mm fruit) until 16-20 mm.

6.2 Active Ingredient Conversion Chart

BREVIS SC (fl oz/A)	Active Ingredient Equivalent (lb metamitron/A)
16	0.16
24	0.23
32	0.32
40	0.39
48	0.46

6.3 Use Sites

Use Sites and labeled crops
Apple
Pear*
*Not registered for use by California.

Brevis™ SC – Fruit Thinner from Adama
Spray Drift Management

5.1 Mandatory Spray Drift Management	Make air-blast application when wind velocity favors on-target product deposition (approximately 3 to 10 mph) …
5.2 Information on Droplet Size	Apply only as a medium or coarser spray (ASABE 572.1) …
5.3 Controlling Droplet Size	Volume – Use high flow rate nozzles … Pressure – **DO NOT** exceed the nozzle …
5.4 Wind	See Mandatory Spray Drift Management for specific wind restrictions …
5.5Temperature and humidity	When making applications …
5.6 Temperature inversions	Applications should not occur during a …
5.7 Boom height above target	Not applicable
5.8 Sensitive Areas	The pesticide should only be applied …
5.9 Airblast Sprayers	Adjust fan setting to produce … …

Brevis™ SC – Fruit Thinner from Adama

Application Rate, Max Rate, Application Interval, PHI

6.4.2: Apple and Pear* Application Rates		
Crop and Location	**Product Rate (fl oz/A)**	**Use Directions**
Apple: West of Rocky Mountains Washington, Oregon, California, Idaho and Utah.	16 – 48	**Determining Application Rates** • Base rates should be determined based on an orchards history of thinning propensity. Use higher application rates in hard to thin orchards. Use mid-range rates in medium to thin orchards. Use lower rates in easy to thin orchards or use a tree carbon status model like BreviSmart™ or The Cornell Apple Carbohydrate thinning model to adjust base rates based on weather conditions. Weather conditions can cause a tree to be in a positive or negative carbon state. Adjust the base rate higher for trees that have a positive carbon status. Adjust to lower rate if the tree has a large, negative carbon status. When the tree has an extremely low carbon status, delay the application until weather conditions are better. • If temperatures are forecasted to exceed 84°F 1-5 days after application, wait to apply until temperature decreases or use a lower rate. • Other factors to consider for determining rate include: variety, tree age (i.e., lower the rate for new orchards), rootstock, training systems, tree stress, orchard cropping history/orchard management practices, or other thinning sprays/plant growth regulators applied to trees.
Apple: East of Rocky Mountains Massachusetts, Michigan, Minnesota, Missouri, New Jersey, New York, North Carolina, Pennsylvania, Virginia, and Wisconsin.	16 – 40	
Pear* Michigan, New Jersey, New York, North Carolina, Oregon, Pennsylvania, and Washington.	16 - 48	
*Not registered for use by California.		

Application Rate Restrictions	
Apple and Pear* Annual Maximum Rate Per Acre	Minimum Application Interval
96 fl oz	8 days
Preharvest Interval (PHI)	
72 days	

Brevis™ SC – Fruit Thinner from Adama
Resistance Management and Mixing Instructions

6.6 Resistance Management and Integrated Pest Management

Not applicable as a plant growth regulator.

6.7 Mixing Instructions and Compatibility

Mixing Instructions
1. Be sure sprayer is clean and not contaminated with any other materials or crop injury or sprayer clogging may result. 2. Fill tank 1/2 full with clean water. 3. Start agitation. 4. Be certain that the agitation system is working properly and creates a rippling or rolling action on the liquid surface. 5. Pour product directly from container into partially filled spray tank. 6. Continue filing tank until 90% full. Increase agitation if necessary, to maintain surface action. 7. Add a non-ionic surfactant when required by the label (western US). 8. Do no leave sprayer standing with spray for prolonged periods. When a non-ionic surfactant is to be used with this product, use a Chemical Producers and Distributors Association (CPDA) certified adjuvant.

Brevis™ SC – Fruit Thinner from Adama

Things not applicable on this label but could be on other labels

7.0 Conversion Table for Premix – All compounds must be listed

10. Crop Rotations – All Common Rotational Crops Should Be Addressed

12.0 Application Directions

Separate table for each type of equipment: ground, aerial, airblast, etc

12.11 Endangered Species Requirements

Spray Drift or Runoff/Erosion

If it's not listed on the label users may not go to EPA website to check!

13.0 Bulletins Live! Two

Clearly specify if user needs to go to BLT or the Mitigation Menu

15.1 Directions for Use – Include Grazing Restrictions

(Grain, Forage, Hay, Pastures, etc) for each crop, they may be different because of use rate