Web-Distributed Labeling for Pesticides

Michelle Arling, EPA OPP
Laurent Mézin, SePRO
Overview of web-distributed labeling

Enforcement of web-distributed labeling

SePRO proposal
Web-Distributed Labeling: Summary

- Voluntary system
- Streamlined use directions can now be available via website
- Both container labeling and web-distributed labeling considered legally valid
- Overall goals
  - Make latest version of state-approved labeling available to user quickly
  - Improve users’ understanding of and compliance with pesticide labeling
Status of Web-Distributed Labeling

- Pesticide Registration Notice 2014-1 issued March 2014
  - Goals of WDL, terminology, suggested text, WDL content, website functionality, etc.
  - Attachments: Sample labeling, master labeling with WDL statements, correct and incorrect examples of “rendered labeling”
  - Note: Suggested text provided but variations are allowed
Container Statements

- WDL reference statement on the container label pointing user to the website and reminding the user that not following labeling, including WDL, is a violation of FIFRA

- Requirement to follow a single version of labeling (container or WDL)

- Statement indicating where on the container/label the released for shipment date and unique identifier are located
Web-Distributed Labeling Statements

- Link WDL and container label through unique identifier and released for shipment date
- Indicate the legal validity of the WDL and explain how labeling must be followed when different versions are available to the user
- On each page of WDL: product name, website address, date of access, page numbers
Released for Shipment Date

- Current system – usually applicators can follow the labeling on the container for as long as they have the product.

- Web-distributed labeling
  - Link WDL and container label
  - Allow users to access newer labeling but prohibit use of earlier versions of labeling
  - Ensure that users do not continue to use old versions of WDL if newer container-based labeling has different requirements
How does a user download web-distributed labeling?

Unique ID: JSA5237G
State: __________
Use site: __________

www.companywebsite/WDL.com
Web-Distributed Labeling: Enforcement

- Labeling is critical to ensuring that a pesticide’s use will not cause adverse effects

- Web-distributed labeling must be enforceable in order to be implemented

- Web-distributed labeling enforcement will rely on current enforcement infrastructure
Web-Distributed Labeling: Enforcement

- Registrants are responsible for ensuring product labeling accurately reflects labeling accepted by EPA; would be responsible for website labeling content
  - If the website host is someone other than the registrant, that entity could also be held accountable as the registrant’s agent

- Users are responsible for complying with product labeling
  - Obtaining web-distributed labeling prior to application
  - Meeting state and federal recordkeeping requirements
SePRO Proposal

- Add a WDL sublabel to an existing product. SePRO will maintain both WDL and non-WDL versions.

- Primary target users: applicators using many containers for a single application. No need for tens of multi-page label booklets.

- Wrap-around label on container will contain NO Directions for Use, other than a reference to SePRO WDL website.

- All Directions for Use will be downloaded from WDL website
  - Users required to obtain labeling from website, or go to the dealer or SePRO to request a copy of the labeling; or exchange for a product container with the complete labeling.
SePRO Proposal

- **Container label**
  - Single page wrap-around label with all required elements
  - WDL reference statement
  - Statement that container label alone insufficient for use
  - No directions for use - user directed to website

- **Web-distributed labeling**
  - Separate website
  - Multi-page labeling downloadable / printable
  - WDL statements
  - Directions for use - specific for product, label version, use and state where used
Web-Distributed Labeling: Next Steps

- EPA and SePRO discussing language that differs from the suggested text in PRN 2014-1

- SePRO formal submission & EPA review (expected 2017)
  - Master label WDL and non-WDL sublabels + rendering of an example WDL ‘download’
  - SePRO responsible to ensure WDL website accurately renders requested labels
  - WDL website reviewable by EPA/states

- Provide feedback/assistance to states as necessary on review/registration of EPA-approved master labeling at the state level