



FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES
COMMISSIONER ADAM H. PUTNAM

Tom Burack, State Co-Chair;
ECOS E-Enterprise Leadership Council (EELC)
Commissioner,
New Hampshire Department of Environmental
Services

Bob Perciasepe, EPA Co-Chair;
ECOS E-Enterprise Leadership Council (EELC)
Deputy Administrator,
EPA Office of the Administrator

May 13, 2014

Re: EELC Proposed Project Titled: Pesticide Smart Label;
submitted by Brian Joffe, USEPA/OPP joffe.brian@epa.gov, 202-564-2229

The State FIFRA Research and Evaluation Group (SFIREG) is a committee of the Association of American Pesticide Control Officials (AAPCO). SFIREG exists to provide an effective mechanism for state pesticide regulatory agencies - typically state departments of agriculture, but also including six state environmental agencies- to give the United States Environmental Protection Agency (USEPA) advice and feedback of pesticide regulatory issues and for USEPA to gather comments on proposed policies and provide guidance to state pesticide regulatory programs.

State pesticide regulatory programs conduct reviews of pesticide labels for registration and compliance, inspections of pesticides in the channels of trade, and certification and inspection of pesticide applicators. A critical component of all these efforts are pesticide labels, and the specific language on these labels. Accurate and timely information about these labels is absolutely necessary for effective compliance programs.

SFIREG has learned that the EELC has received an e-enterprise proposal from EPA Region 5 to enhance compliance monitoring field operations for the pesticide regulatory program by providing instant electronic access to EPA-approved pesticide labels through smartphones and tablet applications. The program would expand the "Pesticide Smart Label" program already underway at OPP by developing database enhancements to facilitate use by field inspectors monitoring compliance of pesticide product labeling, that would reduce the need for comparing label copies or images line -by-line. The proposal would result in significant efficiencies for monitoring compliance in the field.

SFIREG, representing the state lead pesticide agencies, strongly supports this proposal. This proposal will result in significant long term resource savings for both USEPA and state pesticide regulatory programs. It will provide for a more efficient and rapid determination of the compliance of pesticide labels in real-time, affording greater protection to human health and the environment.

Please contact me if you need any more information on our support of this proposal.

A handwritten signature in blue ink, appearing to read "Steven Dwinell".

Steven Dwinell, Chair
State FIFRA Issues Research and Evaluation Group
Assistant Director, Division of Agricultural Environmental Services