

Bilingual Labeling in PRIA 5

Megan Provost

President, RISE, and Chair, PRIA Coalition

September 18, 2023

PRIA Coalition

- ▶ Coalition Members:
 - ▶ American Chemistry Council's Center for Biocide Chemistries
 - ▶ Animal Health Institute
 - ▶ Biological Products Industry Alliance
 - ▶ CropLife America
 - ▶ Council of Producers & Distributors of Agrotechnology
 - ▶ Household & Commercial Products Association
 - ▶ ISSA, The Worldwide Cleaning Industry Association
 - ▶ RISE (Responsible Industry for a Sound Environment)

Bilingual Labeling: The Requirements

- ▶ A phase in of electronic Spanish labels via scannable technology or other electronic methods readily accessible on the product label
 - ▶ Only parts of the label contained in the EPA *Spanish Translation Guide for Pesticide Labeling*
- ▶ Registrants of antimicrobial and non-agricultural use products may comply with the bilingual labeling requirement by providing a link to the safety data sheets (SDS) in Spanish
 - ▶ SDS option not available for non-agricultural RUPs
- ▶ The labeling will be done through non-notification

Bilingual Labeling: The EPA *Spanish Translation Guide*

- ▶ *Spanish Translation Guide for Pesticide Labeling* (STGPL) was published by EPA in October 2019
- ▶ Only parts of the label contained in the EPA *Spanish Translation Guide for Pesticide Labeling* must be translated under PRIA 5, including:
 - ▶ First aid and precautionary statements label language
 - ▶ Signal words
 - ▶ Misuse statements
 - ▶ Storage and pesticide container disposal instructions
 - ▶ Personal Protection Equipment (PPE) label statements
 - ▶ Worker Protection Standard (WPS) agricultural use requirements language
- ▶ Available at: <https://www.epa.gov/sites/default/files/2019-10/documents/spanish-translation-guide-for-pesticide-labeling.10.10.19.pdf>

Bilingual Labeling: Implementation

- ▶ PRIA 5 requires that the labeling will be done through non-notification
 - ▶ “The Administrator shall allow translations of the **parts of the label** of a pesticide contained in the Spanish Translation Guide described in subparagraph (G) and scannable technology or other electronic methods to be **added using non-notification** procedures.” (Emphasis added)
- ▶ Label changes made through non-notification consistent with EPA’s PR 98-10
 - ▶ “Bilingual Labeling. A registrant may provide bilingual labeling on any product **without notification**. The foreign text must be a **true and accurate translation** of the English text.” (Emphasis added)

Bilingual Labeling: The Timelines

- ▶ Spanish labeling provisions are phased in as follows:
 - ▶ Restricted use pesticides (RUPs) within three years (by December 29, 2025)
 - ▶ Non-RUP products that are designated as Toxicity Category 1 within three years (by December 29, 2025) for agricultural products and within four years (by December 29, 2026) for non-agricultural products
 - ▶ Non-RUP products that are designated as Toxicity Category 2 within five years (by December 29, 2027) for agricultural products and within six years (by December 29, 2028) for non-agricultural products
 - ▶ All other products within eight years (by December 29, 2030)
- ▶ After the initial implementation dates, changes to label translations will be made the earlier of:
 - ▶ The next time the end-product label is changed or amended as released for shipment
 - ▶ Within one year of publication of updates to EPA's *Spanish Label Translation Guide* for agricultural-use pesticide products
 - ▶ Within two years of publication of the updates to EPA's *Spanish Label Translation Guide* for non-agricultural use pesticide products

Bilingual Labeling: Enforcement

- ▶ There are no bilingual labeling-specific enforcement provisions in PRIA 5
- ▶ Any violations would be subject to general FIFRA penalty provisions (7 U.S. Code §136l - Penalties), which state:
 - a) Civil penalties
 - 1. In general: Any registrant, commercial applicator, wholesaler, dealer, retailer, or other distributor who violates any provision of this subchapter may be assessed a civil penalty by the Administrator of not more than \$5,000 for each offense.

Bilingual Labeling: Coordination/Outreach

- ▶ EPA Requirements:
 - ▶ EPA shall seek stakeholder input on ways to make bilingual labels available to farm workers and implement a plan within 3 years (by December 29, 2025)
 - ▶ EPA must consult with the states regarding implementation
- ▶ PRIA Coalition Activities:
 - ▶ Hosted PRIA Workshop on April 19th with speakers from EPA and PRIA Coalition highlighting requirements for bilingual labeling
 - ▶ Formed a Bilingual Label Workgroup
 - ▶ In partnership with NASDA, hosted July 20 virtual workshop to address states' questions on bilingual labeling
 - ▶ Reviewed EPA's Spanish Label Translation Guide for recommended updates
 - ▶ Ongoing engagement with Agency

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Questions?

Thank you!