



Digital Labeling Updates

Michelle Arling and Dan Schoeff
Office of Pesticide Programs
**U.S. Environmental Protection
Agency**

Why Do Labels Matter?

The label provides critical information about how to handle and safely use the pesticide product and avoid harm to human health and the environment.

To be effective labels need to be:

Easy to find, read, understand, and enforce



Pesticide Product “Label” and “Labeling” (FIFRA section 2(p) Definition)

- **Label**: the written, printed, or graphic matter on, or attached to, the pesticide or device or any of its containers or wrappers
- **Labeling**: all labels and all other written, printed, or graphic matter that:
 - accompany the pesticide or device at any time; or
 - to which reference is made on the label or in literature accompanying the pesticide or device “except” to current official publications of the EPA, the United States Departments of Agriculture and Interior, and the Department of Health and Human Services, State experiment stations, State agricultural colleges, and other similar Federal or State institutions or agencies authorized by law to conduct research in the field of pesticides.

When mixed with water
CREOCIDE makes an ex-
cellent emulsion, and ac-
tive ingredients do not
separate afterwards.

Call a doctor in case of
accident.

ANTIDOTE: Give half pint
of whisky or brandy and
remove from stomach by
applying stomach tube very
cautiously, then give white
of egg, and epsom salts
(1 oz.), but avoid use of
oils, fats and glycerine.

ROBINSON & WEBBER LIMITED
WINNIPEG & CALGARY CANADA EDMONTON



Photo source: kinwun/stock.adobe.com

Source: Andrey Popov AdobeStock_362224432

CY2024 Digital Transformation Roadmap



DCI OVERHAUL

EDSP Workflows

Completed:

DCI Form

DCI Communication

DCI Tracking

Automated Workflows and
Automated Tracking

On Track, Good Progress:
November 2024 Delivery

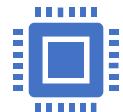


MIGRATION 2

Complete 4/2024

Completed Cases from 2016-
Date of Migration

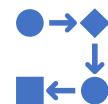
Close non-migrated cases up
to DOM



INFRASTRUCTURE

Underlying physical and
information technology
devices and apps/modules

Exploring Additional
Options to
Enhance/Replace Data
Solutions



PORTAL

Initial design session held
December '23

Design sessions with
internal and external
stakeholders held Q1

Requirements Gathering
with stakeholders Q2/Q3

Portal Workgroup Initiated
August 2024

Initial deployment
November/December 2024



CONTINUOUS IMPROVEMENT

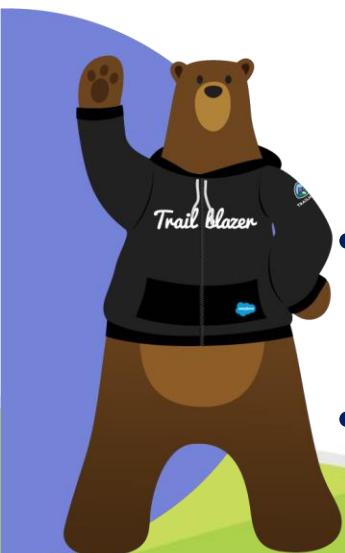
Deployed automated letters
and automated data
collection related to
application deficiencies

Internal work on People and
Process – what can we
improve on, streamline,
make life easier?

Digital Transformation Update



- **Salesforce Workflow Continuous Enhancement (Deployed)**
- **OPPIN Data Migration (Deployed)**
- **New Portal and Customer Experience (In Progress)**
 - Two-way interaction between OPP and External stakeholder
 - Modern submission and application tracking experience
- **e-CSF and e-label Projects**
 - e-label workshop with Caliper to build on previous projects
 - e-CSF currently in limbo
- **DCI Modules: Multiple Updates Deployed (Portal Effects)**
 - Interact with the case via an automated workflow
- **Analytics; Continued Updates in Response to Stakeholder Needs (OPP and External)**





OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

August 27, 2024

SENT BY EMAIL

Charles Levey
charles.levey@envu.com
ENVIRONMENTAL SCIENCE U.S., LLC

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 - Updates to reflect company transfer and revisions to Container Handling
Product Name: TETRANILIPROLE 43 SC INSECTICIDE TURF
Admin Number: 101563-196
EPA Receipt Date: 04/05/2024
Action Case Number: 00561899

Dear Charles Levey:

The U.S. Environmental Protection Agency is in receipt of your application for notification under Pesticide Registration Notice 98-10 for the above referenced product. The EPA has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The labeling submitted with this application has been stamped "Notification" and will be placed in our records.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

If you have questions, please contact Scott Campbell via email at campbell.scott@epa.gov.

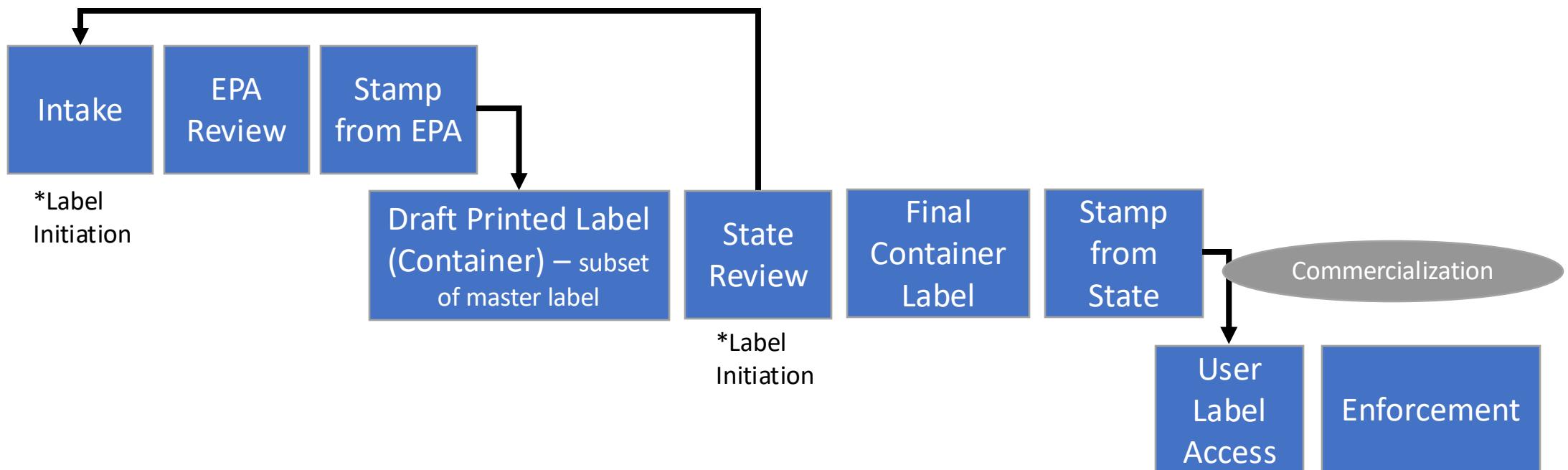
Sincerely,

Venus Eagle, PM01
IVB3, RD
Office of Pesticide Programs

Automated Letters

- Consistent format across OPP
- Added efficiency for staff
- Reportability for OPP and Stakeholders
- Automated send, respond, and tracking

Digital Labeling



Registers

EPA

States

Physical Location

Vendor

Label Users

Structured and Digital Labeling

- Short-term goals
 - Update EPA's infrastructure and systems
 - Engage stakeholders
 - Evaluate potential “data model” for capturing all labeling data electronically
- Long-term goal – fully digital labeling system, from submission to review to final printed labeling
 - Structured label – formatting labeling so the same information is in the same location
 - Digital label – information in the label is presented as data, can be tagged and used in different ways

Structured and Digital Labeling White Paper

- November 2023 – EPA released white paper requesting feedback on plans to develop structured digital labeling
 - <https://downloads.regulations.gov/EPA-HQ-OPP-2023-0562-0002/content.pdf>
- Public comments received – overall positive, questions on logistics of implementation and whether the system will be mandatory or voluntary
- Discussed with AAPCO as part of digital labeling panel in April 2024

PPDC Label Reform Workgroup

- Started in Summer 2023
- Focused on providing advice to EPA through the PPDC on developing structured labeling and structured digital labeling
 - Developing structured labeling “template”
 - Working on suggested standard vocabulary
 - Outlining the needs of a fully digital labeling system from all stakeholder perspectives
- Representatives from industry, grower/applicator groups, States, NGOs, extension, worker advocates, tribes
 - Gretchen Paluch (Iowa), Russell Darling (California), Sarah Caffery (Indiana), Liza Fleeson-Trossbach (Virginia)

EPA-Caliper Proof of Concept

- Caliper has developed a data model that captures labeling data electronically
 - Data model – describes structure, manipulation, and integrity of data stored
- EPA working with Caliper on “proof of concept”
 - EPA staff from all divisions participating in weekly workshops
 - Purpose: evaluate the data model and the impact on real-life practical applicability of tools
 - Goal: refine the existing data model to ensure it captures relevant information at the appropriate level of detail

Next steps

- Seek feedback from states specifically on their needs in a digital labeling system
- Continue to engage with PPDC workgroup on digital labeling