

PRIA Coalition Bilingual Labeling Update

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CropLife America and RISE

PRIA 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)

Recap from September JWC Meeting



- PRIA 5 amended FIFRA requires translation for sections of the end-use pesticide product labels.
- □ The Spanish translation must be included on the product, either directly or as a link accessible through scannable technology or other electronic methods.
- Label changes for bilingual labeling are made through nonnotification.
- Antimicrobial pesticides and non-agricultural or non-RUP pesticides can meet the requirement by providing access to the Spanish Safety Data Sheet (SDS) through a link, scannable code, or other electronic method.

Sections of the Label that Must Be Translated



Only the health and safety sections of pesticide product labels are required to be translated. Under PRIA 5, the EPA requires translation of the specific label sections identified in the Agency's *Spanish Translation Guide for Pesticide Labeling* for every registered pesticide product released for shipment. These parts include:

- Keep out of reach of children (KOROC statement)
- Restricted use pesticide (RUP)
- Signal word
- First aid statements
- Precautionary statements
- Personal protective equipment (PPE) requirements
- Misuse statement
- Storage and disposal instructions

PRIA 5 Compliance Dates



PRIA 5 Bilingual Labeling Requirements Timetable	
Pesticide Product Type	Bilingual Labeling Due
Restricted Use Pesticides (RUPs)	December 29, 2025
Agricultural Products (Non-RUPs):	
Acute Toxicity Category I	December 29, 2025
Acute Toxicity Category II	December 29, 2027
Antimicrobial and Non-Agricultural Products:	
Acute Toxicity Category I	December 29, 2026
Acute Toxicity Category II	December 29, 2028
All Other Pesticide Products	December 29, 2030

Actions and Activities



- □ SFIREG JWC Meeting September 2024
- □ Bilingual Labeling Q&A Webinar October 2024
- □ EPA Update to Spanish Translation Guide Dec 2024
- □ EPA publishes Plan to Track Adoption of Bilingual Labeling on End Use Pesticide Products EPA-HQ-OPP-2024-0438 – Dec 2024
- □ Comments Submitted on EPAs Plan to Track February 2025

Spanish Translation Guide Update



- Includes additional information on:
 - Restricted Use Pesticides
 - Misuse Statements
 - First Aid and precautionary statement language
 - Personal protective equipment (PPE) label statements
 - Storage and pesticide container disposal instructions
 - New sections include:
 - Engineering controls
 - Environmental Hazards
 - Physical or Chemical Hazards
- Starting in 2025, registrants must translate all required sections as outlined in the PRIA 5 Timetable. However, they are not required to revise sections that were already translated.

Proposed Plan to Track



- □ Tracking through existing Annual Pesticide Registration Maintenance Fee process
- □ Registrants would inform EPA whether translations had been completed, and responses would be used to verify compliance with the PRIA Schedule
- □ Information to be published on EPA website

PRIA Coalition Comments on 'Plan To Track'



- □ How determine whether a product should be identified?
 - Products that don't follow PRIA schedule
 - Products where compliance comes after date of response
 - Products which have not been released for shipment
- □ Identify that Manufacturing Use Products are not in scope
- Suggested text to provide additional clarity

Registrant Activity



- Work Continues:
 - How will translations be done?
 - Software, human translator, or both?
 - Use EPA's guide with other resources (which ones)?
 - Provide true and accurate translations
 - Which labels to start with?
 - o RUPs, non-RUPs, or others?
 - How will translation be delivered?
 - QR code, link, printed on label, or some combination?

Thank You!



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