

March 3, 2026



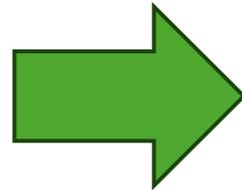
ESA
Field Reality for
Retailers & Custom Applicators

Sophie Gaillardon, PhD – Head Global Regulatory

Game Changer for Applicators



From Single Static Label



Multiple Dynamic Labelling

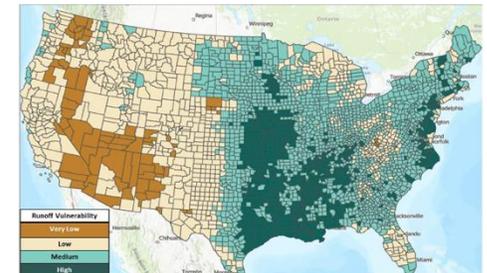


Mitigation Menu



Regulatory Assessment

- **Mapped Field Characteristics** (e.g. runoff vulnerability)
- **Observed field features** (e.g. terrace, waterways)
- **Grower Agronomic practices** (no-till, cover crop, etc.)



Planning is Critical to Success at Farm Level

Plan Ahead – Document – Tweak in-Season – Repeat next year

(1) One-time / year
(review yearly to confirm no changes)

Train on ESA

Assign **Runoff mitigation** pts for **ALL** your Fields
Goal: min. 9 pts

Assign **Buffer reduction** points to **ALL** your Fields
Goal: 100% reduction

(2) Season planning

Review products labels for runoff pts, BLT, buffer, etc.

Review & Print BLT
(likely 1 for the farm)



Adjust Plan
Address specific field challenges

(3) In-season tweaking

Tweak plan
(BLT printing window, additional product(s))

From the lenses of the custom applicator?

Considerations for Custom Applicators?

1 Regulation – 2 Realities

Operational Factor	The Grower	The Custom Applicator
Geographic Scope	1 Operation	50+ operations / Operations across USA
Field Knowledge	Knows the history, slope, and drainage, agronomic practices (no-till) of every acre.	Arrives at a "new" field with a GPS coordinate
Crop/Product Choice	Decides months in advance which 5-10 products to use.	Given a Work order from 100,000+ SKUs
Mitigation Credits	Knows if a cover crop was planted or no-till was used last fall.	Must perform a manual field audit in the moment or get information from the grower (?)
Time Horizon	Has a 4-month window to plan the "Point System" strategy.	Has a 4-hour window to execute before a rain event or wind shift.
Regulatory Burden	Document points, BLT, buffer reduction once ahead of the season.	Must perform 10–20 unique digital audits daily across different counties.
Tank Mixing	Uses a standard "program" across all their acres.	Must perform the evaluation for every new tank on the fly.
Network access	Computer screen, internet access, printer	Phone/tablet, spotty/no internet, no printing

Interim Manual Process



Training

Provide internal ESA education across all field roles:

- Applicators
 - Crop Consultants
 - Administrative staff
 - Agronomists
- consistent understanding and compliance



Label Monitoring

Track and maintain an updated list of impacted product labels :

- BLT requirements
 - Runoff points
 - Buffer requirements
 - Allowed Mitigations
- (EPA menu vs label specific)



Manual Tools

- Print ESA Bulletins (with and without PULAs) for field use
- Use paper forms to record specific ESA requirements for each application
- Develop product-specific cheat sheets to capture product specific requirements

How do we manage as the number of product grows?

Operational Considerations

Large Data Set – Opportunity for Increased Consistency

Information Required	Source	Operational
Bulletin	Label	100,000+ SKUs
Runoff Points	Label & Bulletin	100,000+ SKUs and Billions Bulletins
Buffer	Label & Bulletin	100,000+ SKUs and Billions Bulletins
Other requirements	Label & Bulletin	100,000+ SKUs and Billions Bulletins
Runoff Mitigation availability	EPA mitigation menu or Label	1 menu or 100,000+ labels
Runoff Mitigation data	<p>Mapped field characteristics: Runoff vulnerability map/county list, USDA web soil texture survey,</p> <p>Grower practice: annual rate, tillage, cover crop, etc.</p> <p>Observed field features : vegetative strips, terrace farming, etc.</p>	<ul style="list-style-type: none"> Information not readily available or verifiable (grower info?) Various databases (availability of API?) Availability? Up to data? Liability?
Buffer Mitigation	EPA mitigation menu or Label	1 menu or 100,000+ labels

Task Force Towards a Digital Solution?

Digital Tool and Consistent Language

Collaboration Towards a Digital ESA Compliance Solution?

- **Runs at recommendation/work order creation** to confirm feasibility considering all requirements
- **Integrates & verifies all data sources:**
 - Public (labels, BLT, county maps, USDA soil info, etc.)
 - Grower-provided information
- **Generates compliance report:**
 - ESA requirements with points needed/obtained, buffer needs, etc.
 - On-day application status: no additional requirements OR additional requirements documented
- **Reduces error** by ensuring accuracy of data and reporting

Consistency in label language around ESA

- Consideration for EPA and registrants to bring consistency in label language by referencing ESA mitigation menus for all labels rather than allowing label specific mitigation

Consistency in training and training material (ESA Forum)

- Collaboration between industry and regulators ensures consistent interpretation and implementation

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Thank you!

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