

Web-Distributed Labeling: Enforcement Issues

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The Pesticide Stewardship Alliance
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Enforcement Perspective

- Accessibility
- Label is the Law
- **Pesticide Paradigm**



Accessibility

- End Users
 - Web Access
 - 57% Agricultural Producers
 - Toll Free Number
 - “Good Samaritans”
- Investigators
 - Access to All Labels



Label Is The Law

- Label Version
 - Growers Make Pesticide Application Decisions Including Purchases In Advance
 - Based on the label requirements
 - Valid period for a specific use pattern
 - Investigators Ensure Compliance
 - Label version in effect at time of application
 - Requirement to print label with version number on container



Label Is The Law

- State Specific Requirements
 - Growers can operate across State lines
 - May be State restricted
 - Location specific use directions
- Changes In Field Conditions
 - Between spray plan and actual spray date
 - Weed species
 - Growth Stage
 - May mean a change in rate or timing
 - Label will not address that condition



Pesticide Paradigm

- Label “*On The Container*” Is The Law
- Additional Step Is An Added Inconvenience
- Resistance To Change
 - Ag Community
 - “If it ain’t broke”
- Technology Being Adopted ~ Cautiously
 - Slow internet connections
- Service To Regulated Community
 - Resource Issue
- Big Government



Web-Distributed Labeling

- Stakeholder Input
 - End Users
 - Regulators
- Labeling System / Alternative System
 - Access to Information
 - Host/manage
 - Quality Assurance
 - Customer Service
- Impact Assessment
 - Use of Pesticide
 - Resources
 - Business Practices
- Outreach & Education
 - Regulators
 - Regulated Community
 - Responsible (EPA, SLAs, Extension)
 - Resources

