



August 23, 2016
Label Language Stewardship Committee
2016 ASPCRO Annual Board Meeting Report

Committee Members: Andrew Architect, National Pest Management Association; Greg Baumann, Nisus Corporation; Jonathan Berger, BASF; Jan Brill, Bayer CropScience LP; Allison Cuellar, Texas Department of Agriculture; Judy Fersch, BASF; Ken Kendall, Ensystem, Inc.; Dr. Mel Kyle, Consultant; Bonnie Rabe, New Mexico Department of Agriculture (Co-Chair); Nina Rao, BASF; Micah Raub, Virginia Department of Agriculture (Co-Chair); David Scott, Office of the Indiana State Chemist; Julie Spagnoli, JM Specialty Consulting; Mike Weyman, Clemson University; Jim Wright, Jim Wright Consulting, LLC; Thomas Wright, Pest Pro Academy.

On behalf of the ASPCRO Label Language Stewardship Committee (Committee), we submit the following report for the 2016 annual board meeting.

During the past year, Micah Raub accepted the position of co-chair of the committee. Bonnie Rabe continues to assist as needed while recruiting a person for the second co-chair position continues.

The Committee met on April 18, 2016 in conjunction with the 2016 mid-year meeting in Burlington, VT. The committee also held one conference call on June 22, 2016. The call was primarily to plan for the annual meeting but members also discussed questions related to the label matching application, stewardship for misuse of insecticides for illegal wildlife control, and a new item, the potential implementation of an online regulators' forum to address product compliance issues. Mr. Raub expressed the need to recruit new members especially from state lead agencies. Shawn Hackett, formerly with the Kansas Department of Agriculture, began work with the EPA earlier this year and will no longer be on the committee. The committee has no assigned actions from the Board currently but will continue to pursue discussion in the areas identified below.

Burrowing Rodent Language on Fumigant Labels - No new discussion or action since April '16

At the mid-year meeting Bonnie Rabe provided members with the outcomes of the the Western Pest Management Tour which NMDA hosted April 4-8, 2016 in Albuquerque, NM. Presentations during the meeting included discussion of the label language for burrowing rodent use and the confusion caused for applicators as well as regulators in determining the requirements and verifying compliance. With support from EPA, it was decided during the

training to work towards a solution which would clarify proper use and the ways that could happen. The group at the meeting will begin with a label review and suggestions on how to make it clearer and more consistent in relation to the use for burrowing rodent control. The resulting work will then be passed on for further review by this committee and the structural fumigation committee. Registrants will be involved in the process. The Label Language Stewardship Committee is still awaiting the resulting work.

Termiticide Label Template Discussion - No new discussion or action since April '16

The chairs will be contacting EPA to determine the continued viability of this effort at this time, before further work will continue. If confirmed this will be helpful and accepted considering the agencies move toward SmartLabel and label matching technology, the committee with further advance this project.

Label Matching Application

During the committee meeting in April '16, Jay Kelly and Bonnie Rabe provided an update on the label matching project and new opportunities this will provide for better review of labels found in the marketplace, during use inspections or submitted for review during state registration and renewal. This application will ultimately allow inspectors to take a photo of a label and the program will provide registration information and do a label comparison to the accepted label. This technology is being developed and supported by EPA. It will necessitate the agency ultimately collecting market labels rather than just the master label. In the interim, the program will use state level label database information.

During the June '16 conference call, members inquired about how the labels would handle text not found on the Master Document. Dave Scott indicated that the developers are aware that the container label differs from the master label. They are also aware that different versions may exist. There was a brief discussion of the need for a repository of container labels to work with the program. A demonstration is included on the agenda at the 2016 ASPCRO conference.

EPA Pollinator Protection Policy Comments - No new discussion or action since April '16

The committee will stand ready to review, evaluate and/or work on any label language resulting from the final EPA Pollinator Protection Policy for which EPA is currently evaluating public comments made to the docket.

Stewardship for Misuse of Insecticides for Illegal Wildlife Control

At the mid-year meeting, the committee discussed the outcome of a session held during the 2015 annual conference on issues related to the misuse of Golden Malrin fly bait on nuisance wildlife. Suggestions during the session included contacting some of the national companies to ask for their assistance – Tractor Supply, Coke/Pepsi; commenting on blogs with a statement from ASPCRO; working with USDA Wildlife Services, US Fish and Wildlife and state wildlife agencies; the US Humane Society, County Cooperative Extension and others who would support the effort. These suggestions were further deliberated during the committee meeting and it was agreed to pursue those as well as additionally contact the registrant and EPA to check status of the registration agreement requirements.

During the June '16 conference call, committee members discussed the topic further. One member indicated that on the pest control side misuse seemed to be a non-issue. AAPCO is also working on addressing this issue. The committee discussed whether there was a way to make existing labels more enforceable. For example, EPA may be able to develop a means to make "Professional Use" enforceable when not an RUP. There was also a discussion of technology which would allow EPA, regulators and manufacturers to "Listen to the internet" and therefore identify misinformation. This would potentially allow for them to counter the misinformation.

Regulators' Forum to Address Product Compliance Issues

During the June '16 conference call, there was discussion of the constant battle with problem phrases and terms on both 25(b) and Section 3 labels. These include false claims or claims which weren't permitted such as health claims on 25(b) products. Some members expressed the need for a regulator's forum to allow coordination across the states of product compliance issues. Jim Fredericks shared that NPMA has a community forum that they may be able to set up to serve such a need. Members will be updated and discuss further at the August '16 Annual Meeting.

Respectfully submitted,



Bonnie Rabe, Co-Chair



Micah Raub, Co-Chair