



March 27, 2017
Label Language Stewardship Committee
2017 ASPCRO Mid-Year 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; Alvin Harris, Washington D.C. District Department of Environment; Ken Kendall, Ensystex, 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; Buzz Vance, Nebraska Department of Agriculture; 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.

The committee last met during the 2016 Annual meeting in Santa Fe, NM. There were no other committee activities since the Annual Meeting. The committee has no assigned actions from the Board currently but will continue to pursue discussion in the areas identified below.

In addition to the issues below, committee members expressed that EPA should provide regular updates on personnel changes so states and registrants can know who to contact. With retirements, personnel changes, and changing work assignments at EPA it has been difficult to know who to contact within the agency. Members felt that this should be an ASPCRO issue not just a committee issue.

Since the Annual Meeting, two new members have formerly joined the Label Language Stewardship Committee- Alvin Harris, Washington D.C. District Department of Environment, and Buzz Vance, Nebraska Department of Agriculture.

Burrowing Rodent Language on Fumigant Labels

Following the Western Pest Management Tour held April 4-8, 2016 in Albuquerque, NM, it was decided to work towards a solution which would clarify proper use and the ways that could happen. The group at the meeting was to begin with a label review and provide suggestions on how to make the label clearer and more consistent in relation to the use for burrowing rodent control. The resulting work was to be passed on for further review by this committee and the

structural fumigation committee. The Label Language Stewardship Committee is still awaiting the resulting work and no further action has been taken.

Termiticide Label Template Discussion

During meeting, attendees discussed the termiticide label template briefly. There was an emphasis that there needed to be consistency between labels. PR 96-7 was intended to bring consistency to labels through EPA mandated language. One issue that affects consistency is the copyrighting of some companies' labels. Each company owns its label so the exact language is copyrighted. There was some discussion of proposed termiticide labels being looked at by the states.

Label Matching Application

During the main conference in Santa Fe, Jay Kelley provided a presentation and demonstration of the label matching software so it was not focused on during the separate committee meeting. This technology is being developed and supported by EPA. Mr. Kelly's presentation, demonstration and responses to audience questions addressed some of the questions committee members had in prior discussions. The committee will continue to monitor the progress of the beta testing of the software.

EPA Pollinator Protection Policy Comments

There has been no new discussion since April 2016. 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

The committee further discussed the issue of pesticide misuse, particularly in regards to illegal wildlife control. The increase of sales over the internet is one area of concern. Internet commerce sites make some pesticides more accessible to the general public than in the past. Another issue continues to be the online message boards. One company representative indicated that in the past they had hired a third party to go online and post to message boards. In prior meetings, the committee had discussed 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. Another option discussed in the past was existing labels could be made more enforceable. For example, EPA may be able to develop a means to make "Professional Use" enforceable when not an RUP. The committee will continue to evaluate the issue and any reports of misuse.

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. No further action has occurred since the conference call.

PRIA Legislation

Company members discussed how the number of pests listed on a label determines the costs under PRIA. They currently try to put fewer pests on labels to save costs. For example, rather than listing each species of fly, they just list flies. If they are required under PRIA to list individual species that will increase their costs. The new PRIA adds 40 plus new categories. Instead of simplifying, PRIA keeps expanding categories.

First Aid Statement Guidance

Prior to the Annual meeting, the EPA had announced draft guidance on the placement of First Aid statements. EPA indicated that it would require First Aid Statements be placed on the outside of containers. Some companies had been placing a statement on the front of the container referring customers to another panel of the label. The committee plans to discuss the issue further.

Respectfully submitted,



Bonnie Rabe, Co-Chair



Micah Raub, Co-Chair