

## **Web-Distributed Labeling**

### Overview

In 2008, EPA established an internal web-distributed labeling (WDL) workgroup to develop issue white papers, and a WDL Workgroup under the auspices of the Pesticide Program Dialogue Committee (PPDC) to evaluate and discuss those white papers and related topics. EPA envisions WDL as a mechanism for quicker dissemination of new label information and for allowing applicators to retrieve via the internet only the label information needed for a specific application. During the next 2 years, the PPDC WDL Workgroup met regularly to evaluate and discuss many issues related to distribution of pesticide label information via the internet. EPA intends the initial WDL program to be voluntary and to involve only agricultural and commercial pesticide products. In a November 19, 2010 letter, CPDA and twelve other trade associations formally recommended that EPA discontinue work on WDL, including a proposed pilot project to assess user acceptance. Despite industry objections, EPA conducted the pilot project and a related user survey, which did not receive enough user responses to be statistically valid. On December 29, 2010, EPA published a Federal Register notice seeking comments on the WDL initiative.

On March 29, 2011, CPDA submitted comments that again urged EPA to abandon the WDL initiative, noting that (1) the content of a pesticide product marketing label is not suitable for piecemeal distribution in commerce, (2) products in a WDL system are likely to be perceived as being different from products that are not in the system, resulting in an uneven playing field for competing products in the marketplace and enhanced potential legal liabilities (particularly tort liability), and (3) a reduction in the time needed for label changes to reach the marketplace can easily be achieved by enhancing communication between EPA staff and registrants and by the Agency's better management of registration actions.

### Update

On September 19, 2011, EPA announced that it had decided to reconsider the concept of WDL and move forward with an "amended approach" through a PR Notice. The notice would set forth the procedures registrants could use to obtain legally valid versions of pesticide labeling from either the product container (full labeling) or through the internet (i.e., labeling specific to a state and use site). EPA expects to publish a draft of the PR Notice for comment in late 2011.