



Office of Pesticide Programs Electronic Label
A program of the U.S. Environmental Protection Agency

25 May 2022



The label is the law

Everything OPP does goes back to pesticide labels...

- **The label is the beginning and end of OPP's process**
 - Touched by ALL divisions & employees in OPP
 - The primary way we interact with the public
- **However, our Current label review and retrieval system is antiquated →**
 - Inconsistent labels
 - Inefficient review/assessment
 - Inefficient response to inquiries/emergencies

*Modernizing the label and how we interact with it
will foundationally modernize OPP*



Background Pain Points

Reviewing labels is a slow, costly, manual process

- **Labels are currently submitted as PDFs or paper**
 - No structured template → Inconsistent format
 - Non-digital format → Data manually extracted into multiple databases
 - Uncontrolled vocabularies → Data must be interpreted by EPA
- **Inevitable result**
 - Time consuming/Inconsistent EPA reviews and interpretations
 - Back and forth with registrants about interpretation
 - Limited ability to compare to existing products
 - Inefficient work processes
 - We can't easily answer questions about existing registrations



Solution: Structured eContent (OPPEL)

- **Conversion of an unstructured document to structured data**
 - Standardizing format of labels (→ “Structured Label”)
 - Development of a standardized/Formal/Public OPP vocabulary
 - Delineation of product use patterns by the registrant (→ “Use Index”)
- **Part of the larger OPP Digital Transformation effort, with:**
 - Expansion of the Pesticide Submission Portal (**PSP**)
 - OPP Structured Content Review (**OSCR**) Tool, and
 - Electronic Confidential Statement of Formula (**eCSF**) – *piloted last year*
- **Together, these represent progress towards**
 - A scalable plan for OPP data management and access
 - A process to improve label review and risk assessment workflow
 - OPP’s vision of instantaneous access to quality information
 - Allows for multiple views/perspectives of content & integration with other systems



OPPEL's Guiding Principles

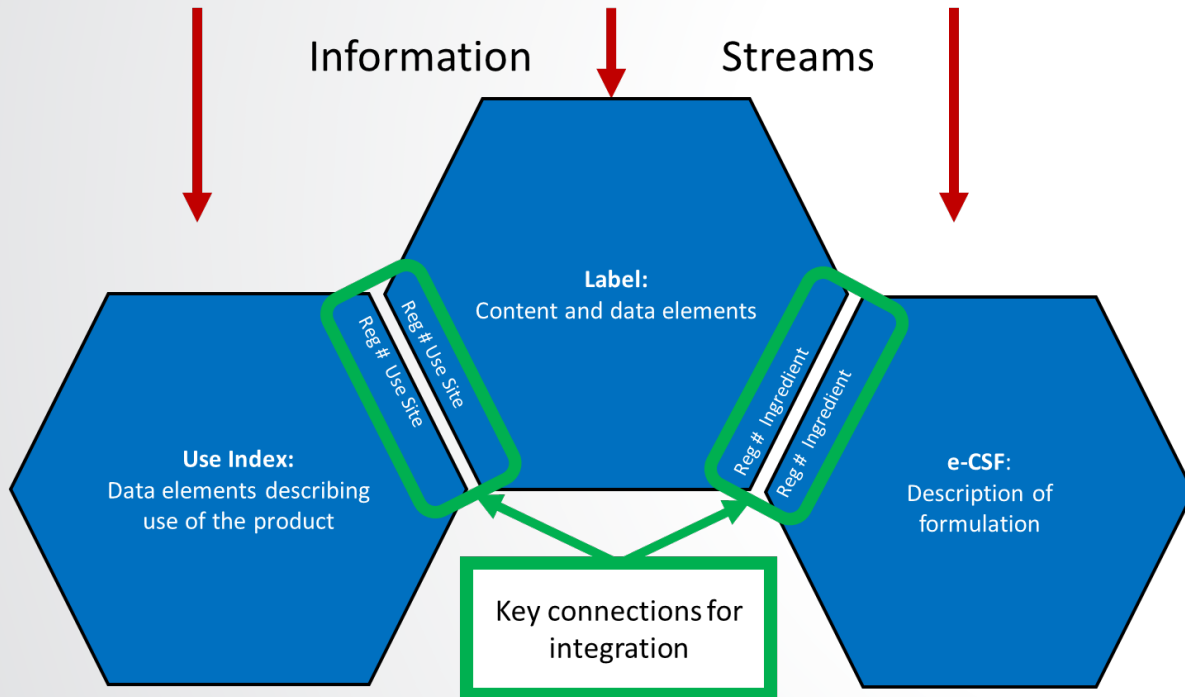
Data standardization through controlled terminology & structure

- **Ensure clearly defined business requirements**
 - Can the concept be clearly defined?
 - Will the information effect assessments?
 - How are the captured elements related?
- **Ensure consistent approaches to development of data models**
 - Avoid “silos” of information that cannot communicate
- **Ensure consistent *Vocabularies and Concepts***
 - Reuse vocab lists across forms where possible
- **Centralized-Standard Vocabulary management**
 - EPA Terminology Services: **Synaptica**

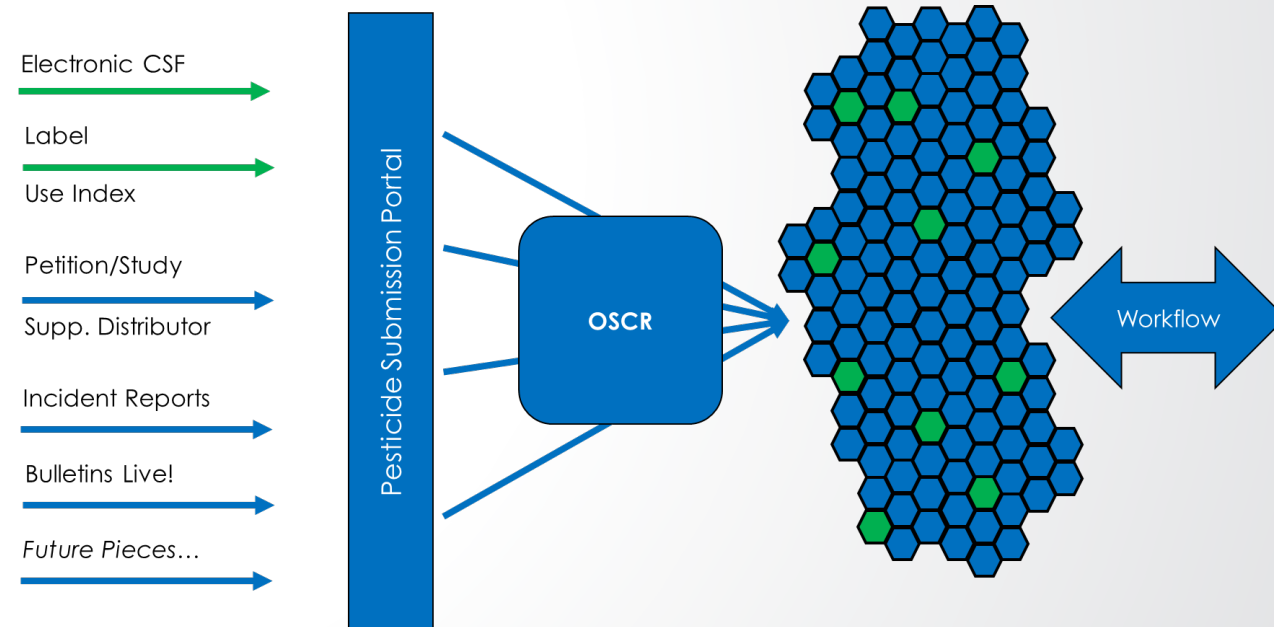


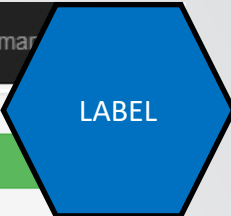
Holistic OPPEL eContent Vision

Purposeful linking information



Across multiple data streams





LABEL

Pest X

Document Information

Pesticide Product Label

Restricted Use Pesticide

Ingredient Statement

Child Hazard Warning/Signal Word

Product Profile

Precautionary Statements

Directions for Use

Product Application

Instructions/Information

Use Site Application Instructions

Warranty/Disclaimer Statement

Marketing/Advertising Claims

Additional Documentation and Labeling

Use Index

Product Level

Product Identification

Product Level Use

Restrictions/Limitations

Site Level

Use Site Attributes

The content for the Precautionary Statements screen is contained within the respective sections located on this screen. They include statements for: First Aid; Hazards to Humans and Domestic Animals; Personal Protective Equipment; Engineering Controls; User Safety Requirements and Recommendations; Environmental Hazards; Physical and Chemical Hazards. Clicking an 'add' button for a section on the screen expands or collapses the Section Text area for the respective

Add Environmental Hazards Statement

3.6.8.1 Environmental Hazards Statement

File ▾ Edit ▾ Insert ▾ Format ▾ Table ▾

B *I* U

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops, plants or weeds. Do not apply this product or allow it to drift to blooming crops, plants or weeds if bees are foraging the treatment area.

PROTECTION OF POLLINATORS



APPLICATION RESTRICTIONS EXIST FOR THIS PRODUCT BECAUSE OF RISK TO BEES AND OTHER INSECT POLLINATORS. FOLLOW APPLICATION RESTRICTIONS FOUND IN THE DIRECTIONS FOR USE TO PROTECT POLLINATORS.

Look for the bee hazard icon in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators.

Add Threatened Species Restrictions

4.3.3.23 Pollinator Protection Statement(s)

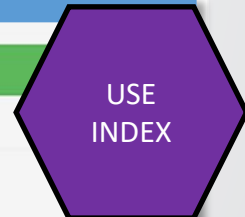
Add a Pollinator Protection Statement

Do not apply prior to bloom

Do not apply until after petal fall

Do not apply while bees are actively foraging

Do not apply while flowers are in bloom



USE INDEX



Goals/Benefits of Structured eContent

- **Increased label accuracy/quality/consistency**
 - Structured Label sections → consistent format
 - Use Pattern Index metadata → label text as standardized use pattern data
 - Standard Vocabulary → shared understanding
 - Built in validation → Reduced error rates & easier reviews
 - Review tool → Improved access to previous reviews & consistency with similar labels
- **Improved access to registration information**
 - Search across products → Increased ability to respond to inquiries
 - Direct to PPLS upload → access to approved content in real-time
 - Usable metadata → Possible connection with bulletins live (etc.)
- **Save Resources**
 - Electronic workplace → less paper
 - Consistency & standardization → improved label comparison capabilities
 - Do more with less → possible to decrease contracts and backlog for staff



Structure & Automation

→ Increased capacity to do more

- **During submission & review**

- Industry facing builders perform extensive data validation *prior to submission*
- Review tool identifies exactly what has changed between versions
- Automation of some types of review (non-PRIAs)
- Reduces burden on EPA staff during 21-day screening (PRIA) and full reviews
- Ability to compare labels level playing field for registrants
- Significant time savings to registrants & OPP *after initial file creation*

- **After labels are accepted**

- Automated data extraction into EPA databases (decreases contract needs & increased consistency)
- Provides data in an easily storable and searchable format
- Integration of multiple systems (labels, bulletins live, incident reporting, etc.)
- Web distributed labeling (easier with structured content)
- Enhanced cooperation with state, federal, and international partners
- **Efficient and accurate response to inquiries and emergencies**



Path Forward

- **Wrap up IT development** (*review tool and database*)
 - **Implementation will be a challenge - *we have a lot of complicated labels***
 - FDA called in all registrations in one year (*assumed submissions were correct*)
 - Our labels are more complex, longer, and we aren't starting with as much standardization
 - OPP will likely want to assist registrants with entry and check submissions
 - OPP staff will also need training in new vocabulary, structure, and tools
 - Initial review of OPPEL file *may* take longer than traditional pdf review
 - Subsequent reviews will be MUCH faster (*rely on validation and comparison*) or entirely automated
 - **LOTS of ways we could handle call in...**
 - Rule making vs voluntary?
 - Day forward submissions?
 - Purposeful request of specific registrations (possibly by AI for ESA or new AIs)?
 - **Establish formal governance for vocab maintenance/training/outreach**
- Considered and purposeful implementation key to future success***



Engaging Stakeholders

Stakeholder Engagement

- Communication with states
- Outreach to regulator, applicator, and trade organizations
 - NPIRS/ALSTAR
 - AAPCO
 - ASPCRO
 - BPIA
 - SFIREG SmartLabel Sub-group
 - PREP courses
 - Canada's PMRA
- Public webinar
- Pilot with registrants

OPPEL Pilot Registrants

- Bayer Crop Science
- Clorox
- Dow AgroSciences (*Corteva*)
- Syngenta
- Reckitt Benckiser
- EcoLab
- Marrone Bio
- SePRO
- United Industries Corporation

eCSF Pilot Registrants

- Bayer Crop Science
- Clorox
- Dow AgroSciences
- Syngenta
- Reckitt Benckiser
- BASF
- Lonza
- TSG USA



Current Workgroup Members

OPPEL/eCSF Oversight group:

AD: Shanta Adeeb, Diane Isbell

BEAD: Claire Paisley-Jones

BPPD: Seiichi Murasaki

HED: Phil Villanueva

ITRMD: James Davis, Robert Schultz, Ben Cobb

RD: Marianne Lewis, Venus Eagle

OPPEL Use Index Workgroup:

BEAD: Claire Paisley-Jones (OPPEL/Use Index Workgroup lead)

HED: Matt Crowley, Mike Doherty, Thurston Morton, Phil Villanueva

EFED: Katie Stebbins, Katrina White, Brian Kiernan, Rick Shamblen

BPPD: Seiichi Murasaki, Gina Burnett, Shannon Borges

OPPEL Label Content Workgroup:

The OPPEL Label Content Workgroup evolved into OSCR to work on the review tool which is needed to review the e-label components.

OSCR Workgroup:

AD: Shanta Adeeb (OPPEL/OSCR Workgroup Lead), Jose Gayoso, Eric Miederhoff, Diane Isbell, Michael Varco, Melanie Bolden, Lindsay Odell, Joseph Daniels, Jessica Bailey

BEAD: Claire Paisley-Jones

BPPD: Gina Burnett, Seiichi Murasaki, Donna Kamarei, Alex Horansky, Matthew Weiner

EFED: Brian Kiernan, Katrina White, Katherine Stebbins

ITRMD: James Davis, Robert Schultz, Casey Welch

PRD: Srijana Shrestha, Jaclyn Pyne

RD: Marianne Lewis, Paul Di Salvo, Lindsay Roe, Venus Eagle, Debra Rate, Manjula Unnikrishnan, Autumn Metzger

eCSF Workgroup:

AD: Diane Isbell (Workgroup Lead), Karen Hicks, Lindsay Odell, Stephen Savage, Joseph Williams

BPPD: Harold Cooper, Joseph Mabon

ITRMD: Ben Cobb, Jimmy Davis, Bob Schultz

RD: Venus Eagle, Marianne Lewis, Debra Rate, Shyam Mathur

And many other team members who have moved on...



Contacts and Resources

- Our website contains information about OPPEL, the pilot, and background documents
<https://www.epa.gov/pesticide-registration/office-pesticide-program-electronic-label-oppel-pilot>
- You can also email us your questions or comments at
Smartlabel@epa.gov
- FYI - Information about FDA program
 - Resources - <https://www.fda.gov/industry/fda-data-standards-advisory-board/structured-product-labeling-resources>
 - Query tool - <https://nctr-crs.fda.gov/fdalabel/ui/search>



Questions



Builder Screenshots

Pesticide Submission Portal

Welcome to the EPA's Pesticide Submission Portal!
 Currently, this portal supports two types of submissions: Pesticide Submission and Data Call-in Response. To begin a submission, please select a type below.

Please do not perform any submissions at midnight (around 12:00 AM Eastern). The system will be undergoing maintenance at this time.

Registration Submission



Continue Saved Packages

To continue working on saved PSP packages.



Create New Package

To create a new PSP package.



Package Status

To check the status of previously submitted packages and applications.



Upload eDossier Builder Packages

To upload packages created by downloadable eDossier Builder.



Upload XML e-Submission Packages

To upload individual applications

Re-evaluation



Consortium Submission

Form consortia and submit data.
View previous submissions.



Data Call-In

View status of Data Call-Ins.
Submit responses to the DCIs.



Registration Review Label

Submit Registration Review Labels.
View previous submissions.



Voluntary Submission

Submit Voluntary Data (Non-DCI).
View previous submissions.

General Services



eCSF

Submit Confidential Statement of Formula.



Generate Root MRIDs

To generate root MRIDs for study documents.



SmartLabel

Submit Pesticide Product Master Labels.

SmartLabel Product Labeling (SPL) Home

Upload Previously Created SmartLabel XML



Browse...

Upload File...

Next

Click 'Browse' to upload a previously created SmartLabel XML.

Begin New SmartLabel XML



Begin New SmartLabel XML

Click the 'Begin New SmartLabel XML' button to create a new SmartLabel Use Index and/or Label Document.

🏠 Pest X

📄 Document Information

▬ Pesticide Product Label

📄 Restricted Use Pesticide

📄 Ingredient Statement

📄 Child Hazard Warning/Signal Word

📄 Product Profile

📄 Precautionary Statements

▬ Directions for Use

▬ Product Application

Instructions/Information

📄 Ornaments

📄 Warranty/Disclaimer Statement

📄 Marketing/Advertising Claims

📄 Additional Documentation and Labeling

▬ Use Index

▬ Product Level

📄 Product Identification

📄 Product Level Use

This provides basic information for the identity of the particular document, its type, title, date and versioning as a member of a document set.

Document Information

Please enter Package Information in the fields below.

Document Name:

This field is optional and its value is not submitted. Saving locally will capture this value instead of the default 'Document ID' filename.

Company Name: *

Registration

Number:

EPA Company
Number

Product Number *

Document Type	Document Version	Document Id	Set Id	Actions
Pesticide Product Label	1	f5a905f3-221e-400e-b39...	0bd5e845-4c3b-4c0e-b0...	
Use Index	1	d573d5ab-5cd1-46ec-be...	a1503fa1-bd95-42c8-b08...	

Mark for Review

Next

Pest X

- Document Information
- Pesticide Product Label
 - Restricted Use Pesticide
 - Ingredient Statement**
 - Child Hazard Warning/Signal Word
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 - Precautionary Statements
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 - Product Application Instructions/Information
 - Use Site Application Instructions
- Warranty/Disclaimer Statement
- Marketing/Advertising Claims
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- Use Index
 - Product Level
 - Product Identification
 - Product Level Use Restrictions/Limitations
 - Site Level
 - Use Site Attributes

This page is used to describe the ingredients contained in the product. Information presented here should include a listing of active/other ingredients, their respective nominal concentrations, and concentrations of equivalence of the active/other ingredients. Statements require description of ingredients, such as toxics, and deterioration of a product during storage where it is found that a pesticide formulation changes chemical composition

Name
Search by Chemical, Common, EPA, or other approved name

CAS Number
Search by CAS Number (must be an exact match).

Initial search string must be 3 characters or longer

Search

Search Results

CAS Number	EPA Registry Name	Systematic Name
8000-78-0	Garlic oil	Oils, garlic
8008-99-9		Garlic, ext.
55335-06-3	Triclopyr	Acetic acid, 2-[(3,5,6-trichloro-2-pyridinyl)oxy]-
64700-56-7	Triclopyr-butotyl	Acetic acid, [(3,5,6-trichloro-2-pyridinyl)oxy]-, 2-butoxyethyl ester
57213-69-1	Triclopyr-triethylammonium	Acetic acid, [(3,5,6-trichloro-2-pyridinyl)oxy]-, compd. with N,N-di...

Active Ingredient

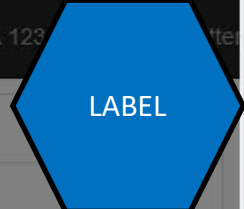
SRS Tracking #

Systematic Name

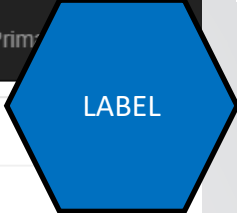
Percent Active Ingredient *

%

Add Percent Factoring Term



LABEL



Pest X

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Ingredient Statement

3.3.1.2 Active Ingredient(s)

Systematic Name	% Active Ingredient	Factoring Term Ingredient	% Factoring Term	Actions
Oils, garlic	25			

+ Add Active Ingredient

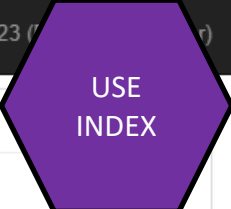
Add Ingredient Statement Section Text

3.3.1.1 Ingredient Statement

File Edit Insert Format Table

B *I* U

ACTIVE INGREDIENTS:% By Wt.
 Garlic oil* 25.0%
 OTHER INGREDIENTS..... 75.0%
 TOTAL100.0%
 *contains 2 pounds of garlic oil per gallon



- Document Information
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 - Additional Documentation and Labeling
- Use Index
 - Product Level
 - Product Identification**
 - Product Level Use Restrictions/Limitations
 - Ornamentals
 - Use Site Attributes
 - Use Site Yearly/Crop Cycle Rate
 - Use Site Level Restrictions/Limitations
 - Scenario Level

Product Identification

4.3.2.2 Active Ingredient(s) *

Systematic Name ▾	% Active Ingredient ▾	Factoring Term Ingredient ▾	% Factoring Term ▾	Actions ▾
Oils, garlic	25			

[+ Add Active Ingredient](#)

4.3.2.3 Product Density (Required for Liquids)

Mass

Units

Per Volume

Units

4.3.2.4 Mass Product per Miscellaneous Application

Mass

Units

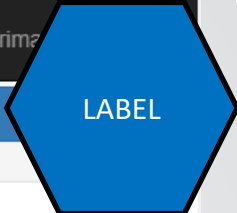
Per Quantity

Units

Mark for Review

[Next](#)

This section provides basic information to identify and characterize the particular product, including active ingredients and their percentages, and other physical characteristics of certain types of products.



🏠 Pest X

- 📄 Document Information
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 - 📄 Additional Documentation and Labeling
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 - Product Level
 - 📄 Product Identification
 - 📄 Product Level Use Restrictions/Limitations
 - Site Level
 - 📄 Use Site Attributes

The content for the Precautionary Statements screen is contained within the respective sections located on this screen. They include statements for: First Aid; Hazards to Humans and Domestic Animals; Personal Protective Equipment; Engineering Controls; User Safety Requirements and Recommendations; Environmental Hazards; Physical and Chemical Hazards. Clicking an 'add' button for a section on the screen expands or collapses the Section Text area for the respective

Add User Safety Requirements Statement

Add User Safety Recommendations Statement

Add Environmental Hazards Statement

3.6.8.1 Environmental Hazards Statement

File ▾ Edit ▾ Insert ▾ Format ▾ Table ▾

B *I* U

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops, plants or weeds. Do not apply this product or allow it to drift to blooming crops, plants or weeds if bees are foraging the treatment area.

PROTECTION OF POLLINATORS



APPLICATION RESTRICTIONS EXIST FOR THIS PRODUCT BECAUSE OF RISK TO BEES AND OTHER INSECT POLLINATORS. FOLLOW APPLICATION RESTRICTIONS FOUND IN THE DIRECTIONS FOR USE TO PROTECT POLLINATORS.

Look for the bee hazard icon in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators.

Document Information

Pesticide Product Label

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Directions for Use

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Warranty/Disclaimer Statement

Marketing/Advertising Claims

Additional Documentation and Labeling

Use Index

Product Level

Product Identification

Product Level Use
Restrictions/Limitations

Ornamentals

Use Site Attributes

Use Site Yearly/Crop Cycle Rate

Use Site Level Restrictions/Limitations

Scenario Level

This section identifies only Product Level Restrictions/Limitations which are applicable to all sites and all scenarios. If a restriction/limitation differs between sites or scenarios, it should be entered only at the respective site or scenario level. Entry of data for the same field at multiple levels will result in a validation error. Restrictions/Limitations should only be recorded in the Use Index if the label explicitly restricts or limits the identified data

Add Threatened Species Restrictions

4.3.3.23 Pollinator Protection Statement(s)

Add a Pollinator Protection Statement

Do not apply prior to bloom

Do not apply until after petal fall

Do not apply while bees are actively foraging

Do not apply while flowers are in bloom

Add Applications to Water

Add Secondary Manufacturing Restriction

Add Method Restrictions

4.3.3.27 Restricted Use Site Location(s)

Add a Use Site Location ▾

4.3.3.28 Restricted Application Target(s)

Add a Application Target ▾



Pest X

- Document Information
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 - Product Level Use Restrictions/Limitations
 - Ornamentals
 - Use Site Attributes

Product Application Instructions/Information

3.7.9.1 Product Application Instructions/Information Statement

File Edit Insert Format Table

B *I* U [List] [List] [Image] [Link] [Table]

MIXING: Shake well before mixing. Always use this product promptly after mixing with water.

APPLICATION METHOD AND EQUIPMENT: Pest X can be applied as a foliar spray or a drench to soil to control insects. When needed, soil drenches can also be used to control soil-borne pests, including soil-borne larvae of foliar insect pests. When applying as a drench avoid excessive leaching. Always follow equipment manufacturers use directions.

Pest X may be applied using manual hand sprayers and backpack equipment. Follow the original manufacturer’s directions when using these types of equipment. Do not apply this product through any type of irrigation system.

Not for sale or use in Suffolk or Nassau counties of New York.

Mark for Review

Next

The Product Application Instructions/Information sub-screen Section Text should include any product application instructions that are consistent across all labeled use sites not described in the above sections. Information provided here includes: directions to users for opening the package; application methods and equipment instructions; ideal environmental conditions; product restrictions; product advisory statements; tank mix and compatibility with other

- Document Information
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 - Ornamentials
 - Use Site Attributes
 - Use Site Yearly/Crop Cycle Rate
 - Use Site Level Restrictions/Limitations
 - Scenario Level

This section identifies only Product Level Restrictions/Limitations which are applicable to all sites and all scenarios. If a restriction/limitation differs between sites or scenarios, it should be entered only at the respective site or scenario level. Entry of data for the same field at multiple levels will result in a validation error. Restrictions/Limitations should only be recorded in the Use Index if the label explicitly restricts or limits the identified data

Add Method Restrictions

4.3.3.27 Restricted Use Site Location(s)

4.3.3.28 Restricted Application Target(s)

4.3.3.29 Restricted Application Type(s)

4.3.3.30 Restricted Application Equipment

 ✕

4.3.3.31 Restricted Application Timing (Time of Day)

4.3.3.31 Restricted Application Timing (Timing of Pest)

4.3.3.31 Restricted Application Timing (Use Site Status)

 Mark for Review[Next](#)

Pest X

Document Information

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Product Level Use
Restrictions/Limitations

Ornamentals

Use Site Attributes

Product Level Use Restrictions/Limitations

4.3.3.2 Geographic Area(s)

- There are no Geographic Restrictions.**
This applies to the entire United States and its territories.
- Some Geographic Restrictions apply.**
Select to add any Level Geographic Restrictions.

Geographic Restrictions

All areas are "allowed" by default.

Move areas between allowed/disallowed containers by checking their respective checkboxes and clicking the appropriate arrow button.

Geographic Areas Allowed

- ▼ United States (2 of 2 Divisions)
 - ▼ States (51 of 51 States)
 - ▼ New York (60 of 62 Counties)
 - New York, Alba New York County
 - New York, Allega New York County
 - New York, Bronx County
 - New York, Broome County
 - New York, Cattaraugus County
 - New York, Cayuga County
 - New York, Chautauqua County
 - New York, Chemung County
 - New York, Chenango County
 - New York, Clinton County
 - New York, Columbia County
 - New York, Cortland County
 - New York, Delaware County
 - New York, Dutchess County
 - New York, Erie County
 - New York, Essex County

Filter

new yo



Geographic Areas Disallowed

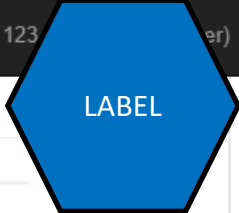
- ▼ United States (1 of 2 Divisions)
 - ▼ States (1 of 51 States)
 - ▶ New York (2 of 62 Counties)

Filter

Restricted Geographic Area Filter



This section identifies only Product Level Restrictions/Limitations which are applicable to all sites and all scenarios. If a restriction/limitation differs between sites or scenarios, it should be entered only at the respective site or scenario level. Entry of data for the same field at multiple levels will result in a validation error. Restrictions/Limitations should only be recorded in the Use Index if the label explicitly restricts or limits the identified data element in legally



- Restricted Use Pesticide
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 - Use Site Level Restrictions/Limitations
 - Scenario Level
 - Scenario Rate
 - Scenario Attributes

The Use Site Application Instructions Pesticide Product Label section and relating Section Text should include application instructions specific to the 'Selected Use Site(s)' on this screen. Application instructions might include application rate, number of applications, reapplication interval, application timing, target pest, site-specific restrictions, etc. 'Use Site' identifies the use site, crop or non-crop, while 'Use Site Location(s)' gives a broad category-based

3.7.10.2 Use Site / Commodity ***Use Site(s)**

All sites are deselected by default.

Move sites between allowed/disallowed containers by checking their respective checkboxes and clicking the appropriate arrow button.

Use Sites		Selected Use Site(s)
<ul style="list-style-type: none"> <input type="checkbox"/> Non-crop vegetation <input type="checkbox"/> Objects/Surfaces <ul style="list-style-type: none"> <input type="checkbox"/> Building/Structural Component <input type="checkbox"/> Water/Fluids/Waste Materials and Systems (Not intended for direct human consumption or food contact) <ul style="list-style-type: none"> <input type="checkbox"/> Non- or slow-flowing/Lentic Water Areas <ul style="list-style-type: none"> <input type="checkbox"/> Man-made Water-containing Structures 	<div style="border: 1px solid #ccc; width: 20px; height: 20px; margin: 5px auto; background-color: #007bff; color: white; display: flex; align-items: center; justify-content: center;">></div> <div style="border: 1px solid #ccc; width: 20px; height: 20px; margin: 5px auto; background-color: #007bff; color: white; display: flex; align-items: center; justify-content: center;"><</div>	<ul style="list-style-type: none"> <input type="checkbox"/> Non-crop vegetation <input type="checkbox"/> Ornamentals <ul style="list-style-type: none"> <input type="checkbox"/> Flowering plants <input type="checkbox"/> Non-flowering Plants <input type="checkbox"/> Shrubs/Bushes/Vines <input type="checkbox"/> Trees (non-food)
Filter <input style="width: 90%;" type="text" value="ornamental"/> ⊗		Filter <input style="width: 90%;" type="text" value="Allowed Use Site Filter"/> ⊗

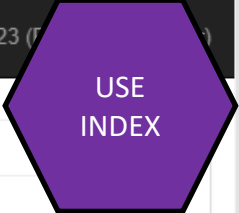
3.7.10.3 Use Site Location(s) *

▾

Agricultural (Indoor)
✕

Agricultural (Outdoor)
✕

3.7.10.4 Action(s) Against Pest **



- Product Labeling
 - Restricted Use Pesticide
 - Ingredient Statement
 - Child Hazard Warning/Signal Word
 - Product Profile
 - Precautionary Statements
 - Directions for Use
 - Product Application Instructions/Information
 - Ornamentals
 - Warranty/Disclaimer Statement
 - Marketing/Advertising Claims
 - Additional Documentation and Labeling
- Use Index
 - Product Level
 - Product Identification
 - Product Level Use Restrictions/Limitations
 - Ornamentals
 - Use Site Attributes**
 - Use Site Yearly/Crop Cycle Rate
 - Use Site Level Restrictions/Limitations
 - Scenario Level
 - Scenario Rate
 - Scenario Attributes

Use Site Attributes

4.4.2.2 Use Site / Commodity *

Use Site(s)

All sites are deselected by default.

Move sites between allowed/disallowed containers by checking their respective checkboxes and clicking the appropriate arrow button.

Use Sites		Selected Use Site(s)
<input type="checkbox"/> 1 - Root And Tuber Vegetable Group <ul style="list-style-type: none"> <input type="checkbox"/> 1a - Root Vegetable Subgroup <input type="checkbox"/> 1b - Root Vegetable Subgroup, Except Sugar Beet <input type="checkbox"/> 1c - Tuberous And Corm Vegetable Subgroup <input type="checkbox"/> 1d - Tuberous And Corm Vegetable Subgroup, Except Potato 	<input type="button" value=">"/> <input type="button" value="<"/>	<input type="checkbox"/> Non-crop vegetation <ul style="list-style-type: none"> <input type="checkbox"/> Ornamentals <ul style="list-style-type: none"> <input type="checkbox"/> Flowering plants <input type="checkbox"/> Non-flowering Plants <input type="checkbox"/> Shrubs/Bushes/Vines <input type="checkbox"/> Trees (non-food)
<input type="checkbox"/> 10 - Citrus Fruit Group <ul style="list-style-type: none"> <input type="checkbox"/> Calamondin <input type="checkbox"/> Citron <input type="checkbox"/> Citrus Hybrids <ul style="list-style-type: none"> <input type="checkbox"/> Tangelo <input type="checkbox"/> Grapefruit <ul style="list-style-type: none"> <input type="checkbox"/> Grapefruit: Juice <input type="checkbox"/> Kumquat <input type="checkbox"/> Lemon <ul style="list-style-type: none"> <input type="checkbox"/> Lemon: Juice <input type="checkbox"/> Lime <ul style="list-style-type: none"> <input type="checkbox"/> Lime: Juice <input type="checkbox"/> Orange <ul style="list-style-type: none"> <input type="checkbox"/> Orange: Juice 		
Filter <input type="text" value="Use Site Filter"/>		Filter <input type="text" value="Allowed Use Site Filter"/>

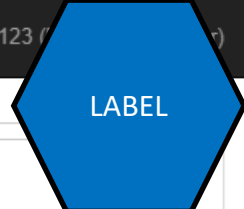
4.4.2.3 Use Site Location(s) *

Add a Use Site Location

Agricultural (Indoor)

Agricultural (Outdoor)

Use Site Attributes is a subsection of the Site Level. Site attributes are used to describe to what and where a product can be applied. Multiple site attributes can be entered if ALL subsequent application information applies to all combinations of the attributes.



- Child Hazard Warning/Signal Word
- Product Profile
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 - Use Site Level Restrictions/Limitations
 - Scenario Level
 - Scenario Rate
 - Scenario Attributes
 - Use Scenario Level Restrictions/Limitations

The Use Site Application Instructions Pesticide Product Label section and relating Section Text should include application instructions specific to the 'Selected Use Site(s)' on this screen. Application instructions might include application rate, number of applications, reapplication interval, application timing, target pest, site-specific restrictions, etc. 'Use Site' identifies the use site, crop or non-crop, while 'Use Site Location(s)' gives a broad category-based

3.7.10.5 Action(s) Against Plant Disease **

(** Information for at least one of the data elements in this section must be provided: Action(s) Against Pest OR Action(s) Against Plant Disease OR Plant Regulators(s).)

3.7.10.6 Plant Regulator(s) **

(** Information for at least one of the data elements in this section must be provided: Action(s) Against Pest OR Action(s) Against Plant Disease OR Plant Regulators(s).)

3.7.10.1 Use Site Application Instructions Statement

File Edit Insert Format Table

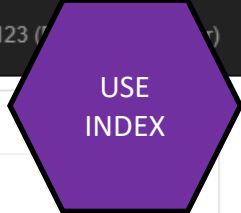
B *I* U

Pest X may be applied as directed to ornamentals at a rate not exceeding 4 fl oz per acre per application, or 4 applications per year.

Use this product at the first sign of infestation. Mix Pest X at a rate of 1-2 fl oz of concentrate to 30 fl oz of water to equal a total of fl 32 oz. Apply to plants foliage and ensure the plants are thoroughly wet. Reapply on a 7-10 day schedule as needed. If deer feeding is heavy, reapply after 3 days.

Mark for Review

Next



- Home Pest X
 - Document Information
 - Pesticide Product Label
 - Restricted Use Pesticide
 - Ingredient Statement
 - Child Hazard Warning/Signal Word
 - Product Profile
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 - Directions for Use
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 - Use Site Yearly/Crop Cycle Rate**
 - Use Site Level Restrictions/Limitations

Use Site Yearly/Crop Cycle Rate

4.4.3.2 Maximum Number of Applications per Site per Time **

(** At least one element in this section must be entered: Maximum Number of Applications per Site per Time, OR Maximum Site Application Rate per Time, OR both.)

Number

Per Time Year Crop Cycle

4.4.3.3 Maximum Site Application Rate per Time **

(** At least one element in this section must be entered: Maximum Number of Applications per Site per Time, OR Maximum Site Application Rate per Time, OR both.)

Rate

Units

Per Quantity

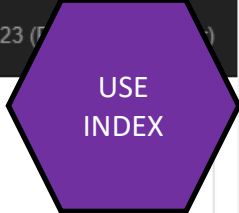
Units

Per Time Year Crop Cycle

Mark for Review

Next

The Use Site Yearly Rate/Crop Cycle Rate section must capture at least one of the 'Maximum Number of Applications per Site per Time' or 'Maximum Site Application Rate per Time'. 'Maximum Number of Applications per Site per Time' identifies the maximum number of applications that can be applied per year or per crop cycle to the use site for all scenarios within this Site Level. 'Maximum Site Application Rate per Time' identifies the maximum amount of



- Child Hazard Warning/Signal Word
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 - Scenario Level
 - Scenario Rate**
 - Scenario Attributes
 - Use Scenario Level Restrictions/Limitations

Scenario Rate describes the single and yearly/crop cycle maximum rate parameters that can be applied using a set of Scenario Attributes. Only one set of maximum single and yearly/crop cycle rates may be entered for each Scenario.

	Per Quantity	<input type="text" value="Quantity"/>		Units	<input type="text" value="Units"/>
4.5.2.2 Single Application Maximum Rate *					
	Rate	<input type="text" value="4"/>		Units	<input style="border: 1px solid #ccc;" type="text" value="fluid ounces"/> ✕ ▾
	Per Quantity	<input type="text" value="1"/>		Units	<input style="border: 1px solid #ccc;" type="text" value="acre"/> ✕ ▾
4.5.2.3 Acre Rate for Non-Standard Target Measures					
	Rate	<input type="text" value="Rate"/>		Units	<input type="text" value="Units"/>
	Per Quantity	<input type="text" value="Quantity"/>		Units	<input type="text" value="Units"/>
4.5.2.4 Minimum Diluent/Carrier or Maximum Finish Spray Volume per Area					
	Volume	<input type="text" value="30"/>		Units	<input style="border: 1px solid #ccc;" type="text" value="fluid ounces"/> ✕ ▾
	Per Area	<input type="text" value="1"/>		Units	<input style="border: 1px solid #ccc;" type="text" value="acre"/> ✕ ▾
4.5.2.5 Residence/Contact Time					
	Min Time	<input type="text" value="Time"/>		Units	<input type="text" value="Units"/>
4.5.2.6 Maximum Number of Applications per Scenario per Time					
	Number	<input type="text" value="4"/>			
	Per Time	<input checked="" type="radio"/> Year <input type="radio"/> Crop Cycle			
4.5.2.7 Minimum Application Rate per Scenario per Time					
	Rate	<input type="text" value="Rate"/>		Units	<input type="text" value="Units"/>
	Per Quantity	<input type="text" value="Quantity"/>		Units	<input type="text" value="Units"/>

Document Information

Pesticide Product Label

Restricted Use Pesticide

Ingredient Statement

Child Hazard Warning/Signal Word

Product Profile

Precautionary Statements

Directions for Use

Product Application
Instructions/Information

Ornamentals

Warranty/Disclaimer Statement

Marketing/Advertising Claims

Additional Documentation and Labeling

Use Index

Product Level

Product Identification

Product Level Use
Restrictions/Limitations

Ornamentals

Use Site Attributes

Use Site Yearly/Crop Cycle Rate

Use Site Level Restrictions/Limitations

Scenario Level

Scenario Rate

Scenario Attributes

Use Scenario Level
Restrictions/Limitations

Scenario Attributes describes the method(s) in which a single set of rate parameters can be applied. Multiple scenario attributes can be entered for each rate parameter set if all of the use pattern parameters and restrictions/limitations are identical.

Scenario Attributes

4.5.3.2 Form As Applied *

Emulsion

4.5.3.3 Application Target(s) *

Add an Application Target

Foliage/Plant

Soil (surface)

4.5.3.4 Application Type(s) *

Add an Application Type

Broadcast

Spray Drench

4.5.3.5 Application Equipment *

Add Application Equipment

Backpack sprayers

Mechanically pressurized hand sprayer

4.5.3.6 Application Timing (Site Status) *

Add Application Timing (Site Status)

All crop stages possible (e.g., timing determined solely by pest pressure)

4.5.3.7 Application Timing (Time of Day)

Add Application Timing (Time of Day)

4.5.3.8 Application Timing (Timing of Pest)

Add Application Timing (Timing of Pest)

When pest occurs

 Mark for Review

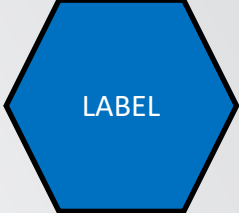
Next

USE
INDEX



USEPA 123

N/A - 4567



Pest X

Ingredient Statement

Active Ingredient(s)

Oils, garlic	25%
Other Ingredients	75%
Total	100%

ACTIVE INGREDIENTS% By Wt.
 Garlic oil* 25.0%
 OTHER INGREDIENTS..... 75.0%
 TOTAL100.0%

*contains 2 pounds of garlic oil per gallon

Product Profile

Pest X

Alternate brand name: PX Concentrate

INSECT REPELLENT / INSECTICIDE

For use on outdoor and greenhouse food and non food crops, ornamental flowers, trees, shrubs and plants

First Aid

If on skin or clothing

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice

Precautionary Statements

Hazards to Humans and Domestic Animals

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Wear chemical-resistant gloves. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals

Personal Protective Equipment

Applicators and other handlers must wear:

- long-sleeved shirt and long pants

