

SmartLabels

December 4, 2014

USEPA

SmartLabel Introduction

- The goal of the SmartLabel Initiative is to:
 - Standardize pesticide label sections
 - “Tag” pertinent labeling content and product information for querying, sorting and filtering of labels
 - Improve the clarity of intended directions for application and proper use of the pesticide product

SmartLabel Definition List

- Label content - refers to the label language which is currently on labels. SmartLabel provides label sections to which label content is added in a free text box
 - Free Text – Text box for label content
- Data element (Highlights) – refers to specific information concerning the product and the use patterns of the label. Data elements can require the input of information in a variety of forms:
 - Text Field – box which allows alphanumeric input
 - Value Field – box which allows numeric input
 - Picklist – List of appropriate terms to populate data elements
- Heading – Any section defined as a Heading does not contain any content or data elements. It serves to group content and data elements.
- X-form – web-based tool used to create an .xml file which will be introduced in Phase 2 of the pilot
- (+) – indicates a section or data element where more than one entry can be made

Questions for Pilot Participants

- Does the model work?
- Label Sections:
 - Are the label sections, as currently defined, sufficient to capture all of the information on pesticide labels?
 - Are the sections specific enough to ensure consistent placement of information across different labels and different system users?
- Data Elements:
 - Are the data elements sufficient, in total, to accurately capture the information portrayed on the label?
 - Are there specific additions that are needed to the vocabulary picklists entries to accommodate the labels being tested?

SmartLabel Model Overview

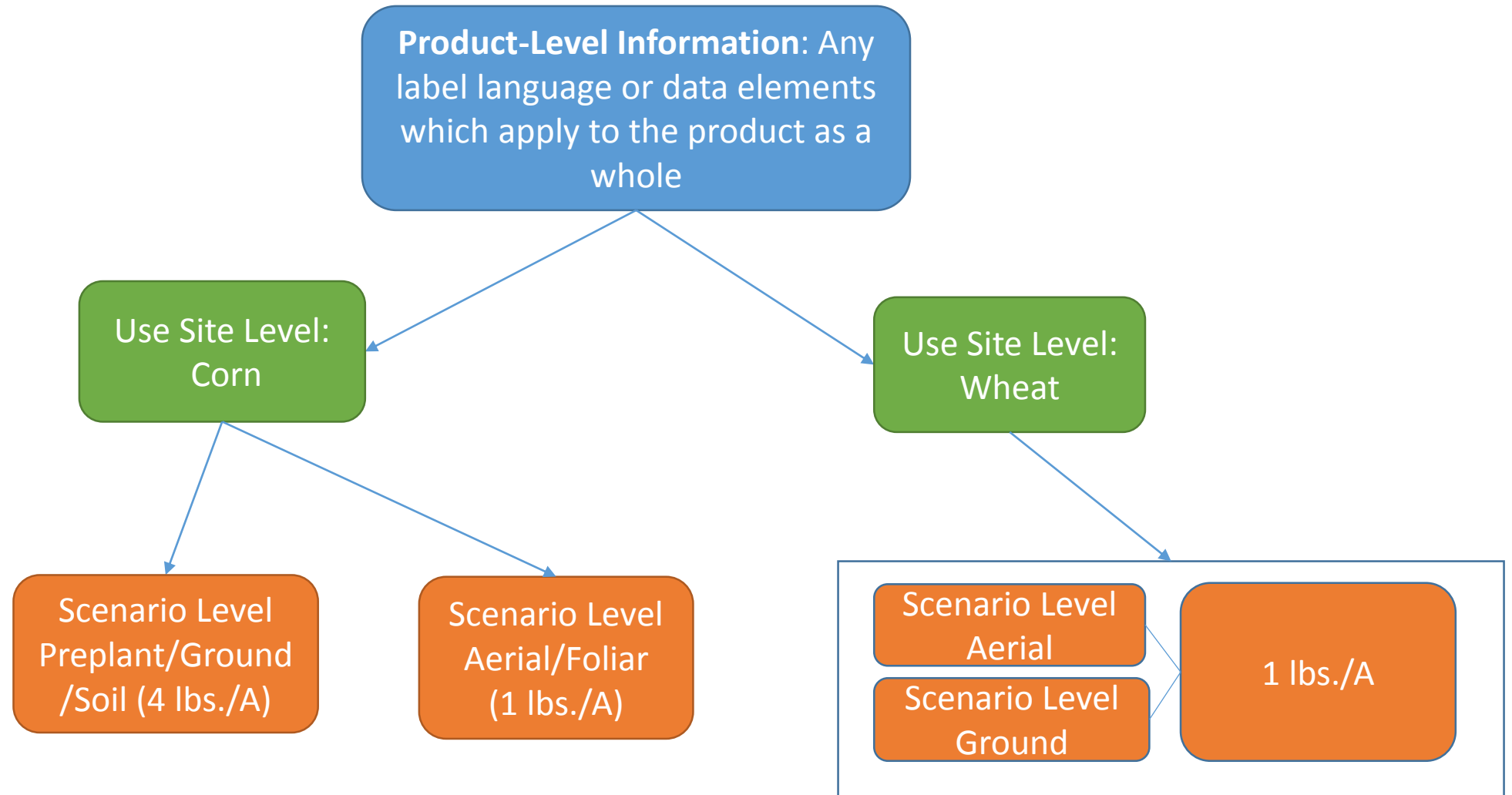
- The SmartLabel Model provides a high level view of the proposed SmartLabel. It briefly defines all the Label Content sections and Data Elements and describes what type of field (text, value, picklist) is used for each.
- Label Content Sections are highlighted in green.

SmartLabel Model Hierarchy

Product

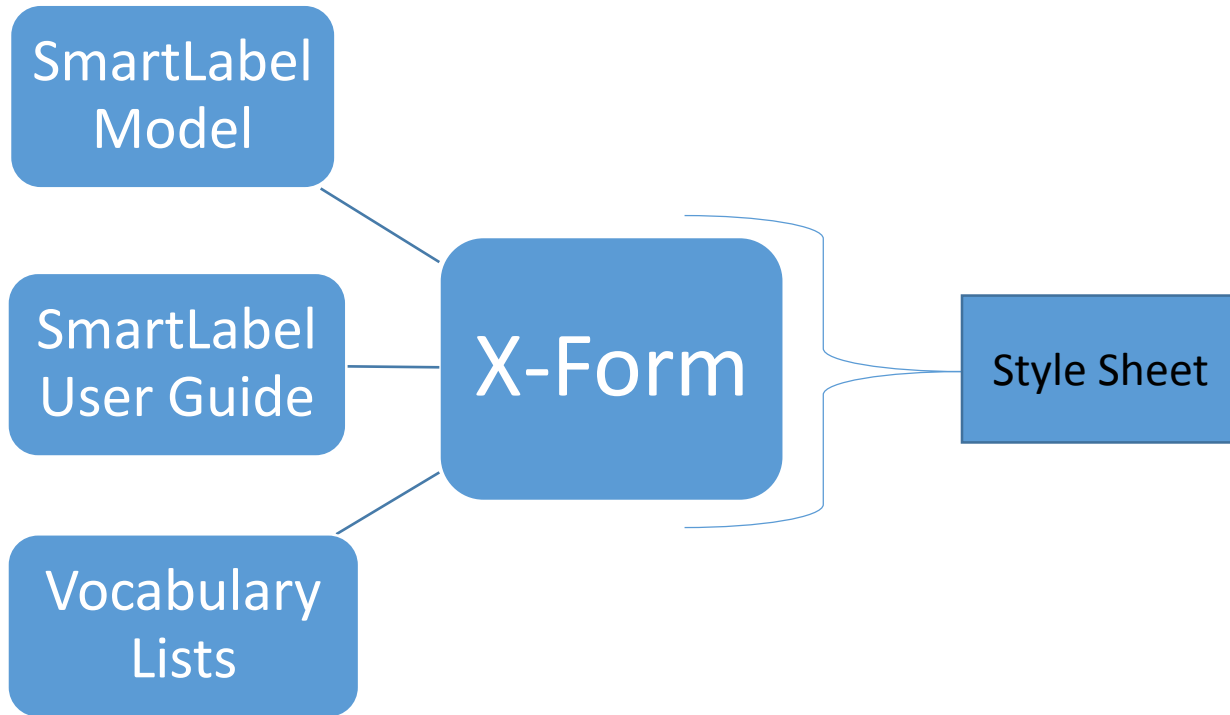
Use Site

Scenario

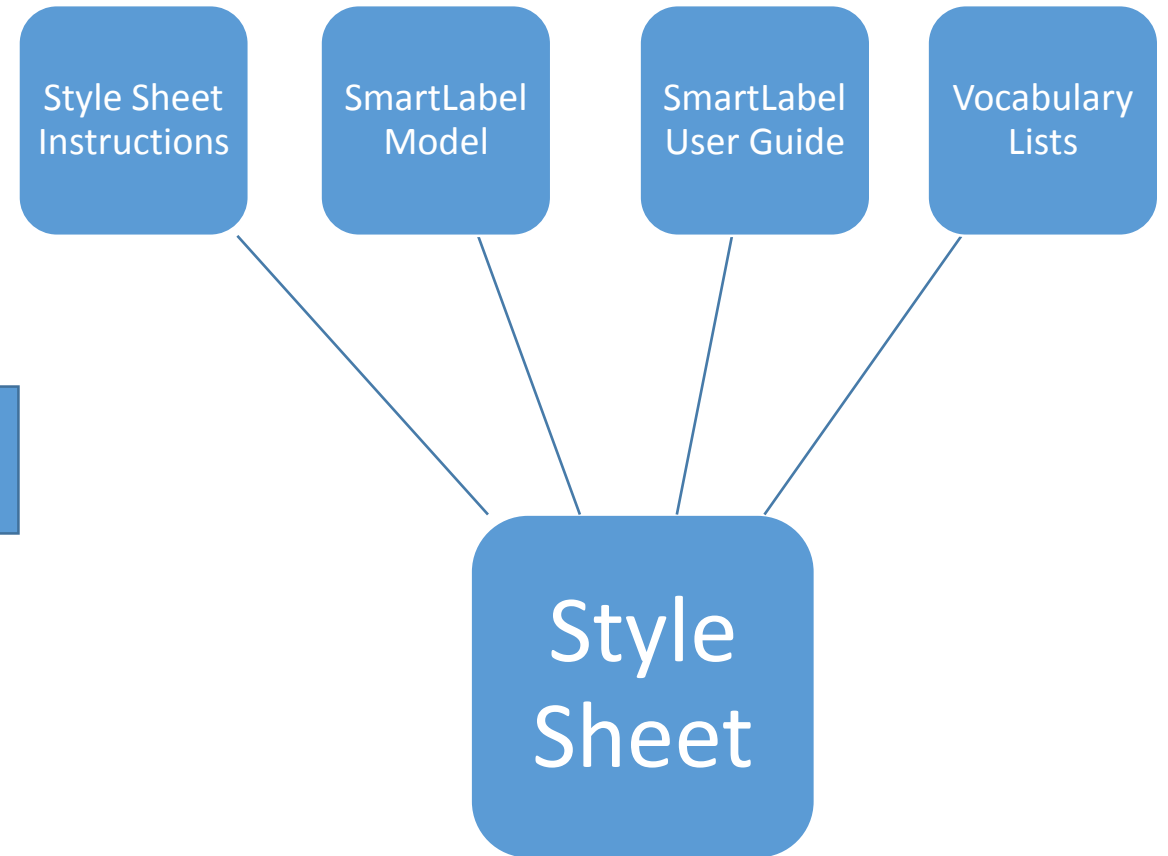


SmartLabel Documents Overview

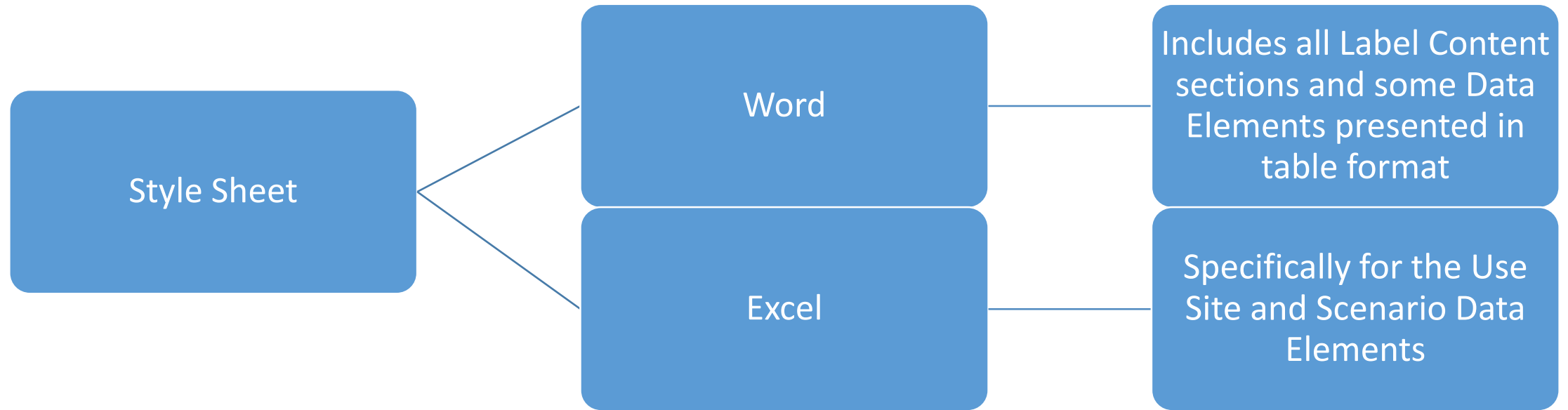
Overall Project



Pilot – Phase 1



Style Sheet Overview



Saving Files:

Upon completion of inputting a product label, save the documents with the following naming convention:

Word document – <cccccc-ppppp_yyyymmdd_SmartLabel Style Sheet.doc>

Excel workbook - <cccccc-ppppp_yyyymmdd_SmartLabel Style Sheet – Use Site_Scenario.xls>

Where:

“cccccc” = 6 digit Company #

“ppppp” = 5 digit product #

“yyymmdd” = year, month, day

Data Element Picklists– indicated by DE_[picklist name]_[ID]

- Data element picklists use the following headings:
 - Label – this column represents the vocabulary in the picklist as well as any parent terms which may be used for grouping
 - Value – the unique code for a Label within a code system
 - Code System – the OID
 - Parent – used to group Labels
 - Exclude from Picklist? (Y) – indicates if a label is excluded from the picklist and is therefore only to be used by the Agency to group terms
 - Definition – narrative explanation of the Labels

The SmartLabel Style Sheet Instructions

A guide to the Word and Excel SmartLabel Style Sheet documents:

Formatting Notes:

- All numbers referenced in this presentation correspond with the SmartLabel User Guide and SmartLabel Model.
- ***Bold Italics*** = Label Content
- **Bold** = Data element

Label Identification

Pesticide Category and Pesticide Sub-category	
Company Name (EPA Company Name)	
Version	
Date	

Pesticide Category (1)

Pesticide Sub-Category (BPPD only) (1.1)

- Indicate whether the pesticide product is a conventional, antimicrobial, or biopesticide. [DE_Pesticide_Category_PID]
 - If a product may fall into more than one category, indicate the category which corresponds to the highest percent active ingredient.
- The **Pesticide Sub-Category** is a secondary categorization for products registered by BPPD. [DE_Pesticide_Sub-Category_PID]
 - This section can be left blank for conventional and antimicrobial products.
 - Choose from the following sub-categories:
 - Plant Incorporated Protectant
 - Microbial
 - Killed Microbial
 - Biochemical

Company Name, Version, and Date

- Indicate the registering Company Name, Label Version and Date in the field.

Company Name (EPA Company Name)	
Version	
Date	

Restricted Use Pesticide (3)

- If this product is classified as an RUP, provide the description associated with that classification found in RUP box.
- If the product is not classified as an RUP, leave this section blank.

Ingredient Statement (4)

- Add in any text associated with the ingredient statement as shown on the label to the ***Ingredient Statement*** section.
 - 4.3 ***Expiration Due to Storage Stability*** is a sub-section - This is only required if the active ingredient falls below the certified limits over a given time.
 - For example, “This product expires 6 months from the date of purchase” or “This product expires 1 year from the production date.”

Highlights: Pesticide Ingredient

- The table in the Style Sheet represents the four Ingredient Types.
- Rows can be added or deleted to allow for the proper description of ingredients based on the label.
- Blacked out cells are not required for the respective Ingredient Type

Ingredient Type	Ingredient Name and Code	Strength w/w, w/v or v/v	Percent
Active			
Other (Total)			
Equivalence			
Identified Inert			

Percent Active Ingredient Based on (#, unit) (4.1)

- This data element provides the denominator used to calculate the percentage of active ingredient. For example: If the product is packaged in liquid form, the denominator could be 1 gallon. If the product is a solid it could be 1 pound.
- For the style sheet, this number, unit combination is entered as the denominator in the column:

Strength w/w, w/v or v/v

Ingredient Type (4.2)

- [DE_Ingredient_Type_ING] - Active, Active (equivalence is basis of strength), Identified Inert, Other (Total). Indicate each type of ingredient in the style sheet table . The next slides provide specific information for each type of ingredient.

When “Active” is Selected (4.2.1)

- Indicate:
 - The Ingredient Name and Code - 4.2.1.1 **Substance** - [DE_Ingredients_ING]
 - The amount of substance numerator - 4.2.1.1.1 **Amount of substance** (value, unit), and the denominator (value, unit) – 4.1 “**Percent Active Ingredient Based on:**”
 - The percent of the ingredient

Ingredient Type	Ingredient Name and Code	Strength w/w, w/v or v/v	Percent
Active	Chemical X – PC Code:000000	0.5 lbs/1 lb	50%

Ingredient Type	Ingredient Name and Code	Strength w/w, w/v or v/v	Percent
Active	Chemical X – PC Code:000000	0.3 lbs/1 gallon	(Depends on Density)

When “Active (equivalence is the basis of strength)” selected (4.2.2)

- **Substance** - [DE_Ingredients_ING] Select active ingredient in product.
 - **Amount of substance** (#, unit) - Enter the numerator used to compare the denominator above to calculate the concentration of the ingredient.
- **Equivalence** - [DE_Ingredients_ING] Equivalence refers to a portion or functional unit of a chemical. It is applicable if a functional unit of the selected substance is the regulated chemical such as elemental metallic or acid equivalence.

For example, the substance selected may be “copper sulfate pentahydrate”, but the equivalence selection would be “copper.” This allows for calculations to be made based on the concentration of the functional unit.

- **Amount of equivalence** (#, unit) - Enter the numerator used to compare the denominator above to calculate the concentration of the ingredient.

Note: Enter the amount of equivalence as part of the whole product, not as the part of the selected active.

When “Active (equivalence is the basis of strength)” selected (4.2.2)

- For this ingredient type, the active and its equivalence must be indicated and the strength/percent for both.

Ingredient Type	Ingredient Name and Code	Strength w/w, w/v or v/v	Percent
Active	Metal Salt X – PC Code 000000	0.5 lbs/1 lb	50%
Equivalence	Metal – PC Code 000000	0.25 lbs/1 lb	25%

In the example above, the Metal is 50% of the molecular weight of the Metal Salt.

When “Identified Inert” selected (4.2.3)

- 4.2.3.1 **Substance** - [DE_Ingredients_ING] Select the inert ingredient which is required to be displayed on the label. Ex – petroleum distillate or sodium nitrate . Not all inert ingredients need to be displayed here.

Ingredient Type	Ingredient Name and Code	Strength w/w, w/v or v/v	Percent
Identified Inert			

When “Other (Total)” selected (4.2.4)

- 4.2.4.1. **Amount of Other substances** (#, unit) - Enter the numerator used to compare the denominator above to calculate the concentration of the ingredient. For example: if the numerator is 0.5 pounds and the denominator is 1 pound, the concentration is 50%.
- This ingredient type represents the summation of all “Other” ingredients in the formulation.

Ingredient Type	Ingredient Name and Code	Strength w/w, w/v or v/v	Percent
Other (Total)			

Product Identification (2)

- Information generically addressing the product such as; paragraph or phrase typically found under the product name describing the type of product, formulation, its uses, and pests it controls. This section also includes company information appearing on the label (e.g. Company Name, address, phone #, establishment number).

Product Identification Highlights (2.1 – 2.11)

Information	Value
EPA Registration Number	[Numeric]
Primary Brand Name	[Text]
Alternate Brand Names	[Text]
Pesticide Classification	[Pesticide classification pick list]
Form as Packaged	[Form pick list]
Form as Applied	[Form pick list]
Product Similarity (type/EPA registration number)	[Equivalence pick list/free text]
Marketing Status	[Status pick list]
User Restrictions	[User pick list]

EPA Registration Number (2.1 and 2.2)

- Enter the 1-6 digit **Company EPA Number** with the 1-5 digit **Product Number** to fill out the EPA Registration Number.

Primary Brand Name (2.4)

- The name of the product.

Alternate Brand Name (+) (2.5)

- Any other names under which this product is intended to be sold. Indicator is Active/Inactive in order to maintain a list of historical ABNs.
- More than one Alternate Brand Name can be entered.

Pesticide Classification (+) (2.6)

- Classifies a pesticide according to the type of pest targeted and the function of the pesticide against the pest (e.g., fungicide, herbicide, disinfectant).
- More than one pesticide classification can be chosen. Separate multiple classifications in the field with a comma (,).
- Full list of pesticide classifications can be found in [DE_Pesticide_Classification_PID].

Form as Packaged (2.8)

- Describes the physical state and attributes of the product as packaged. Ex. - a Water Dispersible Granule product is packed as a "granule" which is coded as a solid.
- Choose all forms in the [DE_Form_as_Packaged_PID] picklist.

Form as Applied (+) (2.9)

- The “form as applied” indicates the form in which the pesticide is intended to be applied. For example, the product may be formulated as a dry flowable (DF) and applied as either a powder or a liquid solution (dissolved in water).
- Choose all forms in the [DE_Form_as_Applied_PID] picklist.

Examples of common Formulation Types:

Formulation Type	Form as Packaged	Form as Applied
WDG – Water Dispersible Granule	Granule	Suspension
WSG – Water Soluble Granule	Granule	Solution
EC - Emulsifiable Concentrate	Emulsion	Emulsion
Mosquito Coil	Pellet/Tablet/Rodlet/Briquette	Smoke
DT – Tablet for direct application	Pellet/Tablet/Rodlet/Briquette	Pellet/Tablet/Rodlet/Briquette
Fogger	Solution	Fog
Pet Collar/Ear Tag	Impregnated material	Impregnated material

Product Similarity: _____ to _____ (+) (2.7)

- Pick the type of similarity (whether composition or labeling) to the currently registered similar or identical product (EPA Registration Number). If uses are added as “me-toos” the user must select “Me-too Use” and identify the source label.
- This information may be claimed as confidential, depending on the type of similarity, and not displayed. **Do not enter confidential information in the Style Sheet.**
- [DE_Product_Similarity_PID] is chosen for the first blank and an EPA Registration Number is entered in the 2nd blank.

Marketing Status (active/inactive), MM/YYYY–MM/YYYY (2.10)

- Status Indicator is chosen (Inactive, Active) followed by the start and end date for which the product will be marketed if applicable.

User Restrictions (2.11)

- Identify enforceable restrictions as to who is allowed to apply the product. Includes:
 - Certified termiticide applicator
 - Military personnel only
 - DOD personnel only
 - For use by USDA APHIS Wildlife Services or state wildlife management
 - Agency personnel or persons working under their authority
- Choose restricted users from the[DE_Restrictions_User_DFU] picklist.

Net Contents or Net Weight (5)

- Indicate the contents or weight of the packaged product in the space provided.
- If unit packaging is used, the registrant may indicate the number of units in the package and the value and units of the contents or weight of each unit packaging.
- If unit packaging is not used, the registrant may indicate the value and units of the contents or weight.

Precautionary Statements (6) - Header

- The precautionary statements are designed to provide the pesticide user with information regarding the toxicity, irritation and sensitization hazards associated with the use of a pesticide, as well as treatment instructions and information to reduce exposure potential.
- Precautionary Statements include 11 Label Content sections and 2 data elements.

Child Hazard Warning (6.2)

- “Keep out of reach of children.”
- Can be left blank or edited if applicable to the product.

First Aid Statement (6.3)

- This section includes the first aid statements (eg If Swallowed, If in eyes...) and the Emergency Contact information.
- Populate this section with your First Aid box.

Note to Physician (6.4)

- Provides information to aid in treatment of symptoms due to product exposure.
- Enter in any required Note to Physician language.

Hazard to Humans and Domestic Animals (6.5)

- Enter the signal word and precautionary language based on acute toxicity categories.

Personal Protective Equipment (6.6)

- This section lists out all PPE required based on acute toxicity categories including clothing, respiratory protection, and protective eyewear.
- Include any information about PPE which relates to a specific use site or method of application.

Engineering Controls Statement (6.7)

- Statements as they relate to items that reduce exposure, such as: product packaging, enclosed cockpits or enclosed cabs.
 - e.g. “Pilots must use an enclosed cockpit in a manner that meets the requirements listed in the Worker Protection Standard...”

User Safety Requirements (6.8)

- This section refers to maintaining PPE and handling contaminated PPE as well as any specific user safety requirements described in RED documents and other Agency documentation.
- e.g. “Follow the manufacturer’s instructions for cleaning/maintaining PPE.”

User Safety Recommendations (6.9)

- This section lists out the user safety recommendations for WPS products.
 - “Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing”.
 - “Users should remove PPE immediately after handling this product.
 - Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing”.

Environmental Hazards (6.10)

- Based on environmental fate and toxicity data, provides the precautionary language informing of the potential hazards to the environment from transport, use, storage, or spill of the product.
- These hazards may be to water, soil, air, or to animals or plants:
“Exposed treated seed may be hazardous to birds and other wildlife.”
- In addition to filling in this section with free-text, you will also pick appropriate environmental hazards from the pick list.

Pollinator Protection Box (6.11) (Advisory Box w/Bee icon)

- This section includes advisory pollinator protection language and symbols triggered by specific chemicals with certain uses.
- Enter in applicable language, if appropriate.

Physical and Chemical Hazards (6.12)

- This section includes any language and symbols about physical or chemical hazards for the product.
- For example, “Oxidative” or “Highly Flammable”.

Highlights: Precautionary Statements

- **Signal Word (6.1)**

- A Signal Word is required for all registered pesticide products unless the pesticide product meets the criteria of Toxicity Category IV by all routes of exposure. If a signal word is used in this case, it must be “Caution.”
- The representation of the signal word can vary depending if the product requires WPS labeling or if the product toxicity requires a skull and crossbones to be included.
- See picklist for vocabulary and definitions [DE_Signal_Word_PREC]

- **Environmental Hazard Highlights (+)(6.10.1)**

- The environmental hazard data element is used to identify different types of environment hazards that are described within the environmental hazard section.
- Choose the environmental hazards from the [DE_Environmental_Hazard_PREC] picklist.

DIRECTIONS FOR USE (7.0)

Misuse Statement (7.1)

- “It is a violation of Federal law to use this product in a manner inconsistent with its labeling.”
- Products may require additional language such as, “Do not apply this product in a way that will contact workers or other persons, either directly or through drift.”
- Enter in all misuse statements required for this product.

Pollinator Restrictions

(for specific chemicals/uses) (7.2)

- Required pollinator protection restrictions for specific chemicals and change depending on the use sites on the label.
- Enter appropriate language, if applicable.

Agricultural Use Requirements (7.3)

- All text associated with the Agricultural Use Requirements box with instructions for products that are subject to Worker Protection Standards, including early entry PPE and the REI.
- Include all language that is part of the Agricultural Use Requirements box.

Non-Agricultural Use Requirements (7.4)

- The Non-Agricultural Use Requirements box is only required on labels that have the Agricultural use box but also have non-WPS uses as well.
- Include all language that is part of the Non-Agricultural Use Requirements box.

Resistance Management (7.5)

- Language describing any precautions, directions, and restrictions related to resistance in the chemical class.
- For example, “contains ingredients from IRAC group 3 and some insects are known to develop resistance... applications should be part of an IPM program.”
- Enter in resistance management language, if applicable.

Instructions for Opening Packaging (7.6)

- This section is to provide a location for directions on how to open the package, including specific Child Resistant Packaging instructions.
- For example, “To remove applicator, use scissors or lift and remove plastic tab to expose foil, then pull down.”
- Enter instructions for opening packaging, if applicable.

Product Application Instructions (7.7)

- This section is to provide a space for any product application instructions which apply to all applications throughout the label and are not part of the Instructions for Application Equipment which are specific to different types of applications.
- For example, “Use sufficient water to obtain thorough, uniform coverage.”
- Enter product application language, if applicable.

Instructions for Application Equipment (7.7.1)

- Header for four sub-sections pertaining to method-specific application instructions consistent for whole product.
- Enter additional instructions for application equipment where applicable:
 - ***Aerial Application*** (7.7.1.1)- Enter instructions specific to aerial applications
 - For example, “For aerial applications, apply in a minimum of 15 GPA.”
 - ***Ground Application*** (7.7.1.2)- Enter instructions specific to ground applications
 - For example, “For ground applications, apply in 50-200 gallons of water per acre to obtain coverage without excessive runoff.”
 - ***Chemigation*** (7.7.1.3)- Enter instructions specific to chemigation applications
 - For example, “Apply this product only through center pivot, solid set, hand move, or moving wheel irrigation systems.”

Instructions for Application Equipment (7.7.1) – (Cont.)

- ***Other Applications*** (7.7.1.4)- Enter application instructions associated with methods other than aerial, groundboom/tractor, or chemigation applications.
 - Any instruction in this section should be general application instructions, not specific to a particular registered use site.
 - These application instructions may include backpack sprayer or use of a mechanical handgun sprayer.

Tank Mix and Compatibility Information (7.7.2)

- Instructions for diluting and/or mixing with other chemicals prior to application.
- For example, “To determine the physical compatibility of this product with other products, use a jar test.”
- Enter tank mix and/or compatibility information, if applicable.

Environmental Information (7.7.3)

- Information associated with ambient environmental conditions upon pesticide application – for example, soil consideration, temperature considerations.
- For example, “Fumigate when the soil temperature is above 60° F at the depth of 6 inches. Do not fumigate when soil temperature is below 50° F or above 90° F.”
- Enter environmental information and considerations, if applicable.

Spray Drift Information (7.7.4)

- Information associated with spray drift management including, but not limited to mandatory and advisory language intended to reduce drift.
- For example, “To avoid spray drift, do not apply when conditions favor drift beyond the target area.”
- Enter spray drift management information, if applicable.

Other Restrictions (7.7.5)

- A content section for product-level restrictions which do not fit into the previously described label content sections.
- For example, “Tarps must be used for all applications, except for deep shank orchard replant and hand held tree hole applications.”
- Enter any other product-level restriction language, if applicable.

Other Advisory Statements (7.7.6)

- A place for advisory language that does not fit in previously described label content sections.
- For example, “It is recommended that the area be left undisturbed for two to three days to eliminate existing infestations before filling [with dry goods].”
- Enter other advisory statements, if applicable.

Product Level Use Restrictions/Limitations (7.8)

Identification of only product level restrictions. These must be applicable to all use sites and all scenarios.

Restrictions	Value	Section
Application Target	[Picklist]	Indicate the Label Content section where the restriction is described
Application Timing	[Picklist]	
Application Type	[Application type pick list]	
Application Equipment	[Equipment pick list]	
Geographic	[State, County Picklist]	
Rate	[Yes/no]	
ASABE drop size	[ASABE pick list]	
Buffer zone (distance/from/equipment)	[Value/ use site pick list/equipment pick list]	
Grazing	[Yes/no]	
GMO	[Yes/no]	
Maximum release height	[Value]	
Maximum wind speed	[Value]	
Pollinator	[Yes/no]	
Pre slaughter Interval	[Value]	
Rotational crop	[Yes/no]	
Secondary manufacturing	[Yes/no]	
Soil incorporation	[Value]	
Soil type	[Soil type pick list]	

Application Target (+) (7.8.1)

- Identifies restrictions associated with the intended target to which the product is applied.
- Indicate targets from [DE_Use_Site_-_Target_DFU] picklist.
- Multiple application targets can be entered.

Application Timing (+) (7.8.2)

- Identifies any and all applicable product-level restrictions regarding the intended timing of pesticide application.
- For example, if the entire product is restricted so that treatment during bloom is not permitted, then select “during bloom”.
- Indicate application timing restrictions from [DE_Timing_DFU] picklist.
- Multiple application timing restrictions can be entered.

Application Type (+) (7.8.3)

- Identifies restrictions associated with the method of which the product is applied.
- For example, “Do not apply by broadcast.”
- Indicate application type restrictions from [DE_Application_Type_DFUE] picklist.
- Multiple application type restrictions can be entered.

Application Equipment (+) (7.8.4)

- Identifies restrictions associated with equipment used in the application of the product.
- Indicate equipment restriction from [DE_Application_Equipment_DFUE] picklist.
- Multiple equipment restrictions can be entered.

Geographic (+) (7.8.5)

- Identifies restrictions associated with geographic location at state and county level for the product.
- Indicate geographic restrictions from [DE_Territory_ID_DFUF] picklist.
- Multiple geographic restrictions can be entered.

Rate (7.8.6)

- Identifies if a rate restriction applies to the product and other products containing the same active ingredient(s).
- Answer YES or NO to whether a rate restriction applies to the product.

ASABE Drop Size (+) (7.8.7)

- Identifies restrictions associated with the application droplet size according to the ASABE 572 standard.
- For example, “Do not apply with a drop size smaller than Fine to Medium.”
- Indicate ASABE Drop Size restriction from [DE_Restrictions_ASABE_DSD_DFUF] picklist.
- Multiple droplet size restrictions can be entered.

Buffer Zone (+) (7.8.8)

- Identifies buffer zone restrictions for the product – value or range, linear unit, application equipment [DE_Application_Equipment_DFU], what is being buffered [DE_Restrictions_Buffered_Area_DFU].
- In the style sheet, indicate the value or range, the unit, the appropriate application equipment from the picklist, followed by the buffered area from the picklist.

Grazing (7.8.9)

- Identifies if there are any grazing restrictions for the product.
- Answer YES or NO to whether a grazing restriction applies to the product.

GMO (7.8.10)

- Identifies if there are any restrictions or association to GMO crops for the product.
- Answer YES or NO to whether this product is associated with GMO crops.

Maximum Release Height (7.8.11)

- Identifies the maximum distance between point of release and the target for the product.
- Indicate a numerical value and appropriate unit.

Maximum Wind Speed in MPH (7.8.12)

- Identifies the maximum wind speed allowed during application.
- Indicate the numerical value. MPH is the value used for all maximum wind speed restrictions.

Pollinator (7.8.13)

- Identifies if there are any pollinator restrictions for the product.
- Answer YES or NO to whether a pollinator restriction applies to the product.

Pre-slaughter Interval (+) (7.8.14)

- Identifies pre-slaughter interval(s) for the product.
- Add in the lowest value for any livestock.

Rotational Crop (7.8.15)

- Identifies if any rotational crop restrictions apply to the product.
- Answer YES or NO to whether a rotational crop restriction applies to the product.

Secondary Manufacturing Restriction (7.8.16)

- Identifies any restrictions which apply to the treated material or manufacturing product as to limitations for further manufacturing.
- This restriction type can also be used to identify restrictions associated with reformulating a product.
- For example, a product is added to plastic slurry in the manufacturing process and there is a restriction that the treated plastic must not be used to manufacture toys.
- Answer YES or NO to whether a secondary manufacturing restriction applies to the product.

Soil Incorporation (7.8.17)

- Identifies any requirements for incorporation of the product into the soil.
- Enter in a value range and corresponding unit.

Soil Type (+) (7.8.18)

- Identifies any soil type restrictions for the product.
- Indicate soil type restrictions from [DE_Restrictions_Soil_Types_DFU].
- Multiple restrictions can be entered.

Use Sites and Scenarios Excel Style Sheet

- Complements the word document style sheet.
- Captures data elements for sites and scenarios.
- Follows form and order of User Guide.
- Represents a possible rendering of eventual x-form information.

Capturing Sites & Scenarios in the Excel Style Sheet

- Each Site and associated Scenarios are placed in their own tab.
- Several blank templates are present in style sheet.
 - Copy tabs to add sites.
- Several rows are present for scenarios.
 - Insert/copy rows to add more data.

Connecting Excel and Word

- For each Site:
 - Data elements are captured in Excel.
 - Label content is captured in Word.
- For each Use Site & Scenarios tab in Excel:
 - Insert a copy of the ***Use Site Description and Application Instructions*** section in the Word document .
 - Number and name each new section to correspond with the appropriate Excel site tab.
 - Fill in the corresponding label content for each Site in the Word document.

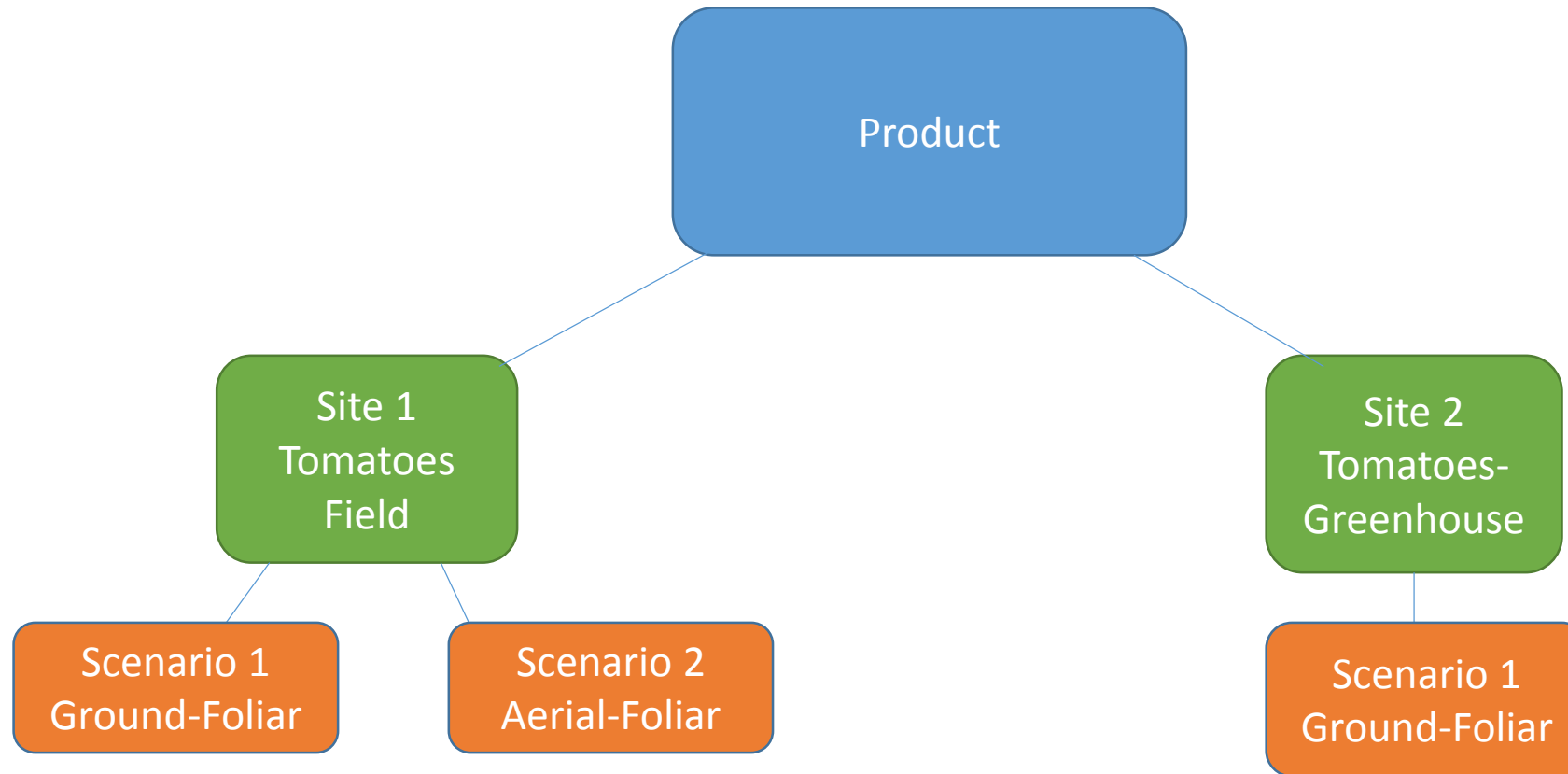
What is a Site?

- For this model, a Site is defined by the combination of site attributes that can be applied with the same maximum yearly rate, using the same set of scenarios.
 1. Site Attributes: Where application can occur.
 2. Maximum Yearly Rate: What amount of product can be applied per year .
 3. Scenarios: How the product can be applied.

When is a New Site Needed?

- Sites are primarily defined by maximum annual application rate.
- A new Site is needed when:
 1. A site attribute results in a different maximum annual application rate.
 2. A site attribute results in a different set of scenarios.
- *Note: only one use site may be listed for each maximum rate per year. If two use sites have identical rates, restrictions, and scenarios the entire site should be cloned and edited to capture the second site.*

Example 1. Two sites are used for tomatoes because all scenarios are not relevant to both groups of site attributes



Example Label

Product X

Ready-to-use formula, kills adult mites and nematodes.

Do not harvest fruit for 14 days after application.

REI: 24 hrs

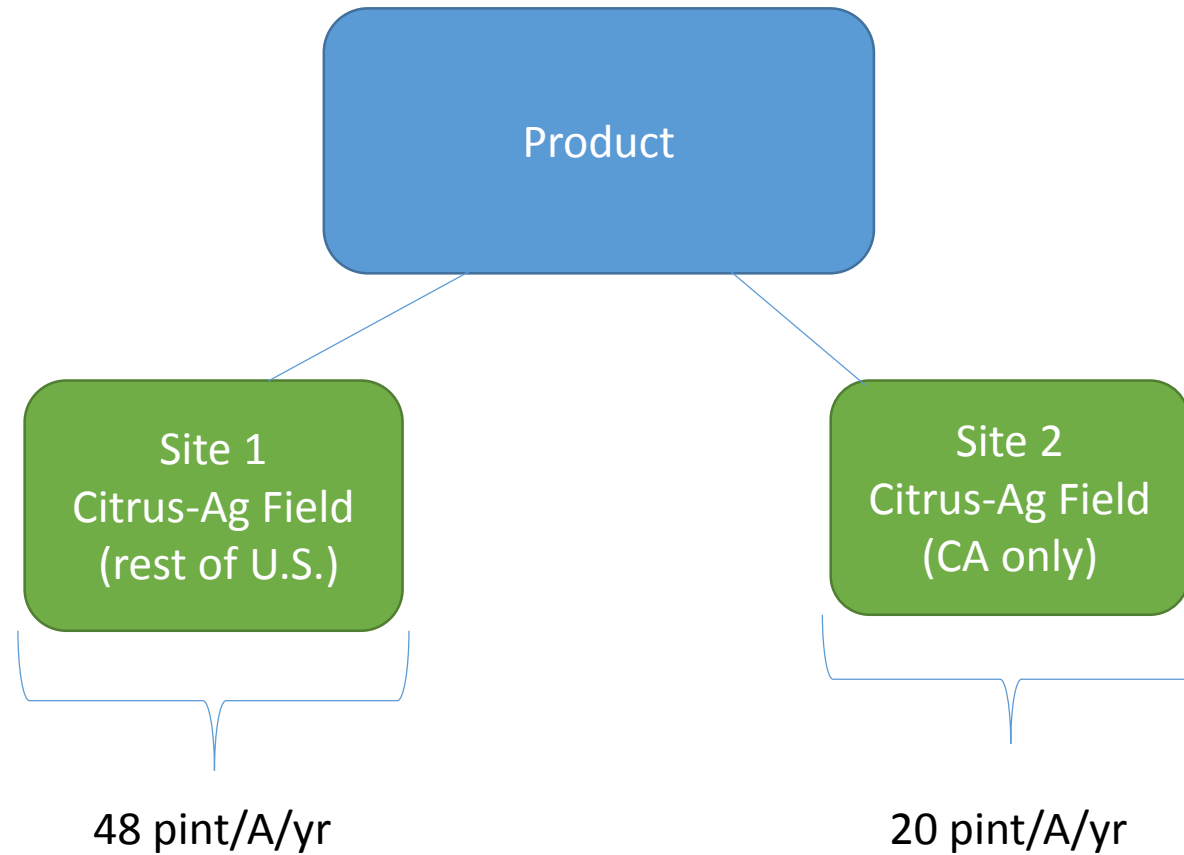
Do not graze livestock in treated areas for 24 hours following transplant treatments.

Do not apply when bees are actively foraging.

Citrus Trees in California				
Crop	Pest	Rate	Timing & Method	Further Use Info
Citrus Trees in California	Mites	Foliar: 2-4 pt/A	Ground or air when insects are present	- Do not exceed 20 pt/A per year - MRI: 14 days - Do not exceed 3 foliar apps/yr (or 4 total apps per year including at transplant app)
	Nematodes	At transplant treatment: 8 pt/A	By ground at transplanting	
		Foliar alone or as a supplement to earlier soil treatment: 2-4 pt/A	Ground or air	

Citrus Trees in All other states				
Crop	Pest	Rate	Timing & Method	Further Use Info
Citrus Trees in all other states	Mites	Foliar: 2-8 pt/A	Ground or air every when insects are present	- Do not exceed 48 pt/A per year - MRI: 14 days - Do not make more than 6 applications per year (if an at transplant application is made, only 5 foliar apps may be made)
	Nematodes	At transplant treatment: 8 pt/A	By ground at transplanting	
		Foliar alone or as a supplement to earlier soil treatment: 2-8 pt/A	Ground or air	

Example 2. New Site Driven by Differences in Maximum Annual Rate by Geography



Sites Excel Style Sheet

	Use Site Level																		
Site Attributes	Use Site:			Location of Pesticidal Activity (+):			Geographic Area (Allowed) (+):												
Maximum Yearly Rate	Dosage per Acre			Record the highest annual application rate, and associated number of apps. If a site attribute group has a different maximum rate, a new site must be created.															
	Max Annual App Rate [Amount /Unit/Year]		Max # of Apps per Year																
Pest Attributes	Pests (+):			Stage (+):			Action (+):												
	<i>Pest with one stage/action</i>																		
	<i>Pest with two stages/actions</i>																		
	<i>Pest with three stages/actions</i>																		
Food Designation	Food Site Designation (+):																		
	picklist																		
Site Level Restrictions/ Limitations	Mixing Required	PHI (days)	REI (+)	App Target (+)	App Timing (+)	App Type (+)	App Equipment (+)	ASABE Droplet Size (+)	Buffer Zone (+)	Grazing	Pre-slaughter Interval	Max Release Height	Max Wind Speed (mph)	Pollinator	Rotational Crop	Soil Inc.	Soil Type	Secondary Manufacturing	
	Explanation of Use Site Level Restrictions/Limitations:																		

Use Site (+) (7.9)

- Identifies the **Use Site**.
 - For crop use sites, the list includes all crops and crop groups [DE_Use_Site_DFUF].
 - For non-crop use sites, the list is comprised of higher level categories [DE_Use_Site_Noncrop_DFUF] (will later be combined with crop use site picklist).

6		Use Site:	Location of Pesticidal Activity (+):	Geographic Area (Allowed) (+):
	Site Attributes	10-10 Citrus Fruit Group		
7				87

Use Site Attributes (7.9.1)

- These data elements further define the site:
- **7.9.1.1 Location of Pesticidal Activity (+)**
 - Choose location(s) from picklist [DE_Use_Site_-_Location_DFU].
 - Identifies the location of where the pesticide treatment can take place (e.g., Greenhouse, Agricultural/Farm Premises/Areas, Aquatic areas, Commercial/Industrial Area, etc). Separate multiple locations with a comma (,) in the cell.
- **7.9.1.2 Geographic Area (Allowed) (+)**
 - Choose location(s) from picklist [DE_Territory_ID_DFU].
 - Identifies allowed geographic locations at state and county level for this specific Use Site. Only areas where application is allowed should be listed. If all areas are allowed, select “All United States”. *Note: Geographic allowances listed at this level must apply to all scenarios listed below. Geographic allowances can be listed at the scenario level as well.*

6	Site Attributes	Use Site:	Location of Pesticidal Activity (+):	Geographic Area (Allowed) (+):
7		10-10 Citrus Fruit Group	Agricultural/Farm Premises/ Areas	CA

Max Annual Application Rate [Amount/Unit/Year]:

- These data elements represent what may be applied to the Use Site in a single year, using all use scenarios described below.
 - **7.9.2 Maximum Annual Application Rate [Amount/Unit/Year]:**
 - Enter the amount of product applied annually and select the units from picklist [DE_Units_of_Measure_PID].
 - **7.9.2.1 Maximum Number of Applications per Year:**
 - Enter the maximum number of times the product may be applied to the Use Site, using all scenarios, in a single year.

8	Maximum Yearly Rate	Dosage per Acre	
9		Max Annual App Rate [Amount/Unit/Year]	Max # of Apps per Year
10		20 pt/A	4

Pests (+)

- **7.9.3 Pest(s)(+):** Choose pest from picklist [DE_Target_Pest_DFU]
Identifies all pests that are controlled for in this site.
(Picklist is currently in development . Write in pest or group of pests).
 - **7.9.3.1 Stage (+):**choose life stage of pest from picklist [DE_Pest_Development_Phase_DFU].
 - Identifies specific life stage of the pest (e.g. adult, larvae, etc).
 - **7.9.3.2 Action (+):**choose intended action of the pesticide [DE_Pesticide_Action_DFU].
 - Identifies how the pest is affected by the application of the pesticide (kill, inhibit, repels, etc).
 - *Note: pest are only captured at the site level, not the scenario level.*

7		Pests (+):	Stage (+):	Action (+):
8	Pest Attributes	Mites	adult	kills
9		Nematodes	adult	kills

How To Add Rows to Excel Style Sheet

1) Highlight rows to copy

11		Pests (*):	Stage (*):	Action (*):
12				
13				
14	Pest Attributes			

2) Right-click: select “copy”

11			Stage (*):	Action (*):
12				
13				
14	Pest Attributes			
15				
16				
17				

3) Right-click desired destination: select “insert copied cells”

11			Stage (*):	Action (*):
12				
13				
14	Pest Attributes			
15				
16				
17				
18				
19				
20				
21				
22				
23				
24				
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91				
92				
93				
94				
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97				
98				
99				
100				

4) Copied row are added above original rows

11		Pests (*):	Stage (*):	Action (*):
12				
13				
14				
15	Pest Attributes			
16				
17				

Food Site Designation (+) (7.9.4)

- Choose **Food Site Designation(s)** from picklist [DE_Use_Site_Food_Relationship_DFU].
 - There are three possible selections:
 - Direct = the pesticide is applied to a food producing site or crop. This includes any application to food products which have received a “non-food determination” from a residue perspective.
 - Indirect = the pesticide is applied in a location where residues may contact food.
 - Nonfood = Nonfood crop designation.

..		
18	Food Designation	Food Site Designation (+):
19		picklist
20		Food Use

Use Site Level Restrictions/Limitations (7.9.5)

- Use the cells in this row to identify site level restrictions (use the information highlighted in orange to ID data element type).
 - See the Product Level Restrictions/Limitations section of this document for descriptions of the limitations.
- Then provide the corresponding label restriction language in the **Explanation of Use Site Level Restrictions/Limitations (7.9.5.19)**.
 - *Note: These restrictions are applicable to the Use Site and includes all scenarios. If the restriction does not apply to all scenarios, include the restriction at the scenario level for those scenarios to which it applies.*

13	Site Level Restrictions/ Limitations	Mixing Required	PHI (days)	REI (*)	App Target (*)	App Timing (*)	App Type (*)	App Equipment (*)	ASABE Droplet Size (*)	Buffer Zone (*)	Grazing	PSI	Max Release Height	Max Wind Speed (mph)	Pollinator	Rotational Crop	Soil Inc.	Soil Type	Secondary Manufacturing	
14		y/n	y/n, value	y/n, value, unit	y/n, picklist	y/n, picklist	y/n, picklist	y/n, picklist	y/n, picklist	y/n, value, unit, picklist	y/n	y/n	y/n, value, unit	y/n, value, unit	y/n	y/n	y/n, value (range), unit	y/n, picklist	y/n	
15		n	14	24 hr	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	
16		Explanation of Use Site Level Restrictions/Limitations:																		
17		Do not harvest fruit for 14 days after application. REI: 24 hrs Toxic to bees																		

What is a Scenario?

- For this model, a scenario is defined by the combination of rate parameters that can be applied with the same method parameters.
 - Rate parameters: **Single Application Rate** and **Number of Applications per Scenario per Year**.
 - Method parameters: **Application Target, Application Timing, Application Type, Application Equipment, and Geographic Area Allowed**.
- Multiple scenarios are allowed and may be necessary to describe the varying application procedures for a single use site.

When is a New Scenario Needed?

- For non-public health pests, a new Scenario is needed when:
 - The **single max rate, max # of apps per scenario per year, max annual app rate** differs based on any of the method parameters.
- For public health pests, a new Scenario is needed when:
 - The **single min or max rate, max or min # of apps per scenario per year, max annual app rate** differs based on any of the method parameters.
- Follow the same instructions as previously described at the Use Site level to add rows/scenarios.

Scenarios Excel Style Sheet

	Scenario Level											
	Rate Parameters					Method Parameters (Select multiple categories, if rates are the same)						Explanation of Use Site Level Restrictions/Limitations:
	Product Single App Rate [Amount / Unit]		Product Annual App Rate			MRI	App Target (+)	App Timing (+)	App Type (+)	App Equipment (+)	Geog. Allowed (+)	
Min Rate [Public Health Only]	Max Rate	Min # Apps per Scenario [Public Health Only]	Max # Apps per Scenario	Max Annual App Rate per Scenario [Amount /unit]								
Scenario #												
1	Scenario with one selection per attribute											
2	Scenario with two selections in at least one attribute											
3	Scenario with three selections in at least one attribute											

Scenario Level Restrictions	Scenario Number	ASABE Droplet Size (+)	Buffer Zone (+)	Grazing	Max Release Height	Max Wind Speed (mph)	Pollinator	Soil Inc.	Soil Type	
	Indicate scenario	picklist	value (range), unit, picklist	y/n	value, unit	value, unit	y/n	value (range), unit	picklist	
	1									
	2									
	3									

Single Application Rate [Amount/Unit](7.9.7.1)

- These data elements represent the rate that may be applied to the Use Site in a single application for each scenario.
 - **Max Rate:** enter the maximum amount of product that can be applied at once for the scenario.
 - **Min Rate:** for use sites which include public health pests only, enter the minimum application rate.

Rate Parameters				
Product Single App Rate [Amount / Unit]		Product Annual App Rate		
Min Rate [Public Health Only]	Max Rate	Min # Apps per Scenario [Public Health Only]	Max # Apps per Scenario	Max Annual App Rate per Scenario [Amount /unit]
	4 pt/A			
	8 pt/A			

Annual Number of Applications per Scenario (7.9.7.2)

- These data elements represent how many times a product may be applied to the Use Site in a year, for each scenario.
 - **Max # Apps:** enter the maximum number of applications that can be applied per year for the scenario.
 - **Min # Apps:** for use sites which include public health pests only, enter the minimum number of applications that can be applied per year for the scenario.

Rate Parameters				
Product Single App Rate [Amount / Unit]		Product Annual App Rate		
Min Rate [Public Health Only]	Max Rate	Min # Apps per Scenario [Public Health Only]	Max # Apps per Scenario	Max Annual App Rate per Scenario [Amount /unit]
	4 pt		3	
	8 pt		1	

Maximum Annual Application Rate per Scenario (7.9.7.3)

- This data elements represent annual amount of product that may be applied to the Use Site in a year, using each scenario.
 - **Max Annual App Rate per Scenario:** enter the maximum amount of product that can be applied per year for the scenario.
 - *if this value is not explicitly stated on the label, calculate the maximum allowable amount.

Rate Parameters				
Product Single App Rate [Amount / Unit]		Product Annual App Rate		
Min Rate [Public Health Only]	Max Rate	Min # Apps per Scenario [Public Health Only]	Max # Apps per Scenario	Max Annual App Rate per Scenario [Amount /unit]
	4 pt		3	12 pt*
	8 pt		1	8 pt*

Method Parameters

- These data elements describe how the product can be applied at the rate described.
- Multiple selections can be made for all parameters with a (+).
- *Note: If multiple selections are made in one or more method parameters for a scenario, all combinations of those selections must be true.*
 - See examples in Smart Label User Guide Section 7.9.7.

Method Parameters (Select multiple categories, if rates are the same)						
Scenario #	MRI	App Target (+)	App Timing (+)	App Type (+)	App Equipment (+)	Geog. Allowed (+)
1						
2						100

Method Parameters

- **7.9.7.4 Minimum Retreatment Interval (MRI)** per scenario.
 - Indicate the shortest MRI for the scenario.
- **7.9.7.5 Application Target (+)** select target(s) from [DE_Use_Site_-_Target_DFUF].
 - Identifies what is physically being treated in the Scenario (e.g. commodity, soil, foliar/plant, skin, fur, etc).

Method Parameters (Select multiple categories, if rates are the same)						
Scenario #	MRI	App Target (+)	App Timing (+)	App Type (+)	App Equipment (+)	Geog. Allowed (+)
1	14 d	foliage/plant				
2	14 d	soil				

Method Parameters

- **7.9.7.7 Application Timing (+)** select timing from [DE_Timing_DFU].
 - Indicates the intended timing (based on crop status, construction status, timing of the pest, and/or time of day).
- **7.9.7.6 Application Type (+)** select application types from [DE_Application_Type_DFU].
 - Identifies the specific type of application (e.g. Broadcast, Band, Drench, etc).

Method Parameters (Select multiple categories, if rates are the same)						
Scenario #	MRI	App Target (+)	App Timing (+)	App Type (+)	App Equipment (+)	Geog. Allowed (+)
1	14 d	foliage/plant	when pests occur	broadcast		
2	14 d	soil	at transplant	broadcast		102

Method Parameters

- **7.9.7.8 Equipment (+)** select application equipment from [DE_Application_Equipment_DFUF] .
 - Identifies the type of equipment used to apply the pesticide in the Scenario (e.g. airblast sprayer, fixed wing, ground boom sprayer, collar, etc).
- **7.9.7.9 Geographic Area Allowed (+)** select from [DE_Territory_ID_DFUF].
 - Identifies ALLOWED geographic areas for this scenario.

Method Parameters (Select multiple categories, if rates are the same)						
Scenario #	MRI	App Target (+)	App Timing (+)	App Type (+)	App Equipment (+)	Geog. Allowed (+)
1	14 d	foliage/plant	when pests occur	broadcast	Fixed-wing	
					Helicopter	
					Ground boom	
2	14 d	soil	at transplant	broadcast	Ground boom	

Scenario Level Restrictions/Limitations (7.9.7.10)

- Use the cells in this row to identify scenario level restrictions (use the information highlighted in orange to ID data element type).
 - See the Product Level Restrictions/Limitations section of this document for descriptions of the limitations.
- Then provide the corresponding label restriction language in the **Explanation of Use Site Level Restrictions/Limitations (7.9.5.10.8)**.
 - *Note: These restrictions are specifically only applicable to the scenario. There is no need to repeat site level restrictions.*

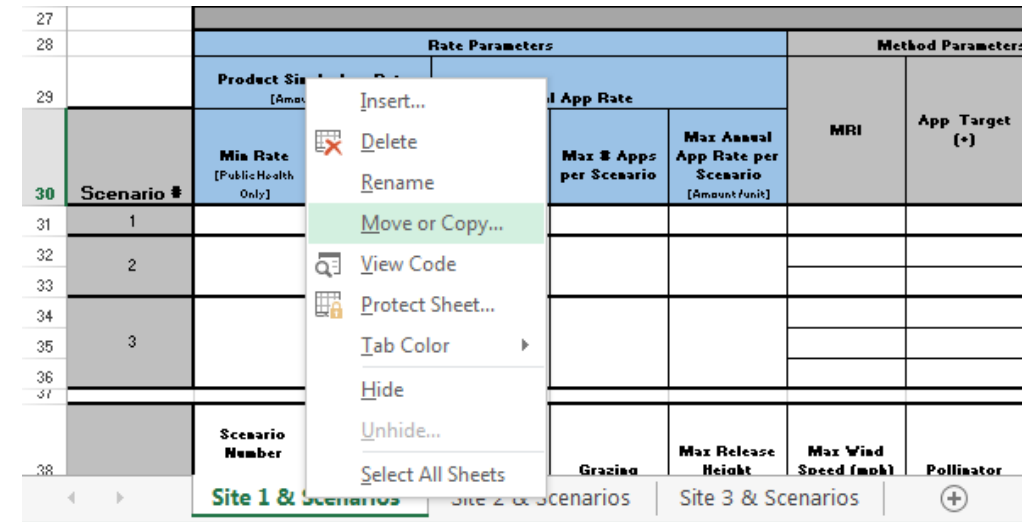
Scenario Level Restrictions	Scenario Number	ASABE Droplet Size (+)	Buffer Zone (+)	Grazing	Max Release Height	Max Wind Speed (mph)	Pollinator	Soil Inc.	Soil Type
	Indicate scenario	picklist	value (range), unit, picklist	y/n	value, unit	value, unit	y/n	value (range), unit	picklist
	1	n	n	n	n	n	n	n	n
	2	n	n	y	n	n	n	n ¹⁰⁴	n

Site Attributes		Use Site:		Location of Pesticidal Activity (+):		Geographic Area (Allowed) (+):		Completed Table for Site 1											
		10-10 Citrus Family Group		Agricultural/Farm Premises/Areas		CA													
Maximum Yearly Rate	Dosage per Acre		Record the highest annual application rate, and associated number of apps. If a site attribute group has a different maximum rate, a new site must be created.																
	Max Annual App Rate [Amount /Unit/Year]	Max # of Apps per Year																	
	20 pt/A	4																	
Pest Attributes	Pests (+):		Stage (+):		Action (+):														
	Mites		Adult		Kills														
	Nematodes		Adult		Kills														
Food Designation	Food Site Designation (+):																		
	picklist																		
	Food Site																		
Site Level Restrictions/ Limitations	Mixing Required	PHI (days)	REI (+)	App Target (+)	App Timing (+)	App Type (+)	App Equipment (+)	ASABE Droplet Size (+)	Buffer Zone (+)	Grazing	Pre-slaughter Interval	Max Release Height	Max Wind Speed (mph)	Pollinator	Rotational Crop	Soil Inc.	Soil Type	Secondary Manufacturing	
	picklist	value	value, unit	picklist	picklist	picklist	picklist	picklist	value (range), unit, picklist	y/n	y/n	value, unit	value, unit	y/n	y/n	value (range), unit	picklist	y/n	
	N	14 d	24 hr	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	
	Explanation of Use Site Level Restrictions/Limitations:																		
	Do not harvest fruit for 14 days after application; REI: 24 hrs; do not apply while bees are actively foraging.																		
Scenario #	Scenario Level																		
	Rate Parameters					Method Parameters (Select multiple categories, if rates are the same)						Explanation of Use Site Level Restrictions/Limitations:							
	Product Single App Rate [Amount / Unit]		Product Annual App Rate			MRI	App Target (+)	App Timing (+)	App Type (+)	App Equipment (+)	Geog. Allowed (+)								
	Min Rate [Public Health Only]	Max Rate	Min # Apps per Scenario [Public Health Only]	Max # Apps per Scenario	Max Annual App Rate per Scenario [Amount /unit]														
	1		4 pt/A		3	12 pt/A*	14 d	Foliage/ plant	when pests occur	broadcast	fixed wing helicopter Ground boom		Do not graze livestock for 24 hours						
2		8 pt/A		1	8 pt/A*	14 d	soil	at transplant	broadcast	ground boom									
Scenario Level Restrictions	Scenario Number	ASABE Droplet Size (+)	Buffer Zone (+)	Grazing	Max Release Height	Max Wind Speed (mph)	Pollinator	Soil Inc.	Soil Type										
	Indicate scenario	picklist	value (range), unit, picklist	y/n	value, unit	value, unit	y/n	value (range), unit	picklist										
	1	n	n	n	n	n	n	n	n										
	2	n	n	y	n	n	n	n	n										

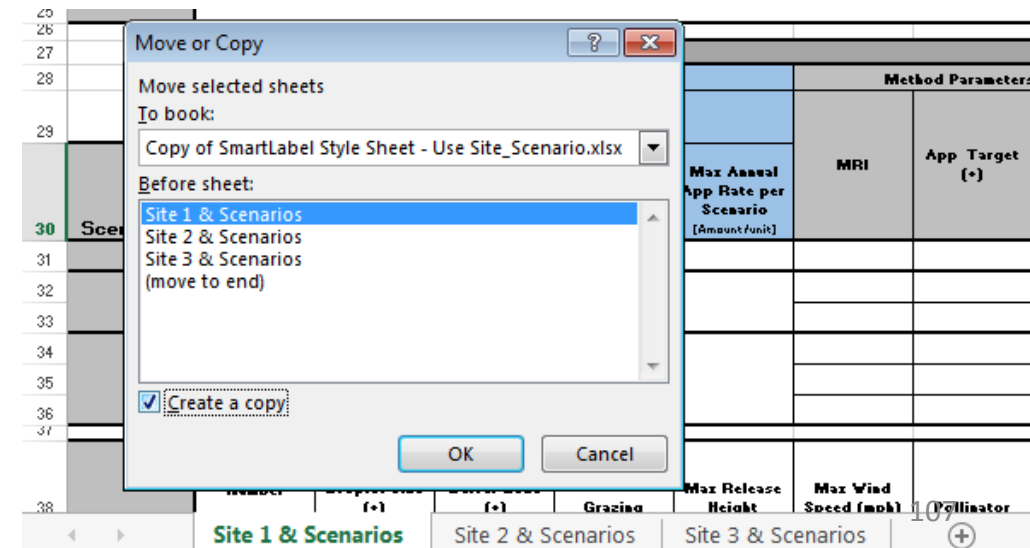
Completed Table for Site 2																		
Site Attributes	Use Site:			Location of Pesticidal Activity (+):			Geographic Area (Allowed) (+):											
	10-10 Citrus Family Group			Agricultural/Farm Premises/Areas			All US, except CA											
Maximum Yearly Rate	Dosage per Acre			Record the highest annual application rate, and associated number of apps. If a site attribute group has a different maximum rate, a new site must be created.														
	Max Annual App Rate [Amount /Unit/Year]		Max # of Apps per Year															
	48 pt/A		6															
Pest Attributes	Pests (+):			Stage (+):			Action (+):											
	Mites			Adult			Kills											
	Nematodes			Adult			Kills											
Food Designation	Food Site Designation (+):																	
	picklist																	
	Food Site																	
Site Level Restrictions/ Limitations	Mixing Required	PHI (days)	REI (+)	App Target (+)	App Timing (+)	App Type (+)	App Equipment (+)	ASABE Droplet Size (+)	Buffer Zone (+)	Grazing	Pre-slaughter Interval	Max Release Height	Max Wind Speed (mph)	Pollinator	Rotational Crop	Soil Inc.	Soil Type	Secondary Manufacturing
	picklist	value	value, unit	picklist	picklist	picklist	picklist	picklist	value (range), unit, picklist	y/n	y/n	value, unit	value, unit	y/n	y/n	value (range), unit	picklist	y/n
	N	14 d	24 hr	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n
	Explanation of Use Site Level Restrictions/Limitations:																	
	Do not harvest fruit for 14 days after application; REI: 24 hrs; do not apply while bees are actively foraging.																	
Scenario #	Scenario Level																	
	Rate Parameters					Method Parameters (Select multiple categories, if rates are the same)						Explanation of Use Site Level Restrictions/Limitations:						
	Product Single App Rate [Amount / Unit]		Product Annual App Rate			MRI	App Target (+)	App Timing (+)	App Type (+)	App Equipment (+)	Geog. Allowed (+)							
	Min Rate [Public Health Only]	Max Rate	Min # Apps per Scenario [Public Health Only]	Max # Apps per Scenario	Max Annual App Rate per Scenario [Amount /unit]													
	1		8pt/A		6	48 pt/A*	14 d	Foliage/ plant	when pests occur	broadcast	fixed wing helicopter Ground boom							
2		8 pt/A		1	8 pt/A*	14 d	soil	at transplant	broadcast	ground boom		Do not graze livestock for 24 hours						
Scenario Level Restrictions	Scenario Number	ASABE Droplet Size (+)	Buffer Zone (+)	Grazing	Max Release Height	Max Wind Speed (mph)	Pollinator	Soil Inc.	Soil Type									
	Indicate scenario	picklist	value (range), unit, picklist	y/n	value, unit	value, unit	y/n	value (range), unit	picklist									
	1	n	n	n	n	n	n	n	n									
	2	n	n	y	n	n	n	n	n									

How To Copy Tabs for New Sites

- 1) Right-click tab you wish to copy, and select “Move or Copy...”



- 2) Check “Create a copy” and “OK”



Storage and Disposal (7.10)

- The storage and disposal instructions for the pesticide and pesticide container.
- Indicate the storage and disposal language.

Container Type (+) (7.10.1)

- Choose the type of container used for the product from the picklist [DE_Container_Type_PID].
- Multiple container types can be entered.

Limitation of Warranty of Liability (8)

- Any language describing the limitation of warranty and liability, and/or terms of use of the product.

Label or Marketing Claims (9)

- A comprehensive list of optional language used to market the product or make claims about the effectiveness or characteristics of the product.

Seals and Certification Name (9.1)

- Any 3rd party seals or certifications approved for the product.
- Indicate approved certifications and seals from the [DE_Certifications_and_Seals_PID] picklist.

Seals and Certification Text (9.1.1)

- Text associated with any approved 3rd party seals or certification which is to be displayed on the label.
- For example, “This certification does not imply enhanced safety or efficacy.”

Additional Documentation and Labeling (10)

- Any additional labeling that accompanies the product.
- Includes application manuals, vial/packaging labels,...
- This section may require uploading additional images or files.

Final Printed Label (11)

- Image of at least one final package label.
- This section will require an image or file to be uploaded.

Questions for Pilot Participants

- Does the model work?
- Label Sections:
 - Are the label sections, as currently defined, sufficient to capture all of the information on pesticide labels?
 - Are the sections specific enough to ensure consistent placement of information across different labels and different system users?
- Data Elements:
 - Are the data elements sufficient, in total, to accurately capture the information portrayed on the label?
 - Are there specific additions that are needed to the vocabulary picklists entries to accommodate the labels being tested?