

SMARTLABEL PILOT OVERVIEW

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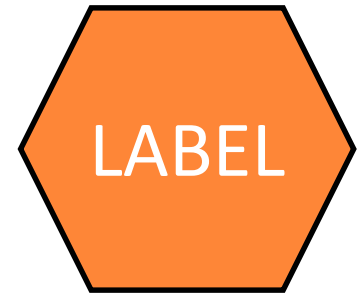
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SMARTLABEL IS...

- Master pesticide label as structured data
- Part of OPP Vision to have instantaneous access to quality information
- Addresses label pain points
- Inclusive of all EPA-registered products
- Builds on previous work (e.g., FDA structured product labeling)

LABEL PAIN POINTS

- Manual extraction of label information and manual entry into multiple EPA databases
- Unclear label information, uncontrolled vocabularies
- Inconsistent EPA reviews and interpretations
- Limited ability to query across products



- **Label Standardization** – defined label content sections which standardize where information appears on pesticide labels
- **Label Structuring** – allows for extraction/comparison of label content sections across labels and label versions
- **Label Data Elements** – discrete pieces of information which allow for the sorting, filtering and querying of labels

SCHEMA VS TOOL

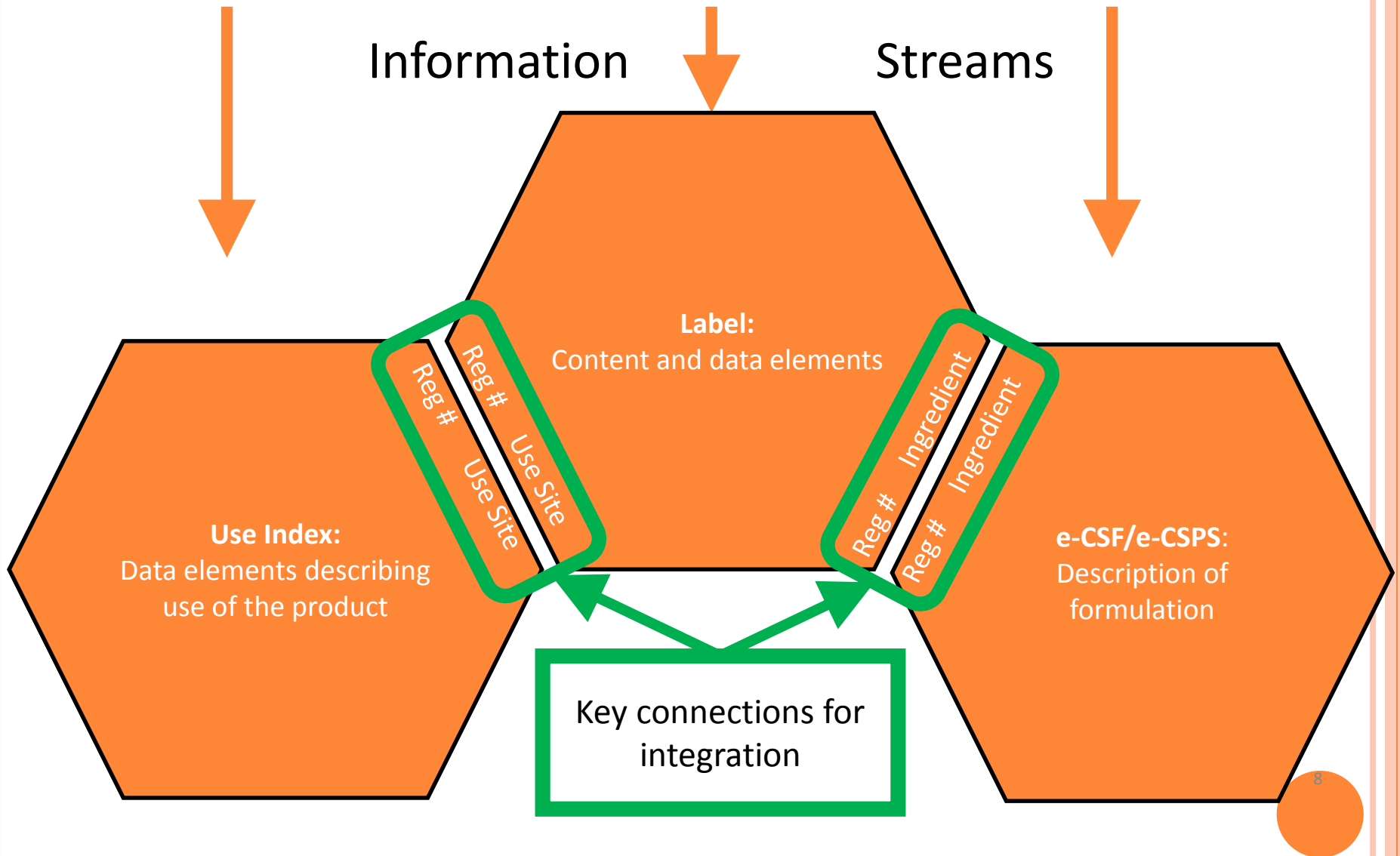
- Schema – an XML schema is a description of a type of XML document. It is upon this framework that the document is structured.
- Tool/Builder – Program or software that provides an interface for a user to create an XML document based on a given XML schema

PILOT PHASE 1 OVERVIEW

- Gathered feedback on proposed data model (data elements, labeling sections, etc.) and draft guidance documentation
- Met with pilot participants December 2014, February 2015, several webinars
- Participants:
 - Bayer CropScience, Syngenta, Dow, SePRO, Reckitt Benckiser, EcoLab, Marrone Bio, Clorox, United Industries Corporation

PHASE 1 FEEDBACK

| Feedback | EPA Response |
|---|---|
| Data entry is labor-intensive and not user-friendly | The pilot's purpose is to evaluate the data model concept |
| Certain data fields are not applicable to antimicrobials | Data fields may or may not apply to individual products |
| Certain data fields are new or different | SmartLabel does not change 40 CFR 156.10 |
| Overly complicated model | Working to simplify |
| Burden to regulated community and benefits are not apparent | Discussion point |



PILOT PHASE 2 OVERVIEW

- Incorporated feedback received in Phase 1
 - Simplified the data model by separating label and use index
 - Updated User Guide Document based on updates to the model
- Completed Draft Vocabulary Lists
 - Includes definitions
- Pilot Participants are utilizing draft vocabularies, User Guide and X-form to input labels
 - **Label Pilot: July 2015 – September 2015**
 - **Use Index Pilot: TBD**

FEEDBACK PILOT PHASE 2

- Pilot Phase II data model is simpler and more user friendly than in Phase I
- Data elements being collected will create efficiencies for states
- *Areas of clarification needed in user guide (Product Profile vs. Marking/Advertising Claims sections)*
- *The website the label data entry form is cumbersome and may require IT security setting exceptions at your location*
 - *Some pilot participants have not been able to submit SPL labels*

CONTACTS AND RESOURCES

- Pilot web page
 - <http://www2.epa.gov/pesticide-registration/pesticide-smartlabel-pilot>
- Comments welcome
 - Smartlabel@epa.gov
- Project leads
 - Patricia Parrot: parrot.patricia@epa.gov
 - Marietta Echeverria: echeverria.marietta@epa.gov
 - Philip Villanueva: villanueva.philip@epa.gov