



US Environmental Protection Agency Office of Pesticide Programs

Specifications for Text PDF Product Labels

January 2008

Full Specifications for Text .PDF Electronic Labels revised 1/17/2008

NOTE: The following guidance is provided for creating and submitting product labels in electronic format to EPA. Submission of electronic labels to EPA is voluntary but if done then two specifications are mandatory: the label must be a text .PDF (not an image .PDF) and the .PDF file name format must be used. Registrants are requested to adhere to the remaining guidance whenever possible although some variation is permissible. Questions, comments, and suggestions are welcome and should be emailed to harris.thomas@epa.gov. Check the EPA website periodically for updates to this guidance. EPA is currently using Adobe® Acrobat® 7.0.0. The guidance below should work with Adobe® Acrobat® 5.0 or above or any software that adheres to the standards of that software.

1. Composing the Original Regulatory Label		
Feature	Specification	Comments
The pesticide product label submitted to EPA for regulatory approval should be formatted for 8.5" x 11" paper using text in paragraphs and tables; do not use columns. This regulatory label does not need to be formatted with the layout, graphics, colors, etc. that are used on the final printed label used on the product. The wording, not the layout, is critical on the regulatory label.		
Software	Use any word processing or desktop publishing software.	One of EPA's goals in selecting .PDF as the standard text exchange format is to allow registrants to use any software to create original product label. The .PDF and CD-ROM submitted to EPA must be formatted for Microsoft® Windows®. Format conversion software may be needed if original document is from MacIntosh®, Unix®, et al.
Paper Size	8.5" x 11"	
Paper Orientation	portrait or landscape	
Margins	Minimum margins: 0.5" on all sides Leave 1.5" x 1.5" (minimum) blank space somewhere on first page.	You must leave sufficient blank space (1.5" x 1.5" minimum) on the first page of a label for placement of the EPA accepted stamp. This blank space can be anywhere on first page; the placement is not prescribed.

1. Composing the Original Regulatory Label

Feature	Specification	Comments
Font Size	12 point preferred for most text 6 point minimum	Follow label requirements in 40CFR156 and in the Label Review Manual regarding minimum font sizes for various components of label.
Font Type & Style	True Type®, Open Type®, or Postscript® Type 1 Arial or Times New Roman preferred	Do NOT use proprietary fonts or printer dependent fonts. These can not be embedded in .PDFs. Acrobat will try to use a substitute font but this may alter label appearance. When converting to .PDF, embed all fonts used in the document. It is recommended that the .PDF be created on the same computer on which the original source document was created so the same fonts are available. Using the “when embedding fails - cancel job” option will make it obvious when font problems exist (often due to proprietary fonts).
Page Numbering	Number all pages.	Page numbers are extremely helpful and should be used on the regulatory label submitted to EPA.
Tables	Use the software’s “table” function rather than tabs or blank spaces to create tables.	Use of tables is encouraged since they improve label comprehension. Text in tables created using your software’s table function converts well to .PDF, retaining the correct appearance and readily exporting to other software. Use of tabs or spaces to create the look of a table may not convert to .PDF correctly and may not result in readily exportable data.
Columns	Recommended - Do NOT use columns. Note: Tables are acceptable.	Placing text in newspaper type columns often makes it difficult to use the Acrobat text compare tool. Columns may be used on final printed labeling but are discouraged on the label submitted to EPA for review.

1. Composing the Original Regulatory Label

Feature	Specification	Comments
Color	Text: black Graphics: grey scale preferred	Regulatory labels are frequently photocopied in black/white. Colors may be used but they must not interfere with ability to read or photocopy the label.
Graphics	Logos, drawings, diagrams, photographs, etc. are allowed if they do not interfere with required text.	Any <u>required</u> label text within or surrounding graphics must be readable as text by the computer. See tip on checking for text versus graphics under "Quality Assurance" below.
Editing Marks	Do NOT include redline, strikeout, highlighting, or other editing marks. Exception: Can use square brackets to indicate editorial comments which do not appear on final printed label.	PDF label should be based on a "clean" version of the proposed label. Do not use editing marks indicating changes from the previous version of label. Acrobat will add these markings when the label comparison is run at EPA. Square brackets can be used to indicate text which is not part of the final printed label (e.g. notes to EPA reviewer) or to indicate graphics to be inserted in final printed label (e.g. skull/crossbones).
Label version identification	Recommended - Include a unique label identifier (version code) and short description of changes at start or end of label. The format of this version code is left to the registrant and is not currently prescribed by EPA.	The goal is to distinguish various versions of a label. The required format for the .PDF filename will distinguish the electronic file. To distinguish paper prints of the regulatory label it is recommended that the label text include a code number and short description of the changes since the last label version. It may be useful to print the code number on the final printed labeling (this is voluntary) but do not include the description of changes.

2. Creating a Text .PDF Electronic Label

Feature	Specification	Comments
Conversion to .PDF	PDF must be created directly from electronic source document. DO NOT SCAN PAPER LABELS (with or without optical character recognition).	Goal is to create a text .PDF rather than an image .PDF to allow for text comparison. Do not submit scanned label images. This specification is different than that for data studies where scanning is a last resort option.
PDF Software	Use any software that creates a text .PDF (version 1.4 or higher) and which can control the required job options specified in this document (e.g. embedding fonts).	To verify version information open the finished .PDF label and check the document properties: <ul style="list-style-type: none"> · Application - any software; often tied to software used to create original source product label (e.g. Acrobat .PDF Maker® for Microsoft® Word®). · Producer - any software (e.g. Adobe® Acrobat® Distiller® 5.x (or higher)) · Version - .PDF 1.4 (Acrobat® 5.x) or higher
PDF Version	PDF Version 1.4 or higher	Verify as described above.
PDF Creation Settings - general	Manually configure .PDF creation software using the settings below (compatibility, fonts, etc). or If using Adobe® Acrobat® Distiller® then you can download the file “Adobe Acrobat Distiller Job Options” from the EPA website to automatically configure settings.	These directions apply to Adobe® Acrobat® Distiller®. If using other .PDF creation software, consult that program’s documentation to achieve these results. Place “Adobe Acrobat Distiller Job Options” file (downloaded from EPA website) on hard drive under: C:\Program Files\Adobe\Acrobat 7.0\Distillr\Settings When creating label .PDF, set Adobe® Acrobat® Distiller® default settings to “EPA Label Print.”

2. Creating a Text .PDF Electronic Label

Feature	Specification	Comments
Resolution	600 dpi minimum	
Page Size	8.5" x 11"	
Font Embedding	Embed all fonts When embedding fails: cancel job	<p>Goal is to embed all fonts used in document to ensure correct formatting, appearance, and printing of document. It is recommended that the .PDF be created on the same computer on which the original source document was created so the same non-proprietary fonts are available. Using the "when embedding fails - cancel job" option will make it obvious when font problems exist (often due to proprietary fonts).</p> <p>Do NOT use proprietary fonts. These can not be embedded in .PDFs. Acrobat will try to use a substitute font but this may alter document format, appearance, and print.</p>
Security	Do not use any security on the .PDF. <ul style="list-style-type: none">· do not encrypt document· do not require password to open document· do not require password to print or edit document	<p>Goal is to enable EPA to compare .PDF files, mark comments on .PDF label, and print.</p> <p>Note: Security options may change in future.</p>

2. Creating a Text .PDF Electronic Label

Feature	Specification	Comments
Bookmarks - Product Label	Optional.	If used, it is recommended that registrant bookmark the major label sections and bookmark the crops/sites.
Bookmark Hierarchy	If used, limit to no more than four levels in either full submission or within a single document.	Consensus is that people get lost when there are more than four levels.
Indexing	Not required at this time.	This includes both the document properties as well as indexing using the Adobe® Acrobat® cataloging capability.
Electronic Signatures	Not implemented at present	Electronic submissions must include <u>Certification with Respect to Label Integrity</u> pending development of Agency policy and standards on electronic signatures.
Mixing Data files and Label files	Do not mix. Regulatory label must be in its own file (see file naming convention below) separate from data studies or forms. Submit label, data, Notice of Filing, etc. each on a separate CD-ROM.	E-label must be in a separate .PDF file on a separate CD-ROM. If electronic versions are submitted, submit separate CD-ROMs for e-label, e-data studies, and e-Notice of Filing since each disk is filed in a different location. <i>[note: this will probably change in the future when a full electronic submission system is developed.]</i>
File Size	No limit	PDF has no limit on file size but the computer used to create or read the file may introduce constraints.

2. Creating a Text .PDF Electronic Label

Feature	Specification	Comments
File Naming Convention - Product Label	<p>Finished .PDF text label file MUST use this file name format:</p> <p style="text-align: center;"><co#>-<prod#>.<yyyymmdd><version>.<optional-id>.PDF</p> <p>where:</p> <ul style="list-style-type: none"> <co#> = 6 digit company number part of registration number; use leading zeros so that field is 6 digits - = mandatory dash symbol <prod#> = 5 digit product sequence number part of registration number; use leading zeros so that field is 5 digits; for new products which do not yet have product numbers assigned use "xxxxx" in this field . (period) = mandatory field separator <yyyymmdd> = date of submission using 4-digit year; use leading zeros for month and day, if needed; note that order is year, month, day to facilitate simple sorting¹ <version> = optional version identifier <i>if needed to distinguish file versions with same date field</i>; consider initial submission to be version "a" but do not include the "a" in the file name; if needed, the first version identifier used in the file name would therefore be "b"; use letters (b, c, d, etc); do NOT separate version from date with period or space . (period) = mandatory field separator <optional-id> = optional descriptor; any additional useful information (reason for amendment, company's document identifier, product name, etc); can include several fields separated by periods if desired² . (period) = mandatory field separator PDF = mandatory file extension <p>Note: use leading zeros to fill co#, prod#, and yyyymmdd fields (but do not use spaces)</p>	

2. Creating a Text .PDF Electronic Label

Feature	Specification	Comments
File Naming Convention - Product Label (continued)	<p>¹ Note: Date can be either date the product label is submitted or created. It is not critical which date is used but “<yyyymmdd><version>” MUST create a unique identification code different from any other file for this registration number. Use date version letter if necessary to distinguish files with same registration number and date.</p> <p>² Note: Full path and file name is limited to 200 characters although some older software may have problems displaying names longer than 60 characters.</p> <p>Do not use spaces in the registration number or date sections of the filename (ok in the optional id section). Use only characters allowed by Windows file naming conventions (eg. no “/”, “*”, etc.).</p> <p>examples:</p> <p> minimum fields 001234-00123.20010215.PDF</p> <p> all fields 123456.12345.20050919.add crops.PDF 123456-12345.20050919b.correct celery.PDF</p>	

2. Creating a Text .PDF Electronic Label

Feature	Specification	Comments
Quality Assurance	<p>Print the .PDF product label and compare to original source print.</p> <p>It is suggested that printed .PDF product labels be used as the paper copies of label required for submission.</p> <p>Check .PDF file to make sure label is text, not graphic.</p>	<p>It is registrant's responsibility to make sure that the .PDF label matches the original source label. Do not assume .PDF is accurate without visually checking it. Errors are usually obvious in terms of formatting (e.g. last line of original source page moves to first line of next page in .PDF version) or fonts that will not print correctly (usually due to use of proprietary fonts). Be sure to look at start and end of each page and to look at any unusual symbols, fonts, or graphics included in label.</p> <p>Using a print of the .PDF label (rather than print of original source document) will help registrant ensure that the submitted paper label is the same as the submitted electronic label as stated on the <u>Certification with Respect to Label Integrity</u>.</p> <p>To check if label is text or graphic, open .PDF label in full Adobe® Acrobat® and try to select text using the "select" tool. If words can be highlighted with select tool then you are working with text .PDF; if they can not be selected then you probably have a graphic (image). The text select tool highlights a word at a time; the graphic select tool highlights rectangular areas so that you can split words, lines, and letters.</p>

3. Submitting a Text .PDF Electronic Label to EPA

Feature	Specification	Comments
What to Submit	<ol style="list-style-type: none"> 1. All required paperwork (cover letter, form 8570-1, data compensation, CSF, etc. as needed). 2. Five paper copies of the label. 3. PDF file of proposed product label on CD-ROM. 4. <u>Certification with Respect to Label Integrity</u> form (signed). 	<p>Label formats: Submit five paper copies of the proposed label plus one electronic copy of the proposed label on a CD-ROM. If submitted, e-data, e-Notice of Filing, etc should each be on a separate CD-ROM. It is suggested that you print the paper copies from the electronic .PDF. You may also include an optional paper copy of the label with redline/strikeout or similar editing marks showing changes since last version (although this is not necessary when electronic labels are available for comparison) but do NOT use this mark-up version when creating the .PDF label.</p> <p>Electronic label file name: Label files MUST use file naming convention above so the file can be automatically loaded into a database record identified by parts of this file name. If label files are incorrectly named the .PDF label will not be used.</p> <p>Certification form: Use one certification form per product.</p>
Submission Medium	Compact Disk (CD-ROM).	CDR (write once) type CD-ROM is preferred to ensure that the registrant's original files can not be altered. The .PDF and CD-ROM must be formatted for Microsoft® Windows®. Format conversion software may be needed if original document is from MacIntosh®, Unix®, et al. Do not submit floppy disks.

3. Submitting a Text .PDF Electronic Label to EPA

Feature	Specification	Comments
How & Where to Submit	Send via courier service to OPP physical location: Document Processing Desk 7502P (E-SUB) U.S. EPA - Office of Pesticide Programs 2777 South Crystal Drive Arlington, VA 22202	Do NOT send via US mail. The irradiation procedures currently used on Washington, DC mail will damage the CD-ROM.

history of significant changes

10/2/07 recommend not to use columns
1/17/08 put e-label on it's own CD-ROM; use separate CD for data, Notice of Filing, etc.