

# **Pesticide Registration Branch Report**

## **Stakeholder Outreach Project**

**August 2008**

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## Table of Contents

I.	Introduction	1
II.	Internal Meetings	1
	A. Meeting Summaries by Subject	2
	B. Discussion and Analysis	7
III.	External Stakeholder Meetings and Comments	9
	A. Comment Summaries by Subject	10
	B. Discussion and Analysis	12
IV.	Recommendations	18

## I. Introduction

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**Scope:** This report aims to provide the Branch Chief and supervisors of the Department of Pesticide Regulation's (DPR's) Pesticide Registration Branch (PRB) with all of the comments and information gathered as a result of the 2007-2008 Stakeholder Outreach Project and to provide recommendations for the development of future outreach materials and training programs for the Pesticide Registration Branch.

**Background:** Created in September 2007, PRB initiated the Stakeholder Outreach Project in an effort to improve the services that it provides to its stakeholders. In addition, PRB initiated the Stakeholder Outreach Project to evaluate the effectiveness of its current outreach materials and training programs and to examine the outreach programs of other regulatory agencies. PRB held meetings with both internal and external stakeholders to solicit input and obtain information on areas of concern and suggestions for solutions.

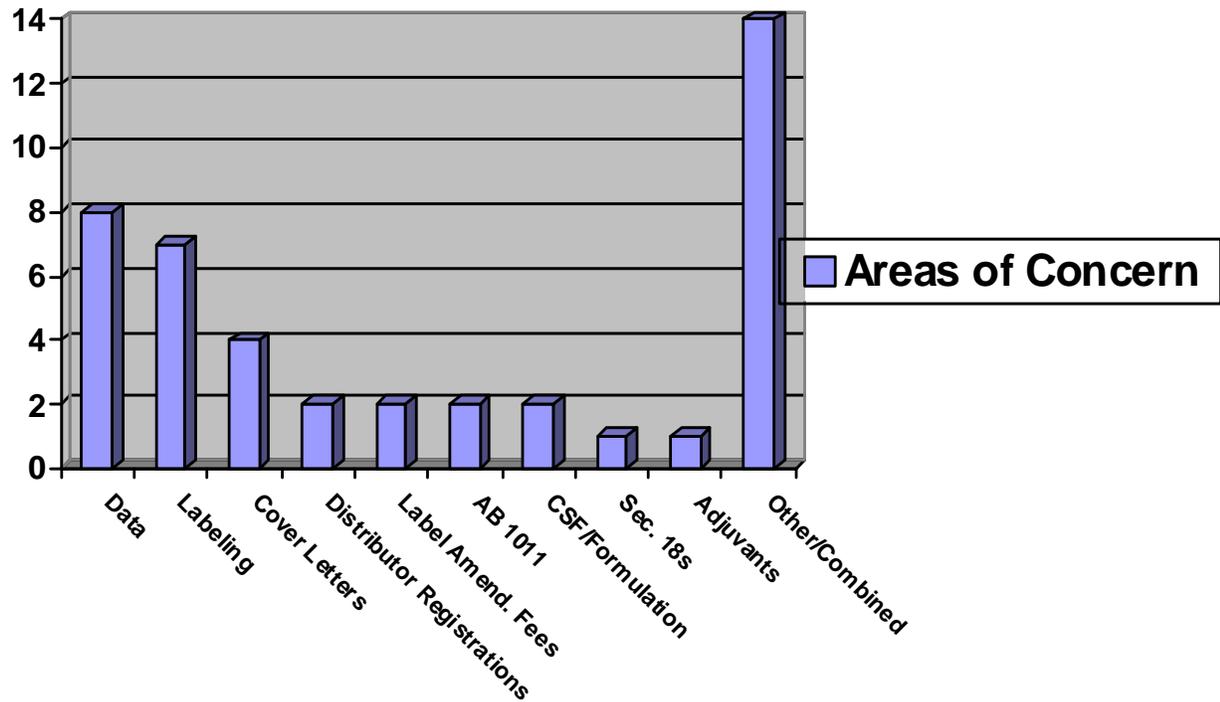
**Summary:** Comments received at internal and external stakeholder meetings, as well as written correspondence received are summarized and analyzed within this report. The report also includes recommendations for future outreach materials and training programs.

## II. Internal Meetings

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Meetings were held with each PRB supervisor and their immediate staff to identify current areas of concern regarding pesticide product submissions, and obtain suggestions for ways to resolve those issues. If unable to attend a meeting, staff were asked to join subsequent groups or provide written comments. Six separate meetings were held between October 18, 2007, and November 1, 2007. Issues raised by PRB staff, including proposed solutions, are grouped by subject. Not all proposed solutions were included in the recommendation section of the report. Issues outside the scope of this project were documented, but are not included in this report. The PRB Branch Chief will address such items separately. The internal meeting summaries are followed by a discussion and analysis. Recommendations are provided in section IV of this report.

## Internal Meetings: Areas of Concern



### A. Internal Meeting Summaries by Subject

#### Data Issues

PRB staff stated that the most important issue impacting their ability to complete their job was improperly bound and incomplete data submissions.

#### **Problems:**

- Improperly bound data
- Flawed data (e.g., lack of untreated controls, questionable product effectiveness, lack of details on study methodology)
- Use of unexplained codes and acronyms
- Data irrelevant to claims listed on label
- Issues with information on breakdown product vs. parent compound
- Summaries submitted instead of complete studies (e.g., without statistical data)
- Submission of incomplete lab reports

### **Proposed Solutions:**

- Develop study protocols and standards (where they do not already exist) and make them more readily available on DPR's website to reduce submission of flawed data
- Ask company to identify breakdown products
- Identify relevant studies within a volume to reduce the amount of irrelevant data read by evaluators
- Include appendices with relevant information

### **Label Issues**

#### **Problems:**

- Legibility (e.g., font too small, poor contrast)
- Proposed California labels do not match U.S. Environmental Protection Agency (U.S. EPA) approved labels
- Final printed labels not submitted. Stakeholders do not have clear understanding of "printer's proof" definition
- Secondary packaging labels not submitted
- Labels not updated at DPR
- Confusion regarding PRB's processing of bilingual labels (i.e., what should be submitted)

#### **Proposed Solutions:**

- Provide outreach/web information on PRB's requirements with regard to pesticide labels, including definition of "final printed label/container" label
- Require the submission of new product labels at time of annual renewal to assure DPR has latest product label
- Provide outreach materials/web information on how PRB processes bilingual labels

### **Cover Letters**

#### **Problems:**

- Lack key information including PRB's ID# for return submissions and reason for the submission
- Submissions without any cover letter
- No reference to identical or substantially similar pesticide product previously approved by DPR

### **Proposed Solutions:**

- On-line video stressing importance of cover letter, including question and answer section
- In-house tour of PRB's business process, including need for cover letter in package

### **Distributor Registrations**

#### **Problems:**

- Brand name inconsistently displayed throughout submitted paperwork
- U.S. EPA Form 8570-5 not submitted

#### **Proposed Solutions:**

- No solutions were provided

### **Label Amendment Fees**

#### **Problems:**

- Not submitted when required
- Submitted when not required

#### **Proposed Solutions:**

- Determine if fee is necessary post revisions to Food and Agriculture Code section 12811.5 (AB 1011)

### **Assembly Bill (AB) 1011**

#### **Problems:**

- Companies identifying "similar" products that are in fact not similar (e.g., end use products identified as similar to manufacturing use product)
- Stakeholders unclear on bill language and intent
- "Substantially similar" not defined by PRB

#### **Proposed Solutions:**

- No solutions provided

## **Confidential Statements of Formula and Product Formulation Sheets**

### **Problems:**

- Not properly filled out

### **Proposed Solutions:**

- Rewrite CA Product Formulation Sheet, including revised instructions

## **Federal Insecticide Fungicide and Rodenticide Act (FIFRA) Section 18 Emergency Exemptions**

### **Problems:**

- Partially filled out applications
- Lack of quality supporting materials included with submission
- Companies unclear on necessary requirements for submission including forms and related documents

### **Proposed Solutions:**

- Pre-application interview or discussion with applicant
- Rewrite application form and include better instructions
- Provide on-line sample of completed FIFRA section 18 application form

## **Adjuvants**

### **Problems:**

- Lack of instructions or guidance on how to prepare a package for submission
- Product formulation sheet and label don't match
- Data requirements unclear
- Compounds and functioning agents not properly identified - including full composition by weight

### **Proposed Solutions:**

- Provide on-line guidance for data and submission requirements

## **Other Items of Concern and General Solutions**

### **Problems:**

- U.S. EPA stamp-accepted labels not included with submission
- External website is not user friendly
- Unnecessary documents included with submission, including all documents submitted to U.S. EPA, letters of authorization, etc.
- Confusion surrounding California definition of a master label and related policies
- Improperly filled out documents
- Updated company contact information is not submitted to DPR
- Renewal applications incorrectly filled out, items missing from submission, renewal letter not being read

### **Proposed Solutions:**

- Develop on-line tutorial of registration process
- Provide introductory training sessions for new companies/representatives
- Display latest label acceptance data in DPR's internal database
- Create a check-box return letter or provide a check-list with the return letters to reduce incomplete submissions
- Reduce the length of the renewal letter, include bullets and "how to" on-line
- Obtain input from other agencies/regional boards
- Provide one-on-one or small group training for smaller companies
- Issue a list of consultants and laboratories to assist registrants
- Update the Desk Manual
- Present an open house for stakeholders to educate them on PRB's business processes

## **B. Discussion and Analysis**

### **Data and Labeling**

Improperly bound and incomplete scientific data submissions and pesticide product label issues cause problems for PRB staff. This is logical as those are two of the most important items in packages submitted to DPR for registration, risk assessment, and reevaluation. In many cases, the submitted data is improperly bound and sometimes incomplete. Over the years, the Pesticide Registration Branch has posted several on-line notices addressing the issue of how to properly format a data submission. However, the notices, including the latest notice issued in 2006, have not substantially reduced the number of improperly bound data packages submitted to the PRB.

Inadequate data submissions are of concern to DPR's scientists who must rely on such data to evaluate the safety and efficacy of pesticide products. Historically, PRB's workshops have provided breakout sessions where registrants can meet one-on-one with DPR's scientific staff to discuss data issues. However, PRB has not provided any specific written guidance to stakeholders on data requirements or acceptable standards for data submissions.

Pesticide product label issues are broad and cover both text and submission errors. DPR staff must review pesticide product labels for accuracy and are frequently asked to fax copies of approved pesticide product labels. If the label text is too small, close together, on poorly contrasting backgrounds, or contains colorful graphics the labels can be difficult to read and illegible when copied. Scanners can deliver color copies with higher resolution, but illegibility of hard to read labels remains an issue. Other than the label requirements listed in federal and state regulation, PRB has not provided further written guidance on its needs with regard to pesticide product labels.

### **Final Printed and Printer's Proof Labels**

Title 3, California Code of Regulations, section 6170 mandates that applicants submit printer's proof, final printed labels, or copies thereof to DPR prior to the issuance of a product license. The revision of 6170 in the late 1980s to mandate such labeling requirements was adopted at the request of management. It was determined that the California stamp-accepted label should be identical to the container label in the field.

Computer advancements over the last 20 years allow registrants to design and develop product labeling within their own offices, rather than sending the labels out to printers. In addition, U.S. EPA *requires* registrants to submit product labeling on 8.5" x 11" paper as a Word® document for review. These two factors have resulted in DPR receiving an increased number of labels as Word® documents. While this is acceptable for purposes of the initial review, as stated in

DPR's regulation, a final printed label must be submitted before DPR can issue a license to register a new pesticide product. PRB addressed the requirement for submission of printer's proof or final printed labels in California Notice to Registrants 2006-11. However, the California Notice did not define the terms "final printed labels" and "printer's proof" or provide examples of such labels.

### **Cover Letters**

Cover letters are a critical component of any submission to DPR. The letters create a written dialogue between the submitter and DPR staff. PRB did not address the need for cover letters until approximately 2-3 years ago when a reference to cover letters was added to the product application form and instructions. Since adding this provision to the on-line submission checklist, we have seen an increase in the number of cover letters submitted, but there is room for improvement. Cover letters should be addressed outside the application form and instructions.

### **Distributor/Supplemental Registrations**

In general, many distributor/supplemental registrants do limited business with California. The infrequency of their business with DPR leads to less knowledge and increased errors. PRB should provide user-friendly on-line guidance to help distributor/supplemental registrants through the pesticide registration process. The development of on-line tutorials, guidance materials, or examples of completed applications, and other forms would likely reduce the number of inadequate or incomplete submissions received.

### **Label Amendment Fees and AB 1011 Law/Regulation Changes**

The adoption of label amendment fees in regulation and the passage of Food and Agricultural Code sections 12811.5, 12836.5, and 12836.6 (AB 1011) have resulted in numerous changes in the pesticide registration process in the last five years. Both subjects can be confusing to external stakeholders. It's critical that PRB's staff have the ability to provide clear and consistent information on these subjects, upon request. In addition, it is important that stakeholders have access to clear information on PRB's website. Revised fact sheets or similar guidance should be considered.

### **Confidential Statements of Formulas (CSFs)/Product Formulation Sheets**

In 1996, DPR revised its policy to allow registrants the option of submitting U.S. EPA's CSF in lieu of DPR's Product Formulation Sheet. Many of the CSFs and Product Formulation Sheets submitted to DPR are not properly filled out. Since U.S. EPA's CSF is a federal document, DPR is not in a position to revise the form or instructions. However, PRB's Product Formulation Sheet and

instructions could be simplified or clarified. It has also been suggested that we eliminate the Product Formulation Sheet and require companies to submit U.S. EPA's CSF (with the exception of California only registrations).

### **Emergency Exemptions from Registration (FIFRA section 18s) and Adjuvants**

Although the specifics differ, both FIFRA section 18s and adjuvants share a common problem. There is a lack of understanding by applicants as to what types of data/information needs to be provided to support an exemption from registration, or registration, in the case of an adjuvant. PRB currently provides some written guidance on data requirements, package preparation, and instructions on how to apply for FIFRA section 18s or registration of an adjuvant. However, because both the FIFRA section 18 and adjuvant processes are unique, it is important that PRB address the need for better outreach and educational materials on these subjects.

### **Other Items of Concern and General Solutions**

All other items of concern will be incorporated into the recommendation section of this report, provided they are within the scope of this project. Direct identification of those concerns/solutions may not be provided, but will be considered in the development of the sub-projects.

## **III. External Stakeholder Meetings and Comments**

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Between October 2007 and February 2008, letters were sent to the following organizations, companies, and consultants, inviting them to provide input on the effectiveness of PRB's training programs and outreach materials:

- Western Plant Health Association (WPHA)
- Chemical Specialty Products Association (CSPA)
- American Chemistry Council (ACC)
- Chemical Producers and Distributors Association (CPDA)
- Biopesticide Industry Alliance (BPIA)
- International Sanitary Supply Association (ISSA)
- California Specialty Crops Council (CSCC)
- Western Growers Association
- California Rice Commission
- California Farm Bureau
- California Seed Association
- California Grape & Tree Fruit League
- Almond Board of California
- The Acta Group, LLC
- Lebanon Seaboard Corporation

Maintex, Inc.  
Champion Technologies, Inc.  
Bio-Dex Laboratories  
Anderson Sterilizers, Inc.  
Seaco Technologies, Inc.  
Lewis & Harrison, LLC  
California Agricultural Pest Control Advisors (CAPCA)  
Pest Control Operators of California (PCOC)  
Pesticide Applicators Professional Association (PAPA)  
Pesticide Action Network (PAN)  
Californians for Pesticide Reform  
National Resources Defense Council (NRDC)  
California Rural Legal Assistance Foundation  
R3 Ag Consulting  
McKenna Long & Aldridge LLP  
Robinson Associates  
RegWest Company, LLC  
Environmental Solutions Group, LLC  
Physicians for Social Responsibility  
Adams Technology Systems

The above companies/organizations were chosen based on involvement with PRB and input from internal staff. Comments were received both verbally and in writing. All comments received are summarized by subject and further analyzed and discussed in the coming sections.

## **A. Comment/Recommendations Summaries by Subject**

### **Stakeholder Guidance Manual/Desk Manual**

- Revise the PRB Desk Manual to provide a more user friendly version for stakeholders
- Create an on-line Stakeholder Desk Manual (suggested using New York State's manual for guidance)
- Post examples/scenarios in the Desk Manual for reference

### **Web Services**

- Model DPR's website after Washington State's and New York's with regard to providing information on applications for FIFRA section 18s exemptions from registration and federal Special Local Needs registrations (FIFRA section 24Cs)
- Post DPR approved FIFRA section 24Cs online so that they are accessible
- Generally, increase PRB's web services

- Track PRB’s website to determine which sites are accessed most often
- Provide on-line video assistance to stakeholders
- Add a web link to PRB’s website for product searches and lookup
- Revise DPR’s database to provide a cumulative Materials Entering Evaluation (MEE) and Notice of Decisions (NOD) list
- Revise the MEE and NOD list format
- Provide secure, on-line tracking databases, so that registrants can track their own packages
- Develop tables or databases for items such as Experimental Use Permits (EUPs) and conditional registrations, similar to the current FIFRA section 18 database

### **On-line Labels and Renewals**

- Provide California stamp-accepted labels and other pertinent information on-line
- Create a license renewal form in a PDF format that can be filled out on-line and printed
- Send renewal notices to consultants who have documented agent authorization letters on file with DPR

### **Workshops**

- More focused, modified workshops
- Conduct joint organization/DPR workshops

### **Outreach Materials**

- Provide a template cover letter as part of the application that includes a section on “My product is identical to....” and/or provide sample cover letters on the web page
- Create a fact sheet comparing U.S. EPA and DPR’s notification processes
- Develop fact sheets on DPR’s application for registration, evaluation process, the registration process, data requirements, licensing renewal, label amendment fees, and other related topics
- Create web-based fact sheets for data requirements, particularly for efficacy data

## Other

- Intermittent stakeholder organization meetings with DPR Branch Chief or other supervisory level staff to discuss concerns
- Address specialized issues through industry task forces that could work together with DPR
- Provide clarification on DPR's need for U.S. EPA notification documentation vs. stamp-accepted EPA labels
- Provide clarification for determining product similarity under AB 1011
- Develop submission and response time frames
- Clarify the subject of concurrent review
- Reduce the time it takes to re-assign companies when a specialist leaves office, and provide information to companies prior to a change in staff
- Separate recently initiated reevaluations from ongoing reevaluations in the Reevaluation Status Reports

## **B. Discussion and Analysis**

Key items from the external stakeholder comments sections have been grouped, outlined, and analyzed in this section. Items that are beyond the scope of this project will be analyzed, but only limited items are discussed.

### Increase Web Services

PRB's website is an important tool that allows stakeholders to obtain information and guidance on registering pesticide products in California. In today's modern age, it is an applicant's primary point of contact with DPR. It is important that PRB's website address all issues regarding the registration of pesticide products and be clear and unambiguous. Stakeholders suggested that the revision of web-based materials be PRB's top priority for this project. They indicated that the materials should be user-friendly and target the regulated community. By making such revisions, PRB may be able to reach more companies than through workshops.

"Use state-of-the-art technology to develop and maintain stable, effective information systems to support DPR's business and program needs," is an objective within DPR's 2008 strategic plan. Unfortunately, there is a manpower and fiscal cost attached to the need for these upgraded and advanced systems Department-wide. Seemingly simple changes are often more complex than they appear. Due to the number of web projects needed Department-wide, DPR has been forced to prioritize such projects based on need. Currently, PRB's website is one of the more stable and functional websites. Therefore, any changes to PRB's website, which require support from the Information Technology (IT) Branch

(programming, etc.), need to be viewed as long-term plans, that could possibly be accomplished in the next three to five years.

Of the web-based items suggested, the on-line stakeholder guidance manual materialized as the most desired item requested by stakeholders. PRB's Desk Manual is the current primary source for registration guidelines, but is written for internal PRB staff. The need for a similar public guidance document was repeatedly mentioned. Development of a public manual would be time consuming and complex, but would not require IT services (other than posting). The manual would include application guidance and links to data requirements for product registration/label amendments, and could also clarify when fees are due. Information on post-registration requirements (annual renewals, mill assessment, etc.) could also be considered for inclusion. The manual may also include sections on mill assessment and special circumstances such as, answering the question, "What if my label has both home/garden and agriculture uses?" Citing relevant sections of current law and regulations within the text would be also beneficial to the user. Many of the data and label concerns identified by PRB internal staff could be addressed by the creation of such a manual.

A number of stakeholders requested that PRB generally increase its web-services, including adding/revising the following websites on its home page:

- Provide further information on FIFRA section 25(b) and products exempt from registration in California
- Add a FIFRA section 24C database/ web page
- Add an experimental use permit database/web page
- Update the FIFRA section 18 web page
- Revise the MEE & NOD web pages
- Include a link and provide more information on Research Authorizations
- Provide more information on public record requests

California Notice 2000-6, available on DPR's website, currently provides information regarding pesticide products that are exempt from registration in California. However, based on the requests for placement of information regarding exempt products (referred to as Section 25b products) on PRB's website, it appears that providing the information in a California Notice is insufficient. Providing this information in a more centralized location on DPR's website may be helpful.

A web-accessible database would allow various interested parties (County Agricultural Commissioners, company representatives, grower groups, etc.) to view the status of all past and present FIFRA section 24Cs issued by California. The database would improve the transparency of DPR's program.

Stakeholders requested that the FIFRA section 24C web page include the following:

- Guidance on applying for a first or third party FIFRA section 24C
- A FIFRA section 24C database (current and past registrations)

It was also suggested that PRB's FIFRA section 18 webpage be revised to include guidance on submitting an application, and a list of items required to justify the emergency, label guidance, etc. It should also include a link to U.S. EPA's re-certification program.

Currently, DPR's NOD and MEE databases are organized by weekly notice, but the date of the notice is not displayed until the notice is opened. A person looking for a particular notice or product may need to open several notices before finding the one they want. It is suggested that the database be revised to include dates. This could provide more user-friendly access to the information.

PRB's website currently provides information on California Research Authorization (RA) permits. However, it appears from the comments that the information needs to be more centrally located. RA information could also be included in the proposed Stakeholder Guidance Manual, which may include background information, application guidance, and other useful information, such as when a registrant should apply for an RA vs. an Experimental Use Permit.

Stakeholders requested more guidance on public record requests. PRB's website could be revised to provide more historical, legal, and processing information.

PRB received several requests to provide or amend current databases (FIFRA section 24Cs, EUPs, FIFRA section 18s, NOD/MEEs, RAs). These changes would require IT resources. As mentioned above, PRB's website is one of DPR's more stable and functional websites, and as such, is not currently slated for IT resources.

### **Workshops**

Stakeholders felt workshops should be geared toward more focused, smaller, interactive groups. Careful consideration should be given to ongoing PRB concerns, audience identification, and ideas to engage the audience. Some felt that current workshops are too broad and may not be beneficial to companies that manufacture microbial products, consumer products, or organic pesticides. Stakeholders indicated an interest in having DPR host workshops for these groups and at the workshops they would like more time to discuss items such as data requirements with PRB scientists. It was suggested that joint workshops with industry be considered based on the design of the workshop and the subject matter. When possible, workshops should be limited to 1 day or less in order to provide the maximum benefit to stakeholders in the least amount of time.

Smaller, interactive workshops that encourage audience participation, less formal breakout sessions that target specific topic areas, and industry sponsored events, on topics such as:

- Applying for FIFRA section 18s
- Applying for FIFRA section 24cs
- Introduction to the DPR registration process for new companies/employees
- Antimicrobial product registration
- Biochemical/microbial product registration
- DPR interactive workshop - to include information on the passage of new laws/regulations effecting stakeholders, new policies/procedures, question and answer sessions, etc.

Suggested breakout sessions include 1) triggers for data requirements including when, why, and what to submit; and 2) package submissions - what's required, important, etc. In addition, stakeholders felt their ability to provide input prior to development of workshop agendas was important and should be considered.

### **Outreach Materials**

#### **Fact Sheets**

The success of DPR's pesticide regulatory program is directly related to the public's understanding of DPR's registration process, policies, and procedures. Professionally developed outreach materials would allow PRB to produce effective materials that aid in achieving that goal. Fact sheets are useful tools because they provide quick reference guides to interested parties on subjects that can be very complex. Fact sheets created by PRB staff knowledgeable on the subject matter may be more effective if prepared professionally.

Stakeholders indicated an interest in PRB developing fact sheets on a variety of subjects. It was suggested that fact sheets be grouped by category and that length should be limited. For simplicity, fact sheets could be written in a question and answer format and placed on PRB's website (similar to those developed by the Product Compliance Branch). The fact sheets could be linked to keywords and/or organized by subject. Anticipated subjects may include, but are not limited to:

- AB 1011 (including DPR's requirements for product similarity)
- Master labels
- Fees
- DPR vs. U.S. EPA notification process
- Acceptable labeling

## **Reevaluation Status Reports**

It was suggested that DPR separate recently initiated reevaluations from ongoing reevaluations in the Reevaluation Status Reports. The goal is to allow the reader to more easily identify newly initiated reevaluations.

## **On-line Tutorial**

Stakeholders felt that an on-line tutorial explaining how to assemble a data package for submission to DPR would be a valuable tool. Stakeholders find current written guidance on the subject cumbersome due to the multitude of directives that must be followed. In order to provide an effective tutorial, many considerations will need to be taken into account such as DPR's server capacity and whether a consultant should be hired to provide expert advice. DPR does not currently have the server capability to produce a live, on-line tutorial, but it may be able to produce an animated version. Another suggested alternative is a slide show presentation.

Stakeholders also suggested an on-line website for questions and answers. However, this project would require IT resources to implement.

## **Concurrent Reviews/AB 1011**

California Notice to Registrants 2005-10 addresses the types of applications for registration that DPR accepts concurrently with the applicant's submission to U.S. EPA for federal registration. However, after AB 1011 passed, which required DPR to accept all products containing new active ingredients concurrently, stakeholders expressed concern regarding reduced risk products being shut out of the process. Most new reduced risk pesticide products submitted to DPR do not contain new active ingredients. Stakeholders feel that biopesticide and microbial products are unique and that market entry delays for all products can be costly. As a procedural change, revising DPR's current policy on acceptance of concurrent applications is outside the scope of the outreach project. However, PRB will take the suggestion under consideration.

Stakeholders also expressed concern over PRB's determinations of product similarity under AB 1011. They recommend that the criteria used by PRB staff to determine that one product is "substantially similar" to another, be provided to stakeholders. Information regarding the criteria on DPR's website would assist stakeholders in identifying products that meet the criteria.

## **DPR Notification Process**

DPR allows registrants to make certain specified minor label and/or formulation changes by "notification." The allowable changes are described in California Notice 2002-1. Stakeholders are still unclear when U.S. EPA notification

paperwork must be submitted to DPR, and they feel that DPR staff are handling notifications inconsistently. In the past, one PRB staff person processed all notifications. Recently, PRB changed its procedures such that each company's regulatory scientist handles that company's notification applications. PRB staff were provided with procedural guidelines and training to aid in consistency.

### **On-line Labels and Renewals**

An overwhelming number of stakeholders and their organizations expressed support for DPR's acceptance of electronic documents. This includes applications, labels, renewals, etc. DPR is currently involved in the Accepted Labels State Tracking and Repository (ALSTAR) project, designed to:

- Provide a secure standardized process for the submission of electronic documents including product labels from registrants to the state regulatory agencies
- Create a process for regulatory agencies to easily manage a repository of state-specific approved or accepted labels
- Design an application that is dynamic enough in nature to allow for growth as future goals are defined

This project is complex and does not have a completion date. DPR faces many challenges regarding on-line labeling due to our complex registration process, enforcement concerns, and schedule for database/software upgrades.

### **Regular Meetings with Stakeholder Organizations**

Stakeholders expressed an interest in holding annual or bi-annual meetings with the Pesticide Registration Branch Chief/Supervisors. The interest is noteworthy and will be taken into consideration, but outside the scope of the project.

### **Other Items Outside the Scope of this Project**

#### **Time Frames**

Members expressed concern over DPR's lack of regulatory or statutory completion time frames. The passage of the Pesticide Registration Information Act (PRIA) II resulted in increased processing times at U.S. EPA. Stakeholders feel that when coupled with the lack of time frames at DPR, they are faced with tough marketing decisions, and having general PRB time frames for processing applications would help them gauge a product's eligibility for sale (provided the registration was approved) and operate more efficiently. This issue is outside the scope of the project; however, it will be taken into consideration.

## IV. Recommendations

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Recommendations are based on both internal and external input, evaluation of outreach programs of other agencies, necessity, and feasibility. The following recommendations are proposed as sub-projects to begin after the completion of this project. The recommendations are not prioritized.

### **On-line Stakeholder Guidance Manual**

Provide stakeholders with an on-line Stakeholder Guidance Manual with step-by-step instructions for registering, amending, and renewing various types of pesticide products. Small group of registrants should be solicited to serve as an advisory panel. DPR may want to obtain the services of an outside vendor regarding layout and design.

Cost projection: Unknown  
Time frame for completion: 1 year +

### **Workshops**

PRB host specialized, more focused workshops. Workshop coordinators may vary depending on the subject matter. Joint workshops with industry organizations may be considered based on the design of the workshop and the subject matter.

Cost projection: Unknown  
Time frame – Begin in 2009

### **Outreach Materials**

#### **Fact Sheets**

Develop professional fact sheets with the assistance of an outside vendor. The intent would be to place fact sheets reflective of the topics identified in the Discussion and Analysis section of this report on PRB's public web page.

Cost projection: Unknown  
Time frame for completion: 1-3 years

#### **Reevaluation Status Reports**

Separate ongoing reevaluation status reports on PRB's website from recently initiated reevaluations.

Cost projection: \$0  
Time frame for completion: 1 year

### Revise Registration Application Form

Revise pesticide product application form to provide more user-friendly version and reduce errors.

Cost projection: \$0

Time frame for completion: 1 year

### On-line Tutorial for Assembling a Data Package

Develop an animated, on-line tutorial showing how to assemble a data package or a slide show presentation, as an alternative.

Cost projection: Unknown

Time frame for completion: 1-3 years

### Website Revision

Revise PRB's website to develop the following:

- A web page for products exempt from registration
- A FIFRA section 24C database/web page
- An EUP database/web page
- Update the FIFRA section 18 web page
- Revise the MEE & NOD web pages
- Include a link and provide more information on Research Authorizations
- Provide more information on public record requests

Cost projection: Unknown

Time frames for completion: 1 – 5 years