

TRIBAL PESTICIDE PROGRAM COUNCIL

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November 3, 2023

Susan Bartow
Office of Pesticide Programs
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

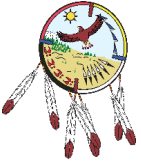
Re: TPPC comments regarding Pesticide Registration Improvement Act Bilingual Labeling Requirements: Making Bilingual Pesticide Labeling Accessible to Farmworkers, Docket Number EPA-HQ-OPP-2023-0270

Dear Ms. Bartow,

We appreciate the opportunity for the Tribal Pesticide Program (TPPC) to comment on the EPA's Bilingual Labeling initiative. The TPPC is a member-based organization with 87 members from 49 Tribes and tribal organizations, whose activities are funded by a cooperative agreement with the EPA. The Council serves as a tribal technical resource, and provides a forum for dialogue between Tribes and the EPA on program and policy development relating to pesticides issues and concerns. Assistance provided to Tribes includes support in building tribal pesticide programs and conducting pesticide education and training, and the preparation of resources for Tribes interested in specialized issues such as Integrated Pest Management and pollinators. Through its interaction with the EPA, the TPPC keeps Tribes informed of developments in the regulation of pesticides and pesticide use, and provides feedback to the EPA on such matters from a tribal perspective. Although the organization always seeks to represent consensus perspectives on any given issue, it is important to note that the views expressed by the TPPC may not be agreed upon by all Tribes. Further, it is important to understand interactions with the organization do not substitute for government-to-government consultation, which can only be achieved through direct communication between the federal government and Indian Tribes.

The TPPC is pleased to submit the following comments on the EPA's Bilingual Labeling initiative:

- In an age where websites and apps like Google can translate just about anything, the TPPC suggests that EPA look into using modern technological tools to allow the Pesticide Product Label System (PPLS) website to translate any label. It's already where people go to find labels online, so it would be a natural fit to provide translations services on the site.
- The TPPC also suggests that EPA consider switching the priority for label translation efforts from the most toxic products to the most used products. In our opinion targeting labels for products that are commonly used would reach more people more quickly, and have a bigger effect in label compliance, than targeting the most toxic products first.
- Finally, the TPPC suggests that EPA be sure to take a multi-tack approach to getting the label information to farm workers, including options such as online, posters, fliers, etc., to be sure everyone who needs it can receive it.



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Once again the TPPC appreciates this opportunity to comment on the EPA's Bilingual Labeling initiative. If you have any questions, please contact TPPC coordinator Mark Daniels at mark.daniels@nau.edu or 928-523-8897.

Sincerely,

A handwritten signature in blue ink that reads "Jasmine R. Courville". The signature is written in a cursive style.

Jasmine Courville
TPPC Chairperson