

Common Pitfalls of Submission

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Deficient Submissions

- Incomplete submissions
- Poorly prepared submissions
- Improperly completed application forms



Label Problems

- Label claims not supported by data
- Inappropriate or missing directions for use
- Improper precautionary statements
- Proposed labels not identical to the EPA-stamped “accepted” labels
- Distributor’s label not identical to the basic registrant’s label

Delays

- Excessive delay in submitting data:
 - in response to negative evaluation reviews
 - to satisfy existing conditional registrations
- Submitting data in a piece-meal fashion



Data Issues



- Using inappropriate testing protocols or methods
- Deficient or poorly prepared laboratory or field reports
- Using inappropriate statistical tests
- Lack of appropriate controls