FIFRA Section 24(c) Special Local Need Label (SLN)
FOR DISTRIBUTION AND USE ONLY WITHIN THE STATE OF OREGON

BRAVO WEATHER STIK®
EPA Reg. No. 66222-276  EPA SLN No. OR-200014

For Control of Fungal Leaf Spot Diseases on Spinach Grown for Seed and Swiss Chard Grown for Seed

This label is valid until December 31, 2025 or until otherwise amended, withdrawn, cancelled, or suspended.

<table>
<thead>
<tr>
<th>Active Ingredient:</th>
<th>% by WT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chlorothalonil (tetrachloroisophthalonitrile)</td>
<td>54.0%</td>
</tr>
<tr>
<td>Other Ingredients</td>
<td>46.0%</td>
</tr>
<tr>
<td>Total:</td>
<td>100.0%</td>
</tr>
</tbody>
</table>

Contains 6.0 lb. a.i. chlorothalonil per gallon.

KEEP OUT OF REACH OF CHILDREN
CAUTION

ENVIRONMENTAL HAZARDS
This product is toxic to aquatic invertebrates and wildlife. DO NOT apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Drift and runoff may be hazardous to aquatic organisms in neighboring areas. DO NOT contaminate water when disposing of equipment washwater or rinsate.

Groundwater Advisory
Chlorothalonil is known to leach through soil into groundwater under certain conditions as a result of label use. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow.

Surface Water Advisory
This chemical can contaminate surface water through spray drift. Under some conditions, it may also have a high potential for runoff into surface water for several days to weeks after application. These include poorly draining or wet soils with readily visible slopes toward adjacent surface waters, frequently flooded areas, areas overlaying extremely shallow groundwater, areas with infield canals or ditches that drain to surface water, areas not separated from adjacent surface waters with vegetated filter strips, and areas overlaying tile drainage systems that drain to surface water.
DIRECTIONS FOR USE

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This Section 24(c) Special Local Need (SLN) labeling and the federal label for this product must be in the possession of the user at the time of application.
- Follow all applicable directions, restrictions, precautions, and Worker Protection Standard requirements on the EPA-registered label for Bravo Weather Stik, EPA Reg. No. 66222-276, and on this SLN label.
- Do not apply this product in a way that will contact workers or other persons, or pets either directly or through drift. Only protected handlers may be in the area during application.

<table>
<thead>
<tr>
<th>CROPS</th>
<th>DISEASES (Pathogen)</th>
<th>APPLICATION RATE</th>
<th>APPLICATION DIRECTIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spinach grown for seed</td>
<td>Cladosporium leaf spot <em>(Cladosporium variabile)</em></td>
<td>3.0 pints/acre</td>
<td>Apply as a broadcast foliar application in sufficient water to obtain good coverage on the foliage and stems. Apply when disease threatens and repeat every 7 to 14 days until conditions no longer favor disease development.</td>
</tr>
<tr>
<td>Swiss chard grown for seed</td>
<td>Stemphylium leaf spot <em>(Stemphylium botryosum)</em></td>
<td>(2.25 lb a.i./acre)</td>
<td>In spinach seed crops, begin applications immediately prior to initiation of pollen shed, as pollen enhances disease pressure.</td>
</tr>
<tr>
<td></td>
<td>Phoma leaf spot <em>(Phoma betae)</em></td>
<td></td>
<td>Applications of Bravo Weather Stik (chlorothalonil) may be alternated with fungicides that have site-specific modes of action to minimize the development of fungicide resistance.</td>
</tr>
<tr>
<td></td>
<td>Cercospora leaf spot <em>(Cercospora beticola)</em></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Restrictions/Precautions:**

- Do not enter or allow workers to enter treated areas during the restricted-entry interval (REI) of 12 hours.
- Do not apply more than 4 applications of Bravo Weather Stik per acre per year.
- Do not apply more than 12 pints of Bravo Weather Stik (9.0 lb a.i.) per acre per year.
- Do not apply this product by air, or through any type of irrigation system.
- This product must not be applied within 25 feet of marine/estuarine water bodies, unless there is an untreated buffer area of that width between the area to be treated and the water body.
- Sensitive Areas: The pesticide should only be applied when the potential for drift to adjacent sensitive areas (e.g., residential areas, bodies of water, known habitat for threatened or endangered species, non-target crops) is minimal (e.g., when wind is blowing away from the sensitive areas).
SPECIAL CROP USE RESTRICTIONS

• The pesticide applicator, the producer of the crop, and the seed conditioner must be aware that use of this product according to this labeling is deemed a non-feed/non-food use by the Oregon Department of Agriculture, and is regulated by Oregon Administrative Rule (OAR) 603-057-0535, Pesticide Use On Crops Grown For Seed. If the applicator of this pesticide is not the producer, the applicator must provide a copy of this labeling to the producer of the crop. Producers of this crop who use this product, or cause the product to be used on a field they operate, must provide a copy of this pesticide label to the seed conditioner.

• This pesticide does not have an established pesticide residue tolerance for this crop. Consequently, no portion of this seed crop may be used or distributed for food or feed for 1 year (365 days) after the last application of this product. This restriction pertains to, but is not limited to: green chop, forage, hay, pellets, meal, whole seed, cracked seed, straw, roots, bulbs, foliage or seed screenings, and to the grazing of the crop field, stubble or regrowth. All seed screenings shall be disposed of in such a manner that the screenings cannot be distributed or used for food or feed purposes, as indicated in OAR 603-057-0535. Additional regulations concerning seed screenings are stated in OAR 603-057-0535.

• Any seed from a field treated with this pesticide product shall bear specific and conspicuous container labeling, or if shipped in bulk, on the shipment invoice or bill of lading. The labeling shall contain the following statement:

"This seed was produced using one or more products for which the United States Environmental Protection Agency has not established pesticide residue tolerances. This seed, in whole, as sprouts, or in any form, may not be used for human consumption or animal feed. Failure to comply with this condition may violate requirements of the Federal Food and Drug Administration, the Oregon Department of Agriculture and other regulatory agencies."

Bravo Weather Stik is a registered trademark of ADAMA
10162020

Section 24(c) Registrant:
Makhteshim Agan of North America, Inc. d/b/a ADAMA
3120 Highwoods Blvd., Suite 100
Raleigh, NC  27604
October 16, 2020

Document Processing Desk (SLN)
Office of Pesticide Programs – 7504P
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC  20460-0001

RE: New Special Local Need Registration, EPA SLN No. OR-200014
   Product: Bravo Weather Stik® (a.i. chlorothalonil), EPA Reg. No. 66222-276
   Site: Spinach grown for seed and Swiss chard grown for seed
   Registrant: Makhteshim Agan of North America, Inc. d/b/a ADAMA

The Oregon Department of Agriculture (ODA) has approved SLN No. OR-200014, a Special
Local Need registration under FIFRA Section 24(c), to allow use of the Makhteshim Agan/ADAMA
product Bravo Weather Stik® (EPA Reg. No. 66222-276), for control of fungal leaf spot diseases
in spinach grown for seed and Swiss chard grown for seed in Oregon. The label and completed
EPA Form 8570-25 for this SLN registration are enclosed.

Western Oregon (along with western Washington) is the only region of the United States that is
suitable climatically for the production of high quality spinach and Swiss chard seed. However,
leaf spot diseases (e.g., Cladosporium, Stemphylium, Phoma) are common threats to western
Oregon's specialty seed producers, and can result in serious impacts to chard and spinach seed
yields. Makhteshim Agan/ADAMA has requested this FIFRA Section 24(c) registration of Bravo
Weather Stik to address the special local need of Oregon's specialty seed producers for an
additional fungicide to aid in control of these diseases.

ODA has received letters of support for this registration from Dr. Cindy Ocamb, Oregon State
University (OSU) Plant Pathologist, and Mr. Ted Hake, Research Director for the Specialty Seed
Growers of Western Oregon (SSGWO). According to Mr. Hake, SSGWO member growers
already benefit greatly from the use of chlorothalonil/Bravo Weather Stik on some of their other
seed crops (e.g., head and stem brassicas, cucurbits, onions), enabling them to produce disease
free, high quality crops with high seed germinability. The growers believe it is becoming more
important that they also have chlorothalonil available for use in their spinach and chard seed
crops, since some of the leaf spot diseases of concern have been showing resistance to other
currently labeled fungicides in some parts of the U.S.

The suite of protective fungicides currently registered for leaf spot disease control in Swiss chard
and spinach seed crops is very limited: Three mancozeb products under SLN registrations (OR-
020030/Dithane DF Rainshiel, OR-090016/Dithane F45 Rainshield, and OR-130003/Roper DF
Rainshiel); neem oil (Trilogy); Bacillus mycoides isolate J (LifeGard); and Bacillus
amyloliquefaciens strain D747 (Double Nickel LC). However, according to Dr. Ocamb of OSU,
neither Double Nickel nor LifeGard nor Trilogy provide a level of control comparable to either the
mancozeb formulations or chlorothalonil. Mr. Hake and Dr. Ocamb both point to the broad-
spectrum, multi-site mode of action of chlorothalonil as making it a valuable aid for managing leaf
spot in spinach and Swiss chard seed crops in Oregon, especially as part of an integrated
disease management program that includes multiple active ingredient deployment to reduce the
risk for development of fungicide resistance in these crops/diseases.
Chlorothalonil has shown efficacy against spinach and Swiss chard leaf spot diseases similar to that obtained with the registered alternative mancozeb, without significant effect on seed yield or seed germination, in field trials conducted by Washington State University. Furthermore, chlorothalonil has been used successfully on spinach and Swiss chard seed crops under FIFRA Section 24(c) registrations in our neighboring state of Washington since 1995 (originally under SLN No. WA-950036; currently under SLN No. WA-190001 for ADAMA's Bravo Weather Stik).

Spinach and Swiss chard crops grown for seed are regulated as nonfood/nonfeed crops under Oregon Administrative Rule (OAR) 603-057-0535, Pesticide Use On Crops Grown For Seed. The “Special Crop Use Restrictions” stated on the label for EPA SLN No. OR-200014 are reflective of the rule.

The seed rule: [http://arcweb.sos.state.or.us/pages/rules/oars_600/oar_603/603_057.html](http://arcweb.sos.state.or.us/pages/rules/oars_600/oar_603/603_057.html)

Outreach information regarding the seed rule: [http://www.oregon.gov/ODA/shared/Documents/Publications/PesticidesPARC/SeedOutreachPesticides.pdf](http://www.oregon.gov/ODA/shared/Documents/Publications/PesticidesPARC/SeedOutreachPesticides.pdf)

Please do not hesitate to contact me if you have any questions about this SLN.

Sincerely yours,

David L. Priebe
State Registration Specialist
Pesticides Program
Oregon Department of Agriculture
Phone: (503)986-4656
Fax: (503)986-4735
Email: dpriebe@oda.state.or.us

enclosures: EPA Form 8570-25
EPA SLN No. OR-200014 label

cc: Jessica Vigna, Makhteshim Agan/ADAMA
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Ted Hake, TH Ag Consulting/SSGWO
Robert B. McReynolds, Specialty Seed Growers of Western Oregon
Angie Smith, Willamette Valley Specialty Seed Association
Steve Foss, Washington State Department of Agriculture
Sherman Takatori, Idaho State Department of Agriculture
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Wendy Sue Wheeler, PICOL