FIFRA SECTION 24(c) – SPECIAL LOCAL NEED

FOR DISTRIBUTION AND USE ONLY WITHIN THE STATE OF WASHINGTON

HELM AGRO INTENDS THAT THIS PRODUCT WILL ONLY BE DISTRIBUTED BY THE PUGET SOUND SEED GROWERS ASSOCIATION TO CONTRACTED GROWERS

HELM AGRO
RO-NEET® HERBICIDE
EPA Reg. No. 74530-16
EPA SLN No. WA-XXXXXX WA-150004

This label for RO-NEET HERBICIDE expires and must not be distributed or used in accordance with this SLN registration after December 31, 2019.

DIRECTIONS FOR USE
• It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
• This labeling must be in the possession of the user at the time of application.
• Follow all applicable directions, restrictions, Worker Protection Standard requirements, and precautions on the EPA-registered label.

SPINACH GROWN FOR SEED: Apply 1/3 gallon of RO-NEET HERBICIDE (2 lbs. ai) in a minimum of 10 gallons of water per acre prior to planting. Use on sandy mineral soils only. Immediately (within minutes) after application thoroughly mix RO-NEET HERBICIDE into the soil to a depth of 2 to 3 inches. Whenever possible, application and incorporation should be done in the same operation. Use equipment which has been proven to incorporate thoroughly to the recommended depth. For a list of weeds controlled refer to the EPA-registered RO-NEET HERBICIDE label.

WEEDS CONTROLLED:

Annual bluegrass : Poa annua
Annual Ryegrass : Lolium multiflorum
Barley, volunteer : Hordeum spp.
Barnyardgrass (watergrass) : Echinochloa spp.
Crabgrass : Digitaria spp.
Foxtails : Setaria spp.
<table>
<thead>
<tr>
<th>Wild oats</th>
<th>Avena fatura</th>
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</thead>
<tbody>
<tr>
<td><strong>ANNUAL BROADLEAF WEEDS</strong></td>
<td></td>
</tr>
<tr>
<td>Black nightshade</td>
<td>Solanum nigrum</td>
</tr>
<tr>
<td>Hairy nightshade</td>
<td>Solanum villosum</td>
</tr>
<tr>
<td>Henbit, deadnettles</td>
<td>Lamium spp.</td>
</tr>
<tr>
<td>Lambsquarters</td>
<td>Chenopodium album</td>
</tr>
<tr>
<td>Nettleleaf goosefoot*</td>
<td>Chenopodium murale</td>
</tr>
<tr>
<td>Purslane common</td>
<td>Portulaca oleracea</td>
</tr>
<tr>
<td>Redroot pigweed</td>
<td>Amaranthus retroflexus</td>
</tr>
<tr>
<td>Shepherdspurse</td>
<td>Capsella bursa-pastoris</td>
</tr>
<tr>
<td>Small stinging nettle/</td>
<td>Urtica urens</td>
</tr>
<tr>
<td>Burning nettle</td>
<td></td>
</tr>
<tr>
<td>Velvetleaf**</td>
<td>Abutilon theophrasti</td>
</tr>
<tr>
<td>*California excluded</td>
<td></td>
</tr>
<tr>
<td><strong>Partial control or suppression only</strong></td>
<td></td>
</tr>
</tbody>
</table>

The above broadleaf weeds will be controlled only if application is made when conditions are favorable for germination. **RO-NEET HERBICIDE SELECTIVE HERBICIDE WILL NOT CONTROL ESTABLISHED OR GERMINATED WEEDS PRESENT AT APPLICATION.**

<table>
<thead>
<tr>
<th>PERENNIAL WEEDS</th>
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<tbody>
<tr>
<td>Yellow nutsedge</td>
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<tr>
<td>Purple nutsedge</td>
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</tbody>
</table>

Existing stands of nutsedge must be turned under and chopped thoroughly before treatment. Prior to planting, **RO-NEET HERBICIDE** must be thoroughly mixed into the soil or applied subsurface to the soil with injectors for nutsedge control.

**RESTRICTIONS / PRECAUTIONS:**

- The restricted entry interval (REI) for **RO-NEET HERBICIDE** is 48 hours. Do not allow entry by unprotected persons into the treated area during the REI.
- Make only one (1) application per growing season.
- For use under this SLN label do not apply this product through any type of irrigation system.
- Stunting and transient crop injury from **RO-NEET HERBICIDE** has been observed in spinach grown for seed. Crop injury may result from unfavorable environmental conditions.
- All spinach seed screenings shall be disposed of in such a way that they cannot be distributed or used for human food or animal feed. The seed conditioner shall keep records of screening disposal for three years from the date of disposal and shall furnish the records to the director immediately upon request. Conditioner disposal records shall consist of documentation of on-farm disposal, disposal at a controlled dumpsite, incinerator, composter, or other equivalent disposal site and shall include the lot numbers, amount of material disposed of, the grower(s), and the date of disposal.
- No portion of the spinach seed plant, including but not limited to green chop, hay, pellets, meal, whole seed, cracked seed, roots, bulbs, leaves and seed screenings may be used or distributed for food or feed purposes.
• Spinach seed shall bear a tag or container label which forbids use of the seed for human consumption or animal feed.
• Spinach seed may not be distributed for human consumption or animal feed.
• For Use on Sandy Mineral Soils Only.

**WSDA CONTAINER DISPOSAL GUIDANCE:**
Pesticide containers must be properly cleaned prior to disposal. The best time to clean empty pesticide containers is during mixing and loading, because residue can be difficult to remove after it dries. Triple rinse (or pressure rinse) the pesticide container, empty all pesticide rinse water into the spray tank, and apply to a labeled crop or site. Recycling cleaned containers is the best method of container disposal. Information regarding the recycling of empty and cleaned plastic pesticide containers in Washington is available on the WSDA Waste Pesticide Program web site at [http://agr.wa.gov/PestFert/Pesticides/WastePesticide.aspx](http://agr.wa.gov/PestFert/Pesticides/WastePesticide.aspx). Cleaned containers may also be disposed of in a sanitary landfill, if permitted by the county. Burning is not a legal method of container disposal in Washington.

**HELM AGRO’S Special Conditions and Disclaimer for use of Ro-Neet Herbicide on Spinach Grown for Seed**

HELM AGRO intends that this Section 24(c) label be distributed by the Puget Sound Seed Growers Association only to end users and/or growers who agree in writing to the terms and conditions required by the Puget Sound Seed Growers Association including a waiver and release from all liability and indemnification by the user and/or grower of HELM AGRO, Puget Sound Seed Growers Association, and others for failure to perform and crop damage from the use of RO-NEET HERBICIDE on spinach grown for seed. If such terms and conditions are unacceptable, return RO-NEET HERBICIDE at once unopened.

This product when used on spinach grown for seed may lead to injury, loss, or damage. HELM AGRO recommends that the user and/or grower test this product in order to determine its suitability for such intended use. The Puget Sound Seed Growers Association and HELM AGRO make this product available to the user and/or grower solely to the extent the benefit and utility, in the sole opinion of the user and/or grower, outweigh, the extent of potential injury associated with the use of this product. The decision to use or not to use this RO-NEET HERBICIDE must be made by each individual RO-NEET HERBICIDE user and/or grower on the basis of possible crop injury from the RO-NEET HERBICIDE , the severity of weed infestation, the cost of alternative weed controls and other factors. HELM AGRO intends that because of the risk of failure to perform or crop damage that all such use is at the user’s and/or grower’s risk, to the extent consistent with applicable law.

This Special Conditions and Disclaimer statement is required by HELM AGRO and is not required by the USEPA or the WSDA.

**RO-NEET HERBICIDE** is a trademark of Helm Agro US, Inc.
24(c) Registrant:
1. Name and Address of Applicant for Registration
Helm Agro US, Inc.
4042 Park Oaks Blvd., Suite 330
Tampa, FL 33610

2. Product is (Check one)

3. Active ingredients(s) in Product
Cycloate

4. Product Name
Ro-Neel Herbicide

5. If this is a food/feed use, a tolerance or other residue clearance is required. Cite appropriate regulations in 40 CFR Part 180, 185, and/or 186.

6. Type of Registration (Give details in Item 13 or on a separate page, properly identified and attached to this form):

7. Nature of Special Local Need (check one)
There is no pesticide product registered by EPA for such use.
There is no EPA-registered pesticide product which, under the conditions of use within the State, would be so safe and/ or efficacious for such use within the terms and conditions of EPA registration.

8. If this registration is an amendment to an EPA-registered product, is it for a "new use" as defined in 40 CFR 152.3?
Yes (choose Item 12 below) No

9. Has an EPA Registration or Experimental Use Permit for this chemical ever been offered for sale or issued, if known:

10. Has FIFRA section 24(c) registration for this use of the product ever, by another State, been (check appropriate boxes), if known:

11. Endangered Species Act: (Give details in Item 13 or on a separate page, properly identified and attached to this form) Identify the counties where this pesticide will be used. If Statewide, indicate "all.

12. Indicate use status of Special Local Need, i.e., planned dates of use:
From: 8/1/2014 To: 12/31/2019

13. Comments (attach additional sheet, if needed)

Determination by State Agency
This registration is for a Special Local Need and is being issued in accordance with section 24(c) of FIFRA, as amended. To the best of our knowledge, the information above is correct except as noted in "Comments" below or in attachments.

Name, Title, and Address of State Agency Official
William "Eddie" Simons
Registration Specialist
WSDA, Pesticide Management Division
PO Box 42560
Olympia, WA 98504-2560

Comments (by State Agency Only)
Replacement for SLN #WA-020003
Non-Food/Non-Feed use
Spinach Grown for Seed
April 1, 2015

Tawanda Maignan, Team Leader
Risk Integration, Minor Use, and Emergency Response Branch
U.S. EPA Office of Pesticide Programs (7505 P)
Room S4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA  22202

RE:  EPA SLN Registration Number WA-150004

Dear Tawanda,

Enclosed is Washington Special Local Need (SLN) registration number WA-150004 issued to Helm Agro US for the use of RO-NEET Herbicide (EPA Reg. No. 74530-16) on spinach grown for seed for control of annual weeds. This registration was issued under authority of Section 24(c) FIFRA.

There is a special local need in Washington for the use of Cycloate to control annual weeds in spinach grown for seed. Other products are either not labeled for this use or not as effective as Cycloate on the target weeds. This SLN registration is being issued as an eventual replacement for WA-020003 which has expired and is expected to be cancelled. Washington State University has given its support of this use through a letter from Dr. Timothy Miller, Weed Scientist at WSU Northwestern Washington Research and Extension Center.

A tolerance for residues of Cycloate on spinach grown for seed is not required, since these crops are considered to be non-food uses in Washington (Washington Administrative Code 16-228-1270).

WSDA has issued this SLN registration with an expiration date of December 31, 2019.

If you have any questions, please contact me at (360) 902-2031 or by e-mail at esimons@agr.wa.gov.

Sincerely,

PESTICIDE MANAGEMENT DIVISION
William “Eddie” Simons
Registration Specialist

Enclosures

cc: Barbarette Young-Henry, Wagner Regulatory Associates
Dr. Tim Miller, Washington State University