

MAY 10 2000

David L. Rodriguez
American Cyanamid Company
P.O. Box 400
Princeton, NJ 08543-0400

Dear Mr. Rodriguez:

Subject: Fall Application
Backdraft herbicide
EPA Registration No 241-407
Your Submission Dated April 24, 2000

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable provided that you:

1. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

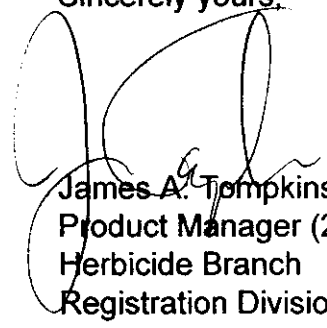
- The phrase "soybeans should be planted in the spring" implies that other crops may be planted. Modify the statement wherever it appears on the label to read similar to the following:

Roundup Ready soybeans must be planted in the Spring following the fall application of BACKDRAFT.

2. Submit one (1) copy of your final printed labeling before you release the product for shipment.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

A handwritten signature in black ink, appearing to read "James A. Tompkins", is written over the typed name and title.

James A. Tompkins
Product Manager (25)
Herbicide Branch
Registration Division (7505C)

Enclosure



Supplemental Labeling

ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAY 10 2000

EPA Reg. No. 241-407

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 241-407

FOR USE ON ROUNDUP¹ READY SOYBEANS

THIS LABEL EXPIRES DECEMBER 31, 2002

FALL APPLICATION OF BACKDRAFT IN A PLANNED SEQUENTIAL PROGRAM USING ROUNDUP¹ ULTRA ON ROUNDUP READY SOYBEANS

FOR DISTRIBUTION AND USE ONLY IN THE STATES OF DELAWARE, ILLINOIS, INDIANA, IOWA, KANSAS, MARYLAND, MICHIGAN, MINNESOTA, MISSOURI, NEBRASKA, OHIO, PENNSYLVANIA, VIRGINIA, WEST VIRGINIA AND WISCONSIN (SEE USE AREA)

OBSERVE ALL PRECAUTIONARY STATEMENTS IN THE BACKDRAFT AND ROUNDUP ULTRA LABELING BEFORE USING. SEE THE BACKDRAFT LEAFLET LABEL FOR PRECAUTIONS, WORKER PROTECTION STANDARD REQUIREMENTS, APPLICATION INFORMATION, WEEDS CONTROLLED, USES WITH OTHER PRODUCTS AND ROTATIONAL CROP RESTRICTIONS.

DIRECTION FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product through any type of irrigation system.

This labeling must be in the possession of the user at the time of herbicide application.

Apply BACKDRAFT after October 31, and prior to ground freeze-up in the winter. Fall applications of BACKDRAFT will control existing weeds and provide residual control of winter annual weeds and early spring germinating weeds in soybeans. See the BACKDRAFT label for a complete list of weeds controlled.

Roundup Ready soybeans should be planted in the spring following the fall application of BACKDRAFT. If weeds emerge in-season, Roundup Ultra may be applied postemergence for weed control.

Refer to the BACKDRAFT product label for additional information on application instructions.

USE RATE

Apply BACKDRAFT at the rate of 4 pints per acre. If heavy grass or waterhemp pressure is expected, add PROWL[®] 3.3 EC herbicide to the spray mixture. See the PROWL 3.3 EC label for appropriate rates.

(See reverse side)

GENERAL INFORMATION

BACKDRAFT provides control of many broadleaf and grass weeds when applied preplant or preemergence. BACKDRAFT may be applied in the late fall for control of weeds in no-till or conventional soybeans, rather than in the spring prior to planting. Treated areas should be planted to Roundup Ready soybeans in the following spring, and, if required, Roundup Ultra applied in-season in a planned sequential program.

USE AREA

Fall applications of BACKDRAFT may be made only in the states of Delaware, Illinois, Indiana, Iowa, Kansas, Maryland, Michigan, Minnesota (south of state highway 210), Missouri, Nebraska, Ohio, Pennsylvania, Virginia, West Virginia and Wisconsin.

ROTATIONAL CROP INFORMATION

Refer to rotational crop restrictions listed in the BACKDRAFT product label.

NOTE: For fall applications of BACKDRAFT, adjust the rotational crop intervals by basing the interval on the date of soybean planting rather than the date of herbicide application.

Use of BACKDRAFT herbicide in accordance with label directions is expected to result in normal growth of rotational crops in most situations; however, various environmental and agronomic factors make it impossible to eliminate all risks associated with the use of this product and, therefore, rotational crop injury is always possible.



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¹Trademarks of Monsanto Agricultural Products Company

PE-XXXX 4/13/00