



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

March 27, 2020

Joshua Wood  
Regulatory Affairs Specialist  
SePRO Corporation  
11550 North Meridian Street Suite 600  
Carmel, IN 46032

Subject: Registration Review Label Mitigation for Flurprimidol  
Product Name: Cutless 10W  
EPA Registration Number: 67690-14  
Application Date: December 14, 2018  
Decision Number: 560953

Dear Mr. Wood:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Flurprimidol Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

A copy of your label stamped "Accepted" is enclosed. Products shipped after 12 months from the date of this amendment must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

Page 2 of 2  
EPA Reg. No. 67690-14  
Decision No. 560953

If you have any questions about this letter, please contact Srijana Shrestha by phone at 703-305-6471, or via email at [shrestha.srijana@epa.gov](mailto:shrestha.srijana@epa.gov).

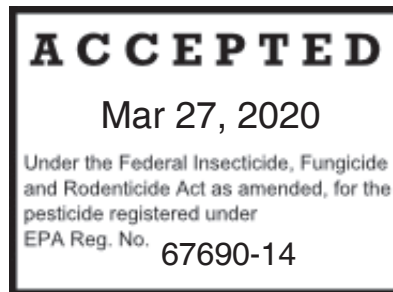
Sincerely,

A handwritten signature in blue ink, appearing to be "Linda Arrington", with a stylized flourish at the end.

Linda Arrington, Branch Chief  
Risk Management and Implementation Branch 4  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

Enclosure

[Front label for Non-refillable, rigid containers, any size]



# Cutless<sup>®</sup> 10W

## Specialty Plant Growth Regulator

A systemic plant growth regulator for terminal growth suppression in shrubs, hedges and perennial ground covers, resulting in a more compact growth form and reduced trimming.

### Active Ingredient

Flurprimidol:  $\alpha$ -(1-methylethyl)-  $\alpha$  -[4-(trifluoromethoxy)-phenyl]-5-pyrimidinemethanol ..... 10%

**Inert Ingredients** ..... 90%

**Total** ..... 100%

Contains 0.05 ounce (14.2 grams) active ingredient per 1/2 ounce water-soluble packet (0.1 lb active ingredient per pound product).

## Keep Out of Reach of Children CAUTION / PRECAUCIÓN

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

**Refer to label booklet for additional Precautionary Information and Directions for Use including First Aid, and Storage and Disposal.**

**Notice:** Read the entire label before using. Use only according to label directions. **Before buying or using this product, read *Warranty Disclaimer* and *Misuse* statements in label booklet. If terms are unacceptable, return at once unopened.**

**Specialty Chemical:** Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 67690-14  
FPL 20190724

EPA Est. No. \_\_\_\_\_  
[P/N] \_\_\_\_\_

Cutless is a registered trademark of SePRO Corporation

**SePRO Corporation 11550 N. Meridian Street, Suite 600 Carmel, IN 46032, U.S.A.**

[Plant Growth Regulator]

Net weight \_\_\_\_\_ (Non-refillable)

[Label booklet text, ALL containers]

<b>First Aid</b>	
<b>If swallowed</b>	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>If in eyes</b>	<ul style="list-style-type: none"><li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li><li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If on skin</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If inhaled</b>	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
<b>HOTLINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency endangering health or the environment involving this product, call <b>INFOTRAC</b> at <b>1-800-535-5053</b> .	

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## **PRECAUTIONARY STATEMENT**

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### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**Caution. Harmful if swallowed, inhaled or absorbed through the skin. Avoid contact with skin, eyes, or clothing. Avoid breathing dust or spray mist. Wash thoroughly with soap and water before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.**

### **PERSONAL PROTECTIVE EQUIPMENT (PPE)**

#### **Applicators and other handlers must wear:**

- Eye protection such as goggles or face shield;
- Long-sleeved shirt and long pants or coveralls;
- Chemical-resistant gloves
- Shoes plus socks.

#### **User Safety Requirements**

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

## **ENVIRONMENTAL HAZARDS**

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

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## **DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read all Directions for Use carefully before applying.

**Note to User: Packets containing Cutless 10W are water-soluble. Do not allow packet to become wet prior to use. Do not handle with wet hands. Reseal container to protect remaining packets.**

## **POLLINATOR ADVISORY STATEMENT**

Protect forage and habitat of pollinators including the monarch butterfly (and its larvae), birds, and bats by following label directions, and making only directed applications.

## **INFORMATION FOR GROWTH REGULATION OF SHRUBS, HEDGES, AND PERENNIAL GROUND COVERS**

Cutless 10W is a systemic plant growth regulator for use on shrubs, hedges and perennial ground covers. Treated plants require less trimming and exhibit a more compact growth form. Growth suppression is achieved by inhibition of gibberellin biosynthesis resulting in reduced internode elongation in terminal shoot growth. Smaller leaves and intensified greening occur in some species. Plant uptake may occur from foliage or by root absorption. Cutless 10W absorbed by plant roots is translocated to above-ground growing points within water conducting tissues. Movement in plants occurs in response to evaporative water loss (transpiration) from leaf surfaces.

Time required for onset of growth suppression may vary from 1 to 2 weeks for herbaceous species up to an entire growing season for certain woody plants. Time from application until onset of growth regulation depends on the rate of water loss from foliage and the rate of water movement through woody stems. In general, growth suppression will be slower to appear and of longer duration in plants with a larger mass of woody tissue. Duration of growth suppression may range from 1 to 3 or more growing seasons. Cutless 10W may not be effective on species with high concentrations of oils, resins or latex materials in stem tissues.

The amount of Cutless 10W required for optimum growth regulation is dependent upon plant characteristics (stem mass, height and foliage volume), environmental setting (exposure to sunlight, temperature conditions, rainfall/irrigation and soil texture), and species tolerance. Because of these interacting factors, plant response to a given application rate of Cutless 10W

may vary according to local conditions. Users should establish specific application rates for different species in small scale treatments under actual use conditions.

Activation of Cutless 10W requires at least 1/2 inch of rainfall or sprinkler irrigation. Periodic rainfall or irrigation is needed to maintain uniform growth regulation activity. Avoid irrigation in excess of plant requirements.

### **Use Restrictions**

- **DO NOT** use Cutless 10W on trees.
- **DO NOT** use Cutless 10W on plants from which fruits, nuts or other commodities may be produced for human consumption or livestock feed.
- **DO NOT** apply to annual bedding plants.
- **DO NOT** allow runoff to occur during initial irrigation of treated areas.
- **Chemigation:** Do not apply this product through any type of chemigation system.
- **DO NOT** make aerial applications..
- The maximum number of annual applications is determined by the sum of the rates applied, not to exceed 3.0 lbs. a.i./A or 30 lbs Cutless 10W (2-11 applications/year over a contiguous acre).

### **Use Precautions**

- Apply only on vigorous, well-established plantings.
- Avoid application when weather conditions favor movement of spray drift from treatment area.

**Note:** Nontarget plants with roots which extend into soil containing Cutless 10W may exhibit growth regulation. **Antidote:** Gibberellin may be applied as an antidote to stimulate terminal shoot growth of over-regulated plants.

## **APPLICATION DIRECTIONS**

### **Application Timing**

Apply to woody plants from 1 month before until 1 month after budbreak or onset of seasonal growth. If applied to deciduous woody plants after leaves are fully expanded, growth regulation may not be effective until the following year. Allow time for growth regulation effects to be fully expressed (up to 1 year) before making a follow-up application to any woody plant. Apply to herbaceous perennial ground covers from onset of seasonal growth until mid-season. Growth regulation from applications made late in the growing season may not be effective until the following year.

### **Reapplication**

To avoid over-application, make repeat applications only after growth regulation from the initial treatment is fully expressed (up to 1 year is required in woody plants). Reapply Cutless 10W only when growth regulation begins to decline from a desired level. Repeat application at a reduced rate may be sufficient to maintain a desired level of growth control.

## Application Rates

Starting rates for Cutless 10W treatments are as follows:

- Woody ornamentals - 2 to 4 ounces per 1000 sq. ft. (0.54 to 1.08 lb a.i./A), depending on the mass of woody tissue present.
- Perennial non-woody ground covers - 1 to 2 ounces per 1000 sq. ft. (0.27 to 0.54 lb a.i./A).

## Determining the Amount of Cutless 10W Required

Choose the application rate (see starting rates above) required for the type of vegetation to be treated and desired level of growth suppression. Refer to Table 1 below to determine the number of water-soluble packets required. Alternative methods for determining the number of packets required to treat an area at a given application rate are provided. Use the "Area-Based Method" if the area to be treated is less than 1000 sq. ft. or the "Packet-Based Method" if the area to be treated is greater than 1000 sq. ft.

<b>Application Rate (oz/1000 sq ft)</b>	<b>Area (sq ft) Per 0.5 oz Packet at Specified Rate</b>	<b>Number of 0.5 oz Packets Required Per 1000 sq ft at Specified Rate</b>
1	500	2
2	250	4
3	167	6
4	125	8

## Mixing and Application

Apply Cutless 10W in a spray volume of at least 0.5 gallon per 100 sq. ft. (1 gallon per 200 sq. ft.). Determine the amount of spray volume required. Add the correct number of water-soluble packets to the spray tank, allow the water-soluble packets to dissolve completely and mix thoroughly. If backpack equipment is used, shake the spray tank to insure thorough mixing and repeat every few minutes while applying to maintain a uniform spray mixture. If power equipment is used, agitate continuously.

Apply Cutless 10W spray uniformly over the treatment area. Use low pressure and coarse spray to prevent drift to nontarget plants. Sprays may be applied over the top of low growing woody plants and perennial ground covers or directed at the soil beneath shrubs or hedges.

## Irrigation

More uniform and consistent results will be obtained if treated areas are irrigated with a minimum of 1/2 inch of overhead sprinkler irrigation within 24 hours of application (avoid runoff during initial irrigation).

## Cleanup

Traces of Cutless 10W may be removed from application equipment with isopropyl (rubbing) alcohol. Thoroughly clean application equipment before use with other products to prevent growth regulation of nontarget vegetation.

## SPRAY DRIFT MANAGEMENT

Applications must be made only when there is no hazard for spray drift. Very small quantities of spray, which may not be visible, may seriously injure susceptible plants. Applicators are required to use a medium or coarser droplet size (according to ASABE standard 572). **When using ground application equipment, apply with nozzle height no more than 2 feet above the target plants. Do not apply when wind speeds exceed 10 miles per hour at the application site. Do not apply during temperature inversions.**

## SPRAY DRIFT ADVISORIES

The interaction of many equipment and weather-related factors determines the potential for spray drift. The applicator is responsible for considering all these factors when making application decisions.

### Importance of Droplet Size

An effective way to reduce spray drift is to apply large droplets. The best drift management strategy is to apply the largest droplets that provide sufficient coverage and control. The presence of sensitive species nearby, the environmental conditions, and pest pressure may affect how an applicator balances drift control and coverage. Applying larger droplets reduces drift potential, but will not prevent drift if applications are made improperly or under unfavorable environmental conditions. See Wind, Temperature, and Humidity, and Temperature Inversions sections of this label.

### *Techniques for Controlling Droplet Size – Ground Boom*

- Volume - Use high flow rate nozzles to apply the highest practical spray volume. Nozzles with higher rated flows produce larger droplets.
- Pressure - Use the lower spray pressures recommended for the nozzle. Higher pressure reduces droplet size and does not improve canopy penetration. When higher flow rates are needed, use a higher-capacity nozzle instead of increasing pressure.
- Nozzle Type - Use a nozzle type that is designed for the intended application. With most nozzle types, narrower spray angles produce larger droplets. Consider using low-drift nozzles.

### Boom Height

Setting the boom at the lowest referenced height (if specified) which provides uniform coverage reduces the exposure of droplets to evaporation and wind. For ground equipment, the boom should remain level with the crop and have minimal bounce.

### Wind

Drift potential increases at wind speeds of less than 3 mph (due to inversion potential) or more than 10 mph. However, many factors, including droplet size and equipment type determine drift potential at any given wind speed. Avoid applications during gusty or windless conditions.



Note: Local terrain can influence wind patterns. Every applicator must be familiar with local wind patterns and how they affect spray drift.

### **Temperature and Humidity**

When making applications in hot and dry conditions, set up equipment to produce larger droplets to reduce effects of evaporation.

### **Temperature Inversions**

Drift potential is high during a temperature inversion. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however, if fog is not present, inversions can also be identified by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing.

### **Shielded Sprayers**

Shielding the boom or individual nozzles can reduce the effects of wind. However, it is the responsibility of the applicator to verify that the shields are preventing drift and not interfering with uniform deposition of the product.

### **RUNOFF PREVENTION**

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when excessive rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

### **STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage or disposal.

**Pesticide Storage:** Store in original container only.

**Pesticide Disposal:** Wastes resulting from the use of this product which cannot be used according to label directions should be disposed of at an approved waste disposal facility.

#### **Container Handling**

**Nonrefillable Container Handling (rigid, any size):**

**(Fiber Carton/Drum and Foil Overpack, nonrefillable container):** Do not reuse or refill this container. Offer for recycling if available. If recycling not available for fiber carton/drum, then dispose of both foil overpack and drum/carton in a sanitary landfill or incinerator, or by other procedures approved by state and local authorities.

**Warranty Disclaimer:** SePRO Corporation warrants that this product conforms to the chemical description on the product label. Testing and research have also determined that this product is reasonably fit for the uses described on the product label. To the extent consistent with applicable law, SePRO Corporation makes no other express or implied warranty of fitness or merchantability nor any other express or implied warranty and any such warranties are expressly disclaimed.

**Misuse:** Federal law prohibits the use of this product in a manner inconsistent with its label directions. To the extent consistent with applicable law, the buyer assumes responsibility for any adverse consequences if this product is not used according to its label directions. In no case shall SePRO Corporation be liable for any losses or damages resulting from the use, handling or application of this product in a manner inconsistent with its label.

For additional important labeling information regarding SePRO Corporation's Terms and Conditions of Use, Inherent Risks of Use and Limitation of Remedies, please visit <http://seprolabels.com/terms> or scan the image below.



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[Base label for Non-refillable, rigid containers, any size]



# Cutless<sup>®</sup> 10W

Specialty Plant Growth Regulator

## Active Ingredient

Flurprimidol:  $\alpha$ -(1-methylethyl)- $\alpha$ -[4-(trifluoromethoxy)-phenyl]-5-pyrimidinemethanol ..... 10%

**Inert Ingredients** ..... 90%

**Total** ..... 100%

Contains 0.5 ounce (14.2 grams) active ingredient per 1/2 ounce water-soluble packet. (0.1 lb active ingredient per pound product.)

## Keep Out of Reach of Children

## CAUTION / PRECAUCIÓN

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## PRECAUTIONARY STATEMENTS

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### Hazards to Humans and Domestic Animals

**Harmful if swallowed, inhaled or absorbed through the skin. Avoid contact with eyes, skin, or clothing. Avoid breathing dust or spray mist. After handling, wash hands thoroughly with soap and water before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash before reuse.**

### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

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**Specialty Chemical:** Do not ship or store with food, feeds, drugs or clothing.

**Refer to label booklet for additional Precautionary Information, including First Aid and Directions for Use.**

**Notice:** Read the entire label before using. Use only according to label directions.  
**Before buying or using this product, read *Warranty Disclaimer* and *Misuse* statements in label booklet. If terms are unacceptable, return at once, unopened.**

EPA Reg. No. 67690-14  
FPL 20190724

[P/N]\_\_\_\_\_

EPA Est. No. \_\_\_\_\_

Cutless is a registered trademark of SePRO Corporation

**SePRO Corporation 11550 N. Meridian Street, Suite 600 Carmel, IN 46032, U.S.A.**

**Plant Growth Regulator**

**Net Weight \_\_\_\_\_ (Non-refillable)**

[Text accessed through the weblink / QR code. This is NOT part of the printed label]

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## **TERMS AND CONDITIONS OF USE**

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If terms of the *Warranty Disclaimer* and *Misuse* provisions on the product label as well as the *Inherent Risks of Use* and *Limitation of Remedies* statements below are not acceptable, return unopened package at once to the seller for a full refund of purchase price paid. Otherwise, to the extent consistent with applicable law, use by the buyer or any other user constitutes acceptance of the terms under *Warranty Disclaimer*, *Misuse*, *Inherent Risks of Use*, and *Limitation of Remedies*.

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## **INHERENT RISKS OF USE**

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It is impossible to eliminate all risks associated with use of this product. Plant injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including use under conditions noted on the label such as unfavorable temperatures, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), the presence of other materials, the manner of application, or other factors, all of which are beyond the control of SePRO Corporation or the seller. To the extent consistent with applicable law, all such risks shall be assumed by the buyer and/or user of the product.

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## **LIMITATION OF REMEDIES**

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To the extent consistent with applicable law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories) shall be limited to, at SePRO Corporation's election, one of the following:

1. Refund of purchase price paid by buyer or user for product bought, or
2. Replacement of amount of product used.

To the extent consistent with applicable law, SePRO Corporation shall not be liable for losses or damages resulting from handling or use of this product unless SePRO Corporation is promptly notified of such losses or damages in writing. In no case shall SePRO Corporation be liable for consequential or incidental damages or losses.

The terms of the *Warranty Disclaimer* and *Misuse* provisions on the product label and these *Terms and Conditions of Use*, *Inherent Risks of Use* and *Limitation of Remedies* cannot be varied by any written or verbal statements or agreements. No employee or sales agent of SePRO Corporation or the seller is authorized to vary or exceed the terms of the *Warranty Disclaimer* and *Misuse* provisions on the product label and these *Terms and Conditions of Use*, *Inherent Risks of Use* and *Limitation of Remedies* in any manner.