



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

May 1, 2020

Joshua Wood  
Regulatory Affairs Specialist  
SePRO Corporation  
11550 North Meridian Street Suite 600  
Carmel, IN 46032-4565

Subject: Registration Review Label Mitigation for Flurprimidol  
Product Name: Cutless Tree Implant  
EPA Registration Number: 67690-18  
Application Date: December 14, 2018  
Decision Number: 562361

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. 67690-18  
Decision No. 562361

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).

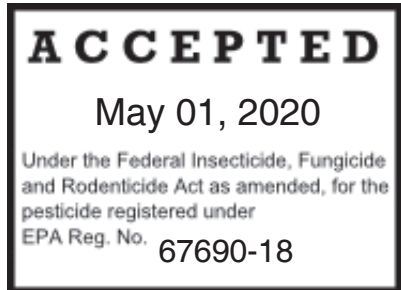
Sincerely,

A handwritten signature in blue ink, appearing to read '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> Tree Implant

A trunk implanted plant growth regulator for the reduction of terminal growth and biomass production of non-crop trees.

### Active ingredient

Flurprimidol: a-(1-methylethyl)-a-4-(trifluoromethoxy)-phenyl]-5-pyrimidinemethanol ..... 93.6%

**Other Ingredients** ..... 6.4%

**Total** ..... 100.0%

Each Cutless<sup>®</sup> Tree Implant contains 0.035 ounce (1 gram) of active ingredient.

## 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. 67690-18  
FPL 20181203

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.**

**Tree Growth Regulator**

**Contains 250 Implants**

[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 or clothing</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 life or property involving this product, call <b>INFOTRAC</b> at <b>1-800-535-5053</b> .	

---

## **PRECAUTIONARY STATEMENTS**

---

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

**Caution. Harmful if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and 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:**

- Long-sleeved shirt and pants;
- Shoes plus socks; and
- Chemical-resistant gloves (such as natural rubber or barrier laminate).

#### **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.

## USER SAFETY RECOMMENDATIONS

### Users should:

- Wear chemical resistant gloves when handling this product.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing.

## ENVIRONMENTAL HAZARDS

Application by methods other than as a tree implant may cause growth regulation effects in nontarget plants. 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 cleaning equipment or disposing of equipment washwaters.

---

## 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.

**Not for use on trees being grown for sale or other commercial use, or for commercial seed production, or for the production of timber or wood products, or for research purposes.**

## PRODUCT INFORMATION

Cutless<sup>®</sup> Tree Implant is a plant growth regulator recommended for growth suppression in a variety of non-crop tree species. It reduces vegetative growth and can significantly reduce the volume of biomass that must be removed from trees when trimming occurs.

Growth suppression is achieved through inhibition of gibberellin biosynthesis resulting in reduced internodal elongation in terminal shoot growth. Smaller leaves and intensified greening occur in some species. The product is translocated from the implant through the xylem to growing leaves and stems and provide long-term growth suppression.

For best results, install Cutless<sup>®</sup> Tree Implants just prior to or during the most rapid period of water uptake when trees are actively transpiring. This period occurs from one month prior to bud swell to just before color change in the fall. Applications during the dormant season are also acceptable. Where pruning is required, best results may be achieved when application is made prior to or in conjunction with pruning. **Growth suppression may not be evident until the year following treatment.** Repeat applications can be made once growth regulator effects start to decline. In follow-up treatments, reduced application rates may be enough on certain species to avoid over-regulation of terminal growth.

## Use Restrictions

- **DO NOT** reapply until growth reduction symptoms begin to disappear. Reduce rates for trees that have experienced heavy crown removal.
- **DO NOT** apply to trees with large wounds, lightning strikes, dead portions of crown, general poor health and vigor, or disease.
- **DO NOT** apply to sugar maple trees or any other trees that may be tapped for sugar.
- **DO NOT** apply to fruit or nut trees which may be harvested for food or feed.
- **DO NOT** apply to trees under severe stress from drought.

## Tree Implant Techniques

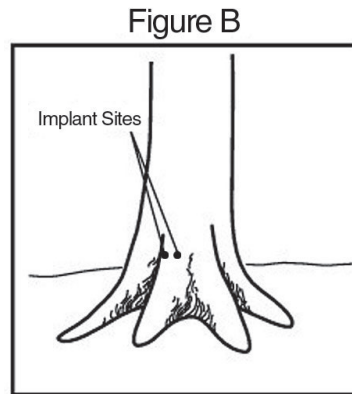
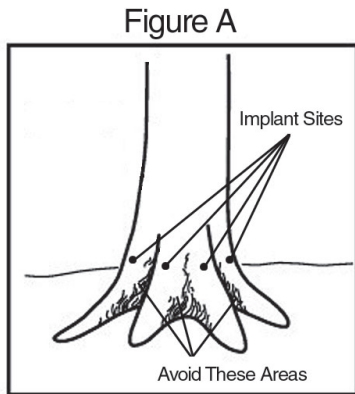
Install Cutless® Tree Implants in a manner which results in even distribution of the active ingredient throughout the above ground portion of the tree. Measure the tree diameter approximately 4.5 feet above the ground to determine the number of implants and the dosage in grams of active ingredient per inch of diameter required to treat the tree.

Space the holes for implants evenly around tree near the ground line. Avoid regions directly over girdling roots or adjacent to trunk damage abrasions and stem defects. Whenever possible, place implants directly above a buttress root in the crown of the flare (A). If a large flare exists, place two or more implants in the same flare but in the sides of the root so that placement is directly into the shoulders (B). While the ideal implant spacing interval is six to eight inches, the spacing can be altered to avoid centering in the sinus between buttresses. If an excessive amount of holes are needed for the high rates (1.0 and 1.5 gram) two implants can be inserted at the same entry point by drilling a "V" and placing one implant in each side of the "V".

Firmly seat each implant into the tree trunk one inch below the bark. Holes should be drilled with a 3/8" self centering (brad point) spiral bit. Stop collars or tape can be used to set hole depths (1 inch plus bark thickness) on the drill bit. Each hole should be filled or flushed with water from a squirt bottle prior to implant insertion.

Implants can be installed anytime of the year. However, best results may be achieved when placed in the tree during active growth or 2-3 months prior to active growth. During periods when trees are in full leaf, best results may be obtained if installation is made when moisture stress is low. This can be accomplished by installing implants after significant rainfall/irrigation; or in early morning to avoid moisture stress induced by transpiration moisture loss in mid-day.

Holes may be covered with bark dressing or colored latex caulk. Use sparingly (just enough to seal hole). **Do not apply pressure and enclose the implant.**



### Application Rates for Cutless® Tree Implants

Each Cutless® Tree Implant contains a measured dose of growth regulator (1 gram of active ingredient). Use the table below to determine the number of implants to be placed in each tree according to tree diameter. Trees which have been heavily pruned and have small crowns relative to diameter should receive the low rates within the appropriate species group. Trees not specifically identified on this label may be treated if all other label recommendations are followed. The maximum number of trees that can be treated is determined by the total number of implants applied, not to exceed 3.0 lbs ai/A or 1360 Cutless Tree Implants/A (30-453 tree/A/year).

Diameter of Tree 4 ft Above the Ground (inches)	<u>Group 1</u> Required Number of Implants per Tree		<u>Group 2</u> Required Number of Implants per Tree	
	0.50g Rate	0.75g Rate	1.00g Rate	1.50g Rate
6	3	4	6	9
7	3	5	7	10
8	4	6	8	12
9	4	7	9	13
10	5	7	10	15
11	6	8	11	16
12	6	9	12	18
13	7	10	13	19
14	7	10	14	21
15	8	11	15	22
16	8	12	16	24
17	9	13	17	26
18	9	13	18	27
19	10	14	19	28
20	10	15	20	30
21	11	16	21	31
22	11	16	22	33
23	12	17	23	34

24	12	18	24	36
25	13	19	25	37
26	13	19	26	39
27	14	20	27	40
28	14	21	28	42
29	15	22	29	43
30	15	22	30	45

<b><u>Group 1 Species</u></b>		<b><u>Group 2 Species</u></b>
Alder Red	Maple, Norway	Aspen
Ash	Maple, Red	Cottonwood
Black Olive	Maple, Silver	Melaleuca
Black Cherry	Maple, Sugar	Sycamore
Black Locust	Oak, Laurel	Willow, Black
Black Walnut	Oak, Live	
Box Elder	Oak, Pin	
Dogwood	Oak, Post	
Elm, American	Oak, Red	
Elm, Chinese	Oak, Southern Red	
Elm, Siberian	Oak, Water	
Elm, Winged	Oak, Willow	
Blue Gum Eucalyptus	Sugarberry	
Hackberry	Sweetgum†	

† Do not exceed the 0.5 gram rate.

**Note:** Cutless® Tree Implant is not recommended for application on conifers (e.g., pine, spruce, fir or juniper).

### **STORAGE AND DISPOSAL**

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

**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):**

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.



© Copyright \_\_\_\_ by SePRO Corporation

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



# Cutless<sup>®</sup> Tree Implant

## Active ingredient

Flurprimidol: a-(1-methylethyl)-a-[4-(trifluoromethoxy)-phenyl]-5-pyrimidinemethanol ..... 93.6%

**Other Ingredients** ..... 6.4%

**Total** ..... 100.0%

Each Cutless<sup>®</sup> Tree Implant contains 0.035 ounce (1 gram) of active ingredient.

## 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.)

---

### PRECAUTIONARY STATEMENTS

---

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**Harmful if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.**

**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.**

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

EPA Reg. No. 67690-18  
FPL 20181203

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.**

**Tree Growth Regulator**

**Contains 250 Implants**

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

---

## **TERMS AND CONDITIONS OF USE**

---

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*.

---

## **INHERENT RISKS OF USE**

---

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.

---

## **LIMITATION OF REMEDIES**

---

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.