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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES

TOXIC SUBSTANCES

AND

MAY - 7 2009

Ms. Mary Beth Endres Nufarm, Inc 150 Harvester Drive, Suite 200 Burr Ridge, IL 60527

Dear Ms. Endres:

Subject: Credit Duo Herbicide (Add Sugarbeets with Roundup Ready Gene) EPA Registration No. 71995-25 71314-25 Application Dated February 12, 2009

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable, provided you make the following change.

--Under Postemergence, revise the third sentence to read "Refer to the "ANNUAL WEEDS RATE SECTION" in the label booklet for **application rates** for specific annual weeds."--

A stamped copy of labeling is enclosed for your records.

Supplemental labeling must be incorporated into master labeling and copies of master labeling submitted to the Agency for our files at your next printing or within two (2) years from the date of acceptance of supplemental labeling, whichever comes first. The Agency will consider a convincing argument as to why a supplemental label should not appear on a master label on a case by case basis.

Sincerely,

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



SUPPLEMENTAL LABEL

with COMMENTS In EPA Letter Dated: MAY -7 2009

ACCEPTED

Under the Federal Insecticide, Fungicide, and Rodenticide Acas emended, for the pessicia registered under EPA Reg. Rc. 71368-25

Herbicide

EPA Reg. No. 71368-25 February 12, 2009

READ AND FOLLOW THE ENTIRE LABEL BOOKLET FOR THIS PRODUCT BEFORE PROCEEDING WITH THE USE DIRECTIONS CONTAINED IN THIS SUPPLEMENTAL LABELING.

"Label" as used in this supplemental labeling refers to the label booklet for this product and this supplemental.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN ANY MANNER INCONSISTENT WITH ITS LABELING.

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

ALL APPLICABLE DIRECTIONS, RESTRICTIONS AND PRECAUTIONS IN THE PRODUCT LABEL BOOKLET MUST BE FOLLOWED, INCLUDING STATEMENTS PERTAINING TO THE WORKER PROTECTION STANDARDS, ON THE EPA REGISTERED LABEL.

APPLICATIONS TO SUGAR BEETS WITH ROUNDUP READY® GENE **Use Instructions**

Preplant, Preemergence, At-Planting: This product may be applied before, during or after planting of Roundup Ready® sugar heets

Postemergence: This product may be applied postemergent over-the-top to Roundup Ready® sugar beets from emergence to 30 days prior to harvest. To maximize yield potential spray sugar beets early to eliminate competing weeds. Up to 4 sequential applications of this product may be made with at least 10 days between applications. Refer to the "ANNUAL WEEDS RATE SECTION" in the label booklet for rate recommendations for specific annual weeds. This product will control or suppress, most perennial weeds. For some perennial weeds, repeat applications may be required to eliminate crop competition throughout the growing season.

The combined total application rate from crop emergence through harvest must not exceed 4.5 quarts per acre. The maximum rate for any single application from crop emergence until the 8-leaf stage is 47 fluid ounces per acre. The maximum rate for any single application between the 8-leaf stage and canopy closure is 33 fluid ounces per acre. Allow a minimum of 30 days between last application and sugar beet harvest.

Maximum Allowable Combined Application Quantities Per Season on Sugar Beets	
Combined total per year for all applications	7.9 quarts per acre
Preplant, At-Planting, Preemergence applications	4.9 quarts per acre
Emergence to 8-leaf stage	84 fluid ounces per acre
Between 8-leaf stage and canopy closure	66 fluid ounces per acre

NOTICE

Read the "WARRANTY DISCLAIMER" and "LIMITATION OF LIABILITY" in the label booklet for this product before using this product. Those terms apply to this supplemental labeling and if those terms are not acceptable, return the product unopaned at once.

> Manufactured For NUFARM, INC. 150 Harvester Drive | Burr Ridge, IL 60527