

74530-4

09/27/2007

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Judy Smith  
Helm Agro US, Inc.  
8295 Tournament Drive, Suite 310  
Memphis, TN 38125

9-27-07

Subject: EPA Reg. 74530-4 / Glyphosate 41%, Supplemental Label

Dear Ms. Smith:

The amended label is acceptable provided you make the following changes to the label:

1. Change "... to 8 leaf Sugar Beets - 3 quarts" to "... to 8 leaf Sugar Beets - 85 oz".
2. Change "...to 30 days before harvest - 3 quarts" to "... to 30 days before harvest - 67 oz".

If you have any questions please call Erik Kraft at 703-308-9358.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Tompkins".

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

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**SUPPLEMENTAL LABELING**

**READ THE ENTIRE LABEL FOR GLYPHOSATE 41% HERBICIDE BEFORE  
PROCEEDING WITH THE USE DIRECTIONS CONTAINED ON THIS SUPPLEMENTAL  
LABELING**

**FOR USE ONLY IN THE STATES OF MI, ND, SD, MT, WY, ID, CO, AND NE**

When using Glyphosate 41% Herbicide as permitted according to this supplemental labeling read and follow all applicable directions, restrictions, and precautions on the label booklet provided with the pesticide container and on this supplemental labeling. This supplemental labeling must be in the possession of the user at the time of pesticide application.

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

9-27-07

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

74530-4

**GLYPHOSATE 41%**  
**Herbicide**

**KEEP OUT OF REACH OF CHILDREN**

**WARNING/AVISO**

In case of an emergency involving this product, call CHEMTREC @ 1-800-424-9300

EPA Reg. No. 74530-4

®Registered Trademark of Helm Agro USA

**SUPPLEMENTAL LABEL FOR ROUNDUP READY® SUGAR BEETS ONLY**

**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.

See "GENERAL INFORMATION" and "MIXING" sections of the label booklet for Glyphosate 41% Herbicide for essential product performance information. See the Roundup Crop section of the Glyphosate 41% Herbicide label booklet for general precautionary instructions for use on Roundup Ready crops.

**GENERAL INFORMATION**

Use this product only on Sugar Beets with a Roundup Ready Gene. Applying this product to Sugar Beet which is not designated as Roundup Ready will result in severe crop injury and yield loss. Avoid contact with foliage, green stems, or fruit of crops, or any desirable plants which do not contain a Roundup Ready gene since severe injury or destruction will result.

The Roundup Ready designation indicates the Sugar Beet contains a patented gene which provides tolerance to this herbicide. Information on Roundup Ready Sugar Beets may be obtained from your seed supplier.

## USE INSTRUCTIONS

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This product will control many troublesome emerged weeds when applied as a burndown preplant (PPI), preemergence (PRE) and over-the-top (POST) application in Roundup Ready Sugar Beets. This product can be used up to 30 days prior to harvest. Allow at least 30 days between the last over-the-top application until Sugar Beets are harvested.

### Maximum Allowable Combined Application Quantities Per Season

1. Preplant burndown and Preemergence to Sugar Beets – 1.5 quarts per acre ✓
2. Over-the-top applications after emergence to 8 leaf Sugar Beets – ~~3 quarts~~ 8502 1.96/6
3. Over-the-top applications after 8 leaf Sugar Beets to 30 days before harvest – ~~3 quarts~~ per acre 9.1.  
6702

Maximum total of all applications combined is 7.5 quarts per acre.

Ground Applications with Broadcast Equipment - Apply this product in 5 to 20 gallons of spray solution per acre. Select spray pressure and nozzle size to avoid a fine mist. Flat fan nozzles are recommended for best results. An even distribution of spray droplets is desired.

Aerial Applications, apply this product in 3 to 15 gallons of water per acre.

**AVOID DRIFT WITH ALL APPLICATIONS. EXTREME CARE SHOULD BE USED WHEN APPLYING THIS PRODUCT TO PREVENT INJURY TO DESIRABLE PLANTS AND CROPS WHICH DO NOT CONTAIN A ROUNDUP READY GENE. DO NOT APPLY DURING LOW-LEVEL INVERSION CONDITIONS, WHEN WINDS ARE GUSTY OR UNDER ANY OTHER CONDITIONS WHICH FAVOR DRIFT. DRIFT MAY DAMAGE ANY VEGETATION CONTACTED TO WHICH TREATMENT IS NOT INTENDED. TO PREVENT INJURY TO ADJACENT DESIRABLE VEGETATION, APPROPRIATE BUFFER ZONES MUST BE MAINTAINED.**

Do not allow the herbicide solution to mist, drip, or splash onto desirable vegetation since minute quantities of this product can cause severe damage or destruction to the crop, plants or other areas on which treatment was not intended. The likelihood of injury occurring from the use of this product increases when winds are gusty, as wind velocity increases, when wind direction is constantly changing or when there are other weather conditions that favor spray drift. Avoid applying at excessive speed or pressure.

Coarse sprays are less likely to drift, therefore, do not use nozzles or configurations of such that cause fine spray droplets. Avoid nozzles that are angled forward into the air stream.

There are no rotational crop restrictions following applications of this product.

### SPRAYER PREPARATION

Extreme care should be taken to clean spray equipment before post emergence applications of this product to Roundup Ready Sugar Beets. Follow the cleaning procedures specified on the label of any previously used product. Sugar Beets can be very sensitive to low concentrations of many herbicides. Therefore, care should be taken to thoroughly clean all equipment prior to use.

## PREPLANT APPLICATIONS

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University studies have indicated that Sugar Beets are very sensitive to early weed pressure. It is recommended that this product be used in conjunction with a PPI or PRE application of a soil applied residual herbicide such as Ro-Neet® to alleviate yield loss from early weed competition.

**BURNDOWN PREPLANT:** Use this product at 1 to 1.5 quarts per acre after preplant tillage and bedding has occurred to control weeds that have germinated. See the label for appropriate rates by weed species and weed size.

## POSTEMERGENCE OVER-THE-TOP APPLICATIONS

**OVER THE TOP PRIOR TO 8-LEAF SUGAR BEET:** Use this product at 1 to 1.5 quarts from emergence to 8-leaf stage. Weeds should be controlled at 2 inches in height to protect yield potential. If needed, a second application should be made at 4 inch weeds before Sugar Beets reach 8-leaf. Sequential applications should be made at least 7 days apart. With over-the-top applications, always use ammonium sulfate at 17 lbs. per 100 gallon of spray solution, or an AMS replacement such as Helm-Ade® at 2 quarts per acre.

**OVER THE TOP APPLICATIONS AFTER 8-LEAF SUGAR BEET:** Up to two additional applications of Glyphosate 41% Herbicide can be made after Sugar Beets reach 8-leaf up to 30 days prior to harvest. Always use ammonium sulfate at 17 lbs. per 100 gallon of spray solution, or a replacement such as Helm-Ade at 2 quarts per acre. If sequential applications are made at this point, allow at least 7 days between treatments.

## PRECAUTIONS/RESTRICTIONS

TOTAL COMBINED APPLICATION OF THIS PRODUCT PER YEAR SHOULD NOT EXCEED 7.5 QUARTS. THIS INCLUDES ALL PREPLANT AND POSTEMERGENCE OVER-THE-TOP APPLICATIONS. TOTAL SHOULD NOT EXCEED 4 QUARTS PER ACRE FOR ALL APPLICATIONS UNDER POSTEMERGENCE OVER-THE-TOP SECTION. ALLOW A MINIMUM OF 30 DAYS BETWEEN LAST APPLICATION AND HARVEST.

## WEEDS CONTROLLED

For specific rates of application and instructions for various annual and perennial weeds, refer to the Glyphosate 41% Herbicide label booklet. For control of difficult to control weeds, tank mixes with other herbicides may be added. See the Tank Mixing part of the Glyphosate 41% Herbicide label.

## RESISTANCE MANAGEMENT

In order to responsibly manage the possible on-set of glyphosate resistance, it is recommended that this product be used in conjunction with PRE or PPI residual herbicides with a different mode of action than that of Glyphosate 41% Herbicide. These include products approved for use with Sugar Beet such as Ro-Neet.

## CONDITIONS OF SALE AND WARRANTY

HELM AGRO US, INC. AND SELLER OFFER THIS PRODUCT AND THE BUYER AND USER ACCEPTS THIS PRODUCT UNDER THE FOLLOWING AGREED CONDITIONS OF SALE AND WARRANTY.

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The directions for use of this product are believed to be reliable and should be followed carefully. However, it is impossible to take into account all variables and to eliminate all risks associated with its use. Injury or damage may result because of conditions which are beyond the control of HELM AGRO US, INC. or the Seller. HELM AGRO US, INC. warrants only that this product conforms to the chemical description on the label and is believed to be reasonably fit for the purposes referred to in the Directions for Use when used as directed under normal conditions. HELM AGRO US, INC. MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY. In no case shall HELM AGRO US, INC. or the Seller be liable for consequential, special or indirect damages resulting from the use or handling of this product. Any variation or exception from this warranty must be in writing and signed by an authorized HELM AGRO US, INC. representative.

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