

80289-6

07/31/2007

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

7-31-07

Mel Graben
Regulatory and Technical Manager
Isagro, USA
430 Davis Drive
Suite 240
Morrisville, NC 27560

Subject: EPA Registration Number 80289-6 / Strada GR Label Amendment

Dear Mr. Graben:

The amended labeling is acceptable provided you add "exist" after "washables" on page 2 of the label. 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", written over a circular stamp.

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

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STRADA® GR

For use as a selective herbicide in permanently flooded or water-seeded rice only in the state of California.

ACTIVE INGREDIENT:

Orthosulfamuron.....	0.50%
OTHER INGREDIENTS.....	99.50%
TOTAL.....	100.0%

ACCEPTED w/comment
 7-31-07
 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

STRADA® is a registered trademark of Isagro USA, Inc.

KEEP OUT OF REACH OF CHILDREN

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CAUTION

FIRST AID	
If swallowed:	Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on skin or clothing:	Take off contaminated clothing Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for further treatment advice.
If inhaled:	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
If in eyes:	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For Chemical Emergency Spill Leak Fire Exposure or Accident Call CHEMTREC Day or Night Domestic North America 800-424-9300 International 703-527-3883 (collect calls accepted)	

[See (back)(side) panel for precautionary statements]

EPA Registration Number 80289-6



EPA Establishment Number
Net Contents:

Manufactured by Isagro SpA for:
 Isagro USA, Inc.
 430 Davis Drive, Suite 240
 Morrisville, NC 27560

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION/PRECAUCION

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).

Harmful if swallowed, absorbed through skin, or inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust.

Personal Protective Equipment: Applicators and other handlers must wear the following:

- Long-sleeved shirt and long pants
- Shoes plus socks
- Chemical-resistant gloves made of any waterproof material
- Protective eyewear

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

User Safety Recommendations: Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Users should remove clothing/PPE immediately if pesticide gets inside. Then wash skin thoroughly and put on clean clothing.

Engineering Controls: When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR 170.240(d)(4-6)), the handler PPE requirements may be reduced or modified as specified in the WPS.

ENVIRONMENTAL HAZARDS

With the exception of treating rice fields as specified on this label, 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 arable land and/or water when disposing of equipment wash water or rinsate.

IMPORTANT

Injury to or loss of desirable trees, vegetation and/or adjacent sensitive crops may result from failure to observe the following:

Avoid all direct or indirect contact with crops other than rice or land scheduled to be planted with crops other than rice due to the potential for sensitivity to the active ingredient in STRADA GR.

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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 the entire label. Use strictly in accordance with Precautionary Statements and Directions, and with applicable State and Federal regulations.

Do not apply this product in a way that will contact workers or other people, 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.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling, and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard. Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: coveralls, chemical resistant gloves (made of any waterproof material), protective eyewear, and shoes plus socks.

GENERAL INFORMATION

STRADA GR is a systemic herbicide formulated as a granule suitable for selective post emergence weed control. When applied according to label directions it is effective in the control of several annual and perennial broadleaf weeds and sedges.

To achieve the best control, it is recommended that STRADA GR be applied to young, actively growing weeds between 1-2 leaves. STRADA GR should be applied as a direct dry application using ground or air equipment to flooded rice.

Efficacy may depend on the following parameters:

- Weed size at application
- Growing and environmental conditions (relative humidity and temperature) prior to and following treatment
- Soil pH, texture and organic matter content
- Water management

STRADA GR is a member of the sulfonyleurea herbicides.

STRADA GR inhibits the plant enzyme acetolactate synthase (ALS), which is also known as acetohydroxy acid synthase (AHAS). Inhibition of this enzyme blocks branched-chain amino acid biosynthesis of valine, leucine and isoleucine, which leads to plant death.

STRADA GR is particularly efficient by foliar uptake. Once in the target weed, it is translocated by xylem and phloem. Soon after STRADA GR is applied, growth of susceptible weeds is inhibited and the plants are no longer competitive with rice. Typically, weed leaves turn yellow, then reddish and within 10 to 20 days, depending on weed size, species and growing conditions, the stem and roots die. Treated target weeds may stay green, but are stunted and not competitive with the crop.

Additional Use Instructions and Precautions

- Do not apply after ½ inch internode elongation
- Do not enter treated fields until 12 hours after application (REI = 12 hours)
- Poor weed control may result from application of STRADA GR made to plants under stress from abnormally hot or cold weather; environmental conditions such as drought, hail damage, hydrogen sulfide or prior herbicide applications
- For detailed instructions regarding water management before and after application, refer to the water management section of this label
- Do not apply where runoff or irrigation water may flow directly onto agricultural lands other than rice fields
- Do not apply STRADA GR directly or indirectly to crops other than rice
- Application of STRADA GR to fields which have been levelled (except water levelling) within 12 months prior to application may result in rice injury in areas that have been cut or filled
- Do not make more than 1 application or apply more than 13.3 pounds of STRADA GR per acre (equivalent to 0.067 lb ai/a) during the growing season
- Do not apply STRADA CA to the same field in the same growing season that an application of STRADA GR has been applied
- Chemigation or applications through any type of irrigation system is not allowed

Rotational Crop Information

Use the time intervals listed below to determine the minimum required time interval between last STRADA GR application and new crop planting.

Rotational Crop Guideline	
Crop	Time Interval in Months Before Planting
Sugarcane	1
Corn (all)	3
Small Grains	3
Cotton	6
Soybean	6
All Other Crops	12

STRADA GR Spectrum

Weeds Controlled		Rate of Application
Common name	Scientific name	STRADA GR 13.3 Pounds/Acre
Ammannia, Purple *	<i>Ammannia coccinea</i> *	
Arrowhead, California*	<i>Sagittaria montevidensis</i> *	
Bulrush, Ricefield *	<i>Schoenoplectus mucronatus</i> *	
Ducksalad *	<i>Heteranthera limosa</i> *	
Eclipta	<i>Eclipta prostrata</i>	
Monochoria	<i>Monochoria vaginalis</i>	
Redstem *	<i>Ammannia auriculata</i> *	
Smallflower umbrella sedge *	<i>Cyperus difformis</i> *	
Smartweed spp.	<i>Polygonum spp.</i>	
Waterhyssop spp.	<i>Bacopa spp.</i>	
Waterplantain spp. (seedling) *	<i>Alisma spp.</i> *	
Weeds Partially Controlled or Suppressed ***		
Alligatorweed	<i>Alternanthera philoxeroides</i>	
Yellow nutsedge **	<i>Cyperus esculentus</i> **	
Watergrass, Early*	<i>Echinochloa oryzoides</i>	
Watergrass, Late*	<i>Echinochloa phyllopogon</i>	

- * STRADA 0.5 GR does not control ALS resistant biotypes of this weed, which might be present in the field.
 - ** An earlier treatment (up to 4 leaf or 4") is suggested for effective control and to prevent nutsedge from competing with the crop. An additional herbicide application may be needed for effective control of heavy infestations.
 - ***Control of suppressed weeds may be significantly improved using weed control programs that incorporate other herbicides with activity against the target weeds listed as partially controlled or suppressed.
- Note: Weeds with gradual and late emergence (like Redstem and bulrush) may escape an early herbicide application.

APPLICATION INFORMATION

Use rate

STRADA GR: 13.3 pounds per acre per year

STRADA GR Dry Application

STRADA GR is applied as a dry application (without dilution in water)

Precautions for this kind of application:

- Loading, application and equipment calibration instructions provided by the equipment manufacturer have to be followed
- Do not apply STRADA GR to dry (non-flooded) rice fields
- Do not mix STRADA GR with any liquid carrier (like water or oil), nor any surfactant or crop oil
- Some crops are sensitive to STRADA GR. Therefore avoid all direct and indirect contact with nontarget crops (or fields intended to be planted with sensitive crops)

STRADA GR Sequential Application

STRADA GR fits well in typical weed management programs. Sequential applications with commonly used herbicides registered for rice are suggested to complete the weed spectrum, especially for grass weeds.

Refer to the companion herbicide label(s) for all applicable use directions, restrictions (including any water-holding requirements), and precautions. Read and follow the entire label of each product to be used sequentially with this product.

Aerial Application Recommendations

Application equipment used to deliver STRADA GR should be calibrated to accurately and uniformly distribute STRADA GR to the target area. Equipment should be monitored during application to ensure that appropriate rate and coverage are maintained. Overlaps that result in a higher than labeled rate should be avoided. STRADA GR application should be avoided in wind speeds exceeding 10 mph.

Application Timing

STRADA GR application timing should be based on the appropriate rice growth stage and is also dependent on the species of weeds present and their growth stage. The recommended application timing for continuous flooded rice production is the 1 to 2 leaf stage of rice. This typically corresponds to the 1 to 2 leaf stage of weeds. To achieve the best weed control, it is recommended that STRADA GR be applied to young, actively growing weeds. It is important to

scout fields regularly to ensure weeds do not become too large before the herbicide application is made.

STRADA GR can only be applied to flooded rice.

Due to the selectivity for use on rice, STRADA GR can be applied at very early stages of the crop. Occasionally, in the presence of very high temperatures, transient symptoms of chlorosis and slight vigor reduction may appear on rice, but the crop recovers within a few days without any adverse effect on yield.

Water Management

24 – 48 Hours Prior to Application:

- Prior to application, a 3-inch minimum water depth should be established covering the shallowest part(s) of the field. Average water depth for the remainder of the field should be 4- to 5-inches. Weeds should be completely submerged and no exposed soil should be found within the field.
- If rainfall occurs prior to application, do not apply STRADA GR until water depth meets the requirements listed above.

0 – 7 Days Following Application:

- For optimum weed control, maintain a static flood for 7 days immediately following application.
- During the static flood period, maintain a minimum water depth of 3 inches. If required, water can be slowly added to maintain correct water depth.
- If water is lost from the field or any part of the field, immediately reflood.
- Failure to maintain an adequate flood may result in reduced weed control.

8 – 14 Days Following Application:

- After the 7-day static flood period, it is recommended that water not be released for an additional 7 days.
- During this time, water depth should be maintained or increased as rice grows. Shallow water conditions can result in reduced weed control as it may promote emergence of additional weeds.
- If water is lost from the field or any part of the field, immediately reflood.
- Failure to maintain a flood may result in reduced weed control.

At the conclusion of the 14 day period, it is important to manage water flood depth to prevent secondary weed emergence which can occur if an adequate flood depth is not maintained.

Resistance Management

The mode of action (MOA) of STRADA GR is via the inhibition of the acetolactate synthase (ALS) inhibiting enzyme. The repeated use of herbicides with the same mode of action may result in the emergence of weed species biotypes that are resistant to that mode of action or

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family of herbicides. Resistance may develop in a number of ways such as altered target site sensitivity, enhanced metabolism, or altered plant characteristics that affect the absorption and translocation of the herbicide to the site of action.

STRADA GR and other pesticides should be incorporated into an Integrated Pest Management (IPM) program that can include the use of cultural, biological, and other chemical practices to prevent economical pest damage. Effective IPM practices include the use of weed free seed, proper scouting and identification of weeds within each field or paddy, optimum water management (adequate soil moisture at the time of application and maintaining the permanent flood), pesticide treatment at the appropriate target stage, crop rotation, and mechanical weed control when appropriate. This list is not inclusive and should be used in conjunction with other practices to further prevent resistance development.

To delay or avoid resistance, any or all of the following practices are recommended:

1. Always apply STRADA GR at 13.3 pounds formulated product per acre
2. Avoid following an ALS-inhibiting herbicide application with another herbicide application of the same mode of action
3. The use of ALS herbicides in consecutive years should be done in conjunction with herbicides containing other modes of action
4. Monitor escaped weeds and control them before they can produce seed
5. Contact and follow local extension and/or consultant recommendations relative to resistance management
6. Do not apply STRADA CA to the same field in the same growing season that an application of STRADA GR has been applied

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed through storage and disposal.

Pesticide Storage: Store under well-vented, cool and dry storage conditions. Do not store under moist conditions.

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

Container Type: This is a nonrefillable, non-rigid container (bag), containing a non-dilutable dry pesticide. Do not reuse or refill this container.

Container Disposal: Empty the bag completely. Then dispose of the empty container according to state and local regulations. Place in trash or offer for recycling if available or return it to the Seller, or, if allowed by state and local authorities, by burning. If burned stay out of smoke.

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LIMITATION OF WARRANTY AND LIABILITY

Read the entire label before using this product, including this Limitation of Warranty and Liability.

If the terms are not acceptable, return the product at once unopened for a refund of the purchase price.

This Company warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes set forth in the Directions for Use, subject to the inherent risks described below, when used in accordance with the Directions for Use under normal conditions. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, ISAGRO MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.**

Buyers and Users of this product must be aware that there are inherent unintended risks associated with the use of this product, independent from the control of Isagro. These risks include, but are not limited to, weather conditions, soil factors, moisture conditions, diseases, irrigation practices, condition of the crop at the time of application, materials which are present in the tank mix with this product or prior to the application of it, cultural practices or the manner of use or application, all risks which are impossible to eliminate. The Buyers and Users should be aware that these factors may cause: ineffectiveness of the product, reduction of harvested yield of the crop (entirely or partially), crop injury or injury to non-target crops or plants or to rotational crops caused by carryover in the soil, resistance of the target weeds to this product. Therefore additional care, treatment and expense are required to take the crop to harvest.

If the Buyer does not agree with the acceptance of these risks, then **THE PRODUCT SHOULD NOT BE APPLIED**. To the extent consistent with applicable law, by applying this product the Buyer acknowledges and accepts these inherent unintended risks and **AGREES THAT ALL SUCH RISKS ASSOCIATED WITH THE APPLICATION AND USE ARE ASSUMED BY THE BUYER.**

To the extent consistent with applicable law, in no event shall ISAGRO or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product (including claims based in contract, negligence, strict liability, other tort or otherwise). To the extent consistent with applicable law, the exclusive remedy of the User or Buyer and the exclusive Liability of Isagro or Seller shall be the return of the purchase price of the product, or at the election of Isagro or Seller, the replacement of the product.

To the extent consistent with applicable law, this Company does not warrant any product reformulated or repackaged from this product except in accordance with this Company's stewardship requirements and with express written permission from this Company.

Isagro or its Seller must have prompt notice of any claim so that an immediate inspection of Buyer's or User's can be made. To the extent consistent with applicable law, if Buyer and User do not notify Isagro or Seller of any claims, in proper time, it shall be barred from obtaining any remedy.

To the extent consistent with applicable law, Buyers and Users are deemed to have accepted the terms of this Limitation of Warranty and Liability, which may not be modified by any verbal or written agreement.

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