



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

April 2, 2024

Victoria Smith  
Agent for Willowood Clethodim, LLC  
Willowood Clethodim, LLC  
c/o Generic Crop Science  
1887 Whitney Mesa Drive #9740  
Henderson, NV 89014

Subject: Approval of Label Amendment; Only Indicated Changes Reviewed – Adding crop groups and other minor edits.  
Product Name: Willowood Clethodim MUP  
EPA Registration Number: 87812-1  
Application Date: 5/17/2022  
Case Number: 477245

Dear Ms. Smith:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. However, EPA reviewed only the label changes highlighted, marked, or otherwise indicated on the submitted label. Any other changes to the previously approved label that were not clearly highlighted, marked, or otherwise indicated in your submission were not reviewed and may form the basis of regulatory and/or enforcement action if later discovered by the Agency. Further, submission of a label amendment application with unidentified changes may be considered a knowing submission of false information to the Agency. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

The label submitted with the application has been stamped "Accepted Only Indicated Revisions Reviewed" and is enclosed for your records.

This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 C.F.R. § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently

approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 C.F.R. § 152.3.

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 FIFRA and is subject to review by the Agency. If the website contains any false or misleading statement, design, or graphic, the product may be misbranded and unlawful to sell or distribute under FIFRA Sections 2(q)(1)(A) and 12(a)(1)(E). 40 C.F.R. § 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on the product label, claims made as part of the product's sale or distribution may not substantially differ from those claims approved through the registration process under FIFRA Section 12(a)(1)(B). 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 product will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of the product 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.

If you have any questions, please contact Sayed Islam at 202-566-2796 or at [islam.sayed@epa.gov](mailto:islam.sayed@epa.gov)

Sincerely,



Kable Bo Davis  
Senior Regulatory Specialist  
Office of Pesticide Programs  
Registration Division, Immediate Office

Enclosure

# WILLOWOOD CLETHODIM MUP

FOR USE IN FORMULATING HERBICIDES ONLY

**ACTIVE INGREDIENT:**

Clethodim [(E)-2-[1-[[3-chloro-2-propenyl]oxy]imino]propyl]-3-hydroxy-2-cyclohexen-1-one ..... 37.0%

**OTHER INGREDIENTS:** ..... 63.0%

**TOTAL:** ..... 100.0%

Contains petroleum distillates.

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

<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>• <del>Do not</del><b>DO NOT</b> give any liquid to the person.</li> <li>• <del>Do not</del><b>DO NOT</b> induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• <del>Do not</del><b>DO NOT</b> 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.</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>
<p><b>Note to Physician:</b> Ingestion of this product or subsequent vomiting can result in aspiration of light hydrocarbon liquid, which can cause pneumonitis. If ingested, probably mucosal damage may contraindicated the use of gastric lavage.</p>	
<b><u>HOTLINE NUMBERS</u></b>	
<p><u>For medical emergencies, call the poison control center at 1-800-222-1222. For product information, call the National Pesticide Information Center Monday through Friday, 8:00 a.m. to 12:00 p.m. Pacific Time at 1-800-858-7378. Have the product container or label with you when calling a poison control center or doctor or going for treatment.</u>  <del>For MEDICAL Emergencies call the National Pesticide Information Center 24 hours a day at 1-800-858-7378. Have the product container or label with you when calling a Poison Control Center or doctor or going for treatment.</del></p>	

[See [Panel] [Side] for First Aid, Precautionary Statements, Directions For Use, and Storage and Disposal.]

EPA Reg. No.: 87812-1

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

**Manufactured For:**

Willowood Clethodim, LLC  
1887 Whitney Mesa Dr., Suite 9740  
Henderson, NV 89014

~~1600 NW Garden Valley Blvd.~~  
~~Roseburg, OR 97471~~

**ACCEPTED**  
 ONLY INDICATED  
 REVISIONS REVIEWED

04/02/2024

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

87812-1

No label revisions other than those indicated were  
 reported to the Agency.

[Lot No.: \_\_\_\_\_]  
 Net Contents: \_\_\_\_\_

## PRECAUTIONARY STATEMENTS

### HAZARD TO HUMANS AND DOMESTIC ANIMALS

#### CAUTION

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

#### ENVIRONMENTAL HAZARDS

~~Do not~~**DO NOT** discharge effluent containing this product directly into lakes, streams, ponds, estuaries, oceans, or public waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. ~~Do not~~**DO NOT** discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

#### PHYSICAL OR CHEMICAL HAZARDS

~~Do not~~**DO NOT** use or store near heat or open flame.

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product may only be used to formulate end-use products with the following uses:

#### Terrestrial Food Uses:

Crop Subgroup 1B: Root Vegetables (except Sugar Beet); Crop Subgroup 1C: Tuberous and Corm Vegetables; Crop Group 2: Leaves of Root and Tuber Vegetables; Crop Subgroup 3-07A: Onion, Bulb; [Crop Subgroup 3-07B: Onion, green](#); Crop Subgroup 4A [and 4-16A](#): Leafy Greens; Crop Subgroup 4B [and 4-16B](#): Leaf Petioles; Crop Subgroup 5A: Head and Stem Brassica; Crop Subgroup 5B: Leafy Brassica Greens; [Crop Group 5-16: Brassica Head and Stem Vegetable](#); Crop Group 6: Legume Vegetables (Dried and Succulent), except soybean; Crop Group 8-10: Fruiting Vegetables [\(except okra\)](#); Crop Subgroup 9A: Melon; Crop Subgroup 9B: Squash/Cucumber; Crop Group 11-10: Pome Fruit; Crop Group 12-12: Stone Fruit; Crop Subgroup 13-07A: Caneberry; Crop Subgroup 13-07B: Bushberry; Crop Subgroup 13-07G: Low Growing Berry (except Cranberry); [Crop Group 14-12: Tree Nut](#); Crop Subgroup 19A: Herbs; Crop Subgroup 20A: Rapeseed; Crop Subgroup 20B: Sunflower; Crop Subgroup 20C: Cotton Seed; [Crop Subgroup 22A: Stalk and Stem Vegetable](#); and [Crop Subgroup 22B: Leaf Petiole Vegetable](#).

**Individual crops:** alfalfa; artichoke (Globe); asparagus; canola; clover; cotton; cranberry; flax; hops; mint; mustard seed; onions (dry bulb, green); peach; peanut (including perennial); safflower; sesame; soybean; Stevia, dried leaves; strawberry; sugar beet; sunflower; and turnip.

#### Other Uses:

Christmas Trees; Greenhouses, Shadehouses, Lathhouses; Golf courses; Nurseries; Residential Outdoor; Outdoor non-food uses; Native prairie warm season grass restoration projects; Niger seed (*Guizotia abyssinica*) grown for use as wild bird feed; Ornamentals; Non-bearing food crops (including but not limited to apples, berries, cherry (sweet), citrus, fruits, grapes, olives, peaches, pears, prunes, stone fruit, strawberries, tree nuts (including but not limited to almond, filbert, pecan, pistachio, walnut); Conifer trees; Fallow land and other non-producing agricultural areas; Non-crop or non-planted areas;

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with the U.S. EPA data submission requirements regarding the support of such use(s).

## STORAGE AND DISPOSAL

~~Do not~~**DO NOT** contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in original container tightly closed and in a safe place.

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

#### CONTAINER HANDLING:

**Nonrefillable container.** ~~Do not~~**DO NOT** reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 60 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Offer for recycling, if available, otherwise, dispose of in a sanitary landfill, or by other procedures approved by state and local authorities. **Refillable containers larger than 5 gallons: Refillable container.** Refill this container with this product only. ~~Do not~~**DO NOT** reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and spray all sides while adding water. Agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Offer for recycling, if available, otherwise, dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

## WARRANTY STATEMENT

**IMPORTANT NOTICE** - Seller warrants that this product conforms to the chemical description and is reasonably fit for purposes stated on the label when used in accordance with the directions and instructions under normal conditions of use. To the extent consistent with applicable law, neither this warranty nor any other warranty of merchantability or fitness for a particular purpose, express or implied, extends to the use contrary to label instructions, or under abnormal conditions, or under conditions not reasonably foreseeable to seller, and buyer assumes the risk of any such use.