

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON. DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

March 11, 2015

Ms. P. Leanne Pruett Agent: Summit Agro North America Holding Corp. c/o Pyxis Regulatory Consulting 4110 136th St., NW Gig, Harbor, WA 98332

Subject: Label Amendment – Addition of canola seed propagation

Product Name: Summit Agro Glufosinate-Ammonium Technical

EPA Registration Number: 88783-4

Application Date: 12/17/14 Decision Number: 498740

Dear Ms. Pruett:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. 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.

A stamped copy of your labeling 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 CFR 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 CFR 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 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.

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

Page 2 of 2 EPA Reg. No. 88783-4 Decision No. 498740

with FIFRA section 6. If you have any questions, please contact Banza Djapao at 703-305-7269 or by email at djapao.banza@epa.gov.

Sincerely,

Ein My for Shaja Joyner, Product Manager 20 Fungicide and Herbicide Branch Registration Division (7505P)

Office of Pesticide Programs

Enclosure

SUMMIT AGRO GLUFOSINATE-AMMONIUM **TECHNICAL**

For Manufacturing of Herbicides Only

ACTIVE INGREDIENT

% BY WT

Glufosinate-ammonium* (ammonium 2-amino-4-(hydroxymethylphosphinyl)butanoate) **OTHER INGREDIENTS:**

96.9% 3.1%

TOTAL

100.0%

* CAS No. 77182-82-2

EPA Reg. No. 88783-4 EPA Est. No.

ACCEPTED

03/11/2015

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 88783-4

KEEP OUT OF REACH OF CHILDREN **CAUTION**

FIRST AID	
If Swallowed:	Immediately call a poison control center or doctor.
	• Do not induce vomiting unless told to do so by a poison control center or doctor.
	• Have person sip a glass of water if able to swallow.
	• Do not give anything by mouth to an unconscious person.
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 treatment advice.
If on Skin	Take off contaminated clothing.
or Clothing:	• Rinse skin immediately with plenty of water for 15-20 minutes.
	Call a poison control center or doctor for 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.
HOT I INF NUMBER	

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact Chemtrec at 1-800-424-9300 for emergency medical treatment information 24 hrs. a day.

NOTE TO PHYSICIAN: Glufosinate-ammonium is a glutamine synthetase inhibitor which can interfere with neurotransmitter function. No specific antidote is available. If ingested, symptoms may be delayed by up to 48 hours. If ingested, endotracheal intubation and gastric lavage should be performed as soon as possible, followed by charcoal and sodium sulfate administration.

Manufactured For:

Summit Agro USA, LLC 8000 Regency Park, Suite 265 Cary, NC 27518

NET CONTENTS:

Lot Number: See container

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed, absorbed through skin, or inhaled. Avoid contact with skin, eyes, or clothing. Avoid breathing dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other 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 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.

DIRECTIONS FOR USE

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

Only For Formulation into Herbicides Intended For The Following Uses: noncrop areas; residential and industrial areas; berries, canola, citrus (Crop Group 10-10), corn (field and sweet), cotton, grapes, olives, pome fruit (Crop Group 11-10), rice, soybeans, sugar beets, tree nuts (Crop Group 14) including pistachios, stone fruit (Crop Group 12-12); potato vine desiccation; elimination of non-glufosinate-ammonium tolerant canola, corn, soybean, rice and cotton plants in seed production.

This product may be used to formulate end use products for which U.S. EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration, and for experimental purposes that are in compliance with U.S. EPA requirements.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in original container only. Keep container closed when not in use.

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

CONTAINER DISPOSAL: Plastic lined fiberboard drums: Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into processing equipment. Dispose of liner in a sanitary landfill or by incineration if allowed by State and local authorities. Offer the drum for recycling, if available.

Supersack: Nonrefillable container. Do not reuse or refill this container. Completely empty bag into application equipment; then dispose of empty bag in a sanitary landfill or by incineration, or by other procedures approved by state and local authorities.

LIMITATION OF WARRANTY AND LIABILITY

IMPORTANT: READ BEFORE USE. Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of Summit Agro USA, LLC. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Summit Agro USA, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, neither Summit Agro USA, LLC, the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

[EPA Approval Date]