



**OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION**

WASHINGTON, D.C. 20460

November 20, 2025

**SENT BY EMAIL**

Don O'Shaughnessy  
doctox@mac.com  
AGRORA CROPS SCIENCE, INC.

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 - Transfer product.  
Revise label with new company information.  
Product Name: AGRORA USA CLETHODIM 37% MUP  
Admin Number: 103822-4  
EPA Receipt Date: 09/29/2025  
Action Case Number: 00671842

Dear Don O'Shaughnessy:

The U.S. Environmental Protection Agency is in receipt of your application for notification under Pesticide Registration Notice 98-10 for the above referenced product. The EPA has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The labeling submitted with this application has been stamped "Notification" and will be placed in our records.

The primary brand name of this product has been changed to Agrora USA Clethodim 37% MUP, and our records have been updated accordingly.

Should you wish to add/retain a reference to your 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 EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the 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 EPA find or if it is brought to our attention that a website contains statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

If you have questions, please contact Bewanda Alexander via email at [alexander.bewanda@epa.gov](mailto:alexander.bewanda@epa.gov).

Sincerely,

*Kable Bo Davis*

Kable Bo Davis, Senior Advisor  
FHB, RD  
Office of Pesticide Programs

# NOTIFICATION

103822-4

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

11/20/2025

**Agrora USA**

## **Clethodim 37% MUP** **FOR MANUFACTURING USE ONLY**

### **ACTIVE INGREDIENT:**

Clethodim [(E)-2-[1-[(3-chloro-2-propenyl)oxy]imino]propyl]-5-[2-(ethylthio)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>• Do not give any liquid to the person.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not 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 eye.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>If inhaled:</b>	<ul style="list-style-type: none"><li>• Move person to fresh air.</li><li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
<b>If on skin:</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>
<b>NOTE TO PHYSICIAN</b>	
Ingestion of this product or subsequent vomiting may result in aspiration of light hydrocarbon liquid which can cause pneumonitis. If ingested, probable mucosal damage may contraindicate the use of gastric lavage.	
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
<b>In case of emergency: spill, leak, fire, exposure, or accident, call CHEMTREC 1-800-424-9300.</b>	

See back panel for additional precautionary statements.

EPA Reg. No. 103822-4

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

### **Manufactured for:**

Agrora CropScience, Inc. 7901 4th St., Ste. 300  
St. Petersburg, FL, 33072  
tel +65 92795527

Net Contents (Printed on Container)

Product of China

Batch No. \_\_\_\_\_

## **PRECAUTIONARY STATEMENTS**

### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION.** Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes 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 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.

### **PHYSICAL OR CHEMICAL HAZARDS**

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. Only for formulation into end use herbicide products for the following use(s):

Terrestrial Non-Food Uses including: Greenhouses, shadehouses, lathhouses, nurseries, and outdoor non-food uses such as on ornamentals, non-bearing food crops, conifer and Christmas trees, fallow land (and non-producing agricultural areas), non-crop or non-planted areas, residential outdoor, golf courses, native prairie warm season grass restoration projects, Niger seed (*Guizotia abyssinica*) grown for use as wild bird feed.

Terrestrial Food Uses including:

- Crop Subgroups 1B: Root Vegetables (except Sugar Beet)
- Crop Subgroups 1C: Tuberous and Corm Vegetables
- Crop Group 3-07A: Bulb Onion
- Crop Group 4: Leafy Vegetables (except Brassica)
- Crop Group 5: Brassica (Cole) Leafy Vegetables
- Crop Group 6: Legume Vegetables (Succulent or Dried)
- Crop Group 8-10: Fruiting Vegetables
- Crop Group 9: Cucurbit Vegetables
- 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 19A: Herbs
- Crop Subgroup 20A: Rapeseed
- Crop Subgroup 20B: Sunflower
- Crop Subgroup 20C: Cotton Seed
- Individual Crops: alfalfa (including sainfoin, holy clover, birdsfoot trefoil), artichoke (Globe), asparagus, clover, cranberry, field corn, green onion, hops, mint (peppermint and spearmint), peanuts (including perennial), Stevia, dried leaves, sugar beet, and turnip

Uses for which EPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration.

Uses for experimental purposes that are in compliance with EPA registration for the formulated products. Each formulator is responsible for obtaining EPA registration for their end-use product(s).

## **CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY**

Agrora CropScience, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, AGRORA CROPSCIENCE, INC. MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

It is impossible to eliminate all risks associated with use of this product. Agrora CropScience, Inc. and the Seller shall not be responsible for any risks caused by the incorporation of this product into an end use product by the Buyer or User. To the extent consistent with applicable law, all of the foregoing risks shall be assumed by Buyer and User, and Buyer and User agree to hold Agrora CropScience, Inc. and Seller harmless for any claims related to such factors.

## **LIMITATION OF REMEDIES**

To the extent consistent with applicable law, the exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to one of the following, at Agrora CropScience, Inc. election:

- (1) Refund of purchase price paid by buyer or user for product bought, or
- (2) Replacement of amount of product used.

To the extent consistent with applicable law, Inc. Agrora shall not be liable for consequential, incidental, or special damages or losses.

The terms of the Warranty Disclaimer above and this Limitation of Remedies cannot be varied by any written or verbal statements or agreements. No employee or sales agent of Agrora CropScience, Inc. or the Seller is authorized to vary or exceed the terms of the Warranty Disclaimer or this Limitation of Remedies in any manner.