



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

August 25, 2025

Carrie Xiang
Regulatory Agent for
Zhejiang Avilive Chemical Imp. & Exp. Co., Ltd.
c/o REACH24H USA, Inc.
11921 Freedom Drive, Suite 550
Reston, VA 20190-5635

Subject: Notification per PRN 98-10 – Updates to Product Label Following Company
Transfer on May 7, 2025
Product Name: Avilive Clopyralid Technical
EPA Registration Number: 104530-2
Application Date: June 9, 2025
Case Number: 659603

Dear Carrie Xiang:

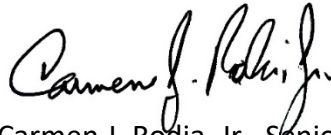
The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "NOTIFICATION" and placed in our records.

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 (FIFRA) 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) lists 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.

If you have any questions, please contact Carmen Rodia via e-mail at Rodia.Carmen@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Carmen J. Rodia, Jr.", written in a cursive style.

Carmen J. Rodia, Jr., Senior Risk Manager
Invertebrate & Vertebrate Branch 2
Registration Division (7505T)

Enclosure: Stamped "NOTIFICATION" Label, August 25, 2025

NOTIFICATION

104530-2

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:

08/25/2025

Avilive Clopyralid Technical**For Manufacturing Use Only****ACTIVE INGREDIENT:**

Clopyralid

(3,6-dichloro-2-pyridinecarboxylic acid).....95.887%

OTHER INGREDIENTS.....4.113%**Total**.....100.00%EPA Reg. No.: [104530-2](#)

EPA Est. No.:

KEEP OUT OF REACH OF CHILDREN**DANGER/PELIGRO**

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.)

FIRST AID	
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 swallowed:	-Call a 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 poison control center or personnel. -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 treatment advice.
HOT LINE NUMBER	
Have the container or label with you when calling a poison control center or doctor, or going for treatment. In the event of a medical emergency, call your poison control center at 1-800-222-1222.	
Note to Physician	
Probable mucosal damage may contraindicate the use of gastric lavage.	

Manufactured for:

[Zhejiang Avilive Chemical Imp. &Exp. Co., Ltd.](#)[12/F, T1, Hengdian Center, No.136 Fuchun Road, Shangcheng District,](#)[Hangzhou, 310016, Zhejiang, China](#)

NET CONTENTS: _____pounds

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

DANGER

CORROSIVE. CAUSES IRREVERSIBLE EYE DAMAGE. HARMFUL IF SWALLOWED OR ABSORBED THROUGH THE SKIN. Do not get in eyes or on clothing. Avoid contact with skin or clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking chewing gum, using tobacco or using the toilet. Remove and wash contaminated 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 requirement of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to the 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. Use only as directed on this label.

This product may only be formulated into manufacturing-use herbicide products or end-use herbicide products for the following uses:

AGRICULTURAL USES

Apple, asparagus, barley, borage, broccoli, broccoli raab, brussel sprouts, bushberries, cabbage, caneberry subgroup (Crop Group 13-07A), canola, cauliflower, cavalo broccoli, Chinese broccoli, Chinese cabbage (bok choy), Chinese cabbage (napa), Chinese mustard cabbage, collards, corn, crambe, cranberry, cuphea, echium, fallow land, flaxseed, garden beet, grasses, hare's ear mustard, hops, intermediate wheatgrass, mint, kale, kohlrabi, lesquerella, low growing berry subgroup (Crop Group 13-07G), lunaria, meadowfoam, milkweed, mizuna, mustard greens, mustard spinach, oats, oil radish, onion, bulb, subgroup (Crop Group 3-07A), pasture, Pome Fruit (Crop Group 11-10), poppy seed, radish roots, rangeland, rape greens, rapeseed, sesame, sod farms, spinach, stone fruits (Crop Group 12-12), strawberry, sugar beets, sweet rocket, Swiss chard, teff, tree plantations, turnip, leaves of root and tuber vegetables (Crop Group 2), Brassica leafy greens subgroup (Crop Subgroup 4-16B), Brassica Head and Stem Vegetable Group (Crop Group 5-16), Stalk and stem vegetable subgroup (Crop Subgroup 22A), and wheat.

This product may be used to formulate products for specific use(s) not listed on this label, except residential turf, if the formulator, user group or grower has complied with U.S. EPA submission

requirements regarding the support of such use(s). Consult [Zhejiang Avilive Chemical Imp. &Exp. Co., Ltd.](#) for instructions for formulation and other information.

NON-AGRICULTURAL USES

For use only on non-residential turf such as athletic and recreational sports fields, cemeteries, golf courses, industrial sites, non-cropland, parks, rights-of-way, and roadsides. Turfgrass and lawn uses are restricted to non-residential sites. In CA, OR and WA, turfgrass and lawn uses are restricted to golf courses only.

This product may be used to formulate products for specific use(s) not listed on this label, except residential turf, if the formulator, user group or grower has complied with U.S. EPA submission requirements regarding the support of such use(s). Consult [Zhejiang Avilive Chemical Imp. &Exp. Co., Ltd.](#) for instructions for formulation and other information.

This product must not be formulated into manufacturing-use herbicide products or end-use herbicide products for use on residential turf.

STORAGE AND DISPOSAL

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

Pesticide Storage: Keep product in original container. Store in a cool, dry secure place. Protect from excessive heat. Do not contaminate food or foodstuffs. Do not store or transport near food or feed.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

Container Handling:

Nonrefillable Container (Lined Plastic Drum): 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 formulation equipment. Then offer for recycling if available or dispose of liner and drum in a sanitary landfill or by incineration or, if allowed by state and local authorities by burning. If burned, stay out of smoke.

Limited Warranty and Limitations of Liability

Read the entire directions for use, conditions of warranties and limitations of liability before using this product. If terms 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.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, [Zhejiang Avilive Chemical Imp. &Exp. Co., Ltd.](#) makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the

statements made on this label. No agent of [Zhejiang Avilive Chemical Imp. &Exp. Co., Ltd.](#) is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, [Zhejiang Avilive Chemical Imp. &Exp. Co., Ltd.](#) disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: 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 or handling of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid or at [Zhejiang Avilive Chemical Imp. &Exp. Co., Ltd.](#) election, the replacement of product.