



FIFRA SECTION 24(c) – SPECIAL LOCAL NEED

FOR DISTRIBUTION AND USE ONLY WITHIN THE STATE OF WASHINGTON

**HELM AGRO INTENDS THAT THIS PRODUCT WILL ONLY BE DISTRIBUTED BY
THE PUGET SOUND SEED GROWERS ASSOCIATION TO CONTRACTED
GROWERS**

**HELM AGRO
RO-NEET[®] HERBICIDE**

EPA Reg. No. 74530-16
EPA SLN No. WA-150004

**This label for RO-NEET HERBICIDE expires and must not be distributed or used in
accordance with this SLN registration after December 31, 2019.**

DIRECTIONS FOR USE

- It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
- This labeling must be in the possession of the user at the time of application.
- Follow all applicable directions, restrictions, Worker Protection Standard requirements, and precautions on the EPA-registered label.

SPINACH GROWN FOR SEED: Apply 1/3 gallon of RO-NEET HERBICIDE (2 lbs. ai) in a minimum of 10 gallons of water per acre prior to planting. Use on sandy mineral soils only. Immediately (within minutes) after application thoroughly mix RO-NEET HERBICIDE into the soil to a depth of 2 to 3 inches. Whenever possible, application and incorporation should be done in the same operation. Use equipment which has been proven to incorporate thoroughly to the recommended depth. For a list of weeds controlled refer to the EPA-registered RO-NEET HERBICIDE label.

WEEDS CONTROLLED:

Annual bluegrass	Poa annua
Annual Ryegrass	Lolium multiflorum
Barley, volunteer	Hordeum spp.
Barnyardgrass (watergrass)	Echinochloa spp.
Crabgrass	Digitaria spp.
Foxtails	Setaria spp.

Wild oats	<i>Avena fatura</i>
ANNUAL BROADLEAF WEEDS	
Black nightshade	<i>Solanum nigrum</i>
Hairy nightshade	<i>Solanum villosum</i>
Henbit, deadnettle	<i>Lamium</i> spp.
Lambsquarters	<i>Chenopodium album</i>
Nettleleaf goosefoot*	<i>Chenopodium murale</i>
Purslane common	<i>Portulaca oleracea</i>
Redroot pigweed	<i>Amaranthus retroflexus</i>
Shepherdspurse	<i>Capsella bursa-pastoris</i>
Small stinging nettle/ Burning nettle	<i>Urtica urens</i>
Velvetleaf**	<i>Abutilon theophrasti</i>
*California excluded	
**Partial control or suppression only	

The above broadleaf weeds will be controlled only if application is made when conditions are favorable for germination. RO-NEET HERBICIDE SELECTIVE HERBICIDE WILL NOT CONTROL ESTABLISHED OR GERMINATED WEEDS PRESENT AT APPLICATION.

PERENNIAL WEEDS

Yellow nutsedge	<i>Cyperus esculentus</i>
Purple nutsedge	<i>Cyperus rotundus</i>

Existing stands of nutsedge must be turned under and chopped thoroughly before treatment. Prior to planting, RO-NEET HERBICIDE must be thoroughly mixed into the soil or applied subsurface to the soil with injectors for nutsedge control.

RESTRICTIONS / PRECAUTIONS:

- The restricted entry interval (REI) for RO-NEET HERBICIDE is 48 hours. Do not allow entry by unprotected persons into the treated area during the REI.
- Make only one (1) application per growing season.
- For use under this SLN label do not apply this product through any type of irrigation system.
- Stunting and transient crop injury from RO-NEET HERBICIDE has been observed in spinach grown for seed. Crop injury may result from unfavorable environmental conditions.
- All spinach seed screenings shall be disposed of in such a way that they cannot be distributed or used for human food or animal feed. The seed conditioner shall keep records of screening disposal for three years from the date of disposal and shall furnish the records to the director immediately upon request. Conditioner disposal records shall consist of documentation of on-farm disposal, disposal at a controlled dumpsite, incinerator, composter, or other equivalent disposal site and shall include the lot numbers, amount of material disposed of, the grower(s), and the date of disposal.
- No portion of the spinach seed plant, including but not limited to green chop, hay, pellets, meal, whole seed, cracked seed, roots, bulbs, leaves and seed screenings may be used or distributed for food or feed purposes.

- Spinach seed shall bear a tag or container label which forbids use of the seed for human consumption or animal feed.
- Spinach seed may not be distributed for human consumption or animal feed.
- For Use on Sandy Mineral Soils Only.

WSDA CONTAINER DISPOSAL GUIDANCE:

Pesticide containers must be properly cleaned prior to disposal. The best time to clean empty pesticide containers is during mixing and loading, because residue can be difficult to remove after it dries. Triple rinse (or pressure rinse) the pesticide container, empty all pesticide rinse water into the spray tank, and apply to a labeled crop or site. Recycling cleaned containers is the best method of container disposal. Information regarding the recycling of empty and cleaned plastic pesticide containers in Washington is available on the WSDA Waste Pesticide Program web site at <http://agr.wa.gov/PestFert/Pesticides/WastePesticide.aspx>. Cleaned containers may also be disposed of in a sanitary landfill, if permitted by the county. Burning is not a legal method of container disposal in Washington.

HELM AGRO'S Special Conditions and Disclaimer for use of Ro-Neet Herbicide on Spinach Grown for Seed

HELM AGRO intends that this Section 24(c) label be distributed by the Puget Sound Seed Growers Association only to end users and/or growers who agree in writing to the terms and conditions required by the Puget Sound Seed Growers Association including a waiver and release from all liability and indemnification by the user and/or grower of HELM AGRO, Puget Sound Seed Growers Association, and others for failure to perform and crop damage from the use of RO-NEET HERBICIDE on spinach grown for seed. If such terms and conditions are unacceptable, return RO-NEET HERBICIDE at once unopened.

This product when used on spinach grown for seed may lead to injury, loss, or damage. HELM AGRO recommends that the user and/or grower test this product in order to determine its suitability for such intended use. The Puget Sound Seed Growers Association and HELM AGRO make this product available to the user and/or grower solely to the extent the benefit and utility, in the sole opinion of the user and/or grower, outweigh, the extent of potential injury associated with the use of this product. The decision to use or not to use this RO-NEET HERBICIDE must be made by each individual RO-NEET HERBICIDE user and/or grower on the basis of possible crop injury from the RO-NEET HERBICIDE, the severity of weed infestation, the cost of alternative weed controls and other factors. HELM AGRO intends that because of the risk of failure to perform or crop damage that all such use is at the user's and/or grower's risk, to the extent consistent with applicable law.

This Special Conditions and Disclaimer statement is required by HELM AGRO and is not required by the USEPA or the WSDA.

RO-NEET HERBICIDE is a trademark of Helm Agro US, Inc.
24(c) Registrant:

HELM AGRO, INC. EPA SLN NO: WA-150004
4042 Park Oaks Blvd., Suite 330
Tampa, FL 33610
EPA SLN NO: WA-150004

Label Rev.

United States Environmental Protection Agency
Office of Pesticide Programs, Registration Division (7505C)
Washington, DC 20460



Application for/Notification of State Registration
of a Pesticide To Meet a Special Local Need
(Pursuant to section 24(c) of the Federal Insecticide,
Fungicide, and Rodenticide Act, as Amended)

For State Use Only

Registration No. Assigned
WA-150004

Date Registration Issued

03/31/2015

1. Name and Address of Applicant for Registration Helm Agro US, Inc. 4042 Park Oaks Blvd., Suite 330 Tampa, FL 33610		2. Product is (Check one) EPA-Registered <input checked="" type="checkbox"/> New (not EPA-registered) <input type="checkbox"/> Attach EPA Form 8570-4, Confidential Statement of Formula for new products. 3. Active ingredient(s) in Product Cycloate		EPA Registration Number 74530-16 EPA Company Number 74530
4. Product Name Ro-Neet Herbicide		5. If this is a food/feed use, a tolerance or other residue clearance is required. Cite appropriate regulations in 40 CFR Part 180, 185, and/or 186. 180.212		
6. Type of Registration (Give details in Item 13 or on a separate page, properly identified and attached to this form): <input type="checkbox"/> a. To permit use of a new product. <input checked="" type="checkbox"/> b. To amend EPA registrations for one or more of the following purposes: <input type="checkbox"/> (1) To permit use on additional crops or animals. <input checked="" type="checkbox"/> (2) To permit use at additional sites. <input type="checkbox"/> (3) To permit use against additional pests. <input type="checkbox"/> (4) To permit use of additional application techniques or equipment. <input type="checkbox"/> (5) To permit use at different application rates. <input type="checkbox"/> (6) Other (specify below)		7. Nature of Special Local Need (check one) <input type="checkbox"/> There is no pesticide product registered by EPA for such use. <input checked="" type="checkbox"/> There is no EPA-registered pesticide product which, under the conditions of use within the State, would be as safe and/or as efficacious for such use within the terms and conditions of EPA registration. <input type="checkbox"/> An appropriate EPA-registered pesticide product is not available.		
10. Has FIFRA section 24(c) registration for this use of the product ever, by another State, been (check appropriate box(es), if known): <input checked="" type="checkbox"/> Sought <input checked="" type="checkbox"/> Issued <input type="checkbox"/> Denied <input type="checkbox"/> Revoked If any of the above are checked, list States in Item 13 below. <input type="checkbox"/> No FIFRA section 24(c) Action		8. If this registration is an amendment to an EPA-registered product, is it for a "new use" as defined in 40 CFR 152.3? <input type="checkbox"/> Yes (discuss in Item 13 below) <input checked="" type="checkbox"/> No 9. Has an EPA Registration or Experimental Use Permit for this chemical ever been (check applicable box(es), if known): <input checked="" type="checkbox"/> Sought <input checked="" type="checkbox"/> Issued <input type="checkbox"/> Denied <input type="checkbox"/> Cancelled <input type="checkbox"/> Suspended <input checked="" type="checkbox"/> Registration <input type="checkbox"/> Experimental Use Permit <input type="checkbox"/> No Previous Permit Action		
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		11. Endangered Species Act: (Give details in Item 13 or on a separate page, properly identified and attached to this form) Identify the counties where this pesticide will be used. If Statewide, indicate "all." Provide a list of Federally protected endangered/threatened species which occur in the areas of proposed use.		
Signature of Applicant or Authorized Representative 		12. Indicate use status of Special Local Need, i.e., planned dates of use: From: 8/1/2014 To: 12/31/2019		
Title Agent for Helm Agro US, Inc.		13. Comments (attach additional sheet, if needed)		
Telephone Number 610-793-3222		Date 8/7/2014		
Determination by State Agency This registration is for a Special Local Need and is being issued in accordance with section 24(c) of FIFRA, as amended. To the best of our knowledge, the information above is correct, except as noted in "Comments" below or in attachments.				
Name, Title, and Address of State Agency Official William "Eddie" Simons Registration Specialist WSDA, Pesticide Management Division PO Box 42560 Olympia, WA 98504-2560		Comments (by State Agency Only) Replacement for SLN #WA-020003 Non-Food/Non-Feed use Spinach Grown for Seed		Received by EPA
Title 				
Telephone Number 360-902-2031		Date 03/31/2015		



STATE OF WASHINGTON

DEPARTMENT OF AGRICULTURE

P.O. Box 42560 • Olympia, Washington 98504-2560 • <http://agr.wa.gov> • (360) 902-1800

April 1, 2015

Tawanda Maignan, Team Leader
Risk Integration, Minor Use, and Emergency Response Branch
U.S. EPA Office of Pesticide Programs (7505 P)
Room S4900, One Potomac Yard
2777 Crystal Drive
Arlington, VA 22202

RE: EPA SLN Registration Number WA-150004

Dear Tawanda,

Enclosed is Washington Special Local Need (SLN) registration number WA-150004 issued to Helm Agro US for the use of RO-NEET Herbicide (EPA Reg. No. 74530-16) on spinach grown for seed for control of annual weeds. This registration was issued under authority of Section 24(c) FIFRA.

There is a special local need in Washington for the use of Cycloate to control annual weeds in spinach grown for seed. Other products are either not labeled for this use or not as effective as Cycloate on the target weeds. This SLN registration is being issued as an eventual replacement for WA-020003 which has expired and is expected to be cancelled. Washington State University has given its support of this use through a letter from Dr. Timothy Miller, Weed Scientist at WSU Northwestern Washington Research and Extension Center.

A tolerance for residues of Cycloate on spinach grown for seed is not required, since these crops are considered to be non-food uses in Washington (Washington Administrative Code 16-228-1270).

WSDA has issued this SLN registration with an expiration date of December 31, 2019.

If you have any questions, please contact me at (360) 902-2031 or by e-mail at *esimons@agr.wa.gov*.

Sincerely,

PESTICIDE MANAGEMENT DIVISION



William "Eddie" Simons
Registration Specialist

Enclosures

cc: Barbarette Young-Henry, Wagner Regulatory Associates
Dr. Tim Miller, Washington State University