



**US Environmental Protection Agency
Office of Pesticide Programs**

Petition for Cyazofamid

April 2014

September 6, 2013



Nicole Williams, Registration Division
Document Processing Desk (REGFEE)
Office of Pesticide Programs
U.S. EPA, Room S-4400
One Potomac Yard (South Building)
2777 South Crystal Drive
Arlington, VA 22202-4501
Phone number: 703-308-5551

(Sent via FedEx)

SUBJECT: ATTENTION: MINOR USE – EXCLUSIVE USE REQUEST – PRIA M0007
CYAZOFAMID TECHNICAL (EPA REGISTRATION NUMBER 71512-2)
RANMAN 400SC (EPA REGISTRATION NUMBER 71512-3)

Dear Ms. Williams,

ISK Biosciences Corporation (ISKBC, EPA Company Number 71512) is submitting this petition for the extension of the exclusive use period for Cyazofamid under FIFRA section 3(c)(1)(F)(ii), and requests that EPA grant a 3 year extension for the Cyazofamid data. Please find enclosed with this letter three (3) copies of the petition along with one CD and a copy of the payment receipt as noted below:

- Petition: Application for Extension of the Exclusive Use Period for Cyazofamid.
- One Compact Disc of the complete petition document (fully linked, PDF file).
- One copy of the PRIA Code MOO7 Fee Payment Email Receipt for \$5000.

FIFRA section 3(c)(1)(F)(ii) provides for up to a 3 year extension of the exclusive use period for an active ingredient if it meets the qualifying criteria for 9 minor use crop registrations, obtained within the specified 7 year period following the initial registration. Ranman 400SC end use product (EPA Reg. No. 71512-3) containing Cyazofamid was first registered on November 12, 2004, and Technical Cyazofamid (EPA Reg. No. 71512-2) on November 9, 2004. The initial registration included Cucurbit Vegetables (Crop Group 9); and potatoes and field tomatoes. Potatoes and tomatoes are not part of the submission supporting the requested exclusive use period extension. On August 1, 2008, EPA amended the RANMAN 400SC registration to add Carrot. On July 29, 2009, EPA amended the RANMAN 400SC registration to add Grapes, East of the Rocky Mountains; and Fruiting Vegetables (Crop Group 8) and Okra. Further, on August 13, 2010, EPA amended the RANMAN 400SC registration to add Brassica (Cole) Leafy Vegetables (Crop Group 5) and Turnip Greens; Spinach; and Hops. Note that these uses were registered within seven years of the initial Cyazofamid registration. Minor uses included in the 2004, 2008, 2009 and 2010 registration actions are thus eligible for consideration in a request to extend the exclusive use period.

On September 14, 2012, EPA further amended the RANMAN 400SC registration to add basil; succulent-podded and succulent-shelled beans; and expanded label from spinach to leafy greens (Crop Subgroup 4A) including lettuce; and expanded from potatoes to tuberous and corn

ISK Biosciences Corporation

7470 Auburn Road, Suite A, Concord, Ohio 44077, U.S.A.

tel: 440/357-4640 • fax: 440/357-4661

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vegetables (Crop Subgroup 1C) and expanded fruiting vegetables crop Group 8 to Group 8-10. However, the crops added in September 14, 2012 amendment are not within the scope of this requested extension of the exclusive use period as the amendment was not within 7 years of the initial Cyazofamid registration.

With this petition, ISKBC provides justification and evidence for 48 minor use crops in the above crop groups, approved during the 7 year period following the initial registration, and meeting at least one of the FIFRA criteria. The available data on these crops and crop groups were reviewed and analyzed and the eligibility of many more than 9 minor use crops was determined. The evidence and justification are detailed in the enclosed petition, and ISKBC believes that Cyazofamid fully meets the statutory criteria to qualify for a 3 year exclusive use extension. The current exclusive use period for Cyazofamid expires in November 2014. If EPA grants the requested extension, the new exclusive use period will expire November 12, 2017.

We appreciate EPA's efforts to implement this provision of FIFRA, and hope that the information provided in this petition is helpful to EPA's evaluation of the extension request. We look forward to working with the agency.

Please let us know if we can provide any further information and if you have any questions. I can be contacted by phone at (440)-357-4653, by fax at (440)-357-4661, or by e-mail at peplowskim@iskbc.com.

Sincerely,

ISK BIOSCIENCES CORPORATION



Michael A. Peplowski
Manager, Product Registrations
Enclosures

Cc: Lois Rossi, Director, Registration Division
Michelle Knorr, EPA- Office of General Counsel
William Chism, Specialty Crops Advisor