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EPA PSP

August 12, 2020

Document Processing Desk **(RD) (AMEND)**
Office of Pesticide Programs **(7505P)**
U.S. Environmental Protection Agency
One Potomac Yard, Room S-4900
2777 South Crystal Drive
Arlington, VA 22202

ATTN: Mindy Ondish, Product Manager 23, Herbicide Branch, Registration Division
CC: Dan Kenny, Branch Chief, Herbicide Branch, Registration Division
Sarah Meadows, Herbicide Branch, Registration Division

SUBJECT: A21472 Plus VaporGrip® Technology - EPA Reg. No. 100-1623
(Alternate Brand name: Tavium® Plus VaporGrip® Technology)
PRIA R350 Action: Amend Conventional Registration - Change Product Label

Dear Ms. Ondish,

Syngenta Crop Protection LLC, is submitting a label amendment to A21472 Plus VaporGrip® Technology (EPA Reg. No. 100-1623). This product, herein referred to as "Tavium", is marketed under the alternate brand name Tavium® Plus VaporGrip® Technology. The purpose of this label amendment is to change the directions for use removing the December 20, 2020 automatic expiration and subsequent prohibition of use after this date.

The ability to utilize dicamba containing products approved for over-the-top (OTT) use in dicamba tolerant (DT) crops remains of paramount importance due to widespread populations of broadleaf weeds - including Palmer Amaranth, Tall Waterhemp, and Giant Ragweed - that are resistant to glyphosate and other herbicides including PPO-, ALS- and EPSP- inhibiting herbicides. At the present time, as well as for the foreseeable future, cotton and soybean growers have limited options to protect their crops against these herbicide resistant weed species. The continuing ability to use Tavium which is specifically designed for use in DT crops, provides growers a needed solution by providing both preemergence and postemergence control of broadleaf weeds including herbicide resistant biotypes. Effective management of difficult to control weeds is of critical importance to protect cotton and soybean yield. Accordingly, Syngenta respectfully requests that registration of Tavium be renewed prior to the December 20, 2020 automatic expiration date.

Syngenta understands that the Agency is evaluating data submitted in support of the reregistration of dicamba on these DT crops by Syngenta as well as the other registrants who previously held OTT registrations. Please find included a courtesy copy of our January 15, 2020 submission letter identifying the studies we submitted as required by the Conditions of Registration for Tavium. Syngenta has also made subsequent data submissions as requested by the Agency on March 27 and April 10, 2020. We anticipate that as an outcome of this

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review, the Agency may seek additional label modifications in support of a decision to reregister products for OTT use in DT crops. Syngenta welcomes the opportunity to address any questions the Agency may have during this data review and to engage in consideration of potential next steps with respect to potential label modifications if deemed appropriate by the Agency. To that end, we will be requesting a meeting with the Agency to discuss other potential requirements the Agency believes would be beneficial to incorporate consistently across dicamba OTT labels for DT cotton and soybeans.

Please find enclosed with this application a confidential appendix that provides additional information for the Agency's consideration with this action.

The following documentation has been enclosed in support of this amendment.

- Cover Letter
- Completed Application for Pesticide Registration (Form 8570-1) for this action
- PRIA Receipt
- Clean and Highlighted versions of the revised label for A21472 Plus VaporGrip® Technology (EPA Reg. No. 100-1623)
- Courtesy Copy of January 15, 2020 Letter - Subject: Tavium® (A21472) Plus VaporGrip® Technology (EPA Reg. No. 100-1623) Submission of 2019 Annual Report and Studies Supporting Conditions of Registration

PRIA Fee for Service

Based upon discussion with the Agency, this request falls into PRIA category R350 and as such, the required PRIA fee of $13,888 has been paid per the Pesticide Registration Improvement Renewal Act (PRIA IV) of 2019.

Please contact me by email (monty.dixon@syngenta.com) or call me 336-632-7055 if you have any questions regarding this submission.

Sincerely,

Montague Dixon
US Regulatory Portfolio Lead, Herbicides
Regulatory and Stewardship North America

Enclosure