LEWIS &
HARRISON
Consultants in Government Affairs

2461 South Clark Street
Suite 710
Arlington, VA 22202
telephone 202.393.3903
fax 202.393.3906

May 2, 2019

Document Processing Desk (BARIS)
Office of Pesticide Programs (7505P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Attn: Reuben Baris, Product Manager, Team 25

RE: Nissan Chemical Corporation Quizalofop-P-Ethyl MUP Herbicide (EPA Reg. No. 33906-10) and TARGA Herbicide (EPA Reg. No. 33906-9)
Submission of Annual Report in Accordance with Conditions of Registration – Appendix A

Dear Mr. Baris:

The EPA approvals for the above referenced products approving a new use on Quizalofop-resistant Provisia™ Rice require Nissan to file an annual report with the Agency in accordance with the provisions of Appendix A, Subpart D.

As you know, Nissan's partner in the use of Quizalofop on Provisia™ Rice has been BASF Corporation. The two companies worked together on this use for several years. All marketing for the use on Provisia™ Rice is handled exclusively by BASF. As previously acknowledged, Nissan understands that the legal responsibility for maintaining the registration and ensuring that the conditions of registration are faithfully executed are theirs as the product registrant.

The information required to be included in the annual report includes proprietary business information, such as, the annual sales Provisia™ Rice seed and associated pesticide sales on a state by state basis. Such sales information is highly sensitive and proprietary to BASF. Accordingly, Nissan has agreed with BASF that BASF will submit the annual report to EPA. The report will be separately submitted by Ms. Christine Keating, Product Registration Manager, BASF Corporation. In addition to hard copy, it is my understanding that Ms. Keating also intends to provide you with a pdf copy to help ensure that the report is connected to Nissan's two registrations (EPA Reg. Nos. 33906-9 and 33906-10).

I appreciate your help on this. If further information or clarification is needed, please contact me by email (dlewis@lewisharrison.com) or phone (202-393-3903, ext. 112).

Sincerely yours,

E. David Lewis
Agent for,
Nissan Chemical Corporation

cc: Keita Tsunemi (Nissan)
Christine Keating (BASF)