

August 29, 2014

Document Processing Desk (SLN)  
Office of Pesticide Programs – 7504P  
U.S. Environmental Protection Agency  
1200 Pennsylvania Ave. NW  
Washington, DC 20460-0001

RE: New Special Local Need Registration  
Rovral® Brand 4 Flowable Fungicide (a.i. iprodione)  
EPA Reg. No. 279-9564, EPA SLN No. OR-140013  
Registrant: FMC Corporation  
Site: Crucifer Seed Crops

The Oregon Department of Agriculture (ODA) is pleased to enclose SLN No. OR-140013, a Special Local Need registration under FIFRA Section 24(c), to allow for the use of Rovral® Brand 4 Flowable Fungicide (iprodione), on crucifer crops grown for seed in Oregon. Rovral is a fungicide that is particularly effective in helping prevent the spread of several fungal pathogens.

Growers of seed crops in the *Brassica*, *Raphanus*, and *Sinapis* genera have seen a dangerous uptick in the presence of black leg (*Phoma lingam*), white leaf spot (*Pseudocercospora capsellae*), and light leaf spot (*Cylindrosporium concentricum*). These diseases are new to western Oregon, and fungicides currently registered for seed treatment lack control efficacy. Dr. Cynthia Ocamb of Oregon St University, and Bob McReynolds of the Specialty Seed Growers of Western Oregon, provided letters of support in order to help control the threat of these pathogens. Washington State University's Dr. Lindsey duToit conducted studies in 2004 and 2005, which demonstrated that Rovral 4F is highly effective in controlling black Leg on cauliflower and cabbage.

All seed and plants of susceptible species within the family Brassicaceae are subject to Oregon Administrative Rule 603-052-0882, which states that:

(A) Seeds be accompanied by a certificate stating that the untreated seed is free from blackleg (*Leptosphaeria maculans*, asexual stage = *Phoma lingam*) based on official sampling and testing. Alternatively, a seed lot that initially tests positive for blackleg by official testing must be treated in a manner approved by the Department for black leg control and the treatment officially documented; or,

(B) The seed lot must be treated in a manner approved by the Department for blackleg control and records documenting said treatment provided to the Department upon request.

FMC Corporation has requested this registration in order to address a special local need of Oregon crucifer seed crop growers for an alternative to other fungicide products such as Thiram, which has shown limited effectiveness in the control of Phoma. A similar SLN registration has been approved in Washington State for the control of *Phoma lingam* on broccoli crops grown for seed (WA-070001 Rovral® Brand 4 Flowable Fungicide). There is an existing Rovral 4F SLN in the state of Oregon (EPA SLN No. OR-130001), for Brassica crops grown for seed, but it is for foliar application only.

Crucifer crops grown for seed are regulated as a nonfood/non-feed crop under Oregon Administrative Rule (OAR) 603-057-0535, Pesticide Use On Crops Grown For Seed. The “Special Crop Use Restrictions” stated on the label for EPA SLN No. OR-140013 are reflective of the rule.

The seed rule: [http://arcweb.sos.state.or.us/pages/rules/oars\\_600/oar\\_603/603\\_057.html](http://arcweb.sos.state.or.us/pages/rules/oars_600/oar_603/603_057.html)

If you have any questions do not hesitate to contact me. Thank you.

Grant T Jackson

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attachments: EPA Form 8570-25  
EPA SLN No. OR-140013

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