

**NISSO AMERICA INC.**

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September 25, 2018

Stephen Schaible  
Document Processing Desk (REFGEE)  
Office of Pesticide Programs  
U.S. EPA, Room S-4400  
One Potomac Yard (South Building)  
2777 South Crystal Drive  
Arlington, VA 22202-4501

RE: Request for Extension of Exclusive Use Data Protection for Cyflufenamid  
PRIA Code M007; 12-month review, \$5,513.00

Dear Mr. Schaible:

Nippon Soda Co. Ltd. (Nisso), the sole registrant of the proprietary fungicide, cyflufenamid, is submitting a petition for the extension of exclusive use data protection under FIFRA § 3(c)(1)(F)(ii). Cyflufenamid was first registered on June 27, 2012, and to date, Nisso has successfully petitioned for the use of cyflufenamid on 11 minor use representative crops within the requisite 7 years from registration. The criteria have been satisfied for the full 3-year extension, as outlined in this letter and fully detailed in the petition.

The current registrations are:

<b>Product</b>	<b>EPA Registration Number</b>	<b>Registration Date</b>	<b>Alternate Brand Names</b>
Cyflufenamid Technical	8033-102	June 27, 2012	n/a
Miltrex 10 SC Fungicide (10% ai)	8033-103	June 27, 2012	Torino® (Gowan, EPA Reg. No. 8033-103- 10163)
Cyflufenamid 10 SC fungicide (10% ai)	8033-104	June 27, 2012	n/a

The formulation of cyflufenamid for agricultural use, Miltrex 10 SC Fungicide (EPA Reg. No. 8033-103), is registered for use on the following crops:

- Cucurbit Vegetables (Crop Group 9)
- Pome Fruit (Crop Group 11)
- Small Fruit Vine Climbing, Except Fuzzy Kiwifruit (Subgroup 13-07F)
- Low Growing Berry (Subgroup 13-07G), except cranberry
- Fruiting Vegetables (Crop Group 8-10)

- Cherries (Subgroup 12-12A)
- Hops

Cited residue data include 2 representative crops that are considered major crops; apple and grapes. As per guidance in the EPA questions and answers document for exclusive use data protection revised February 2018, a minor crop may be substituted for a major crop, and a total of 13 crops are discussed in the petition.

Cyflufenamid has a unique mode of action and is an important part of the IPM approach for the treatment of powdery mildew pathogens in a variety of crops, as it does not show any cross-resistance with other classes of fungicides. This petition includes several recommendations and letters of support from university and extension service researchers, and the end-use products are labeled for resistance management. Cyflufenamid is also non-toxic to beneficial insects.

Based on all of the information and data submitted and/or cited in this petition, Nisso believes that the criteria have been satisfied, if not exceeded, for data protection extension for cyflufenamid. We look forward to receiving the additional 3 years of data protection beyond the standard 10-year exclusive use period.

In support of this petition, the following documents are included with the submission:

1. 8570-1 Application for Pesticide
2. Receipt for PRIA payment; Agency Tracking ID: 75572392888
3. 8570-34 Certification with Respect to the Citation of Data
4. 8570-35 Data Matrix (both Agency and Public copies)
5. Transmittal Document
6. Petition for 3 Years Extension of Exclusive Data Use for Cyflufenamid report (which includes product labels)

Please contact me at phone: 917-891-0855 or e-mail: [k.knox@nissoamerica.com](mailto:k.knox@nissoamerica.com) if you have any questions or require further information. Thank you in advance for your review of this petition.

Best regards,



Kristen B. Knox  
Regulatory Affairs Manager



## Receipt

### Your payment is submitted

Pay.gov Tracking ID: 26C7DN9Q  
Agency Tracking ID: 75572392888  
Form Name: Pesticide Registration Improvement Act - Prepayment  
Application Name: PRIA Service Fees

### Payment Information

Payment Type: Bank account (ACH)  
Payment Amount: \$5,513.00  
Transaction Date: 09/13/2018 11:14:40 AM EDT  
Payment Date: 09/14/2018  
Registration Number: 8033-102  
Company Name: Nippon Soda Co. Ltd.  
Company Number: 8033  
Action Code: M007

### Account Information

Account Holder Name: Nisso America Inc  
Routing Number: 026008905  
Account Number: \*\*\*\*\*1324

### Email Confirmation Receipt

Confirmation Receipts have been emailed to:  
k.knox@nissoamerica.com