



CMNP Abscission Agent Registration Update

April 21, 2010

Agenda

- Cooperating Organizations Roles & Responsibilities
- Section 5 Experimental Use Permit (EUP) & Temporary Tolerance
- Section 3 Registration

Roles and Responsibilities

- FDOC
 - Mechanical harvesting/abscission support
 - Project funding
 - Industry coordination
 - CMNP Registrant
- AgroSource
 - CMNP development & registration
 - Authorized agent for CMNP registration at EPA
 - CMNP commercialization & stewardship
 - Financial investment

Roles and Responsibilities

- IFAS
 - Mechanical harvesting/Abscission research
 - Abscission candidate identification
 - Field development & data based guidance
 - Economics
 - Industry analysis
 - Grower/Harvester decision tools
- CHRAC
 - Mechanical harvesting/Abscission
 - Broad industry representation
 - Oversight & input

EUP Purpose

- EUP required for testing unregistered product on >10 acres
- EPA emphasizes an EUP is **experimental**
 - Approval based on EPA determination that EUP will generate data needed by Registrant for Section 3
 - EPA may revoke an EUP at any time
- Detailed records and final report **required** at conclusion of EUP to verify compliance

EUP Oversight

- FDOC is *Permitee*
- AgroSource is designated *Participant* and responsible for oversight of entire EUP/TT
- *Supervisor(s)* responsible for oversight of:
 - Delivering product and providing guidance on use
 - Collecting required site background data
 - Assuring all product performance data is collected
- *Cooperator(s)* responsible for:
 - CMNP application (directly responsible)
 - Advising *Supervisor/Participant* when application will be made and ensuring application and environmental conditions are recorded
 - Maintaining records on product used and returning unused product

EUP/TT Regulatory Package



Delivered to EPA 12/24/09

- 82 separate study volumes
- > 100 studies
- ~ 45,000 pages
- > 500 lbs in shipment

Regulatory Timelines

	2009	2010	2011	2012
Section 5 EUP/TT	Submission 12/24		EPA Decision 07/14	
Section 3 Registration		Submission ~ 3Q		EPA Decision ~3Q

THANK YOU!