













Attach the following information and label it as “**Attachment 6**”:

- Results of testing for efficacy of the proposed product against the pest(s) of concern, including information on application rates, methods, and sites.
- Comparative data in possession for testing of the proposed product’s efficacy against that of any other products already registered for the proposed use.
- Brief statement of test methodology for the above information.

**7) Evidence showing that pest control methods and federally registered pesticides are not adequate to meet the special local need [ATCP 29.72(4)(h)]**

Document the lack of sufficient non-chemical pest control methods for the pest(s) of concern.

Document the lack of sufficient EPA-registered pesticides by providing:

A list of the available pesticides currently registered for the proposed use including:

- Product name
- EPA registration number
- Active ingredient(s)
- Explanation of why each product will not sufficiently control the pest problem or is not sufficiently available

Applicants (or technical experts) can generate this list by searching the Kelly Registration Systems database at <http://kellysolutions.com/wi/pesticideindex.asp> for the appropriate type of EPA-registered pesticide products currently listed with DATCP for sale/distribution in Wisconsin that include the proposed use site(s) [e.g. insecticides registered for use on corn (seed treatment), fungicides registered for use on cherries (foliar treatment)].

- *For assistance with searching this database, contact Alyssa Foss (608-224-4547).*

Label any tables and other supporting documentation as “**Attachment 7**”.

**8) A description and analysis of the potential benefits and risks associated with the proposed pesticide use. Demonstrate that the potential benefits to be derived from the proposed pesticide use exceed the potential adverse effects and will not have unreasonable adverse effects on persons, property, or the environment when used according to label directions. [ATCP 29.72(4)(i), (j), (k), (L)]**

- Benefits described and analyzed could include, but are not limited to, improved crop yield/quality, economic gain, and control of invasive species. Applicants **may not** cite lower cost of product as the sole benefit.
- Risks described and analyzed could include, but are not limited to, risks posed to applicators, bystanders, target site of application (e.g. phytotoxicity), endangered and threatened species, other non-target species including pollinators, groundwater, and surface water.
- Demonstration of adverse effects could include, but is not limited to, phytotoxicity data.
- The description and analysis should be sufficiently detailed so that DATCP can clearly identify the potential benefits and risks and determine whether the benefits exceed the risks.



State of Wisconsin  
Governor Tony Evers

**Department of Agriculture, Trade and Consumer Protection**  
Bradley M. Pfaff, Secretary

**9) Other relevant information required by the department.**

Submit the following:

- Properly completed EPA Form 8570-25 <http://www.epa.gov/opprd001/forms/8570-25.pdf>.

The department has noted errors with the following items:

- Item 1: Only enter the name and address of the primary registrant.
  - Item 2: Only enter the EPA registration number for the primary registrant.
  - Item 6b: If option 6 selected, enter the required information in Item 13.
  - Item 10: Select the appropriate boxes and list the names of states in Item 13.
  - Item 11: Enter the required information in Item 13 or on a separate page.
  - Item 13: Ensure the responses for Items 6b (option 6), 10, and 11 are entered here, when applicable.
- Letter(s) of support for use of the product (from the primary registrant and, if applicable, the supplemental distributor); label each as **"Attachment 9-A"**
- Include a statement regarding federal registration and labeling goals for the requested use, including a timeline of application submission and expected registration decision
- Letter(s) of support (technical expert); label as **"Attachment 9-B"**
- Letter(s) of support (representative of the organization representing the crop/site; or, in the absence of such an organization, at least one letter from a grower/applicator); label as **"Attachment 9-C"**
- Copy of the current Section 3 specimen label for the proposed product, if the product is federally registered; label as **"Attachment 9-D"**
- Copy of the current MSDS for the proposed product; label as **"Attachment 9-E"**
- For proposed uses on a food or feed crop:
- Provide the appropriate Code of Federal Regulations (CFR) citation(s) for established tolerances, or exemption from tolerances, for the proposed use.
  - Describe how the treated items will be marketed (processed, fresh, or both) and what will happen to byproducts of the produced item (e.g. consumption by livestock).
  - Provide data showing that the proposed use will not result in residues that exceed established tolerances; label as **"Attachment 9-F"**.