

April 30, 2024

Ms. Korinne Bell Ventura County Agricultural Commissioner 555 Airport Way, Suite E. Camarillo, CA 93010

Dear Ms. Bell:

We are writing to clarify the registration status of the end-use product, Dacthal, and its active ingredient DCPA, as we understand that Ag commissioners in different regions are taking disparate approaches (ranging from inaction to expressly warning growers) with respect to this product. As you may have read, USEPA has expressed its concern that based upon their assessment of the data from a comparative thyroid assay ("CTA" – a relatively new and complex study) they believe that DCPA may pose a health risk at very early stages of pregnancy. As the registrant, we have been highly engaged with EPA proposing mitigations to the label that we believe eliminate the human health risk of concern. AMVAC takes USEPA's concerns seriously and in response (prior to a regulatory decision by the EPA), we have voluntarily suspended sales of Dacthal pending agency review of the mitigated label.

That said, we wanted to make clear that neither USEPA nor CDPR has made a regulatory decision on either Dacthal or DCPA. And, while we are in close communication with many of the cognizant agencies, we ourselves are not in a position to predict the regulatory outcome. In short, our current registration labels remain registered, while we have suspended sales out of an abundance of caution pending review and potential approval of an amended label by USEPA. When we have more information on this, we will provide an update. We are more than glad to discuss with any personnel directly to clarify the situation.

Sincerely,

Timothy J. Donnelly CAO. General Couns

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