



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

March 19, 2019

Mr. Matthew Flanery  
Regulatory Specialist, Seedcare  
Syngenta Crop Protection, LLC  
P.O. Box 18300  
Greensboro, NC 27419

Subject: Label Amendment – adding use on oats and rye; other revisions and updates  
Product Name: Dividend XL RTA  
EPA Registration Number: 100-826  
Application Date: 3/6/17 with resubmission on 3/7/19  
Decision Number: 527074

Dear Mr. Flanery:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them. The Agency, in accordance FIFRA, as amended, has also completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Mefenoxam Interim Decision, and has concluded that your submission is acceptable.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Heather Garvie by phone at 703-308-0034, or via email at [garvie.heather@epa.gov](mailto:garvie.heather@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Lindsay Roe", with a stylized flourish at the end.

Lindsay Roe,  
Product Manager 22  
Fungicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

[Master]

<b>DIFENOCONAZOLE</b>	<b>GROUP</b>	<b>3</b>	<b>FUNGICIDE</b>
<b>MEFENOXAM</b>	<b>GROUP</b>	<b>4</b>	<b>FUNGICIDE</b>

## Dividend® XL RTA®

### Fungicide

A seed treatment product for protection against damage from listed diseases of small grain cereals: barley, oats, rye, triticale and wheat

#### Active Ingredients:

Difenoconazole <sup>1</sup> : .....	3.21%
Mefenoxam <sup>2</sup> : .....	0.27%
<hr/>	
Other Ingredients:	96.52%
Total:	100.00%

<sup>1</sup>CAS No. 119446-68-3

<sup>2</sup>CAS Nos. 70630-17-0 and 69516-34-3

Dividend XL RTA is a flowable concentrate for seed treatment containing 0.31 lb difenoconazole and 0.025 lb mefenoxam per gallon.

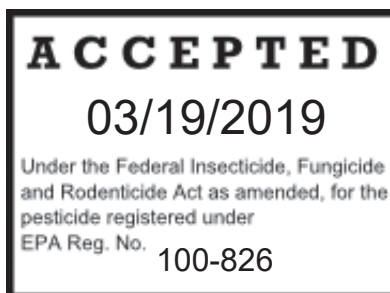
**KEEP OUT OF REACH OF CHILDREN.**

## CAUTION

See additional precautionary statements and directions for use inside booklet.

EPA Reg. No. 100-826

Net Contents



<b>FIRST AID</b>	
<b>If on skin or clothing</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
<b>NOTE TO PHYSICIAN</b>	
If ingested, induce emesis and treat symptomatically.	
Have the product container or label with you when calling a poison control center or doctor or going for treatment.	
<b>HOT LINE NUMBER</b>	
For 24-Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire, or Accident), Call <b>1-800-888-8372</b>	

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## **PRECAUTIONARY STATEMENTS**

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### **Hazards to Humans and Domestic Animals**

#### **CAUTION**

Harmful if absorbed through skin. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

### **Personal Protective Equipment (PPE)**

#### **Applicators and other handlers must wear:**

- Long-sleeved shirt and long pants
- Chemical-resistant gloves: barrier laminate, butyl rubber  $\geq 14$  mils, neoprene rubber  $\geq 14$  mils, nitrile rubber  $\geq 14$  mils, polyvinyl chloride (PVC)  $\geq 14$  mils, or Viton®  $\geq 14$  mils
- Shoes plus socks

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing or other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them.

### **Engineering Controls**

When handlers use closed systems in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

## **User Safety Recommendations**

### **Users should:**

- Wash thoroughly with soap and water after handling, and before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

## **Environmental Hazards**

This product is toxic to fish and aquatic invertebrates. Do not contaminate water when disposing of equipment wash waters or rinsate.

## **Groundwater Advisory**

Mefenoxam is known to leach through soil into groundwater under certain conditions as a result of label use. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow.

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## CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

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**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather or crop conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of SYNGENTA CROP PROTECTION, LLC or Seller. To the extent permitted by applicable law, Buyer and User agree to hold SYNGENTA and Seller harmless for any claims relating to such factors.

SYNGENTA warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. To the extent permitted by applicable law: (1) this warranty does not extend to the use of the product contrary to label instructions, or under conditions not reasonably foreseeable to or beyond the control of Seller or SYNGENTA, and (2) Buyer and User assume the risk of any such use. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, SYNGENTA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS WARRANTED BY THIS LABEL.**

To the extent permitted by applicable law, in no event shall SYNGENTA be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT PERMITTED BY APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF SYNGENTA AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF SYNGENTA OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

SYNGENTA and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of SYNGENTA.

## DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Use is permitted on-farm and in commercial seed treatment facilities. Do not use for at-plant applications (e.g. hopper box, planter box, etc.). This product is to be applied as a water-based slurry through standard slurry- or mist-type commercial seed treatment equipment.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

**Maximum usage when applying metalaxyl- and mefenoxam- containing products to the same crop within the same season:** Do not apply more than the maximum yearly total application rate for the active ingredient as stated on the label of the product containing the lowest yearly total on that crop.

**FAILURE TO FOLLOW THE DIRECTIONS FOR USE AND PRECAUTIONS ON THIS LABEL MAY RESULT IN CROP INJURY, POOR DISEASE CONTROL, AND/OR ILLEGAL RESIDUES.**

## AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

**Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 48 hours.** Exception: If the seed is treated with the product and the treated seed is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

For early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, wear:

- Coveralls
- Chemical-resistant gloves: barrier laminate, butyl rubber ≥14 mils, neoprene rubber ≥14 mils, nitrile rubber ≥14 mils, polyvinyl chloride (PVC) ≥14 mils, or Viton ≥14 mils
- Shoes plus socks

Treatment of highly mechanically scarred or damaged seed or seed known to be of low vigor and poor quality may result in reduced germination and/or reduction of seed and seedling vigor. Treat a quantity of seed using equipment similar to that planned for treating the total seed lot. Then, conduct germination tests with a portion of this treated seed before committing the total seed lot to a selected seed treatment.

Due to seed quality, crop or variety sensitivity, and seed storage conditions beyond the control of Syngenta, no claims are made to guarantee the germination of seed or propagating material for all crop seed when treated with Dividend XL RTA.



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## PRODUCT INFORMATION

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Dividend XL RTA is a systemic seed treatment fungicide that protects against damage from listed seed-borne, soil-borne, and early season foliar diseases of barley, oats, rye, triticale, and wheat.

Dividend XL RTA contains the active ingredients difenoconazole and mefenoxam. Mefenoxam provides protection against damping-off caused by *Pythium* spp. Difenoconazole provides protection against several seed, seedling, and certain foliar diseases including bunts and smuts.

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## RESISTANCE MANAGEMENT

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<b>DIFENOCONAZOLE</b>	<b>GROUP</b>	<b>3</b>	<b>FUNGICIDE</b>
<b>MEFENOXAM</b>	<b>GROUP</b>	<b>4</b>	<b>FUNGICIDE</b>

For resistance management, please note that Dividend XL RTA contains Group 3/difenoconazole and Group 4/mefenoxam fungicides. Any fungal populations may contain individuals naturally resistant to Dividend XL RTA and other Group 3 or Group 4 fungicides. A gradual or total loss of pest control may occur over time if these fungicides are used repeatedly in the same fields. Appropriate resistance-management strategies should be followed.

Difenoconazole belongs to the triazole class of chemistry and is a demethylation inhibitor of sterol biosynthesis (DMI) which disrupts membrane synthesis of the fungal cell. Mefenoxam belongs to the phenylamide class of chemistry which interferes with fungal RNA synthesis.

To delay fungicide resistance, take one or more of the following steps:

- Rotate the use of Dividend XL RTA or other Group 3 or Group 4 fungicides within a growing season sequence with different groups that control the same pathogens.
- Use tank mixtures with fungicides from a different group that are equally effective on the target pest when such use is permitted. Use at least the minimum application rate as labeled by the manufacturer.
- Adopt an integrated disease management program for fungicide use that includes scouting, uses historical information related to pesticide use, and crop rotation, and which considers host plant resistance, impact of environmental conditions on disease development, disease thresholds, as well as cultural, biological and other chemical control practices.
- Where possible, make use of predictive disease models to effectively time fungicide applications. Note that using predictive models alone is not sufficient to manage resistance.
- Monitor treated fungal populations for resistance development.
- Contact your local extension specialist or certified crop advisor for any additional pesticide resistance-management and/or IPM recommendations for specific crop and pathogens.

- For further information or to report suspected resistance contact Syngenta at 1-866-Syngent(a) (866-796-4368). You can also contact your pesticide distributor or university extension specialist to report resistance.

Syngenta encourages responsible product stewardship to ensure effective long-term control of the fungal diseases on this label.

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## **MIXING PROCEDURES**

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Dividend XL RTA is especially formulated for on-farm treatment, using standard mechanical slurry- or mist-type seed treatment equipment which accurately meters and mixes a flowable seed treatment. The equipment must provide uniform coverage of Dividend XL RTA on the seed. Uneven seed coverage may not give the desired level of disease control. This product does not require the addition of water for application. Consult the manufacturer of the application equipment you plan to use for suitability for this application and for instructions on operation and calibration of the equipment. An EPA-approved coloring agent, Pigment Red 48, has already been added to this formulation. Allow seed to dry before bagging.

### **Tank Mixtures**

All tank mixes should be pre-tested to determine physical compatibility between formulations. It is the pesticide user's responsibility to ensure that all products are registered for the intended use.

Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

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## **SEED CONTAINER LABEL REQUIREMENTS**

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The Federal Seed Act requires that containers of treated seeds shall be labeled with the following statements:

- This seed has been treated with difenoconazole and mefenoxam fungicides.
- Do not use for feed, food, or oil purposes.

In addition, the following statements are required on containers of seeds treated with Dividend XL RTA:

- Ground Water Advisory: Mefenoxam is known to leach through soil into groundwater under certain conditions as a result of label use. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow.

- Excess treated seed may be used for ethanol production only if (1) By-products are not used for livestock feed, and (2) No measurable residues of pesticide remain in the ethanol by-products that are used in agronomic practice.
- Do not allow children, pets, or livestock to have access to treated seed.
- Store away from feeds and foodstuffs.
- Wear long-sleeved shirt, long pants and chemical-resistant gloves when handling treated seed.
- Treated seeds exposed on soil surface may be hazardous to wildlife. Cover or collect treated seeds spilled during loading.
- Treated seed must be planted into the soil at a depth greater than ½ inch.
- Dispose of all excess treated seed. Leftover treated seed may be doublesown around the headland or buried away from water sources in accordance with local requirements.
- Do not contaminate water bodies when disposing of planting equipment washwater.
- Dispose of seed packaging in accordance with local requirements.
- In the event of crop failure or harvest of a crop grown from seeds treated with Dividend XL RTA, the following crops may be replanted immediately:

<b>Immediate Plantback</b>
Carrot
Cereal Grains: Barley, Oats, Rye, Triticale, and Wheat
Cotton
Cucurbit Vegetables Crop Group 9
Dried Shelled Pea and Bean (Except Soybean) Crop Subgroup 6C
Fruiting Vegetables Crop Group 8
Head and Stem Brassica Crop Subgroup 5A
Leafy Brassica Greens Crop Subgroup 5B
Onion, Bulb, Vegetable Crop Subgroup 3-07A
Onion, Green, Vegetable Crop Subgroup 3-07B
Rapeseed (Including Canola) Crop Subgroup 20A
Soybean
Strawberry
Sugarbeet
Sweet Corn
Tuberous and Corm Vegetables (Including Potato) Crop Subgroup 1C
Turnip, Greens

- For any other crops the minimum plantback interval is 30 days from the date seeds treated with Dividend XL RTA were planted.

**SEED TREATMENT DIRECTIONS**

**SMALL GRAIN CEREALS: BARLEY, OATS, RYE, TRITICALE, AND WHEAT**

Use Dividend XL RTA to treat seeds of small grain cereals according to in the following table:

Crop	For Protection Against the Following Diseases	Use Rate (fl oz/100 lb)	Use Rate (g ai/100 kg)
<p><b>SMALL GRAIN CEREALS:</b></p> <p><b>Barley</b></p> <p><b>Oats</b></p> <p><b>Rye</b></p> <p><b>Triticale</b></p> <p><b>Wheat, Spring</b></p> <p><b>Wheat, Winter</b></p>	<p><b>Diseases Controlled:</b></p> <p>General Seed Rots<sup>1</sup>:</p> <p>Seedling Disease Complex: Damping-off, Seedling Blight, Seed Rot, and Root Rot caused by <i>Fusarium</i> species and <i>Pythium</i> species</p> <p>Bunts<sup>2</sup>: Common, Dwarf, and Karnal</p> <p>Fall Season Foliar Diseases<sup>3</sup>: Leaf Rust, Powdery Mildew, and Septoria Blotch</p> <p>Seed-borne <i>Septoria</i> species</p> <p>Smuts: Covered, False Loose, Flag, and Loose, Except Loose Smut (<i>Ustilago nuda</i>) in Barley</p> <p><b>Diseases Suppressed<sup>4</sup>:</b></p> <p>Common Root Rot (<i>Cochliobolus</i> species)</p> <p>Crown and Foot Rot (<i>Fusarium</i> species)<sup>5</sup></p> <p>Rhizoctonia Root Rot</p> <p>Take-All<sup>5</sup></p>	<p>5 – 10</p>	<p>Difenoconazole: 12 – 24</p> <p>Mefenoxam: 1 – 2</p>
<p><b>Triticale</b></p> <p><b>Wheat, Spring</b></p> <p><b>Wheat, Winter</b></p>	<p>Fusarium Seed Rot</p> <p>Common Bunt</p> <p>Loose Smut</p>	<p>2.5<sup>6</sup></p>	<p>Difenoconazole: 6</p> <p>Mefenoxam: 0.5</p>

<sup>1</sup>Active on pathogens that cause general seed rots. These seed rots include those caused by saprophytic organisms such as *Penicillium* and *Aspergillus* species.

<sup>2</sup>Provides protection against both seed- and soil-borne bunts (common, dwarf).

<sup>3</sup>Provides early-season foliar disease protection for up to 6 weeks after planting at the 10 fl oz/100 lb rate. For full-season protection, use Tilt® fungicide according to label directions.

<sup>4</sup>Suppression means consistent protection at a level which is not optimal but is still of commercial benefit.

<sup>5</sup>Must use the 10 fl oz/100 lb rate to provide suppression for these diseases.

<sup>6</sup>The 2.5 fl oz/100 lb rate must only be used on Triticale and Wheat in the following states: CA, CO, KS, MN, MO, MT, ND, NE, OK, SD, and TX

## **STORAGE AND DISPOSAL**

Do not contaminate water, food, or feed by storage, or disposal.

### **Pesticide Storage**

Store in the original container and only in a cool, dry, secure place.

### **Spill Response**

For minor spills, leaks, etc., follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup and disposal of wastes. In the event of a major spill, fire, or other emergency, call 1-800-888-8372, day or night.

### **Pesticide Disposal**

Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

### **Container Handling [less than or equal to 5 gallons]**

**Non-refillable container.** Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container  $\frac{1}{4}$  full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use and disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures approved by state and local authorities.

### **Container Handling [greater than 5 gallons]**

**Non-refillable container.** Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container  $\frac{1}{4}$  full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use and disposal. Repeat this procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill or by incineration, or by other procedures approved by state and local authorities.

### **Container Handling [greater than 5 gallons]**

**Refillable container.** Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the

responsibility of the person refilling. To clean container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures approved by state and local authorities.

**CONTAINER IS NOT SAFE FOR FOOD, FEED, OR DRINKING WATER.**

Dividend®, Dividend® XL RTA®, Tilt®, the ALLIANCE FRAME the SYNGENTA Logo and the PURPOSE ICON are Trademarks of a Syngenta Group Company

Viton® is a trademark of E.I. duPont de Nemours and Company.

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For non-emergency (e.g. current product information) call  
Syngenta Crop Protection at 1-800-334-9481.

Manufactured for:  
Syngenta Crop Protection, LLC  
P.O. Box 18300  
Greensboro, North Carolina 27419-8300

Dividend XL RTA 826 MAS 0709 AMEND FEB2017 VER B – mar – 3/07/2019  
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