



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

August 23, 2019

Odette Alexander-Watkins  
Regulatory Product Manager  
Syngenta Crop Protection, LLC  
PO Box 18300  
Greensboro, NC 27419

Subject: Registration Review Label Mitigation for Mefenoxam  
Product Name: Dividend XL RTA  
EPA Registration Number: 100-826  
Application Date: July 31, 2018  
Decision Number: 554255

Dear Odette Alexander-Watkins:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has 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. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

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.

A copy of your label stamped "Accepted" is enclosed. Products shipped after 12 months from the date of this amendment must bear the new revised label. Your release for shipment of the product bearing the amended label 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 about this letter, please contact Darius Stanton by phone at 703-347-0433, or via email at [Stanton.darius@epa.gov](mailto:Stanton.darius@epa.gov).

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EPA Reg. No. 100-826  
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Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington", with a long horizontal flourish extending to the right.

Linda Arrington, Branch Chief  
Risk Management and Implementation Branch 4  
Pesticide Re-Evaluation Division  
Office of Pesticide Programs

Enclosure

[Master]

DIFENOCONAZOLE	GROUP	3	FUNGICIDE
MEFENOXAM	GROUP	4	FUNGICIDE

**Dividend® XL RTA®**

**Fungicide**

A seed treatment for control of diseases of wheat and barley

Active Ingredients:

Difenoconazole* .....	3.21%
Mefenoxam** .....	0.27%
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Other Ingredients:	96.52%
Total:	100.00%

\*CAS No. 119446-68-3

\*\*CAS Nos. 70630-17-0 and 69516-34-3

Dividend XL RTA contains 0.31 lb difenoconazole and 0.025 lb mefenoxam per gallon.

**KEEP OUT OF REACH OF CHILDREN.**

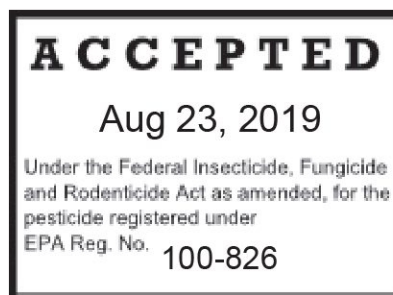
**CAUTION**

See additional precautionary statements and directions for use inside booklet.

EPA Reg. No. 100-826

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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, eyes, or clothing. Wear long-sleeved shirt and long pants, socks and shoes, and chemical-resistant gloves made of any waterproof material. Wash thoroughly with soap and water after handling.

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

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

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

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

## **Engineering Control Statements**

When handlers use closed systems or enclosed cabs 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 hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

## **Environmental Hazards**

This product is toxic to fish and aquatic invertebrates. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash waters or rinsate.

If treated seed is spilled outdoors or in areas accessible to birds, promptly clean up or bury to prevent ingestion.

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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 should 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 fullest extent allowed by State 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. 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 Buyer and User assume the risk of any such use. SYNGENTA MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the fullest extent allowed by State law, SYNGENTA or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **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 of 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.

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
- Socks plus shoes

- Chemical-resistant gloves made of: barrier laminate, butyl rubber ≥14 mils, nitrile rubber ≥14 mils, neoprene rubber ≥14 mils, polyvinyl chloride (PVC) ≥14 mils, or Viton® ≥14 mils

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

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## **GENERAL INFORMATION**

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Dividend XL RTA is a systemic seed dressing that controls or suppresses certain seed-borne, soil-borne, and early season foliar diseases of wheat and barley. It is a mixture of Dividend and Apron XL®. Apron XL provides Pythium damping-off activity and Dividend provides activity on the remaining diseases claimed on this label. An EPA-approved coloring agent, Pigment Red 48 has been added to the formulation.

**Note:** Mefenoxam is a systemic fungicide having a specific mode of action. Apron XL LS could be subject to development of insensitive strains of fungi. Development of insensitivity cannot be predicted. Therefore, Syngenta cannot assume liability for crop damage resulting from insensitive strains of fungi. Consult with your State Agricultural Experiment Station or Extension Service Specialist for guidance and ways to control any possible mefenoxam insensitive strains of fungi which may occur.

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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.

### **Tank Mixtures**

Confirm physical compatibility, seed safety, seed safety in stored seed, and biological efficacy before tank mixing with other seed treatment products.

Follow the label directions for the most restrictive of label precautions and limitations. This product cannot be mixed with any product containing a label prohibition against such mixing.



## RESTRICTIONS

- Do not use for feed, food, or oil purposes. Store away from feeds and foodstuffs.
- Green wheat forage may not be grazed until 55 days after planting.
- Green barley forage may not be grazed until 30 days after planting.
- Do not plant any crop other than those on this label within 30 days to fields in which treated seeds were planted.

## SEED BAG LABEL REQUIREMENT

Federal law requires that bags containing treated seeds shall be labeled with the following information: “This seed has been treated with the fungicides difenoconazole (CAS No. 119446-68-3) and mefenoxam (CAS Nos. 70630-17-0 and 69516-34-3). Do not use for feed, food, or oil purposes. Store away from feeds and foodstuffs. Green wheat forage may not be grazed until 55 days after planting. Green barley forage may not be grazed until 30 days after planting. Do not plant any crop other than those on this label within 30 days to fields in which treated seeds were planted.”

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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, and 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 fungicide 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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## BARLEY

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Apply Dividend XL RTA to barley seed at the rates given in the following table:

Rate/CWT	Diseases Controlled	Diseases partially controlled <sup>1</sup>
5 fl oz	Barley Stripe General Seed Rots <sup>2</sup> Covered Smut Pythium Damping Off	Common Root Rot ( <i>Cochliobolus</i> spp.) Fusarium Seed Scab Rhizoctonia Root Rot
10 fl oz	Barley Stripe General Seed Rots <sup>2</sup> Fusarium Seed Scab Covered Smut Pythium Damping Off	Take-all Common Root Rot ( <i>Cochliobolus</i> spp.) Fusarium Root Rot Fusarium Crown Rot Rhizoctonia Root Rot

<sup>1</sup> Partial control can either mean erratic control from good to poor, or consistent control at a level below that is generally considered acceptable for commercial disease control.

<sup>2</sup> General seed rots controlled include those caused by saprophytic organisms such as *Penicillium* spp. and *Aspergillus* spp.

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## WHEAT

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Apply Dividend XL RTA to wheat seed at the rates given in the following table:

### Winter Wheat

Rate/CWT	Diseases Controlled	Fall Season Foliar Diseases Controlled <sup>1</sup>	Diseases Partially Controlled <sup>2</sup>
2.5 fl oz <sup>5</sup>	Common Bunt Loose Smut		
5 fl oz	Common Bunt <sup>3</sup> Dwarf Bunt Flag Smut Seed-borne Septoria Loose Smut General Seed Rots <sup>4</sup> Fusarium Seed Scab Pythium Damping-Off		Common Root Rot ( <i>Cochliobolus</i> spp.) Rhizoctonia Root Rot
10 fl oz	Common Bunt <sup>3</sup> Dwarf Bunt Loose Smut Flag Smut Seed-borne Septoria General Seed Rots <sup>4</sup> Fusarium Seed Scab Pythium Damping-Off	Fall Season Powdery Mildew Fall Season Leaf Rust Fall Season Septoria Leaf Blotch	Common Root Rot ( <i>Cochliobolus</i> spp.) Fusarium Root Rot Fusarium Crown Rot Take-All Rhizoctonia Root Rot

<sup>1</sup>Dividend XL RTA provides control of fall season powdery mildew, fall season leaf rust, and fall season Septoria leaf blotch in winter wheat for the first 6 weeks after planting. For full-season control of these foliar diseases, use Tilt® fungicide according to label instructions.

<sup>2</sup>Partial control can either mean erratic control from good to poor or consistent control at a level below that generally considered acceptable for commercial disease control.

<sup>3</sup>Dividend XL RTA controls both seed-borne and soil-borne common bunt.

<sup>4</sup>General seed rots controlled include those caused by saprophytic organisms such as *Penicillium* spp. and *Aspergillus* spp.

<sup>5</sup>The 2.5 fl oz rate should only be used in the following states: TX, OK, KS, CO, MO, NE, ND, SD, MN, MT, CA.

## Spring Wheat

Rate/CWT	Diseases Controlled	Diseases Partially Controlled <sup>4</sup>
2.5 fl oz <sup>3</sup>	Common Bunt Loose Smut Fusarium Seed Scab	
5 fl oz	Common Bunt <sup>1</sup> Seed-borne Septoria Loose Smut General Seed Rots <sup>2</sup> Fusarium Seed Scab Pythium Damping-Off	Common Root Rot ( <i>Cochliobolus</i> spp.) Rhizoctonia Root Rot
10 fl oz	Common Bunt <sup>1</sup> Loose Smut Flag Smut Seed-borne Septoria General Seed Rots <sup>2</sup> Fusarium Seed Scab Pythium Damping-Off	Take-All Common Root Rot ( <i>Cochliobolus</i> spp.) Rhizoctonia Root Rot

<sup>1</sup>Dividend XL RTA controls both seed-borne and soil-borne common bunt.

<sup>2</sup>General seed rots controlled include those caused by saprophytic organisms, such as *Penicillium* spp. and *Aspergillus* spp.

<sup>3</sup>The 2.5 fl oz rate should only be used in the following states: TX, OK, KS, CO, MO, NE, ND, SD, MN, MT, CA.

<sup>4</sup>Partial control can either mean erratic control from good to poor or consistent control at a level below that generally considered acceptable for commercial disease control.

### STORAGE AND DISPOSAL

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

#### Pesticide Storage

Keep container tightly closed when not in use. Store out of the reach of children.

#### 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 may 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. Offer for recycling if available. 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. Offer for recycling if available. 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 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.

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Viton® is a registered 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

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