



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

February 7, 2020

Odette Alexander-Watkins  
Regulatory Product Manager  
Syngenta Crop Protection  
P.O. Box 18300  
Greensboro, NC 27419

Subject: Registration Review Label Mitigation for Mefenoxam  
Product Name: Dividend XL  
EPA Registration Number: 100-885  
Application Dates: July 31, 2018  
Decision Numbers: 557515

Dear Ms. Alexander Watkins:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all 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.

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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).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Linda Arrington', with a stylized flourish at the end.

Linda Arrington, Branch Chief  
Risk Management and Implementation Branch 4  
Pesticide Re-Evaluation Division  
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**

**Fungicide**

A seed treatment for control of diseases of wheat by commercial seed treaters

Active Ingredients:

Difenoconazole* .....	16.50%
Mefenoxam** .....	1.38%
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Other Ingredients:	82.12%
Total:	100.00%

\*CAS No. 119446-68-3

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

Dividend XL contains 1.54 lbs. difenoconazole and 0.13 lb. mefenoxam per gallon.

**KEEP OUT OF REACH OF CHILDREN.**

**CAUTION**

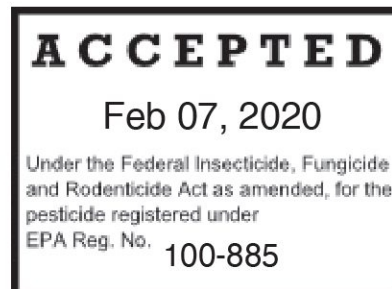
See additional precautionary statements and directions for use inside booklet.

EPA Reg. No. 100-885

EPA Est.

SCP 885A

2.5 gallons  
Net Contents



<b>FIRST AID</b>	
<b>If inhaled</b>	<ul style="list-style-type: none"> <li>• Remove victim to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for further treatment advice.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</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 inhaled. Avoid breathing vapor or spray mist. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

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

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

- Long-sleeved shirt and long pants
- Shoes plus socks

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- Chemical-resistant gloves made of 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

Follow 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.

## Engineering Controls

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 water 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 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, Inc. or Seller. To the extent consistent with 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. 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 WARRANTED BY THIS LABEL.

**IT IS SYNGENTA'S AND SELLER'S INTENTION THAT** in no event shall SYNGENTA or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH 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 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.

### 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.

PPE required 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  $\geq 14$  mils, neoprene rubber  $\geq 14$  mils, nitrile rubber  $\geq 14$  mils, polyvinyl chloride (PVC)  $\geq 14$  mils, or Viton®  $\geq 14$  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 is a systemic seed dressing that controls or suppresses certain seed-borne, soil-borne, and fall foliar diseases of wheat. It is a mixture of Dividend and Apron XL® LS. Apron XL LS 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.

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**RESISTANCE MANAGEMENT**

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

For resistance management, please note that Dividend XL contains Group 3/difenoconazole and Group 4/ mefenoxam fungicides. Any fungal population may contain individuals naturally resistant to Dividend XL 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 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.

## MIXING PROCEDURES

Apply Dividend XL as a water-based slurry through standard slurry or mist-type commercial seed treaters. Prepare a slurry by mixing Dividend XL in up to 16 fl. oz. of water per 100 lbs. of seed. Mix the slurry thoroughly with the seed to provide uniform coverage.

## WHEAT

Apply Dividend XL 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 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
1 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

<sup>1</sup>Dividend XL 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 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* and *Aspergillus*.

## Spring Wheat

Rate/CWT	Diseases Controlled	Diseases Partially Controlled
2 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
1 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

<sup>1</sup>Dividend XL 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* and *Aspergillus*.

<sup>3</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.

**Important:** (1) Do not use treated seed for feed, food, or oil. (2) Green wheat may not be grazed until 55 days after planting. (3) Do not plant any crop other than wheat within 30 days to fields in which treated seeds were planted.

**Note:** Federal law requires that bags containing treated seeds shall be labeled with the following information: "This seed has been treated with difenoconazole and mefenoxam fungicides. Do not use for feed, food, or oil purposes. Store away from feeds and foodstuffs. Green wheat may not be grazed until 55 days after planting. Do not plant any crop other than those on this label within 30 days in fields in which treated seeds were planted."

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## STORAGE AND DISPOSAL

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

### Pesticide Storage

Store in a tightly closed container out of 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.

### 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 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 or 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 use 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 refiller. 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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For non-emergency (e.g. current product information) call Syngenta Crop Protection at 1-800-334-9481.
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Manufactured for:  
Syngenta Crop Protection, LLC  
P.O. Box 18300  
Greensboro, North Carolina 27419-8300

SCP 885A

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