



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

**February 23, 2004**

Carolyn Brinkley  
Syngenta Crop Protection, Inc.  
PO Box 18300  
Greensboro, NC 27419

**Subject:** Emamectin Technical, EPA Reg. # 100-902  
label amendment submitted 8/29/03  
accepted with comments

Dear Ms. Brinkley,

The revised labeling reference to above, submitted in connection with the registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable provided you incorporate the changes required by the Agency as listed below.

Topic	Action required
Directions for Use site list	<p>EXPAND the term "turnip greens" to "turnip greens (tops, leaves)".</p> <p>ADD a footnote to the new term turnip greens (tops, leaves) term that reads:</p> <p>"Turnip Greens (tops, leaves) only: For use on turnip varieties grown for leaves only. Do not use on turnip varieties grown for roots or dual-purpose varieties grown for roots and leaves." [this is text is from 100-904]</p>

Submit two (2) copies of your final printed labeling incorporating the above changes prior to releasing your product for shipment. If the above provisions are not complied with the registration will be subject to cancellation in accordance with

FIFRA Section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A copy of your label stamped "accepted with comments" is enclosed for your records.

If you have any questions please contact me at (703) 308-9423 or Harris.Thomas@EPA.gov.

Sincerely yours,



Thomas C. Harris  
Insecticide / Rodenticide Branch  
Registration Division (7505C)  
Office of Pesticide Programs

enclosure

**Emamectin Benzoate Technical**

An insecticide for formulation into end-use insecticide products intended for non-domestic terrestrial outdoor food use.

Active Ingredient:	
Emamectin Benzoate (CAS No. 155569-91-8).....	97.0%
Other Ingredients:	3.0%
<b>Total:</b>	<b>100.0%</b>

**KEEP OUT OF REACH OF CHILDREN**

**DANGER/PELIGRO**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See additional precautionary statements on label.

EPA Reg. No. 100-902  
EPA Est.

Product ID.

Product of Switzerland

SCP 902A-L(Draft C)

Net Contents

**ACCEPTED  
with COMMENTS  
in EPA Letter Dated:**

**FEB 23 2004**

**Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
100-902**

<b>FIRST AID</b>	
<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 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>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>If inhaled</b>	<ul style="list-style-type: none"> <li>• Move person to fresh air.</li> <li>• If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth-to-mouth, if possible.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>NOTE TO PHYSICIAN</b>	
<p><b>Probably mucosal damage may contraindicate the use of gastric lavage.</b> Early signs of intoxication include dilated pupils, muscular incoordination, and muscle tremors. If toxicity from exposure has progressed to cause severe vomiting, the extent of resultant fluid and electrolyte imbalance should be gauged. Appropriate supportive parenteral fluid replacement therapy should be given, along with other required supportive measures (such as maintenance of blood pressure levels and proper respiratory functionality) as indicated by clinical signs, symptoms, and measurements.</p> <p>In severe cases, observations should continue for at least several days until clinical condition is stable and normal. Since emamectin benzoate is believed to enhance GABA activity in animals, it is probably wise to avoid drugs that enhance GABA activity (barbiturates, benzodiazepines, valproic acid) in patients with potentially toxic emamectin benzoate exposure.</p>	
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	
<b>HOT LINE NUMBER</b>	
<p>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></p>	

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**PRECAUTIONARY STATEMENTS**

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**Hazards to Humans and Domestic Animals**

**Danger/Peligro**

Corrosive. Causes irreversible eye damage. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). May be fatal if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove and wash contaminated clothing before reuse.

**Environmental Hazards**

This pesticide is toxic to fish, birds, mammals, and aquatic invertebrates. Do not discharge effluent containing this active ingredient into lakes, streams, ponds, estuaries, oceans, or other public waters, unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit, and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

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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, Inc. or Seller. All such risks shall be assumed by Buyer and User, and 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 abnormal conditions 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.

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. **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.

This product may be used only for the formulation of end-use insecticide products registered by the EPA for use on leafy vegetables, including *Brassica*, turnip greens, fruiting vegetables, cotton, and tobacco.

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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 original container in a cool, dry place. Do not store near food or feed.

### Pesticide Disposal

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance. Pesticide that cannot be used or chemically reprocessed must be disposed of according to federal, state, or local procedures under the Resource Conservation and Recovery Act.

### Container Disposal

#### Bulk

Thoroughly clean container before reuse. Consult Federal, state, or local disposal authorities for approved alternative procedures.

#### 250 Gal. Mini Bulk

This is a refillable container that must be returned to an authorized Syngenta refilling facility for refilling or disposal. Before refilling, inspect thoroughly for damage such as cracks, punctures, bulges, dents, abrasions, and damaged or worn threads on closure devices. After filling and before transporting, check for leaks. Do not refill or transport damaged or leaking container.

**Other Containers**

Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

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

**Note:** 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 clean up and disposal of wastes.

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

Syngenta Crop Protection, Inc.  
Greensboro, North Carolina 27409  
[www.syngenta-us.com](http://www.syngenta-us.com)

SCP 902A-L(Draft C)



Chron

August 30, 2001 – draft revised label to EPA, revised first aid statements according to PR Notice 2001-1, revised ingredient statement according to new CSF and prod. chem, revised and added storage and disposal statements, specified on front panel end-use product uses supported for this active ingredient. Corrected label by adding Spanish signal word and warning statement, deleted chemical name of active – common name and CAS no. are sufficient, changed all references to Novartis to Syngenta and replaced Warranty statement with new Syngenta Warranty Statement, changed country of origin to Switzerland, revised ingredient statement per PR Notices 97-5 & 97-6

July 31, 2003 – In July, EPA set new tolerances for emamectin: leafy vegs crop group, Brassica leafy vegs group, turnip tops, cotton and EPA approved a new use on tobacco.

August 20, 2003 – Draft – Added new approved uses, deleted Skull and Crossbones and "Poison", revised order of First Aid statement, made minor non-notif changes.