



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 28, 2019

Ricky Kyaw,
Regulator Product Manager
Syngenta Crop Protection, LLC
PO Box 18300
Greensboro, NC 27419

Subject: Label Amendment – Removal of Respirator Per Azoxystrobin Interim Decision
Product Name: GRADUATE A+
Registration Number: 100-1308
Application Date: 5/2/2019
Decision Number: 550726

Dear Mr. Kyaw:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, 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.

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 18 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.

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

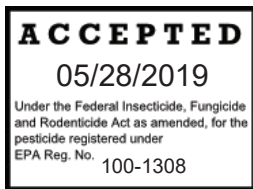
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with FIFRA section 6. If you have any questions, please contact Shaja Joyner by phone at 703-308-3194, or via email at joyner.shaja@epa.gov.

A handwritten signature in black ink that reads "Shaja B. Joyner". The signature is written in a cursive style with a large initial "S".

Shaja B. Joyner, Product Manager 20
Fungicide-Herbicide Branch
Registration Division 7505P

Enclosure



[Master Label]

Graduate® A+

AZOXYSTROBIN	GROUP	11	FUNGICIDE
FLUDIOXONIL	GROUP	12	FUNGICIDE

Fungicide

For Control of listed Post-Harvest Diseases of Citrus Fruit, Crop Group 10-10 and Sugar Beets

Active Ingredient:

Fludioxonil* 20.6%
Azoxystrobin** 20.6%

Other Ingredients: 58.8%

Total: 100.0%

*CAS No. 131341-86-1

**CAS No. 131860-33-8

Graduate A+ is a flowable suspension concentrate containing 1.99 lb ai fludioxonil and 1.99 lb ai azoxystrobin per gallon.

KEEP OUT OF REACH OF CHILDREN.

CAUTION

See additional precautionary statements and directions for use inside booklet.

Reformulation is prohibited. See individual container labels for repackaging limitations.

EPA Reg. No. 100-1308

EPA Est.

[Batch Code: _____] (*For non-refillables only*)

_____ gallons

Net Contents

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1.0 FIRST AID

FIRST AID	
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If inhaled	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes. • Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
HOT LINE NUMBER For 24-Hour Medical Emergency Assistance (Human or Animal) or Chemical Emergency Assistance (Spill, Leak, Fire or Accident) Call 1-800-888-8372	

2.0 PRECAUTIONARY STATEMENTS

2.1 Hazards to Humans and Domestic Animals

CAUTION

Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Harmful if absorbed through skin. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

2.2 Personal Protective Equipment (PPE)

Applicators and other handlers of the fungicide must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of barrier laminate, butyl rubber \geq 14 mils, nitrile rubber \geq 14 mils, polyvinyl chloride (PVC) \geq 14 mils, and Vitron® \geq 14 mils.
- Shoes plus socks
- Protective eyewear (goggles, face shield, or safety glasses)

2.3 Environmental Hazards

The active ingredient, azoxystrobin, in this product can be persistent for several months or longer. Azoxystrobin has degradation products which have properties similar to chemicals which are known to leach through soil to ground water under certain conditions as a result of agricultural use. Use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in ground water contamination.

This pesticide is toxic to freshwater and estuarine/marine fish and aquatic invertebrates. Do not apply directly to water except as specified on this label. Do not contaminate water when disposing of equipment washwater or rinsate.

The active ingredient, fludioxonil, in this product is toxic to fish and aquatic invertebrates.

Notify State and/or Federal authorities and Syngenta immediately if you observe any adverse environmental effects due to use of this product.

2.4 Physical or Chemical Hazards

Do not use or store near heat or open flame.

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.

Do not formulate this product into other end-use products without written permission.

FAILURE TO FOLLOW DIRECTIONS, RESTRICTIONS, AND PRECAUTIONS ON THIS LABEL MAY RESULT IN CROP INJURY, POOR DISEASE CONTROL, OR ILLEGAL RESIDUES.

3.0 PRODUCT INFORMATION

Graduate A+ is a broad-spectrum, protective fungicide used to aid in the control of several storage diseases **in post-harvest facilities** on Citrus Fruit, Crop Group 10-10 and Sugar Beets.

3.1 Integrated Pest Management (IPM)

Graduate A+ must be integrated into an overall disease and pest management strategy (IPM) whenever the use of a fungicide is required. Cultural practices known to reduce disease development must be followed. Consult your local agricultural authorities for additional IPM strategies established for your area. Graduate A+ may be used in State Agricultural Extension advisory (disease forecasting) programs, which recommend application timing based on environmental factors favorable for disease development.

3.2 Resistance Management

AZOXYSTROBIN	GROUP	11	FUNGICIDE
FLUDIOXONIL	GROUP	12	FUNGICIDE

Graduate A+ is a protective fungicide used to aid in the control of post-harvest diseases. Graduate A+ contains fludioxonil and azoxystrobin. Fludioxonil is in the phenyl pyrrole group of fungicides, and has a mode of action involving interaction with a MAP/Histidine kinase that leads to disruption of osmotic signal transduction (Group 12 Fungicide). Azoxystrobin is in the strobilurin class of chemistry and its mode of action is inhibition of the Qo (quinone outside) site in the mitochondrial electron transport system (Group 11 Fungicide). Fungal isolates with acquired resistance to Group 11 or 12 may eventually dominate the fungal population if Group 11 or 12 fungicides are used repeatedly or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by azoxystrobin or fludioxonil or other Group 11 or 12 fungicides. A disease management program that includes alternation or tank mixes between Graduate A+ and other labeled fungicides that have a different mode of action may prevent pathogen populations from developing resistance. Sanitation and other cultural practices to minimize disease are also advised to aid in control as well as to assist in preventing/delaying resistance development.

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

- Rotate the use of azoxystrobin or other Group 11 fungicides and fludioxonil or other Group 12 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.

4.0 APPLICATION DIRECTIONS

4.1 Methods of Application

Graduate A+ may be used as a post-harvest dip, drench, flood or spray application for control of certain post-harvest rots on specified uses.

4.2 Application Equipment

- All application equipment must be properly maintained and calibrated using appropriate carriers or surrogates.
- Use T-jet, CDA, flood jet, or similar application system for in-line aqueous or coating spray application.

4.3 Application Volume and Spray Coverage

- Ensure proper coverage from the dip/drench or spray application.

4.4 Mixing Directions

1. Thoroughly clean spray equipment before using this product.
2. Vigorously shake the product container before mixing.
3. Prepare no more spray mixture than is required for the immediate operation.
4. Vigorous agitation is necessary for proper dispersal of the product.
5. Maintain maximum agitation throughout the spraying operation.
6. Do not let the spray mixture stand overnight in the spray tank.
7. Flush the spray equipment thoroughly following each use.

4.4.1 Graduate A+ Alone

1. Add $\frac{1}{2}$ of the required amount of water or wax/oil emulsion (or aqueous dilution of a wax/oil emulsion) to the spray or mixing tank.
2. With the agitator running, open the container and add the Graduate A+ to the tank.
3. Continue agitation while adding the remainder of the carrier.
4. Begin application of the solution after the Graduate A+ has completely and uniformly dispersed into the mix carrier.
5. Maintain agitation until all of the mixture has been applied.

4.4.2 Tank-Mix Precautions

- It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions, limitations and directions for use on all product labels involved in tank mixing. User must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.
- Tank mixes of Graduate A+ with other pesticides, fertilizers, or any other additives not specifically labelled for use with Graduate A+ may result in tank mix incompatibility or unsatisfactory performance. In such cases, always check tank mix compatibility by conducting a jar test according to guidance in **Section 4.4.3** before actual tank mixing.

4.4.3 Tank-Mix Compatibility

- Conduct a jar test using a 1 pt to 1 qt container with lid by adding water or other intended carrier such a liquid fertilizer to the jar.
- Next, add the appropriate amount of pesticides(s) or tank-mix partner(s) in their relative proportions based on specified label rates. Add tank-mix components separately in the order described in the tank-mixing section, **Section 4.4.4**. After each addition, shake or stir gently to thoroughly mix.
- After all ingredients have been added, put the lid on the jar, tighten and invert the jar 10 times to mix.
- After mixing, let the mixture stand 15–30 minutes and then examine for signs of incompatibility such as obvious separation, large flakes, precipitates, gels or heavy oily film on the jar.
- If the mixture remains mixed or can be remixed readily, it is physically compatible and can be used.

- If the mixture is incompatible, repeat the test using a compatibility agent at the specified label rate. Or, if applicable, slurry dry formulations in water before adding to the jar. If incompatibility is still observed after following these procedures, do not use the mixture.
- After compatibility testing is complete, dispose of any pesticide wastes in accordance with the storage and disposal section, **Section 6.0**, of this label.

4.4.4 Graduate A+ In Tank Mixtures

1. Add ½ of the required amount of water or wax/oil emulsion (or aqueous dilution of a wax/oil emulsion) to the spray or mixing tank.
2. With the agitator running, open the container and add the Graduate A+ to the tank.
3. Continue agitation while adding the remainder of the carrier.
4. After the product has completely and uniformly dispersed into the mix carrier, add tank mix partners in the following order unless label directions or other consideration indicate otherwise.
 - a) wettable powders
 - b) wettable granules (dry flowables)
 - c) liquid flowables
 - d) liquids
 - e) emulsifiable concentrates
5. Always allow each tank mix partner to become fully dispersed before adding the next product.
6. Continue agitation to maintain a uniform suspension until all of the spray solution has been applied.

5.0 POST-HARVEST USE DIRECTIONS

5.1 Citrus Fruit, Crop Group 10-10

Crops (Including all cultivars, varieties, and/or hybrids of these)			
Calamondin	Lime, Australian round	Orange, sour	
Citron	Lime, brown river finger	Orange, sweet	
Citrus hybrids	Lime, mount white	Orange, tachibana	
Grapefruit	Lime, New Guinea, wild	Orange, trifoliolate	
Grapefruit, Japanese summer	Lime, Russell river	Pummelo	
Kumquat	Lime, sweet	Tangelo	
Lemon	Lime, Tahiti	Tangerine (Mandarin)	
Lime	Mandarin, Mediterranean	Tangor	
Lime, Australian desert	Mandarin, satsuma	Uniq fruit	
Lime, Australian finger			
Target Disease	Rate	Application Method	Use Directions
Blue mold (<i>Penicillium</i> spp.) Diplodia stem-end rot (<i>Lasiodiplodia theobromae</i>) Gray mold (<i>Botrytis cinerea</i>) Green mold (<i>Penicillium</i> spp.)	32-64 fl oz/100 gallons (0.50 – 1.0 lb ai/gallon)	In-line dip/drench	Mix in an appropriate amount of water, wax/oil emulsion, or aqueous dilution of wax/oil emulsion. Dip for a minimum of 30 seconds and allow fruit to drain.
	32-64 fl oz/ 250,000 lb of fruit (0.50 – 1.0 lb ai/ 250,000 lb fruit)	In-line aqueous or fruit-coating spray	Ensure proper coverage of the fruit. Mix the fungicide solution in an appropriate water, wax/oil emulsion, or aqueous dilution of wax/oil emulsion for the crop being treated. Use T-jet, CDA, or similar application system.
Resistance Management:			
<ul style="list-style-type: none"> Refer to Section 3.2. 			
Precaution:			
<ul style="list-style-type: none"> Ensure the Graduate A+ solution remains in suspension by using agitation, otherwise product may settle out. 			
USE RESTRICTIONS			
<ol style="list-style-type: none"> Maximum Rate per Application: 64 fl oz Maximum Rate per Crop: 128 fl oz <ul style="list-style-type: none"> DO NOT exceed 1.99 lb ai/crop of fludioxonil-containing products. DO NOT exceed 1.99 lb ai/crop of azoxystrobin-containing products. DO NOT make more than two applications to citrus fruit. For maximum decay control, treat fruit once before storage and once after storage, just prior to marketing. 			

5.2 Sugar Beets

Crops			
Sugar Beets			
Target Disease	Rate	Application Method	Use Directions
<i>Fusarium</i> spp. <i>Botrytis</i> spp. <i>Penicillium</i> spp. <i>Rhizoctonia</i> spp.	0.6 fl oz/2000 lb of roots (0.009 lb ai/2,000 lb of roots)	In-line aqueous spray	Ensure proper coverage of the roots. Roots must be tumbling as they are treated. Mix the fungicide solution in an appropriate amount of water for the crop being treated. 0.5 gallons per ton is advised. Use T-jet, CDA, or similar application system.
Resistance Management:			
<ul style="list-style-type: none"> • Refer to Section 3.2. 			
Precaution:			
<ul style="list-style-type: none"> • Ensure the Graduate A+ solution remains in suspension by using agitation, otherwise product may settle out. 			
USE RESTRICTIONS			
<ol style="list-style-type: none"> 1) Maximum Rate per Application: 0.6 fl oz/2000 lb of roots 2) Maximum Rate per 2000 lb of Roots: 0.6 fl oz <ul style="list-style-type: none"> • DO NOT exceed 0.0093 lb ai of fludioxonil-containing products. • DO NOT exceed 0.0093 lb ai of azoxystrobin-containing products. 3) DO NOT make more than one post-harvest application to the roots. 			

6.0 STORAGE AND DISPOSAL

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

Storage

Store in original containers in a cool, dry place. Do not store this product under wet conditions. Keep container closed when not in use. Do not store near food or feed. In case of spill on floor or paved surfaces, sweep and remove to chemical waste storage area until proper disposal can be made if product cannot be used according to the label. Take special care to avoid contamination of equipment and facilities during cleanup procedures and disposal of wastes.

Pesticide Disposal

Improper disposal of excess pesticide, spray mixture, 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 of the nearest EPA Regional Office for guidance.

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)

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

7.0 CONDITIONS OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

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 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. To the extent consistent with 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 CONSISTENT WITH 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 consistent with 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 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 Liability, which may not be modified except by written agreement signed by a duly authorized representative of SYNGENTA.

8.0 APPENDIX

8.1 Graduate A+ Use Summary Table [Optional Text]

[Start of Optional Text]

IMPORTANT: The table below is a summary of the Crop Use Directions for Graduate A+. However, it is important for the user to read and follow the complete instructions contained within this label.

Crop or Crop Group or Subgroup, with examples	Maximum Rate per Application (fl oz)	Maximum Rate per Application (lb ai)	Maximum Total Application (lb ai/crop)	Maximum Total Application Rate (fl oz)	Maximum Post Harvest Application Number
Citrus Fruit, Crop Group 10-10 (post-harvest use) Orange Lemon Lime	64	0.5 – 1.0	1.99	128	2
Sugar Beets (post-harvest use)	0.6	0.0009	0.0093	0.6	1

[End of Optional Text]

Graduate®, the ALLIANCE FRAME
the SYNGENTA Logo and the PURPOSE ICON
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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

GRADUATE A+ 1308 MAS 1218 AMEND-B 0519 CL– jb – 05/20/2019
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