

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

December 17, 2021

Dave Wilson Senior Regulatory Affairs Manager Bayer U.S.- Crop Science 700 Chesterfield Pkwy W Chesterfield, MO 63017

Subject: Registration Review Label Mitigation for Metalaxyl Product Name: Raxil PRO Shield EPA Registration Number: 264-1186 Application Date: 06/28/2018 Decision Number: 580525

Dear Mr. Wilson:

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 Metalaxyl 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 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 12 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 Page 2 of 2 EPA Reg. No. 264-1186 Decision No. 580525

approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact Srijana Shrestha by phone at 202-566-2329, or via email at shrestha.srijana@epa.gov.

Sincerely,

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

Enclosure: Stamped Label

IMIDACLOPRID	GROUP	40	INSECTICIDE
PROTHIOCONAZOLE	GROUP	3	FUNGICIDE
METALAXYL	GROUP	4	FUNGICIDE
TEBUCONAZOLE	GROUP	3	FUNGICIDE

# Raxil PRO Shield Insecticide and Fungicide

For: Control or suppression of the listed seed, seedling and soilborne diseases and insects of wheat, barley and triticale.

ACTIVE INGREDIENT(S):	
Imidacloprid: 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine:	08.59%
Prothioconazole: 2-[2-(1- Chlorocylocpropyl)-3-(2-chlorophenyl)-2-hydroxypropyl]- 1,2- dihydro-3H-1,2,4-triazole-3-thione:	01.47%
Metalaxyl: N- (2,6-dimethylphenyl)-N-(methoxyacetyl)alanine methyl ester	00.57%
Tebuconazole: (Alpha-[2-(4-chlorophenyl)ethyl]-alpha-(1,1-dimethylethyl)-1H-1,2,4-triazole-1- ethanol)	00.29%
OTHER INGREDIENTS:	<u>89.08%</u>
TOTAL:	100.00%

Contains 0.768 pound imidacloprid, 0.128 pound prothioconazole, 0.051 pound metalaxyl, and 0.025 pound tebuconazole per U.S. gallon.

#### EPA Reg. No. 264-1186

EPA Est.

#### KEEP OUT OF REACH OF CHILDREN CAUTION

For MEDICAL And TRANSPORTATION Emergencies ONLY Call 24 Hours A Day 1-800-334-7577 For PRODUCT USE Information Call 1-866-99BAYER (1-866-992-2937)

Please refer to [back panel] [booklet] for additional precautionary statements and directions for use. [Note to reviewer: Location of additional precautionary statements and directions for use will vary between those listed, depending on container type/size.]

**Net Contents:** 

PRODUCED FOR

Bayer CropScience

Bayer CropScience LP 800 N. Lindbergh Blvd. St. Louis, MO 63167 1-866-99BAYER (1-866-992-2937)

## ACCEPTED

### Dec 17, 2021

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

EPA Reg. No. 264-1186

	FIRST AID		
If swallowed:	Immediately call a poison control center or doctor for treatment advice.		
	Have person sip a glass of water if able to swallow.		
	Do not induce vomiting unless told to do so by a poison control center or doctor.		
	Do not give anything to an unconscious person.		
lf on skin or	Take off contaminated clothing.		
clothing:	Rinse skin immediately with plenty of water for 15-20 minutes.		
	Call a poison control center or doctor for treatment advice.		
If in eyes:	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 inhaled:	Move person to fresh air.		
	• If person is not breathing, call 911 or an ambulance, and then give artificial respiration, preferably mouth- to-mouth if possible.		
	Call a poison control center or doctor for further treatment advice.		
	emergency call toll free the Bayer CropScience Emergency Response Telephone No. 1-800-334-7577. luct container or label with you when calling a poison control center or doctor or going for treatment.		
Note to Physician: N	lo specific antidote. Treat symptomatically.		

## PRECAUTIONARY STATEMENTS

## HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### CAUTION

- Harmful if swallowed, absorbed through skin, or inhaled.
- Causes moderate eye irritation.
- Avoid contact with skin, eyes, or clothing, and avoid breathing vapor or spray mist.
- Remove and wash contaminated clothing before reuse.
- Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

#### Workers, loaders, applicators and other handlers involved in on-farm treatment must wear:

- Long pants
- Long-sleeved shirt
- Socks and shoes
- Chemical resistant gloves made of: barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, pvc ≥ 14 mils, or viton ≥ 14 mils.
- In addition to the above PPE for on farm treatment, workers involved in bagging, sewing, or stacking bags of treated seed or when transferring seed to a storage bin, must wear: a filtering face piece NIOSH approved respirator (TC-84A) with any N, R, or P filter.

## Workers, loaders, baggers, applicators and other handlers involved in commercial seed treatment facilities must wear:

- Long pants
- Long-sleeved shirt
- Socks and shoes
- Chemical resistant gloves made of: barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, pvc ≥ 14 mils, or viton ≥ 14 mils.
- A minimum of a filtering face piece NIOSH approved respirator (TC-84A) with any N, R, or P filter.

#### USER SAFETY REQUIREMENTS

• 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.

#### USER SAFETY RECOMMENDATIONS

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should 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 pesticide is highly toxic to bees, birds and aquatic invertebrates, and toxic to mammals, fish and aquatic plants. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment wash water or rinsate.

Cover or incorporate spilled treated seed

#### **Ground Water Advisory**

Prothioconazole-desthio (a degradate of prothioconazole) is known to leach through soil into ground water under certain conditions as a result of label use.

Metalaxyl is known to leach through soil into ground water under certain conditions as a result of label use.

Tebuconazole is known to leach through soil into ground water under certain conditions as a result of label use.

These chemicals may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow.

Ensure that planting equipment is functioning properly in accordance with manufacturing specifications to minimize seed coat abrasion during planting to reduce dust which can drift to blooming crops or weeds.

## CONDITIONS OF SALE AND LIMITATIONS OF WARRANTY AND LIABILITY

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

Treatment of highly mechanically damaged seed, or seed of known low vigor and poor quality, may result in reduced germination and/or reduction of seed and seedling vigor. Treat and conduct germination tests on a small portion of seed before committing the total seed lot to a selected chemical treatment. Due to seed quality conditions beyond the control of Bayer CropScience, no claims are made to guarantee germination of carry-over seed.

**CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Bayer CropScience. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Bayer CropScience is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER CROPSCIENCE DISCLAIMS ANY LIABILITY WHATSOEVER FOR SPECIAL, INCIDENTAL OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT.

**LIMITATIONS OF LIABILITY:** TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT BAYER CROPSCIENCE'S ELECTION, THE REPLACEMENT OF PRODUCT.

## **DIRECTIONS FOR USE**

#### It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read the entire label before using this product.

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 State or Tribal agency responsible for pesticide regulation.

#### 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, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), notification to workers, 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 **12 hours**.

Exception: If the product is soil injected or soil incorporated, the Worker Protection Standard under certain circumstances, allows workers to enter the treated area without restrictions 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), is:

- coveralls over long-sleeved shirt and long pants
- Chemical resistant gloves made of: barrier laminate, butyl rubber ≥ 14 mils, nitrile rubber ≥ 14 mils, neoprene rubber ≥ 14 mils, pvc ≥ 14 mils, or viton ≥ 14 mils.
- chemical-resistant footwear plus socks
- protective eyewear

Notify workers of the application by warning them orally.

#### **PRODUCT INFORMATION**

Raxil PRO Shield Insecticide and Fungicide:

- is a seed treatment containing the fungicides prothionconazole, tebuconazole and metalaxyl, and the insecticide imidacloprid which aids in the control or suppression of the following seed, seedling and soilborne diseases of wheat, barley and triticale: stinking smut, flag smut, loose smut, covered smut (common bunt), early season Septoria disease complex, general seed rots, Pythium damping-off, early season Rhizoctonia root rot, early season common root rot, seedborne Fusarium scab, barley stripe, early season Fusarium foot rot.
- provides early season protection of seedlings against injury by wireworms, aphids (including Bird cherry-oat, English grain, Greenbug, and Russian wheat aphid) and Hessian fly.

#### **USE RESTRICTIONS**

- For use in commercial seed treatment facilities and on-farm application.
- Applications must be made using standard slurry or mist-type seed treatment equipment.
- Only use seed that is sound and well cured prior to treatment.
- In California Registered only for use in commercial seed treating establishments. Not allowed for "on-farm" use.
- Important: The purchaser of this product is responsible for ensuring that all seed treated with this product are adequately dyed with a suitable color to prevent its accidental use as food for man or feed for animals. Refer to 21CFR, Part 2.25. Any dye or colorant added
- to treated seed must be cleared for use under 40CFR, Part 180.1001. Federal regulations have established official tolerances for certain pesticide residues. In order that residues on food and forage crops will not exceed established tolerances, use only at specified rates.
- Maximum usage when applying both 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.

Refer to the specific use directions and restrictions in each Crop, Crop Group or Crop Subgroup table.

#### COMPATIBILITY

It is essential that before using Raxil PRO Shield Insecticide and Fungicide in any tank mixture the compatibility of the mixture be established. Add Raxil PRO Shield Insecticide and Fungicide at the labeled rate to a clean quart jar containing approximately one-half the amount of water intended for a final slurry application rate. Next, follow with all other tank mix components that will be used in the total slurry application. Add last the remaining balance of water. The total amount of volume is determined by the seed size and how much is necessary to ensure complete and uniform coverage and distribution on the seed, as well as the type of commercial seed treating application equipment that will be used.

DO NOT USE MIXTURES THAT CURDLE, PRECIPITATE, OR GEL. USE TANK MIXTURES IMMEDIATELY AFTER MIXING WITH ADEQUATE AGITATION.

It is the pesticide user's responsibility to ensure that all products in the listed mixtures are registered for the intended use. Users must follow the most restrictive directions are precautionary language of the products of the mixture (for example, first aid from one product, ppe from another).

#### **RESISTANCE MANAGEMENT RECOMMENDATION**

For resistance management, please note that Raxil PRO Shield Insecticide and Fungicide contains a Group 4 [Phenylamides class] and a Group 3 [Demethylation Inhibitor class] fungicide. Any fungal population may contain individuals naturally resistant to Raxil PRO Shield Insecticide and Fungicide and other Group 4 or 3 fungicides. A gradual or total loss of pest control may occur over time if these fungicides are used repeatedly in the same fields. Raxil PRO Shield Insecticide and Fungicide contains a Group 4A [Neonicotinoids class] insecticide. Any insect population may contain individuals naturally resistant to Raxil PRO Shield Insecticide and Fungicide and Fungicide and other Group 4A insecticides. The resistant individuals may dominate the insect population if this group of insecticides are used repeatedly in the same fields. Appropriate resistance-management strategies should be followed.

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

- 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.
- Adopt an integrated pest management program for insecticide use that includes scouting, uses historical information related to pesticide use, crop rotation, record keeping, and which considers cultural, biological and other chemical control practices.
- Monitor treated fungal populations for resistance development.
- Monitor after application for unexpected target pest survival. If the level of survival suggests the presence of resistance, consult
  with your local university specialist or certified pest control advisor.
- Contact your local extension specialist or certified crop advisor for any additional pesticide resistance-management and/or IPM recommendations for specific crops and pathogens.
- For further information or to report suspected resistance contact Bayer CropScience at 1-866-99BAYER (1-866-992-2937). You can also contact your pesticide distributor or university extension specialist to report resistance.

#### **ROTATIONAL CROPS**

Areas planted with treated seed may be replanted immediately with artichoke, barley, Brassica (cole) leafy vegetables, borage, bulb vegetables, canola, cilantro, corn (field), corn (pop), corn (sweet), cotton, cranberry, crambe, cucurbits, eggplant, flax, ground cherry, leaf petiole vegetables, leafy vegetables, legume vegetables (succulent or dried, including soybean), millet, mustard seed, oats, okra, pepinos, pepper, potato, rapeseed, rye, safflower, sorghum, soybean, strawberry, sugarbeet, sunflower, tomatillo, tomato, triticale, root and tuber vegetables, watercress, wheat. These areas may also be replanted after 30 days with cereals, including buckwheat, rice. Do not plant any other crop in the treated area for at least one year after treated seeds are planted.

## SPECIFIC CROP DIRECTIONS

#### STANDARD SLURRY OR MIST-TYPE SEED TREATMENT EQUIPMENT APPLICATION

Barley, Triticale, and Wheat		
Disease(s) Controlled or Suppressed	Product Rate (fl oz per 100 lbs Seed)	
Stinking smut		
Flag smut		
Loose smut		
Covered smut (common bunt)		
Early season Septoria disease complex		
General seed rots		
Pythium damping-off	5.0	
Early season Rhizoctonia root rot	5.0	
Early season common root rot		
Seedborne <i>Fusarium</i> scab		
Barley stripe		
Early season <i>Fusarium</i> foot rot		
Early Season Seedling Injury Protection		
Aphids (including Bird cherry-oat, English grain, Greenbug, and		
Russian wheat aphid), Hessian fly and wireworms.		
Crop Specific Directions and Restrictions:		
<ul> <li>Applications must be made using standard slurry or mist-type se</li> </ul>	ed treatment equipment	
<ul> <li>In some instances, a chemical slurry dilution may enhance cove with 1 part water dilution may be used.</li> </ul>	rage. A 1 part $Raxil$ PRO Shield Insecticide and Fungicide	
<ul> <li>Uniform application to seed is pacessary to ensure seed safety.</li> </ul>	and bast disease control	

Uniform application to seed is necessary to ensure seed safety and best disease control.

#### SEED TAG LABELING

The Federal Seed Act requires that the container of seed treated with Raxil PRO Shield Insecticide and Fungicide must be labeled with the following statements:

- This seed has been treated with:
  - Raxil PRO Shield Insecticide and Fungicide, which contains 8.59% imidacloprid, 1.47% prothioconazole, 0.57% metalaxyl, and 0.29% tebuconazole.
- Do not use treated seed for food, feed, or oil production.

In addition, the US Environmental Protection Agency requires the following statements on the container of seed treated with Raxil PRO Shield Insecticide and Fungicide:

- Areas planted with treated seed may be replanted immediately with artichoke, barley, Brassica (cole) leafy vegetables, borage, bulb vegetables, canola, cilantro, corn (field), corn (pop), corn (sweet), cotton, cranberry, crambe, cucurbits, eggplant, flax, ground cherry, leaf petiole vegetables, leafy vegetables, legume vegetables (succulent or dried, including soybean), millet, mustard seed, oats, okra, pepinos, pepper, potato, rapeseed, rye, safflower, sorghum, soybean, strawberry, sugarbeet, sunflower, tomatillo, tomato, triticale, root and tuber vegetables, watercress, wheat. These areas may also be replanted after 30 days with cereals, including buckwheat, rice. Do not plant any other crop in the treated area for at least one year after treated seeds are planted.
- For all other crops not listed on an Imidacloprid label, or for crops for which no tolerance for the active ingredient has been established, a 12- month plant-back interval is required.
- Cover crops for soil building or erosion control may be planted any time, but do not graze or harvest for food or feed.
- Do not graze or feed livestock on barley, wheat and triticale green forage, or harvest for hay within 45 days of seeding.
- Store treated seeds away from food and feedstuffs.
- Do not allow children, pets, or livestock to have access to treated seed.
- Wear long-sleeved shirt, long pants and chemical-resistant gloves when handling treated seed.
- Treated seeds must be planted into the soil at a depth greater than 1 inch. Consult your area agronomist regarding planting depth recommendations for the particular variety to be planted.
- Treated seeds exposed on soil surface may be hazardous to wildlife. Cover or collect treated seeds spilled during loading.
- This pesticide is highly toxic to bees, birds and aquatic invertebrates, and toxic to mammals, fish and aquatic plants.
- 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 ethanol by-products that are used in agronomic practice.

- Dispose of all excess treated seed. Leftover treated seed may be double sown around the headland or buried away from water sources in accordance with local requirements.
- Dispose of seed packaging or containers in accordance with local requirements. Do not use empty seed bags for any other purpose.
- Surplus seed or empty seed containers are to be stored or disposed according to state or local regulations.
- Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water bodies when disposing of planting equipment wash waters.
- Runoff may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment wash water or rinsate.
- Prothioconazole-desthio (a degradate of prothioconazole), metalaxyl and tebuconazole are known to leach through soil into ground water under certain conditions as a result of label use. Use of this product in areas where soils are permeable, particularly where the water table is shallow, may result in ground-water contamination.
- Ensure that planting equipment is functioning properly in accordance with manufacturing specifications to minimize seed coat abrasion during planting to reduce dust which can drift to blooming crops or weeds.
- This seed has been treated with 0.0105 mg of imidacloprid, 0.0003 mg of tebuconazole, 0.0007 mg of metalaxyl, and 0.0017 mg of prothiconazole per seed. Based on an average of 13,000 seeds per lb.
- Do not use at a rate that will result in more than 0.4 lb of imidacloprid per acre per calendar year for all application types (seed, foliar, soil, etc.)

#### For PRODUCT USE Information Call 1-866-99BAYER (1-866-992-2937)

For MEDICAL, TRANSPORTATION or OTHER Emergencies ONLY Call 24 Hours A Day 1-800-334-7577

#### STORAGE AND DISPOSAL

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

#### **Pesticide storage**

Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat.

#### 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 at the nearest EPA Regional Office for guidance.

#### **Container handling**

#### **Non-Refillable Plastic Containers**

#### Rigid Non-refillable containers that are too large to shake (i.e., with capacities greater than 5 gallons or 50 lbs)

Non-refillable container. Do not reuse or refill this container. After emptying product from container, either return container to Bayer CropScience per instructions from Bayer CropScience Customer Service Center (1-800-527-4781), or rinse and either recycle or dispose of the container as follows:

#### Bottom Discharge IBC (e.g. – Schuetz Caged IBC or Snyder Square Stackable)

Pressure rinsing the container before final disposal is the responsibility of the person disposing of the container. To pressure rinse the container before final disposal, empty the remaining contents from the IBC into application equipment or mix tank. Raise the bottom of the IBC by 1.5 inches on the side which is opposite of the bottom discharge valve to promote more complete product removal. Completely remove the top lid of the IBC. Use water pressurized to at least 40 PSI to rinse all interior portions. Continuously pump or drain rinsate into application equipment or rinsate collection system while pressure rinsing. Continue pressure rinsing for 2 minutes or until rinsate becomes clear. Replace the lid and close bottom valve.

#### Top Discharge IBC, Drums, Kegs (e.g.- Snyder 120 Next Gen, Bonar B120, Drums, and Kegs)

Triple rinsing the container before final disposal is the responsibility of the person disposing of the container. To triple rinse the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container at least 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Rinse all interior surfaces. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this procedure two more times.

Once container is rinsed, offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

#### **Non-Refillable Metal Containers**

Nonrefillable container. Do not reuse or refill this container. After emptying product from container, either return container to Bayer CropScience per instructions from Bayer CropScience Customer Service Center (1-800-527-4781), or rinse and either recycle or dispose of the container as follows:

#### Liquid dilutables in containers small enough to shake (5 gallons or less)

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 ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

#### Solid dilutables in containers small enough to shake (5 gallons or 50 pounds or less)

Triple Rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

#### Any dilutable pesticides in containers too large to shake (larger than 5 gallons or 50 pounds)

Triple Rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container ¼ 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.

Once container is rinsed, offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration.

#### Non-Refillable Containers

Seed-Treatment Products in Non-Refillable Fiber Drums with Liners

Non-refillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen

clinging particles. Empty residue into application equipment, then offer for recycling if available or dispose of in a sanitary landfill or by incineration. If drum is contaminated and cannot be reused, dispose of it in the manner required for its liner.

#### Seed-Treatment Products in Non-rigid, Non-Refillable Containers

Nonrefillable container. Do not reuse or refill this container. Completely empty container into application equipment. Then offer for recycling if available or dispose of in a sanitary landfill or by other procedures approved by state and local authorities.

#### **Refillable Containers**

Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. After emptying product from container, either return container to Bayer CropScience per instructions from Bayer CropScience Customer Service Center (1-800-527-4781) or rinse and either recycle or dispose of the container as follows:

#### Bottom Discharge IBC (e.g. - Schuetz Caged IBC or Snyder Square Stackable)

Pressure rinsing 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 pressure rinse the container before final disposal, empty the remaining contents from the IBC into application equipment or mix tank. Raise the bottom of the IBC by 1.5 inches on the side which is opposite of the bottom discharge valve to promote more complete product removal. Completely remove the top lid of the IBC. Use water pressurized to at least 40 PSI to rinse all interior portions. Continuously pump or drain rinsate into application equipment or rinsate collection system while pressure rinsing. Continue pressure rinsing for 2 minutes or until rinsate becomes clear. Replace the lid and close bottom valve.

#### Top Discharge IBC, Drums, Kegs (e.g. – Snyder 120 Next Gen, Bonar B120, Drums, and Kegs)

Triple rinsing 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 triple rinse the containers before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container at least 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Rinse all interior surfaces. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this procedure two more times.

Once container is rinsed, offer for recycling if available or puncture and dispose of in a sanitary landfill or by incineration.

End users are authorized to remove tamper evident cables as required to remove the product from the container unless the container is equipped with one way valves and refilling or returning is planned. If this is the case, end users are not authorized to remove tamper evident cables, one way valves or clean container.

Raxil PRO Shield Insecticide and Fungicide (PENDING) 06/02/2018, 03/09/2020