



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

August 27, 2025

Arianna Shorey
Regulatory Consultant for UPL NA, Inc.
c/o Pyxis Regulatory Consulting Inc.
535 Dock St, Ste 211
Tacoma, WA 98402

Subject: Label Amendment - Registration Review Mitigation for Metalaxyl and Ipconazole
Product Name: Rancona Pinnacle
EPA Registration Number: 70506-591
Case Number: 481072
Application Date: January 19, 2022

Dear Arianna Shorey:

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 Metalaxyl and Ipconazole Interim Decisions, 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 Assurance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. 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 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 Concepción Rodríguez by phone at 202-566-0820, or via email at rodriguez.concepcion@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie R. Javier". The signature is fluid and cursive, with the first name "Julie" being the most prominent.

Julie Javier, Team Leader
Risk Mitigation and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

ENCLOSURE: Stamped label

{Note to reviewer: [Text] in brackets denotes optional text. {Text} in braces denotes where in the final label text will appear and notes to reviewer.}

IPCONAZOLE	GROUP	3	FUNGICIDE
METALAXYL	GROUP	4	FUNGICIDE

Rancona® Pinnacle

SEED PROTECTANT

Active Ingredients: (% by weight)

ipconazole (CAS No. 125225-28-7).....	0.434%*
metalaxyl (CAS No. 57837-19-1).....	0.579%**
Other Ingredients:	98.987%
Total:	100.000%

*Contains 0.0385 pounds ipconazole per gallon. Contains 4.61 grams ipconazole per liter.

**Contains 0.051 pounds metalaxyl per gallon. Contains 6.12 grams metalaxyl per liter.

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
IF IN EYES:	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.• Remove contact lens, if present, after the first 5 minutes, then continue rinsing eye.• Call a poison control center or doctor for treatment advice.
EMERGENCY ASSISTANCE: Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	
FOR 24-HOUR MEDICAL EMERGENCY ASSISTANCE CALL ROCKY MOUNTAIN POISON AND DRUG SAFETY: 1-866-673-6671.	
FOR 24-HOUR CHEMICAL EMERGENCY (Spill, leaks, fire, exposure or accident) CALL CHEMTREC: 1-800-424-9300 or +1-703-527-3887.	
For Product Use Information Call 1-800-438-6071	

{Optional reference statements:} [See [front][back][side][inside] panel for First Aid Instructions and [leaflet][booklet] for complete Precautionary Statements and Directions for Use.] [Peel Down for Directions.] [See inside for First Aid, Precautionary Statements, and complete Directions for Use.] {Box/Case:} [See containers inside for additional Precautionary Statements and complete Directions for Use.] {Container:} [See attached booklet for additional Precautionary Statements and complete Directions for Use.]

Net Contents:

EPA REG. NO. 70506-591

EPA EST. NO.

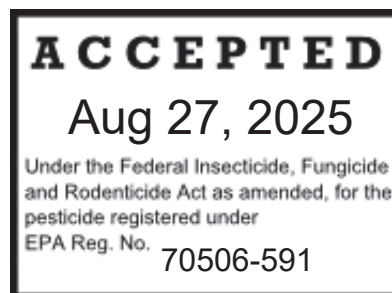
[Manufactured] [Produced] for:

UPL NA Inc.

630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

[xxxxxxV00x]

[Batch Code will be placed on the container.]



PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Applicators and Other Handlers Must Wear: 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, polyvinyl chloride ≥14 mils, or Viton ≥14 mils; shoes plus socks and protective eyewear. Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

When handlers use closed systems in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170-240 (d) (4)], the handler PPE may be reduced or modified as specified in the WPS. Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions exist for washables, 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.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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:

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Cover or incorporate spilled treated seeds. Do not contaminate water when disposing of equipment washwater or rinsate or by disposal of wastes.

Treated seed exposed on soil surface may be hazardous to wildlife. Cover or collect seeds spilled during loading and planting.

Groundwater Advisory: Metalaxyl is known to leach through soil into groundwater 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 groundwater contamination.

Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other 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 to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all label directions carefully before use.

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.

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 **24 hours**.

Exception: Once the seeds are planted in soil, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area without restriction if there will be no worker contact with the soil subsurface or treated seed.

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 and long pants; chemical-resistant gloves made of barrier laminate, butyl rubber ≥14 mils, nitrile rubber ≥14 mils, neoprene rubber ≥14 mils, polyvinyl chloride ≥14 mils, or Viton ≥14 mils; shoes plus socks.

PRODUCT INFORMATION

RANCONA® PINNACLE is a systemic and contact broad-spectrum fungicide for seed treatment that protects against a wide variety of diseases. RANCONA PINNACLE is effective against *Fusarium*, *Cochliobolus sativus*, *Pythium*, smuts, bunt and leaf stripe. It is also effective against seed rot fungi such as *Aspergillus* and *Penicillium*. Seed should be sound and well-cured before treatment.

Do not use RANCONA PINNACLE in combination with other seed treatment products unless compatibility has been verified. Read and follow carefully all label directions of each combination product. When using combinations of products, the most restrictive of label limitations and precautions must be followed.

RESISTANCE-MANAGEMENT

For resistance management, RANCONA PINNACLE contains Group 3 and 4 fungicides. Any fungal/bacterial population may contain individuals naturally resistant to RANCONA PINNACLE and other Group 3 and 4 fungicides/bactericides. A gradual or total loss of pest control may occur over time if these fungicides/bactericides are used repeatedly in the same fields. Appropriate resistance-management strategies should be followed.

To delay fungicide/bactericide resistance, take the following steps:

- Rotate the use of RANCONA PINNACLE or other Group 3 and 4 fungicides/bactericides within a growing season sequence with different groups that control the same pathogens.
- Use tank mixtures with fungicide/bactericides 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/bactericide 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/bactericide applications. Note that using predictive models alone is not sufficient to manage resistance.
- Monitor treated fungal/bacterial 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 crops and pathogens.
- For further information or to report suspected resistance contact your UPL NA Inc. retailer, representative or call 1-800-438-6071. You can also contact your pesticide distributor or university extension specialist to report resistance.

SEED TREATMENT EQUIPMENT

RANCONA PINNACLE is both for commercial and for on-farm application. It may be applied with mechanical, slurry, or mist-type seed treating equipment, provided that the equipment can be calibrated to accurately and uniformly apply the product to seed. Not for use in hopper-box, planter-box or slurry-box seed treatment applications. Uniform application to seed is necessary to ensure best disease protection and optimum performance. Seed should be sound and well-cured before treatment. Refer to the label rates below.

In most cases, RANCONA PINNACLE is ready to use and may be applied to seed as is; however, dilution with water may be appropriate for some types of treaters and/or when treating under dry and/or hot conditions, to achieve more uniform product to seed coverage. RANCONA PINNACLE and water should be mixed thoroughly into a slurry prior to treating seed. Recalibrate treating equipment to compensate for the addition of water. The amount of dilution water that is most suitable depends on the seed, treater type and temperature. Contact your local UPL NA Inc. representative or supplier for specific recommendations.

ALWAYS SHAKE OR STIR PRODUCT WELL BEFORE USE

Rancona Pinnacle must be THOROUGHLY AGITATED to ensure uniform mixing of the product, both prior to and during application.

Equipment Cleaning: Following applications, thoroughly rinse seed treatment equipment with water. Do not contaminate water by disposal of equipment washwater or rinsate.

APPLICATION INSTRUCTIONS

Crop	Rate Per 100 lbs. of seed*	Symptoms Controlled (Disease Organism)	Symptoms Suppressed (Disease Organism)
Wheat (Spring and Winter)	5.0 to 8.33 fl. oz. ----- To deliver 0.0012 - 0.0020 mg.ai. per seed, apply 0.385 - 0.641 fl.oz. of product per 100,000 seeds (Based on average of 13,000 seeds per lb.)	General Seed rots (including those caused by <i>Penicillium</i> and <i>Aspergillus</i>) Seed rot, damping off and seedling blight (seed- and soil-borne <i>Fusarium</i> , <i>Pythium</i> and <i>Cochliobolus sativus</i>) Loose Smut (<i>Ustilago tritici</i>) Common Bunt (<i>Tilletia caries</i> , <i>T. foetida</i>) Early Season Root Rot (<i>Rhizoctonia</i>)	Common root rot (<i>Cochliobolus sativus</i>) Crown and Foot rot (<i>Fusarium</i>)
Barley	5.0 to 8.33 fl. oz. ----- To deliver 0.0012 - 0.0020 mg.ai. per seed, apply 0.385 - 0.641 fl.oz. of product per 100,000 seeds (Based on average of 13,000 seeds per lb.)	General Seed rots (including those caused by <i>Penicillium</i> and <i>Aspergillus</i>) Seed rot, damping off and seedling blight (seed- and soil-borne <i>Fusarium</i> , <i>Pythium</i> and <i>Cochliobolus sativus</i>) True Loose Smut (<i>Ustilago nuda</i>) Covered Smut (<i>U. hordei</i>) False Loose Smut (<i>U. nigra</i>) Early Season Root Rot (<i>Rhizoctonia</i>)	Common root rot (<i>Cochliobolus sativus</i>) Crown and Foot rot (<i>Fusarium</i>) Leaf Stripe (<i>Pyrenophora graminea</i>)
Oats	5.0 to 8.33 fl. oz. ----- To deliver 0.0012 - 0.0020 mg.ai. per seed, apply 0.385 - 0.641 fl.oz. of product per 100,000 seeds (Based on average of 13,000 seeds per lb.)	General Seed rots (including those caused by <i>Penicillium</i> and <i>Aspergillus</i>) Seed rot, damping off and seedling blight (seed- and soil-borne <i>Fusarium</i> , <i>Pythium</i> and <i>Cochliobolus sativus</i>) Loose Smut (<i>Ustilago avenae</i>) Covered Smut (<i>U. segetum</i> var. <i>hordei</i>)	Common root rot (<i>Cochliobolus sativus</i>) Crown and Foot rot (<i>Fusarium</i>)
Rye, Triticale	5.0 to 8.33 fl. oz. ----- To deliver 0.0008 - 0.0014 mg.ai. per seed, apply 0.265 - 0.442 fl.oz. of product per 100,000 seeds (Based on average of 18,850 seeds per lb.)	General Seed rots (including those caused by <i>Penicillium</i> and <i>Aspergillus</i>) Seed rot, damping off and seedling blight (seed- and soil-borne <i>Fusarium</i> , <i>Pythium</i> and <i>Cochliobolus sativus</i>)	Root rot
Buckwheat	5.0 to 8.33 fl. oz. ----- To deliver 0.0012 - 0.0020 mg.ai. per seed, apply 0.385 - 0.641 fl.oz. of product per 100,000 seeds (Based on average of 13,000 seeds per lb.)	General Seed rots (including those caused by <i>Penicillium</i> and <i>Aspergillus</i>)	Root rot
Sorghum	5.0 to 8.33 fl. oz. ----- To deliver 0.0009 - 0.0015 mg.ai. per seed, apply 0.278 - 0.463 fl.oz. of product per 100,000 seeds (Based on average of 18,000 seeds per lb.)	Seed rot, damping off and seedling blight (seed- and soil-borne fungi including <i>Pythium</i>)	Root rot

*Use the higher rate when disease pressure is expected to be high, or when there is a history of high disease levels in the field.

TREATED SEED LABELING

Seed that has been treated with this product that is then packaged or bagged for future use must contain the following labeling on the outside of the seed package or bag:

"This bag contains seed treated with metalaxyl and ipconazole. Do not use treated seed for food or animal feed or processing for oil. Persons opening this bag or loading/pouring the treated seed must wear a long-sleeved shirt, long pants, chemical resistant gloves, shoes and socks.

Treated seeds exposed on soil surface may be hazardous to wildlife. Cover or collect treated seeds spilled during loading and planting. Dispose of all excess treated seed by burying seed away from bodies of water. Do not contaminate bodies of water when disposing of planting equipment wash water. Dispose of seed packaging or containers in accordance with local requirements.

After seeds have been planted, do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 24 hours. *Exception:* Once the seeds are planted and covered by soil or other planting media, the Worker Protection Standard allows workers to enter the treated area without restriction if there will be no contact with soil/subsurface. 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, chemical resistant gloves, shoes plus socks.

This product may have effects on federally listed threatened or endangered species or their critical habitat in some counties. It is a violation of federal law to kill, harm or harass listed animal species without authorization. To limit the potential for such impacts when using this product, consult and follow the instructions provided in the EPA Endangered Species Bulletin for the County or Parish in which you are applying the seed. To determine whether your County or Parish has a bulletin, consult <http://www.epa.gov/espp> before each season's use of this product. Bulletins also may be available from local pesticide dealers, extension offices, or State pesticide agencies."

Excess 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 practices.

USE RESTRICTIONS

Do not use treated seed for food, feed or oil purposes. Care must be exercised in the handling of treated seed. Augers used for handling treated seed must not be used to move seed for feed, food or oil processing. Do not reuse bags from treated seed to handle food or feed products.

Treatment of highly mechanically damaged seed, or seed known to be of low vigor and poor quality, except for the purpose of curative control of existing disease pests, may result in reduced germination and/or reduction of seed and seedling vigor. Treat and conduct germination tests on a small test sample of seed before treating commercial quantities with a selected chemical treatment. Due to seed quality and seed storage conditions beyond the control of UPL NA Inc. , UPL NA Inc. makes no claims or guarantees as to germination of carry-over seed.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in original container only. After partial use, replace lid and close tightly. Store in a secure place that is temperate, dry and out of direct sunlight. Avoid excess heat. Do not freeze. ALWAYS SHAKE OR STIR WELL BEFORE USE.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Cover or incorporate spilled treated seeds.

CONTAINER HANDLING:

Nonrefillable Container

Plastic Containers: Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Then offer container for recycling, reconditioning, or puncture and dispose of in a sanitary landfill, by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

Triple rinse as follows: *For containers with capacities equal to or less than 5 gallons:* Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Add water - at least 2% of the container volume, and up to 1/3 of the volume of water needed to make the proper slurry composition, with a maximum of 1/4 of the container volume - and recap. Shake for 30 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. If used in application equipment, adjust the slurry volume application rate to account for any added rinsate water.

For containers with capacities greater than 5 gallons: Empty the remaining contents into application equipment or a mix tank. Add water - at least 2% of the container volume, and up to 1/3 of the volume of water needed to make the proper slurry composition, with a maximum of 1/4 of the container volume. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 60 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over on 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. If used in application equipment, adjust the slurry volume

application rate to account for any added rinsate water.

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 refiller.

To clean the container before final disposal, empty the remaining contents into application equipment or mix tank. Add water – at least 2% of the container volume, and up to 1/3 of the volume of water needed to make the proper slurry composition, with a maximum of 10% of the container volume. Replace and tighten closure. Agitate vigorously or recirculate the rinsate with a pump for at least 2 minutes, ensuring that the rinsate rinses the walls of the container. Empty the rinsate into application equipment or rinsate collection system, for later use or disposal. Repeat this procedure two more times. If used in application equipment, adjust the slurry volume application rate to account for any added rinsate water.

IMPORTANT INFORMATION

READ BEFORE USING PRODUCT

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 reflect the opinion of experts based on field use and tests, and must be followed carefully. 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 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 UPL NA Inc or Seller. Handling, storage, and use of the product by Buyer or User are beyond the control of UPL NA Inc and Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold UPL NA Inc and Seller harmless for any claims relating to such factors.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, UPL NA INC AND SELLER MAKE NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ON THIS LABEL.

To the extent consistent with applicable law, UPL NA Inc or Seller shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product and **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF UPL NA INC 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 UPL NA INC OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

UPL NA Inc and Seller offer this product, and Buyer and User accept it, subject to the foregoing conditions of sale and limitations of warranty and of liability, which may not be modified except by written agreement signed by the duly authorized representative of UPL NA Inc.

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[EPA APPROVAL DATE]