



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

September 4, 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 Summit
EPA Registration Number: 70506-592
Application Date: January 19, 2022
Case Number: 474193

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 'M. Perch', with a long horizontal flourish extending to the right.

Maryam K. Muhammad-Perch, Team Lead
Risk Management 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[®] Summit

SEED PROTECTANT

Active Ingredients:	(% by weight)
ipconazole (CAS No. 125225-28-7).....	0.902%*
metalaxyl (CAS No. 57837-19-1).....	1.443%*
Other Ingredients:	97.655%
Total:	100.000%

*Contains 0.080 lb. ipconazole and 0.128 lb. metalaxyl per gallon.

*Contains 9.6 grams ipconazole and 15.4 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 lenses, if present, after the first 5 minutes, then continue rinsing.• 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:

[Manufactured][Produced] for:

UPL NA Inc.

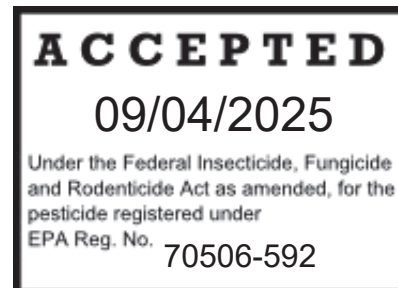
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

EPA REG. NO. 70506-592

EPA EST. NO.

[xxxxxxV00x]

[Batch Code will be placed on the container.]



PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Causes moderate eye irritation. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

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, or Viton ≥14 mils); and shoes plus socks. Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables exist, 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.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE 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. Ipconazole may persist in soil, and long-term use in the same field may result in an accumulation of active ingredient.

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.

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

READ ALL LABEL DIRECTIONS CAREFULLY BEFORE USE

PRODUCT INFORMATION

RANCONA® Summit is a systemic and contact broad-spectrum fungicide for seed treatment that protects against a wide variety of seed borne and soil borne diseases as listed in the Application Instructions table for the specific crops.

In most cases, RANCONA Summit 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. The amount of dilution water required to achieve uniform coverage of the seed depends on the seed, the treater type and the temperature. When diluted with water, mix RANCONA Summit and water thoroughly into a slurry before treating seed. RANCONA Summit can also be mixed in combination with other seed treatment products, however, do not mix with other seed treatment products unless their compatibility has been verified. Always read and follow carefully all label directions and precautions of each combination product. When using combinations of products, the most restrictive of label limitations and precautions must be followed. Do not tank mix with any pesticide that has a prohibition against tank mixing. Recalibrate treating equipment to compensate for the addition of water and / or other seed treatment products. Contact your local UPL NA Inc. representative or supplier for specific recommendations.

ALWAYS SHAKE OR STIR PRODUCT WELL BEFORE USE

RESISTANCE-MANAGEMENT

For resistance management, RANCONA Summit contains Group 3 and 4 fungicides. Any fungal/bacterial population may contain individuals naturally resistant to RANCONA Summit 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 Summit 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 Summit 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. 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.

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

APPLICATION INSTRUCTIONS

FAILURE TO FOLLOW DIRECTIONS ON THIS LABEL MAY RESULT IN CROP INJURY OR POOR DISEASE CONTROL

Crop	Application Rate	Diseases Controlled	Diseases Partially Controlled*
Soybeans	<p>4 fl oz** per 100 lb seed</p> <p>-----</p> <p>To deliver 0.0106 mg ai per seed, apply 2.0 fl oz of product per 140,000 seeds (Based on average of 2,800 seeds per lb)</p>	<p>Seed rots (seed and soil borne <i>Penicillium</i> spp. and <i>Aspergillus</i> spp.)</p> <p>Seed rot, damping off and seedling blights (seed and / or soil borne <i>Fusarium</i> spp., <i>Rhizoctonia solani</i>, <i>Phomopsis</i> (<i>Diaporthe</i>) and <i>Pythium</i> spp.)</p> <p>Seed borne <i>Botrytis</i> and <i>Sclerotinia</i></p>	
Beans (dried shelled and succulent / edible podded)	<p>4 fl oz** per 100 lb seed</p> <p>-----</p> <p>To deliver 0.0185 mg ai per seed, apply 2.5 fl oz of product per 100,000 seeds (Based on average of 1,600 seeds per lb)</p>	<p>Seed rots (seed and soil borne <i>Penicillium</i> spp. and <i>Aspergillus</i> spp.)</p> <p>Seed rot, damping off and seedling blights (seed and / or soil borne <i>Fusarium</i> spp., <i>Rhizoctonia solani</i> and <i>Pythium</i> spp.)</p> <p>Seed-borne <i>Botrytis</i> and <i>Sclerotinia</i></p> <p>Seed rot, damping off and seedling blight (seed-borne <i>Ascochyta</i> spp.)</p>	Seed-borne Anthracnose (<i>Colletotrichum lindemuthianum</i>)
Peas (dried shelled and succulent / edible podded)	<p>4 fl oz** per 100 lb seed</p> <p>-----</p> <p>To deliver 0.092 mg ai per seed, apply 1.25 fl oz of product per 100,000 seeds (Based on average of 3,200 seeds per lb)</p>	<p>Seed rots (seed and soil borne <i>Penicillium</i> spp. and <i>Aspergillus</i> spp.)</p> <p>Seed rot, damping off and seedling blights (seed and / or soil borne <i>Fusarium</i> spp., <i>Rhizoctonia solani</i> and <i>Pythium</i> spp.)</p> <p>Seed-borne <i>Botrytis</i> and <i>Sclerotinia</i></p> <p>Seed rot, damping off and seedling blight (seed-borne <i>Ascochyta</i> spp.)</p>	

Crop	Application Rate	Diseases Controlled	Diseases Partially Controlled*
Wheat (Spring and Winter)	<p>2.5 – 4.0*** fl oz per 100 lb seed</p> <p>-----</p> <p>To deliver 0.0014 - 0.0023 mg ai per seed, apply 0.19 - 0.31 fl oz of product per 100,000 seeds (Based on average of 13,000 seeds per lb)</p>	<p>Seed rots (seed and soil borne <i>Penicillium</i> spp. and <i>Aspergillus</i> spp.)</p> <p>Seed rot, damping off and seedling blights (seed and / or soil borne <i>Fusarium</i> spp., <i>Rhizoctonia solani</i>, <i>Cochliobolus sativus</i> and <i>Pythium</i> spp.)</p> <p>Loose Smut (<i>Ustilago tritici</i>)</p> <p>Common Bunt (<i>Tilletia caries</i>, <i>T. foetida</i>)</p> <p>Seed-borne <i>Septoria</i></p>	<p>Common root rot (<i>Cochliobolus sativus</i>)</p> <p>Crown and Foot rot (<i>Fusarium</i> spp.)</p>
Barley	<p>2.5 – 4.0*** fl oz per 100 lb seed</p> <p>-----</p> <p>To deliver 0.0014 - 0.0023 mg ai per seed, apply 0.19 - 0.31 fl oz of product per 100,000 seeds (Based on average of 13,000 seeds per lb)</p>	<p>Seed rots (seed and soil borne <i>Penicillium</i> spp. and <i>Aspergillus</i> spp.)</p> <p>Seed rot, damping off and seedling blights (seed and / or soil borne <i>Fusarium</i> spp., <i>Rhizoctonia solani</i>, <i>Cochliobolus sativus</i> and <i>Pythium</i> spp.)</p> <p>True Loose Smut (<i>Ustilago nuda</i>)</p> <p>Covered Smut (<i>U. hordei</i>)</p> <p>False Loose Smut (<i>U. nigra</i>)</p>	<p>Common root rot (<i>Cochliobolus sativus</i>)</p> <p>Crown and Foot rot (<i>Fusarium</i> spp.)</p> <p>Leaf Stripe (<i>Pyrenophora graminea</i>)</p>
Oats	<p>2.5 – 4.0*** fl oz per 100 lb seed</p> <p>-----</p> <p>To deliver 0.0014 - 0.0023 mg ai per seed, apply 0.19 - 0.31 fl oz of product per 100,000 seeds (Based on average of 13,000 seeds per lb)</p>	<p>Seed rots (seed and soil borne <i>Penicillium</i> spp. and <i>Aspergillus</i> spp.)</p> <p>Seed rot, damping off and seedling blights (seed and / or soil borne <i>Fusarium</i> spp., <i>Rhizoctonia solani</i>, <i>Cochliobolus sativus</i> and <i>Pythium</i> spp.)</p> <p>Loose Smut (<i>Ustilago avenae</i>)</p> <p>Covered Smut (<i>U. segetum var. hordei</i>)</p>	<p>Common root rot (<i>Cochliobolus sativus</i>)</p> <p>Crown and Foot rot (<i>Fusarium</i> spp.)</p>

Crop	Application Rate	Diseases Controlled	Diseases Partially Controlled*
Rye, Triticale	2.5 – 4.0*** fl oz per 100 lb seed ----- To deliver 0.0010 - 0.0016 mg ai per seed, apply 0.13 - 0.21 fl oz of product per 100,000 seeds (Based on average of 18,850 seeds per lb)	Seed rots (seed and soil borne <i>Penicillium</i> spp. and <i>Aspergillus</i> spp.) Seed rot, damping off and seedling blights (seed and / or soil borne <i>Fusarium</i> spp., <i>Rhizoctonia solani</i> , <i>Cochliobolus sativus</i> and <i>Pythium</i> spp.)	Common root rot (<i>Cochliobolus sativus</i>) Crown and Foot rot (<i>Fusarium</i> spp.)

* Partial control can either mean erratic control from good to poor, or consistent control at a level below that generally considered acceptable for commercial disease control.

** Delivers 0.04 oz ipconazole plus 0.064 oz. metalaxyl per 100 pounds seed

*** Delivers 0.024 – 0.04 oz ipconazole plus 0.04 – 0.064 oz metalaxyl per 100 pounds seed

SEED BAG LABEL REQUIREMENTS

The Federal Seed Act requires that bags containing treated seeds shall be labeled with the following statements:

- This seed has been treated with ipconazole and metalaxyl.
- Do not use for feed, food, or oil purposes.
- User is responsible for ensuring that the seed bag meets all requirements under the Federal Seed Act.

In addition, the U.S. Environmental Protection Agency requires the following statements on bags containing seed treated with RANCONA Summit:

- Store away from food and feedstuffs.
- Do not allow children, pets, or livestock to have access to treated seeds.
- Wear long-sleeved shirt, long pants, and chemical resistant gloves made of barrier laminate, butyl rubber, neoprene or viton; shoes and socks.
- Treated seeds exposed on soil surface may be hazardous to wildlife. Cover or collect treated seeds spilled during loading.
- Dispose of all excess treated seed by double sowing around the headland or buried away from water sources in accordance with local requirements.
- Do not contaminate water bodies when disposing of planting equipment washwater.
- Dispose of seed packaging in accordance with local requirements.
- 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 for agronomic practice.

USE RESTRICTIONS

For soybeans, beans (dried shelled and succulent / edible podded), and peas (dried shelled and succulent / edible podded) the maximum annual rate must not exceed 12.3 lbs metalaxyl/A.

IN CALIFORNIA: ONLY for use in commercial seed-treatment establishments. NOT allowed for “on-farm” use.

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.

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.

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 if available, reconditioning if appropriate, 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 capacity 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: Triple rinse as follows: 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 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. 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.

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[EPA APPROVAL DATE]