



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

January 14, 2026

Abigail Wacek
Regulatory Consultant
Technology Sciences Group Inc (dba Sagentia Regulatory)
1150 18th Street, N.W.
Suite 475
Washington, D.C. 20036

Subject: Label Amendment - Registration Review Mitigation for Imazalil
Product Name: CITROSOL A IMAD 2
EPA Registration Number: 91951-1
Case Number: 475380
Application Date: June 25, 2021

Dear Abigail Wacek:

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 Imazalil 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 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.

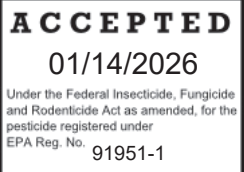
If you have any questions about this letter, please contact Kelsi Grogan by phone at 202-566-2228, or via email at grogan.kelsi@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kevin Costello". The signature is written in a cursive, flowing style.

Kevin Costello, Branch Chief
Risk Management and Implementation Branch 2
Pesticide Re-Evaluation Division
Office of Pesticide Programs

ENCLOSURE: Stamped label



Imazalil	GROUP	3	FUNGICIDE
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CITROSOL A IMAD 2

POSTHARVEST WAX TREATMENT FOR PROTECTING AND SHINING CITRUS FRUIT

Active Ingredient:

Imazalil: 1-(2-(2,4-dichlorophenyl)-2-(2-propenyloxy)ethyl)-1H-imidazole.....0.2%

Other Ingredients:.....99.8%

Total:.....100.0%

Contains 0.02 lbs. Imazalil per gallon

KEEP OUT OF REACH OF CHILDREN CAUTION

{SI USTED NO ENTIENDE LA ETIQUETA, BUSQUE A ALGUIEN PARA QUE SE LA EXPLIQUE A USTED EN DETALLE.
IF YOU DO NOT UNDERSTAND THE LABEL, FIND SOMEONE TO EXPLAIN IT TO YOU IN DETAIL.}

FIRST AID	
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 a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
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.
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 immediately for treatment advice.
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.
Call a Poison Control Center 1-800-222-1222 or doctor for treatment advice. Have the product container or label with you when calling a Poison Control Center or doctor, or when going for treatment.	

PRODUCTOS CITROSOL, S.A.

Partida Alameda s/n
46721 Potries (Valencia) Spain

www.citrosol.com



EPA Reg. No. 91951-1
EPA Est. No.

NET CONTENTS:

Date of manufacture:
Expiry date:
Manufacture batch no:

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION. Harmful if swallowed. Harmful if absorbed through the skin. Harmful if inhaled. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist.

PERSONAL PROTECTIVE EQUIPMENT

All mixers, loaders, applicators and other handlers must wear:

- long-sleeve shirt and long pants
- shoes plus socks
- chemical resistant gloves made of barrier laminate, butyl rubber ≥ 14 mil, nitrile rubber ≥ 14 mils, or neoprene rubber ≥ 14 mils, natural rubber ≥ 14 mils, polyethylene, polyvinyl chloride ≥ 14 mils, or Viton ≥ 14 mils (except for truck drivers and sorters)
- protective eyewear
- chemical resistant apron when mixing/loading, cleaning up spills, cleaning equipment, or otherwise exposed to the concentrate.

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 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. 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.

PHYSICAL AND CHEMICAL PROPERTIES

Do not mix or allow contact with oxidizing agents. Hazardous chemical reaction may occur.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not apply to water, to areas where surface water is present or intertidal area below the mean high water mark. Runoff from the treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when cleaning equipment or disposing of equipment wash waters or rinsate. 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 into sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

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 requirement specific to your State and Tribe, consult the State/Tribal agency responsible for pesticide regulation.

READ THE LABEL CAREFULLY BEFORE USING THE PRODUCT

NON-AGRICULTURAL USE REQUIREMENTS: The requirements in this section apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40CFR170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses. Keep unprotected persons out of the treated area until sprays have dried.

RESTRICTIONS:

- Do not apply more than two applications per single lot of citrus fruit.
- Do not enter or allow others to enter the treatment area until the citrus is treated and completely drained.
- The windows and doors of the transport vehicle must be closed prior to and during treatment.

APPLICATIONS:

For postharvest citrus fruit treatment, to improve their appearance, increasing the shine, reducing loss of weight and slowing the process of senescence by reducing the fruit transpiration and gives fungicide protection against fungi that cause decay (*Penicillium*, *Diplodia*, etc). This product may be used in combination with other post-harvest imazalil products at different stages in harvest, storing, and packing. Do not make more than two applications of imazalil to any single lot of citrus fruit.

RESISTANCE MANAGEMENT:

For resistance management, CITROSOL A IMAD 2 contains a Group 3 fungicide/bactericide. Any fungal/bacterial population may contain individuals naturally resistant to (name of product) and other Group 3 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 resistance, take one or more of the following steps:

- Rotate the use of CITROSOL A IMAD 2 or other Group 3 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 1PM recommendations for specific crops and pathogens.
- For further information or to report suspected resistance contact Productos Citrosol, S.A. at www.citrosol.com. You can also contact your pesticide distributor or university extension specialist to report resistance.

IN CITRUS PACKOUT WAX: Apply in conventional waxing equipment at 1 gallon of product per 10,000 to 12,000 lb. of citrus fruit to achieve a use concentration of 2000 ppm Imazalil. Stir product thoroughly for 5 minutes prior to application to the citrus fruit and continue slow agitation of the wax during the application process. The fruit should be dry when the wax treatment is applied. To apply to the citrus fruit on a roller conveyor, spray wax using waxing equipment while the citrus fruit passes on the conveyor. Allow the brushes to distribute the wax. Check nozzles frequently for blockage to ensure that the wax treatment is applied evenly.

IN CITRUS STORAGE WAX: Apply in conventional waxing equipment at 1 gallon per 10,000 to 12,000 lb. of citrus fruit to achieve a use concentration of 2000 ppm Imazalil. Stir the prepared wax thoroughly for 5 minutes before applying and continue slow agitation of the wax during the application process. The fruit should be dry when the wax treatment is applied. To apply to the citrus fruit on a roller conveyor, spray wax using waxing equipment while the citrus fruit passes on the conveyor. Allow the brushes to distribute the wax. Check nozzles frequently for blockage to ensure that the wax treatment is applied evenly.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool place (41 – 95°F).

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING:

Non-Refillable Container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Recap 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 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.

(Note to Reviewer: These warranty statements are optional.)

WARRANTY STATEMENT

{Conditions of Sale and Warranty} PRODUCTOS CITROSOL, S.A. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in accordance with the use directions under normal conditions. To the extent consistent with applicable law, PRODUCTOS CITROSOL, S.A. neither makes, nor authorizes any agent or representative to make, any other warranties, express or implied, including fitness or merchantability. The directions for use of this product are believed to be reliable and must be followed carefully. However, it is impossible to eliminate all risks inherently associated with the use of this product. Plant injury, ineffectiveness or other unintended consequences may result because of such factors as timing and method of application, weather and plant conditions, presence of other materials, or other influencing factors, all of which are beyond the control

of PRODUCTOS CITROSOL, S.A. and Seller. To the extent consistent with applicable law, buyer and user acknowledge and assume all risks and liability resulting from the handling, storage and use of this material not in strict accordance with directions given herewith. To the extent consistent with applicable law, PRODUCTOS CITROSOL, S.A. or the Seller shall not be liable for consequential, special, indirect or incidental damages or losses resulting from the handling or use of this product. The foregoing is a condition of sale by PRODUCTOS CITROSOL, S.A. and is accepted as such by the Buyer.

OR

{CONDITIONS OF SALE AND WARRANTY} Follow the Directions for Use. PRODUCTOS CITROSOL, S.A. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes referred to in the Directions for Use, subject to the inherent risks, referred to above. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW: (A) PRODUCTOS CITROSOL, S.A. MAKES NO OTHER WARRANTIES EXPRESS OR IMPLIED, INCLUDING WARRANTIES OF FITNESS FOR PARTICULAR PURPOSE OR MERCHANTABILITY, (B) BUYER'S EXCLUSIVE REMEDY AND PRODUCTOS CITROSOL, S.A. AND SELLER'S EXCLUSIVE LIABILITY, WHETHER IN CONTRACT, TORT, NEGLIGENCE, STRICT LIABILITY, OR OTHERWISE SHALL BE LIMITED TO REPAYMENT OF THE PURCHASE PRICE OF THE PRODUCT, AND (C) PRODUCTOS CITROSOL, S.A. AND THE SELLER DISCLAIM ANY LIABILITY FOR CONSEQUENTIAL, INCIDENTAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. PRODUCTOS CITROSOL, S.A. and the seller offer this product, and the Buyer accepts it, subject to these Conditions of Sale and Warranty which may be varied only by agreement in writing signed by a duly authorized representative of PRODUCTOS CITROSOL, S.A.