

PM 03

3125-517

11/1/99

179 1/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV 1 1999

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

John S. Thornton, Director
Product Registrations and Regulatory Affairs
Bayer Corporation, Agriculture Division
8400 Hawthorn Road
P.O. Box 4913
Kansas City, MO 64120-0013

Subject: Amendment - Label Revision/Alternate Brand Name
Rose, Shrub & Flower Care
EPA Registration No. 3125-517
Your submission dated October 22, 1999

Dear Mr. Thornton:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below. Submit two copies of the finished labeling before you release the product for shipment. A stamped copy of the label is enclosed for your records.

- 1. Words or phrases implying that a product possesses unique characteristics because of its composition are not acceptable. The alternate brand name, Bayer Advanced Garden 2-in-1 Systemic Azalea, Camellia & Rhododendron Care, must be modified by deleting the phrase "ADVANCED GARDEN" from the product name. Since there has been no change in the product formulation (CSF) since the initial registration, the phrase "ADVANCED GARDEN" is considered false and misleading and, as such, is not considered acceptable either as part of the product name or as a separate marketing claim. We note that our letter of May 19, 1999 regarding revised Consumer Labeling Initiative (CLI) labeling for this product required that the phrase "ADVANCED PROTECTION FORMULA" be deleted from the front panel of the proposed label. This statement is a comparative advertising claim relative to effectiveness and may be false or misleading in comparison with other products that don't include such a statement on their labels. According to 40 CFR 156.10(a)(5), no advertising claims may be false or misleading in any way. In addition, claims that are exaggerated or unsubstantiated can not be made on the label.

CONCURRENCES

Table with columns for SYMBOL, SURNAME, DATE and a large text area for CONCURRENCES. Handwritten entries include '2. Reinstatement of the statement "For Outdoor Residential Use Only" to the front panel of the label.', 'SPROAT', and '11/1/99'.

Since the labeling submitted with your October 22, 1999 letter is substantially similar to that approved on May 19, 1999, is in finished format and the above requested revisions do not raise risk concerns associated with the use of this product, we will allow you to use this labeling for a period not to exceed January 31, 2000. Products released for shipment after January 31, 2000 must bear labeling revised in accordance with this letter.

If you have any questions, please call Dr. William Sproat of my team at 703-308-8587.

Sincerely,

George T. LaRocca  
Product Manager 13  
Insecticide Branch  
Registration Division (7505C)

Enclosure

ACCEPTED  
with COMMENTS  
in EPA Letter Dated

NOV 1 1999

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
3125-517



**2-in-1 Systemic**  
**Azalea, Camellia &**  
**Rhododendron Care**

**READY-TO-USE GRANULES**

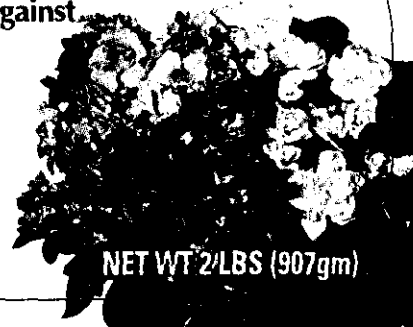
- ▶ Feeds and protects against insects for 6 weeks
- ▶ Promotes strong roots and beautiful blooms
- ▶ Rainproof protection

**16-8-8**

KEEP OUT OF REACH OF CHILDREN

**WARNING** See back panel booklet for ingredients and precautionary statements

MAY BE FATAL IF SWALLOWED  
909914 R.O




**NET WT 2/LBS (907gm)**

Bayer  
**ADVANCED  
GARDEN**

2-in-1 Systemic  
**Azalea, Camellia &  
Rhododendron Care**

READY-TO-USE GRANULES

*Bayer Advanced Garden's 2-in-1 Azalea, Camellia, & Rhododendron Care's exclusive formula feeds your plants and protects against insects for up to six weeks. Now you can grow beautiful flowers and shrubs in one easy step.*

Distributed by:  
Bayer Corporation  
Garden & Professional Care  
Box 4913  
Kansas City, MO 64120-0013  
EPA Reg. No. 3125-517  
EPA Est. No. 34704-NB-003  
Made in USA  
Bayer and  are registered trademarks of Bayer AG



**FIRST AID** 

IN THE CASE OF ACCIDENTAL... IMMEDIATELY...

**SWALLOWING**  
If the person is able to swallow:  
• Have them sip 1 to 2 glasses of water.  
• Call a doctor or poison control center for further treatment advice.

**INHALATION**  
• If breathing is affected, move person to fresh air.  
• Contact doctor or poison control center for further treatment advice.  
• If not breathing, call an ambulance and give artificial respiration.

**CONTACT WITH SKIN**  
• Remove contaminated clothing.  
• Wash affected skin with soap and warm water.  
• Call a doctor if irritation occurs.

**CONTACT WITH EYES**  
• Hold eye open and rinse slowly and gently with water.  
• Continue to rinse eye for 10 to 15 minutes.  
• Call a doctor if irritation persists.

**NOTE:** When calling poison control center, have this product label accessible. If seeking treatment at an emergency room or doctor's office, bring this product label to show medical personnel.

For medical emergency information, you may call toll-free 1-877-229-3763.  
Active Ingredient: Disulfoton [CAS # 298-04-4]

**Note to Physicians:** Disulfoton is an organophosphate. Prolonged exposure will cause cholinesterase depression. Atropine sulfate is an antidote. 2-PAM is also antidotal and may be administered in conjunction with atropine.

**ENVIRONMENTAL HAZARDS**

- This pesticide is toxic to fish and wildlife. Do not apply directly to water.
- This pesticide is toxic to bees exposed to direct application.

**NOTICE:** Research and testing has determined that the "Directions for Use" are appropriate for the proper use of 2-in-1 Systemic Azalea, Camellia, and Rhododendron Care under expected conditions. The Buyer assumes responsibility for lack of performance or safety if the product is not used according to the directions on this label.

**Money Back Guarantee:** If you are not satisfied with this product, we will gladly refund your original purchase price.

PRESS TO RESEAL

919814 R.0

TOTAL NUMBER OF PAGES MUST BE  
 DIVISIBLE BY FOUR.

Back  
 Cover

Front  
 Cover

3.5"

1/4" 1/4"

1/8"

**IMPORTANT - Directions for Storage and Disposal**

**STORAGE CONDITIONS** Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.

**DISPOSAL**

- Do not reuse empty container
- Completely empty container
- Wrap the empty container in several layers of newspaper
- Place container in trash

**Important:** It is best to use all of the product in accordance with label directions. If it is necessary to dispose of unused product, please follow any applicable state or local guidelines.

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

**WARNING**

- Poisoning may occur as a result of exposure.
- May be fatal if swallowed.
- Avoid breathing dust.
- Do not get in eyes, on skin, or on clothing.
- Wash thoroughly with soap and water after handling.

**READ THE LABEL FIRST!**

**QUICK FACTS**

- Feeds and Protects in One Easy Step
- Easy-to-Use Granules

**KILLS** Aphids, Birch Leafminers, Elm Leaf Beetles, Holly Leafminers, Lacebugs, Leafhoppers, Mimosa Webworms, Pine Tip Moths, Spider Mites, Thrips, Whiteflies

**FEEDS** 16-8-8 fertilizer for strong roots and blooms

**COVERAGE** Treats up to 16 medium-sized shrubs

**WHERE TO USE** Azaleas, Camellias, Rhododendrons

**WHEN TO USE** Every 6 weeks throughout the growing season

**HOW MUCH TO USE** Use easy measuring cap to apply as directed

For questions or comments, call toll-free 1-877-BayerAG www.AdvancedGarden.com

**ACTIVE INGREDIENT:** Disulfoton 1.00%  
**OTHER INGREDIENTS\*** 99.00%  
 100.00%

\*Other ingredients include: fertilizer, glycols and fragrance

**GUARANTEED ANALYSIS 16-8-8**

Total Nitrogen (N)	16%	Derived from: Ammonium Sulfate,
16% Ammoniacal Nitrogen		Ammoniated Phosphates, Muriate of
Available Phosphate (P <sub>2</sub> O <sub>5</sub> )	8%	Potash, Iron Oxide, Zinc Oxide
Soluble Potash (K <sub>2</sub> O)	8%	E1339
Sulfur (S)	15%	
15% Combined Sulfur (S)		Information regarding the contents
Total Iron (Fe)	1%	and levels of metals in this product
Total Zinc (Zn)	1%	is available on the internet at
		http://www.regulatory-info-states.com

919914 R.0

*OPEN  
 Reasonable Label  
 for Directions &  
 Precautions*

2.375"

2.375"

1/4" 1/4"

1/4"

Even #  
 Pages

Odd #  
 Pages

3.5"

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For best results, be sure to read and follow all label directions.

**BEFORE YOU USE**

- Do not apply near fish pools, ponds, streams or lakes.
- Food utensils such as teaspoons or measuring cups should not be used for food purposes after use with this insecticide.
- Keep children and pets off treated areas until product is worked into the soil, watered, and the treated areas have dried completely.
- Wear rubber gloves when handling.

**Read and follow these directions when using:**

**HOW TO USE**

**WHEN TO USE** Apply when planting. For established plants, use any time after new growth appears. Apply again every 6 weeks during the growing season.

**HOW MUCH TO USE**


Fill measuring cap to top of inner circle. (2 oz)  
 Four rounded tablespoons equals 2 oz  
**Azaleas, Camellias, & Rhododendrons:** 2 capfuls per foot of plant height  
**Shrubs:** 2 capfuls per foot of plant height  
**Flower beds:** 2 capfuls per 12 sq ft (3' x 4' bed area)

**DIRECTIONS FOR USE (cont'd)**

**HOW TO APPLY**


- Apply granules to soil around base of plant, sprinkling evenly in the area under the branches.
- Work granules into top 1 to 2 inches of soil.
- Water thoroughly after applying.

For flower beds, sprinkle granules evenly over the bed.

 Children and pets may re-enter after the treated area has been watered and allowed to dry.

**HOW IT WORKS**

This product is absorbed by roots and moves through the entire plant. Even new growth is fed and protected against insects for up to 6 weeks. Rain or watering cannot wash off this internal protection.



**FOR BEST RESULTS**

Apply evenly, cultivate lightly and water thoroughly.

2.375"

6/1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

NOV 1 1999

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

John S. Thornton, Director  
Product Registrations and Regulatory Affairs  
Bayer Corporation, Agriculture Division  
8400 Hawthorn Road  
P.O. Box 4913  
Kansas City, MO 64120-0013

Subject: Amendment - Label Revision/Alternate Brand Name  
Rose, Shrub & Flower Care  
EPA Registration No. 3125-517  
Your submission dated October 22, 1999

Dear Mr. Thornton:

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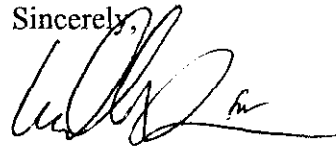
- Words or phrases implying that a product possesses unique characteristics because of its composition are not acceptable. The alternate brand name, Bayer Advanced Garden 2-in-1 Systemic Rose and Flower Care Ready-To-Use Granules, must be modified by deleting the phrase "ADVANCED GARDEN" from the product name. Since there has been no change in the product formulation (CSF) since the initial registration, the phrase "ADVANCED GARDEN" is considered false and misleading and, as such, is not considered acceptable either as part of the product name or as a separate marketing claim. We note that our letter of May 19, 1999 regarding revised Consumer Labeling Initiative (CLI) labeling for this product required that the phrase "ADVANCED PROTECTION FORMULA" be deleted from the front panel of the proposed label. This statement is a comparative advertising claim relative to effectiveness and may be false or misleading in comparison with other products that don't include such a statement on their labels. According to 40 CFR 156.10(a)(5), no advertising claims may be false or misleading in any way. In addition, claims that are exaggerated or unsubstantiated can not be made on the label.

		CONCURRENCES					
SYMBOL	2.	Reinstate the statement "For Outdoor Residential Use Only" to the front panel of the					
SURNAME	2.5252	label:					
DATE	SPRINT						
	11/1/99						

Since the labeling submitted with your October 22, 1999 letter is substantially similar to that approved on May 19, 1999, is in finished format and the above requested revisions do not raise risk concerns associated with the use of this product, we will allow you to use this labeling for a period not to exceed January 31, 2000. Products released for shipment after January 31, 2000 must bear labeling revised in accordance with this letter.

If you have any questions, please call Dr. William Sproat of my team at 703-308-8587.

Sincerely,



George T. LaRocca  
Product Manager 13  
Insecticide Branch  
Registration Division (7505C)

Enclosure

8/10

REGISTERED  
EPA ESTABLISHED  
By EPA Order No. 3125-512

No. 1999

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
**3125-512**



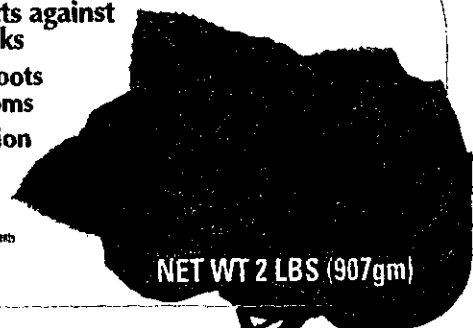
# 2-in-1 Systemic Rose & Flower Care

READY-TO-USE GRANULES

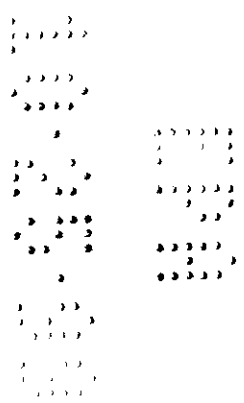
- ▶ Feeds and protects against insects for 6 weeks
- ▶ Promotes strong roots and beautiful blooms
- ▶ Rainproof protection

12-18-6

KEEP OUT OF REACH OF CHILDREN  
**WARNING** See back panel booklet for ingredients  
and precautionary statements  
MAY BE FATAL IF SWALLOWED  
90811 60



NET WT 2 LBS (907gm)






9/10



# 2-in-1 Systemic Rose & Flower Care

READY-TO-USE GRANULES

Bayer Advanced Garden's 2-in-1 Systemic Rose & Flower Care's exclusive formula feeds your plants and protects against insects for up to six weeks. Now you can grow beautiful roses and flowers in one easy step.

© 1992 Bayer  
Manufactured by:  
Bayer Corporation  
Care & Professional Care  
Box 4911  
Kansas City, MO 64120-0013  
EPA Reg. No. 3125-517  
EPA Est. No. 34704-NB-003  
Bayer and  are registered trademarks of Bayer AG

Made in USA



### FIRST AID

IN THE CASE OF ACCIDENTAL...	IMMEDIATELY...
<b>SWALLOWING</b>	<ul style="list-style-type: none"> <li>If the person is able to swallow:</li> <li>• Have them sip 1 to 2 glasses of water.</li> <li>• Call a doctor or poison control center for further treatment advice.</li> </ul>
<b>INHALATION</b>	<ul style="list-style-type: none"> <li>• If breathing is affected, move person to fresh air.</li> <li>• Contact doctor or poison control center for further treatment advice.</li> <li>• If not breathing, call an ambulance and give artificial respiration.</li> </ul>
<b>CONTACT WITH SKIN</b>	<ul style="list-style-type: none"> <li>• Remove contaminated clothing.</li> <li>• Wash affected skin with soap and warm water.</li> <li>• Call a doctor if irritation occurs.</li> </ul>
<b>CONTACT WITH EYES</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water.</li> <li>• Continue to rinse eye for 10 to 15 minutes.</li> <li>• Call a doctor if irritation persists.</li> </ul>

NOTE: When calling poison control center, have this product label accessible. If seeking treatment at an emergency room or doctor's office, bring this product label to show medical personnel.

For medical emergency information, you may call toll-free 1-877-229-3763.

Active ingredient: Disulfoton (CAS # 298-04-4)  
Note to Physicians: Disulfoton is an organophosphate. Prolonged exposure will cause cholinesterase depression. Atropine sulfate is antidotal. 2-PAM is also antidotal and may be administered in conjunction with atropine.

### ENVIRONMENTAL HAZARDS

- This pesticide is toxic to fish and wildlife. Do not apply directly to water.
- This pesticide is toxic to bees exposed to direct application.

NOTICE: Research and testing has determined that the "Directions for Use" are appropriate for the proper use of 2-in-1 Systemic Rose & Flower Care under expected conditions. The Buyer assumes responsibility for lack of performance or safety if the product is not used according to the directions on this label.

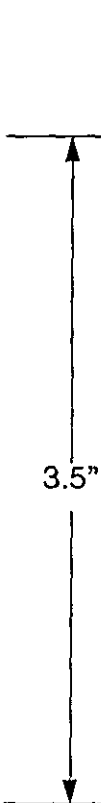
Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

PRESS TO RESEAL

919911 R0

TOTAL NUMBER OF PAGES MUST BE  
 DIVISIBLE BY FOUR.

Back  
 Cover



1/4"

1/4"

1/8"

**IMPORTANT-Directions for Storage and Disposal**

**STORAGE CONDITIONS** Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.

**DISPOSAL**

- Do not reuse empty container.
- Completely empty container.
- Wrap the empty container in several layers of newspaper.
- Place container in trash.

**Important:** It is best to use all of the product in accordance with label directions. If it is necessary to dispose of unused product, please follow any applicable state or local guidelines.

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals**

**WARNING**

- Poisoning may occur as a result of exposure.
- May be fatal if swallowed.
- Avoid breathing dust.
- Do not get in eyes, on skin, or on clothing.
- Wash thoroughly with soap and water after handling.

**READ THE LABEL FIRST!**

**QUICK FACTS**

**Feeds and Protects in One Easy Step**  
**Easy-to-Use Granules**

**KILLS** Aphids, Birch Leafminers, Elm Leaf Beetles, Holly Leafminers, Lacebugs, Leafhoppers, Mimosa Webworms, Pine Tip Moths, Spider Mites, Thrips, Whiteflies

**FEEDS** 12-18-6 fertilizer for strong roots and blooms

**COVERAGE** Treats up to 40 medium-sized roses

**WHERE TO USE** Roses, Flowers & Shrubs

**WHEN TO USE** Every 6 weeks throughout the growing season

**HOW MUCH TO USE** Use easy measuring cap to apply as directed

For questions or comments, call toll-free 1-877-BayerAG www.AdvancedGarden.com

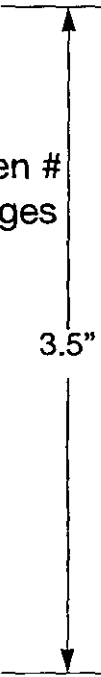
**INGREDIENTS**  
**ACTIVE INGREDIENT:**  
 Disulfoton 1.00%  
**OTHER INGREDIENTS\*** 99.00%  
 \*Other ingredients include: fertilizer, glycols and fragrance

**GUARANTEED ANALYSIS 12-18-6**  
 Total Nitrogen (N) 12% Derived from: Ammonium Sulfate, Ammoniated Phosphates, Sulfate of Potash  
 12% Ammoniacal Nitrogen F1339  
 Available Phosphate (P<sub>2</sub>O<sub>5</sub>) 18%  
 Soluble Potash (K<sub>2</sub>O) 6%  
 Sulfur (S) 11%  
 11% Combined Sulfur (S)  
 Information regarding the contents and levels of metals in this product is available on the internet at <http://www.regulatory-info-states.com>.

919911 RD

Front  
 Cover

Even #  
 Pages



1/4"

1/4"

1/4"

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For best results, be sure to read and follow all label directions.

**BEFORE YOU USE**

- Do not apply near fish pools, ponds, streams or lakes.
- Food utensils such as teaspoons or measuring cups should not be used for food purposes after use with insecticides.
- Keep children and pets off treated areas until product is worked into the soil, watered, and the treated areas have dried completely.
- Wear rubber gloves when handling.

**WHEN TO USE** Apply when planting. For established plants, use any time after new growth appears. Apply again every 6 weeks during the growing season.

**HOW MUCH TO USE**


Fill measuring cap to top of inner circle. (2 oz)  
 Four rounded tablespoons equals 2 oz

Roses: 1 capful per plant  
 Shrubs: 2 capfuls per foot of plant height  
 Flower beds: 2 capfuls per 12 sq ft (3' x 4' bed area)

**DIRECTIONS FOR USE (cont'd)**


**HOW TO APPLY**

- Apply granules to soil around base of plant, sprinkling evenly in the area under the branches.
- Work granules into top 1 to 2 inches of soil.
- Water thoroughly after applying. For flower beds, sprinkle granules evenly over the bed.

 Children and pets may re-enter after the treated area has been watered and allowed to dry.

**HOW IT WORKS**

This product is absorbed by roots and moves through the entire plant. Even new growth is fed and protected against insects for up to 6 weeks. Rain or watering cannot wash off this internal protection.



**FOR BEST RESULTS**

Apply evenly, cultivate lightly and water thoroughly.

Odd #  
 Pages

