



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

April 19, 2024

Jeanette A. Covert
Regional Regulatory Manager
UPL NA Inc.
630 Freedom Business Center, Ste. 402
King of Prussia, PA 19406

Subject: Label Amendment - Registration Review Mitigation for Bifenazate & Abamectin
Product Name: Prevamite O
EPA Registration Number: 70506-557 (previously 400-582)
Application Dates: February 26, 2020 & March 13, 2024
Decision Numbers: 560197 & 595202

Dear Jeanette A. Covert:

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 Bifenazate and Abamectin 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 Caleb Carr by phone at (202) 566-0636, or via email at carr.caleb@epa.gov.

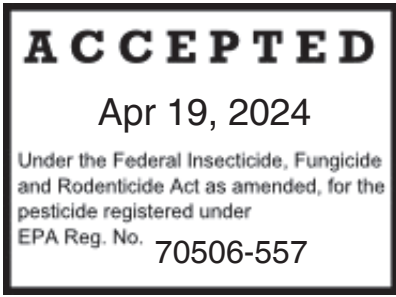
Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington", with a stylized flourish at the end.

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

ENCLOSURE: Stamped label

[Text in brackets is optional]



ABAMECTIN	GROUP	6	ACARICIDE
BIFENAZATE	GROUP	20D	ACARICIDE

Prevamite® O

MITICIDE/INSECTICIDE

ACTIVE INGREDIENT:	% BY WT.
Bifenazate: hydrazine carboxylic acid, 2-(4-methoxy-[1,1'-biphenyl]-3-yl) 1-methylethyl ester (CAS No. 149877-41-8)	43.2%*
Abamectin (CAS No. 71751-41-2)	2.2%**
OTHER INGREDIENTS:	54.6%
TOTAL:	100.0%

*Contains 4.0 lbs. bifenazate per gallon.

**Contains 0.20 lbs. abamectin per gallon.

KEEP OUT OF REACH OF CHILDREN

WARNING / AVISO

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.)

[Note to reviewer, bracketed text is optional]

[[See [front][back][side][inside][attached booklet][containers inside][inside booklet][inside leaflet] [booklet] [panel] for [additional] [Precautionary Statements] [First Aid][and] [complete] [Directions for Use].];
 [See [front][back][side][inside][attached booklet][containers inside][inside booklet][inside leaflet] [booklet] [panel] inside for complete Directions For Use, including Conditions of Sale and Warranty.]
 [PEEL HERE TO OPEN PRESS TO RESEAL ►]

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 by a poison control center or doctor. • Do not give anything by mouth to an unconscious person.
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 by mouth-to-mouth, if possible. • Call a poison control center or doctor for treatment advice.
NOTE TO PHYSICIAN	
<p>Early signs of intoxication include dilation of pupils, muscular incoordination, and muscular tremors. Toxicity following accidental ingestion of this product can be minimized by early administration of chemical adsorbents (e.g., activated charcoal).</p> <p>If toxicity from exposure has progressed to cause severe vomiting, the extent of resultant fluid and electrolyte imbalance should be gauged. Appropriate supportive parental fluid replacement therapy should be given, along with other required supportive measures (such as maintenance of blood pressure levels and proper respiratory functionality) as indicated by clinical signs, symptoms, and measurements.</p> <p>In severe cases, observations should continue for at least several days until clinical condition is stable and normal. Since abamectin is believed to enhance GABA activity in animals, it is probably wise to avoid drugs that enhance GABA activity (barbiturates, benzodiazepines, valproic acid) in patients with potentially toxic abamectin exposure.</p>	
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment.</p>	

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

EPA Reg. No. 70506-557

EPA Est. No.:

xxxxxxV004

NET CONTENTS:

[Batch Code will be placed on the container.]

Produced For:

UPL NA INC.

630 FREEDOM BUSINESS CENTER, SUITE 402

KING OF PRUSSIA, PA 19406

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: May be fatal if swallowed. Harmful if inhaled. Avoid breathing spray mist.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and Other Handlers Must Wear:

- Long-sleeved shirt and long pants;
- Shoes plus socks; and
- For mixing and loading activities, wear an apron and 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).

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.

USER SAFETY RECOMMENDATIONS

Users should:

- Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then, wash thoroughly and change into clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing them. As soon as possible, wash thoroughly and change clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to birds, estuarine/marine invertebrates, fish and wildlife. Do not apply directly to water, to areas where surface water is present, or to intertidal areas below the mean high-water mark. Do not apply when weather conditions favor drift from target areas. Do not contaminate water when disposing of equipment wash water or rinsate.

This product is highly toxic to bees and other pollinating insects exposed to direct treatment or to residues in/on blooming crops or weeds. Protect pollinating insects by following label directions intended to minimize drift and to reduce pesticide risk to these organisms. Do not apply this product while bees are foraging the treatment area.

Use of this product may pose a risk to threatened and endangered species of fish, amphibians, crustaceans (including fresh water shrimp), and insects. All use of this product in the state of California should comply with the recommendations of the California Endangered Species Project. Before using this product in California, consult with your county agriculture commissioner to determine use limitations that apply in your area.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near heat or open flame.

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 through any type of irrigation system.

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), restricted-entry interval and notification to workers (as applicable). 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.

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 short pants and short-sleeved shirt;
- 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);
- Chemical-resistant shoes and socks.

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses.

Keep unprotected persons out of treated areas until sprays have dried.

FAILURE TO FOLLOW DIRECTIONS AND PRECAUTIONARY STATEMENTS ON THIS LABEL MAY RESULT IN CROP INJURY, POOR MITE/INSECT CONTROL, AND/OR ILLEGAL RESIDUES

USE INFORMATION

PREVAMITE® O is a suspension concentrate (flowable) that will control the pests on the crops listed on this label when it is applied according to the **DIRECTIONS FOR USE**. Thorough coverage of foliage is essential for good mite and insect control.

NOTE:

- **Adjuvant:** Residual control of pests may be enhanced with the addition of a horticultural spray oil at 0.5 to 1.0% of the spray volume on field-grown woody ornamentals, landscape plants and Christmas trees. As some plants are sensitive to oils, the user should spray a small number of plants and observe them for 2 weeks for signs of phytotoxicity before spraying additional plants. Excessive cold or warm temperatures may increase the chance of plant damage following application with oils. Carefully read and follow directions on the oil label and do not exceed maximum rates listed on either label.
- **Phytotoxicity:** The user should pre-test any proposed mixtures with **PREVAMITE O** to ensure the physical compatibility and lack of phytotoxic effects.

RUNOFF PREVENTION

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

MANDATORY SPRAY DRIFT MANAGEMENT

Airblast applications:

- Sprays must be directed into the canopy.
- Do not apply when wind speeds exceed 15 miles per hour at the application site.
- User must turn off outward pointing nozzles at the row end and when spraying the outer row.
- Do not apply during temperature inversions.

Ground Boom Applications:

- Apply with the nozzle height recommended by the manufacturer, but no more than 4 feet above the ground or crop canopy.
- Applicators are required to use Fine or coarser droplet size (ASABE S572.1).
- Do not apply when wind speeds exceed 10 miles per hour at the application site.
- Do not apply during temperature inversions.

Boomless Ground Applications:

- Applicators are required to use a medium or coarser droplet size (ASABE S572.1) for all applications.
- Do not apply when wind speeds exceed 15 miles per hour at the application site.
- Do not apply during temperature inversions.

SPRAY DRIFT ADVISORIES

THE APPLICATOR IS RESPONSIBLE FOR AVOIDING OFF-SITE SPRAY DRIFT.

BE AWARE OF NEARBY NON-TARGET SITES AND ENVIRONMENTAL CONDITIONS.

IMPORTANCE OF DROPLET SIZE

An effective way to reduce spray drift is to apply large droplets. Use the largest droplets that provide target pest control. While applying larger droplets will reduce spray drift, the potential for drift will be greater if applications are made improperly or under unfavorable environmental conditions.

Controlling Droplet Size – Ground Boom

- **Volume** - Increasing the spray volume so that larger droplets are produced will reduce spray drift. Use the highest practical spray volume for the application. If a greater spray volume is needed, consider using a nozzle with a higher flow rate.
- **Pressure** - Use the lowest spray pressure recommended for the nozzle to produce the target spray volume and droplet size.
- **Spray Nozzle** - Use a spray nozzle that is designed for the intended application. Consider using nozzles designed to reduce drift.

BOOM HEIGHT – Ground Boom

Use the lowest boom height that is compatible with the spray nozzles that will provide uniform coverage. For ground equipment, the boom should remain level with the crop and have minimal bounce.

SHIELDED SPRAYERS

Shielding the boom or individual nozzles can reduce spray drift. Consider using shielded sprayers. Verify that the shields are not interfering with the uniform deposition of the spray on the target area.

TEMPERATURE AND HUMIDITY

When making applications in hot and dry conditions, use larger droplets to reduce effects of evaporation.

TEMPERATURE INVERSIONS

Drift potential is high during a temperature inversion. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. The presence of an inversion can be indicated by ground fog or by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing. Avoid applications during temperature inversions.

WIND

Drift potential generally increases with wind speed. AVOID APPLICATIONS DURING GUSTY WIND CONDITIONS. Applicators need to be familiar with local wind patterns and terrain that could affect spray drift.

BOOMLESS GROUND APPLICATIONS: Setting nozzles at the lowest effective height will help to reduce the potential for spray drift.

HANDHELD TECHNOLOGY APPLICATIONS: Take precautions to minimize spray drift.

RESISTANCE MANAGEMENT

For resistance management, please note that **PREVAMITE O** contains both a Group 6 (abamectin) and Group 20D (bifenazate) insecticides/acaricides. Any insect/mite population may contain individuals naturally resistant to **PREVAMITE O** and other Group 6 or Group 20D insecticides/acaricides. The resistant individuals may dominate the insect/mite population if these insecticides/acaricides are used repeatedly in the same fields. Appropriate resistance-management strategies should be followed.

To delay insecticide/acaricide resistance, take the following steps:

- Rotate the use of **PREVAMITE O** or other Group 6/20D insecticides/acaricides within a growing season, or among growing seasons, with different groups that control the same pests.
- Use tank mixtures with insecticides/acaricides from a different group that are equally effective on the target pest when such use is permitted. Do not rely on the same mixture repeatedly for the same pest population. Consider any known cross-resistance issues (for the targeted pests) between the individual components of a mixture. In addition, consider the following recommendations provided by the Insecticide Resistance Action Committee (IRAC):
 - Individual insecticides selected for use in mixtures should be highly effective and be applied at the rates at which they are individually registered for use against the target species.
 - Mixtures with components having the same IRAC mode of action classification are not recommended for insect resistance management.
 - When using mixtures, consider any known cross-resistance issues between the individual components for the targeted pest(s).
 - Mixtures become less effective if resistance is already developing to one or both active ingredients, but they may still provide pest management benefits.
 - The insect resistance management benefits of an insecticide mixture are greatest if the two components have similar periods of residual insecticidal activity. Mixtures of insecticides with unequal periods of residual insecticide activity may offer an insect resistance management benefit only for the period where both insecticides are active.
- Adopt an integrated pest management program for insecticide/acaricides 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 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 advisors for any additional pesticide resistance-management and/or IPM recommendations for the specific site and pest problems in your area.
- For further information or to report suspected resistance contact UPL NA INC. at 1-800-438-6071.

APPLICATION DIRECTIONS

ORNAMENTALS

PREVAMITE O provides knockdown and long residual control of a wide variety of mite pests listed in the following table on the following plants:

- All ornamental plants, including bedding plants, flowering plants, foliage plants, ornamental bulb crops, perennials and trees and shrubs.
- All non-bearing fruit trees which will not bear fruit for a minimum of 12 months.

PREVAMITE O can be used in the following areas where these plants are grown and/or maintained in containers or in the ground:

- Greenhouses and shadehouses;
- Nurseries, including Christmas tree / conifer plantations;
- Landscapes;
- Interiorscapes.

NOT INTENDED FOR HOMEOWNER USE

General Use Precautionary Statements: Time applications to allow **PREVAMITE O** to dry on the treated surface prior to a rain event. To limit unwanted surface runoff in outdoor ornamental uses, do not apply when growth media is saturated.

Target Pests	Application Rates Fl Ozs Per 100 Gals Water	Application Instructions
<u>Mites:</u> Bamboo spider mite Broad mite Bud mite Carmine spider mite Citrus red mite Clover mite Cyclamen mite European red mite Lewis mite Pacific spider mite Rust mite Southern red mite Spruce spider mite Strawberry mite Two-spotted spider mite	3 – 4 (0.09 lb ai bifentazate + 0.005 lb ai abamectin – 0.125 lb ai bifentazate + 0.006 lb ai abamectin)	Apply in sufficient volume of water to ensure thorough coverage of the foliage. Actual spray volume will vary depending on the size of the plants being treated. Do not exceed spray volumes of 300 gals/A. Begin applications as soon as mites appear. One additional application can be made after 7 days or as necessary to maintain control. Do not make more than two (2) applications (8 fl oz– 0.25 lb ai bifentazate + 0.0125 lb ai abamectin) per crop per year.
Leafminers: Boxwood <i>Liriomyza</i> Suppression only: Aphids Thrips Whiteflies	6 (0.1875 lb ai bifentazate + 0.009 lb ai abamectin)	Apply in sufficient volume of water to ensure thorough coverage of the foliage. Actual spray volume will vary depending on the size of the plants being treated. Do not exceed spray volumes of 200 gals/A. For control of mining larvae, apply when adults are beginning to lay eggs on the new foliage. For suppression of pest populations, young immatures must be contacted by the spray. One additional application can be made after 7 days or as necessary to maintain control. Do not make more than two (2) applications (12 fl oz– 0.375 lb ai bifentazate + 0.019 lb ai abamectin) per crop per year.
USE RESTRICTIONS <ul style="list-style-type: none"> Do not use in citrus nurseries. Apply by ground equipment including compressed air sprayers, hydraulic sprayers, ground boom sprayers, air blast sprayers, hose-end sprayers. Do not apply aerially. 		

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a tightly closed container in a cool, dry place under lock and key. Post as a pesticide storage area. Always store pesticides in the original container. Store away from food, pet food, feed, seed, fertilizers, and veterinary supplies. Place liquid formulations on lower shelves and dryer formulations above.

PESTICIDE DISPOSAL: To avoid wastes, use all material in this container by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program (often such programs are run by state or local governments or by industry).

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent) 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 1/4 full with water and recap. Shake container 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.

If pressure rinsing: Empty the remaining contents into application equipment or a mix-tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix-tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 PSI for at least 30 seconds. Drain for 10 seconds after the flow begins to drip.

Then offer container for recycling or reconditioning, or puncture and dispose of container in a sanitary landfill or by incineration. Do not burn, unless allowed by state and local ordinances.

Recycling: Once cleaned, some agricultural plastic pesticide containers can be taken to a container collection site or picked up for recycling. To find the nearest site, contact your chemical dealer or manufacturer or contact the Ag Container Recycling Council (ACRC) at 1-877-952-2272 (toll free) or www.acrecycle.org.

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.

UPL NA INC. and the UPL NA INC. logo are registered trademarks of UPL NA INC.

PREVAMITE is a registered trademark of an UPL NA INC.

©2024 UPL NA INC.

20180312 Bifenazate ID changes revised 2/23/2024

20200226 Abamectin ID changes revised 2/23/2024