

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

February 27, 2025

Rebecca M. Horton
Consultant/Agent for
Excel Marketing
c/o Registrations by Design, Inc.
P.O. Box 1019
Salem, VA 24153

Subject: Notification per PRN 98-10 – Addition of Optional Marketing

Statements/Graphics/Text and Revised Referral Statement Consistent with

Approved Label Use Directions

Product Name: Excel® Systemic Rose & Flower Care

EPA Registration Number: 71376-1 Application Date: August 21, 2023

Case Number: 606359

Dear Rebecca M. Horton:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

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 (FIFRA) 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) lists 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.

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If you have any questions, please contact Carmen Rodia via e-mail at Rodia.Carmen@epa.gov.

Sincerely,

Janvice Caux
Tamica L. Cain, Product Manager 10
Invertebrate-Vertebrate Branch 2
Registration Division (7505T)

Enclosure: Master Label Stamped "NOTIFICATION", dated February 27, 2025

Excel® Systemic Rose & Flower Care

[Additional Brand Name(s): Lilly Miller Ready to Use Systemic Rose & Flower Care]

NOTIFICATION

71376-1

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

02/27/2025

X-X-X

Optional Marketing Statements

Ready-to-Use [Granules]

No Mixing

Insecticide & Plant Food [Fertilizer]

[Feeds plants and provides] 6 Week Protection

For Roses, Flowers and Shrubs

Absorbs through the roots to protect from the inside out

Kills both chewing and sucking insects as listed: Aphids, Lace Bugs, Leafhoppers, Cuban Laurel Thrips, Leafminers, Leaf Beetles, Leaftiers, Root Weevils and Worms

Won't wash off with rain or sprinklers

[



NO MIXING





]

ACTIVE INGREDIENT:

KEEP OUT OF REACH OF CHILDREN CAUTION

(See back/side/other panel(s) for additional Precautionary Statements and First Aid)
[See inside booklet for Precautionary Statements, First Aid and complete Directions for Use]

NET WT 4, 5 LB (1.8, 2.27 kg)

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Excel® Systemic Rose & Flower Care contains an effective systemic insecticide that provides up to 6 weeks control of Aphids, Lace Bugs, Leafhoppers, Cuban Laurel Thrips, Leafminers, Leaf Beetles, Leaftiers and Worms.

Excel® Systemic Rose & Flower Care's combination of fertilizer and systemic insecticide helps plants grow strong and vigorously, and prevents damage caused by the destructive insects listed on this label. *Systemic* means that the plant actually absorbs the insecticide through its root system and then moves it internally through the sap stream into its branches, leaves, blossoms and new growth.

Excel® Systemic Rose & Flower Care protects against insects for 6 weeks. It cannot be washed by rain or sprinkling, since the protection is internal. This systemic action protects all plant surfaces, including undersides of leaves and blossoms. New growth is also fully protected.

Excel® Systemic Rose & Flower Care kills the following insects on roses, flowers and shrubs:

Aphids (plant lice)	Cuban Laurel Thrips*	Leafhoppers
Lace Bugs	Holly Leafminers	Birch Leafminers
Maple Shoot Moth	Elm Leaf Beetle	Willow Leaf Beetle

Obscure Root Weevil**

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: For outdoor use around the home only. Do not allow people or pets to enter treatment area until dusts have settled. Do not apply this product in a way that will contact people or pets. Do not apply to plants used for food or feed. Do not apply to ornamentals that are planted directly beneath food producing trees such as fruit or nut bearing trees. Do not apply to lawns.

Storage & Disposal

Pesticide Storage: Keep in original container. Store in a cool, dry, preferably locked area away from children and pets.

Pesticide Disposal & Container Handling: *If empty* – Do not reuse this container. Place in trash or offer for recycling if available. *If partly filled* – Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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^{**}on azalea and rhododendron *on ficus

PRODUCT USAGE			
Kills	Aphids, Lace Bugs, Leaf Beetles, Leafhoppers, Leafminers, Worms, and other listed insects.		
Feeds	X-X-X Fertilizer		
Use on	Roses, Flowers, Shrubs & Ornamentals including ageratum, aster, azalea, birch, cherry laurel, chrysanthemum, crape myrtle, Cuban laurel (ficus), dahlia, elm, holly, maple, marigold, petunia, photinia, pyracantha, salvia, spirea, snapdragon, sycamore, viburnum, willow, yaupon, zinnia		
Amount	Established Roses: ½ cup (5 oz.) per 9 sq. ft. (3' x 3')		
to Use	Flowers: 2/3 lb. per 25 sq. ft. (5' x 5')		
	Shrubs & Ornamentals: $\frac{2}{3}$ cup (6½ oz.) for each foot of plant height.		
When	When plants have about 1 inch of new growth in the spring.		
to Use	Reapply every 6 weeks through the summer.		
How	Established Roses: Work into the top 1-2 inches of the soil, taking care not to		
to Use	disturb plant roots. Water thoroughly. Do not apply to newly planted roses until they have become well established (planted in the ground for 3 months).		
	Flower Beds: Work into the top 1-2 inches of the soil. Plant seed or set plants and water thoroughly. Do not apply additional fertilizer for 6 weeks. Do not get on foliage when foliage is wet.		
	Ornamental Shrubs & Trees (under 12 ft. tall): Distribute evenly from the base to the dripline of all sides of the plant. Work into the top 1-2 inches of the soil and water in thoroughly.		

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. When handling this product or mixing into the soil as directed, wear long pants and long-sleeved shirt, socks, shoes and gloves. Wash the outside of gloves with soap and water before removing. Remove and wash contaminated clothing before reuse.

USER SAFETY RECOMMENDATIONS

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Environmental Hazards

Do not apply directly to water. Do not contaminate water by cleaning of equipment washwaters or rinsate.

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FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact x-xxx-xxxx [the National Pesticide Information Center at 1-800-858-7378] for emergency medical treatment information.

If swallowed: 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 the poison central center or doctor. Do not give anything by mouth to an

by the poison control center or doctor. Do not give anything by mouth to an

unconscious person.

If on skin

or clothing: 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: 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 further treatment advice.

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove

contact lenses, if present, after the first five 5 minutes, then continue rinsing eye.

Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Contains an organophosphate that inhibits cholinesterase. If symptoms of cholinesterase inhibition are present, atropine sulfate by injection is antidotal. 2-PAM is also antidotal and may be administered in conjunction with atropine.

NOTICE: To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this material when use and/or handling is contrary to label instructions.

Optional:

- **?** 1-888-648-9855
- + 1-800-424-9300

Guaranteed by

Excel Marketing

1000 Parkwood Circle, Suite 700 Atlanta, GA 30339

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[Fertilizer guarantee/claims:]

GUARANTEED ANALYSIS	X-X-X
Total Nitrogen (N)	X.XX%
x.xx% Ammoniacal Nitrogen	
x.xx% Nitrate Nitrogen	
x.xx% Urea Nitrogen (and/or Other Water Soluble Nitrogen)	
x.xx% Water Insoluble Nitrogen*	
Available Phosphate (P ₂ O ₅)	X.XX%
Soluble Potash (K ₂ O)	X.XX%
Calcium (Ca)	
Magnesium (Mg)	X.XX%
x.xx% Water Soluble Magnesium (Mg)	
Sulfur (S)	X.XX%
x.xx% Combined Sulfur (S)	
Boron (B)	X.XX%
Total Iron (Fe)	X.XX%
x.xx% Water Soluble Iron (Fe)	
Total Manganese (Mn)	X.XX%
x.xx% Water Soluble Manganese (Mn)	
Molybdenum (Mo)	
Total Zinc (Zn)	X.XX%
x.xx% Water Soluble Zinc (Zn)	

Derived from

Information concerning the raw materials composing this product can be obtained by writing to the Guarantor listed on this label, and referring to the batch number found on this container. Information regarding the contents and levels of metals in the fertilizer portion of this product is available on the internet at http://www.aapfco.org/metals.html

F XXX

[NOTICE: Contains Molybdenum. The application of fertilizing materials containing molybdenum may result in plants containing levels of molybdenum which are toxic to ruminant animals.]

[NOTICE: Boron is recommended for all plants where Boron may be deficient; however, excessive applications may cause damage.]

^{*}x.xx% slowly available nitrogen from ...

[Optional graphics/text that may be featured on supplemental distribution labels]









