

72155-57

7. 21. 2010

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Charles W. Boyd
Bayer Advanced
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

JUL 21 2010

Dear Mr. Boyd:

Subject: Label Amendment; Additional Marketing Claims
Merit 0.22G Rose, Flower & Shrub Care Insecticide
EPA Registration No. 72155-57
Submission Date: May 27, 2010

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following provision:

1. On page one of the label, delete the claim "*Exclusive rose care products – Pasadena Tournament of Roses*".

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment. If you have any questions regarding this letter, please contact Kable Bo Davis at (703) 306-0415 or davis.kable@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Venus Eagle", is written over a horizontal line.

Venus Eagle
Product Manager (01)
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure- Stamped Label

(Front Panel)

Merit[®] 0.22G

Rose, Flower & Shrub Care Insecticide

(ABN) Bayer Advanced 2 in 1 Systemic Rose & Flower Care Ready-to-Use Granules II

- Protects against insects for 8 weeks, and feeds
- Promotes strong roots and beautiful blooms
- Rainproof Protection
- 2-in-1 Systemic
- Ready-To-Use Granules
- Protects for up to 8 weeks, and feeds
- Treats up to 32 (medium sized) Rose Bushes (4 lb. size)
- Feeds & protects in one easy step
- Bonus size – 25% more (vs* 4 lb size)
- For stronger, fuller, thicker, healthier plants.
- Helps plants resist environmental stresses including heat, drought and insect damage
- Helps protect plants from environmental stresses including heat, drought and insect damage
- Exclusive rose care products - Pasadena Tournament of Roses

X - X - X Fertilizer Analysis



**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

JUL 21 2010

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
72155-57**

ACTIVE INGREDIENT:

Imidacloprid 0.22 %

OTHER INGREDIENTS:

99.78 %

Net Wt: 2 lbs. (907 g) or 5 lbs. (2.26 kg) or 10 lbs. (4.54 kg)

**STOP - Read This Entire Label Before Use
KEEP OUT OF REACH OF CHILDREN**

CAUTION

See Back Panel [Booklet] for Additional Ingredients and Precautionary Statements

Not for sale, sale into, distribution and or use in Nassau and Suffolk counties of New York.

(Optional alternate statement) Not for sale, sale into, distribution and or use in Nassau, Suffolk, Kings, and Queens counties of New York.

(BACK PANEL)

Merit 0.22G Rose, Flower & Shrub Care Insecticide's formula protects against insects for up to eight weeks, and feeds your plants. Now you can grow beautiful roses, flowers and shrubs in one easy step.

READ THE LABEL FIRST!

QUICK FACTS	
<ul style="list-style-type: none"> • Feeds and Protects in One Easy Step • Easy-to-Use Granules 	
KILLS	Aphids, Holly Leafminers, Lacebugs, Leafhoppers, Pine Tip Moth Larvae, Thrips, Whiteflies and other listed pests.
FEEDS	X-X-X fertilizer for strong roots and blooms
COVERAGE	2 lbs. treats up to 16 medium-size roses or shrubs
WHERE TO USE	Roses, Flowers & Shrubs
WHEN TO USE	Every 8 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.	

FOR OUTDOOR RESIDENTIAL USE ONLY

ACTIVE INGREDIENT:

Imidacloprid 0.22 %

OTHER INGREDIENTS:* 99.78 %

TOTAL 100.00%

* Other ingredients include: Fertilizer, sticker and surfactants.

Imidacloprid is the chemical name for Merit® insecticide

EPA Reg. No. 72155-57

EPA Est. No. ____-AA-__

FERTILIZER ANALYSIS X-X-X

Total Nitrogen (N) X %


Available Phosphate (P₂O₅) X %

Soluble Potash (K₂O) X %

Derived from commercially available fertilizer

DIRECTIONS FOR USE		
It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. For best results, read and follow all label directions.		
BEFORE YOU USE Read and follow directions when using.	<ul style="list-style-type: none"> • Restriction: Do not apply near fish pools, ponds, lakes or streams • Restrictions: Do not use in vegetable gardens. 	
KILLS	Adelgids Aphids Black Vine Weevil Larvae Japanese Beetle Adults Lacebugs Leaf Beetles [including Viburnum Leaf Beetles] Leafhoppers Leafminers	Mealybugs Pine Tip Moth Larvae Psyllids Sawfly Larvae Scales (Including Armored Scale [Suppression] and Soft Scale) Thrips Whiteflies
Continued on next page		

HOW TO USE	
WHEN TO USE	<p>Apply when planting.</p> <p>For established plants, use any time prior to pest problems or immediately when seen.</p> <p>Apply again every 8 weeks during the growing season.</p>
HOW MUCH TO APPLY	<ul style="list-style-type: none"> 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)
HOW TO APPLY	<ol style="list-style-type: none"> 1. Apply granules to soil around base of plant, sprinkling evenly in the area under branches. 2. Work granules into top 1 to 2 inches of soil. 3. Water thoroughly after applying. For flower beds, sprinkle granules evenly over the bed.
FOR BEST RESULTS	Apply evenly, cultivate lightly and water thoroughly.
HOW MERIT 0.22G ROSE, FLOWER & SHRUB INSECTICIDE WORKS	<p>This product is absorbed by roots and moves through the entire plant. Even new growth is fed and protected against insects for up to 8 weeks.</p> <p>Rain or watering cannot wash off this internal protection!</p>

Storage and Disposal	
Pesticide Storage Conditions:	Store in original container in a cool, dry place, out of the reach of children, preferably in a locked storage cabinet.
Pesticide Disposal: 	<ul style="list-style-type: none"> Non-refillable container. Do not refill or reuse empty container. Place empty container in trash.
Important: Use the product in accordance with label directions. If it is necessary to dispose of unused product, please follow any applicable state and local guidelines.	

PRECAUTIONARY STATEMENTS	
HAZARDS TO HUMANS AND DOMESTIC ANIMALS	
CAUTION	
<ul style="list-style-type: none"> Harmful if swallowed or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Washing hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco will reduce exposure. 	

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:	<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 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 eye. • Call a poison control center or doctor for treatment advice.
<p>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. You may call toll-free 877-229-3763 for medical emergency information. Active Ingredient: 0.22% Imidacloprid (CAS # 138261-41-3).</p>	

ENVIRONMENTAL HAZARDS
<ul style="list-style-type: none"> • This product is highly toxic to aquatic invertebrates. • Do not apply directly to water. 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 to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems. • Do not contaminate water when cleaning equipment or disposing of equipment washwater.

NOTICE: Research and testing has determined that the "Directions for Use" are appropriate for the proper use of Merit® PM Plus Fertilizer 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.



A Business Group of Bayer CropScience LP
P.O. Box 12014, 2 T.W. Alexander Drive
Research Triangle Park, North Carolina 27709

Merit 0.22 G (PENDING) 05/24/10, Resubmitted 07/15/10