



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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

January 31, 2019

Dean Moser  
Regulatory Agent for Chemicals Laif S.P.A  
Technology Sciences Group, Inc.  
980 9<sup>th</sup> Street, Suite 400  
Sacramento, CA 95814

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 to Add Graphics  
Relating to the Directions for Use/Application Instructions  
Product Name: API LIFE VAR  
EPA Registration Number: 73291-1  
Application Date: 12/05/2018  
OPP Decision Number: 547089

Dear Mr. Moser:

The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) 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.

The labeling submitted with this application has been stamped "Notification" and will be placed in our records. You must submit one (1) copy of the final printed labeling with the modifications.

Should you wish to add/retain a reference to your 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 EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the 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 EPA 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.

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If you have any questions, please contact Gina Burnett of my team by phone at (703) 605-0513 or via email at [burnett.gina@epa.gov](mailto:burnett.gina@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Andrew C. Bryceland". The signature is written in a cursive style with a large initial 'A' and a long horizontal stroke at the end.

Andrew Bryceland, Team Leader  
Biochemical Branch  
Biopesticides and Pollution  
Prevention Division (7511P)  
Office of Pesticide Programs

Enclosure

**API LIFE VAR**

For Use in Honeybee Colonies  
 For the Suppression of Varroa Mites

**NOTIFICATION**

73291-1

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:

01/31/2019

<b>Active Ingredients:</b>	By Weight
Thymol .....	74.09%
Eucalyptus oil .....	16.00%
L-Menthol .....	3.73%
<b>Other Ingredients</b> .....	<b>6.18%</b>
Total .....	100.00%

Net Weight: \_\_\_\_\_

**KEEP OUT OF REACH OF CHILDREN  
 WARNING**

EPA Reg. No. 73291-1  
 EPA Est. \_\_\_\_\_ **No. 73291-ITA-2**

First Aid	
<b>If inhaled:</b>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• Call poison control center or doctor for treatment advice.</li> </ul>
<b>If swallowed:</b>	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water, if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call poison control center or doctor for treatment advice.</li> </ul>
<b>Hot Line Number:</b> Have the product container label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-233-7929 for information.	

*[Note: The First Aid Statements' grid format will be used if market label space permits; otherwise a paragraph format will be used.]*

Before using this product read the entire **Precautionary Statements, Conditions of Sale and Warranty, Directions for Use and Storage and Disposal** instructions. If the **Conditions of Sale and Warranty** are not acceptable, return the product unopened, within 30 days of purchase, to the place of purchase.

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.)

**PRECAUTIONARY STATEMENTS**

### Hazards to Humans and Domestic Animals

**WARNING:** May be fatal if inhaled. Harmful if swallowed, absorbed through skin. Causes substantial but temporary eye injury, and skin irritation. Avoid breathing vapors. Do not get in eyes, on skin or on clothing. Use a NIOSH approved dust/mist filtering respirator (with any N.R.P. or HE filter) when handling tablets. Wear protective eyewear (face shield) and chemical-resistant gloves (comparable beekeeping equipment (e.g.: beekeeping gloves, bee veil with goggles or safety glasses) and bee suits may be used as personal protective equipment. Wash thoroughly with soap and water after the completion of activities that include handling this product and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash before reuse.

#### Personal Protective Equipment (PPE)

##### Applicators and Handlers Must Wear:

- Long-sleeved shirt and long pants
- Socks and shoes
- Chemical resistant gloves
- Protective eyewear

#### User Safety Recommendations:

##### Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE after the completion of operations that include handling this product. As soon as possible, wash thoroughly and change into clean clothing.

#### Physical or Chemical Hazards

Combustible. Do not use or store near heat or open flames. Do not store above 86°F.

#### Environmental Hazards

Do not contaminate water when disposing of tablets or bags.

#### DIRECTIONS FOR USE

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

#### General Use Information

**Applications of Api Life Var may be made in any season (spring/summer/fall/winter) in which all applicable restrictions, precautions and directions for use, must be followed.**

The Api Life Var formulation of Thymol is formulated as an evaporating tablet. Tablets are sealed in polyethylene type bags. When used as directed Api Life Var provides suppression of Varroa mite in colonies of honey bees. Do not use when honey supers are in place to prevent excessive residues in marketable honey or wax by unwanted residues. Use when daytime highs are between 64 and 95 degrees Fahrenheit. Do not apply the treatment when bees are robbing.

**Colony Treatment** (8 to 20 full– size Langstroth frames or equivalent)

Two treatments per year may be made. A treatment (3 tablets) consists of the following:  
Take one pack and cut the pack in half lengthwise. Each half pack will contain two pieces that should equal one whole tablet. Each half will treat one colony. Break the two half tablets into two pieces and place the 4 pieces around the edge of the brood nest on top of the top bars. Avoid placing the tablets directly above the brood nest. After 7 to 10 days replace with a second fresh tablet broken into 4 pieces as above. Repeat procedure again with third tablet, 7-10 days later and leave last tablet for 12 days. After 12 days remove residuals from colony.

### Restrictions:

Remove Api Life Var tablets from hive at least 1 month (30 days) prior to harvesting honey.

Do not use during honey flows.

Do not use when surplus honey supers are installed on the hives.

Do not harvest honey from brood chambers or colony feed supers.

Do not use Api Life Var at temperatures above 95° degrees.

### Notes:

- Use of Api Life Var is most effective when less sealed brood is present.
- At higher concentrations, Thymol residues may impart off-flavors to honey. To minimize residues, carefully follow all label directions and restrictions. The potential for off - flavors can be further reduced by increasing the PHI and/or by delaying the replacement of surplus honey supers after the treatment is completed.
- The use of Api Life Var at average daily temperatures below 54° degrees may result in less control of Varroa mites.
- The use of Api Life Var at higher than recommended temperatures over (95°degrees) may increase the potential for brood or bee mortality. Closely adhering to the label directions will minimize adverse effects. The benefits of Varroa mite control will usually greatly exceed the effects of limited mortality. However, since not every possible combination of colony and environmental conditions have been replicated in experimental trials, beekeepers should follow all directions and monitor colonies for unusual conditions or signs of colony stress.
- For best results, the colony should be as compact as possible during treatment. Combine weak colonies before treatment.
- Apply Api Life Var during the coolest time of the day either in the early morning or evening.
- Close up screened bottom boards and make colonies as tight as possible by reducing entrances and any other openings that exist.

### Storage and Disposal

Do Not Contaminate Water, Food or Feed by Storage or Disposal.

**Pesticide Storage:** Store in original containers in cool, dry, isolated, well-ventilated area away from heat, sparks, and open flame. Do not eat, drink, or smoke in areas of use or storage. Do not store in houses or other areas where vapors could accumulate. Api Life Var is not affected by freezing, so it may be stored in unheated areas.

**Pesticide Disposal:** Pesticide wastes are toxic. Improper disposal of excess pesticide is a violation of Federal Law. If pesticide cannot be used according to label instructions and must be disposed of, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

**Container Handling:** Do not reuse empty pouch. Offer for recycling or dispose of in sanitary landfill, or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

*{Per PR Notice 2007-4 a lot/batch number will appear on either the labeling or container.}*

#### CONDITIONS OF SALE AND WARRANTY

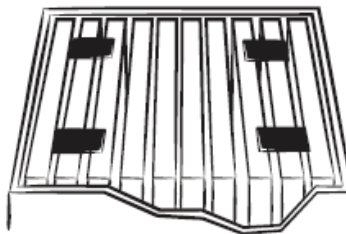
To the extent consistent with applicable law, Chemicals Laif makes no warranty or guarantee of any kind, expressed or implied, concerning effects of use of this product, other than those specified on this label. Buyer or user accepts all responsibility for results due to misuse or improper handling of this product.

Manufactured by:  
**Chemicals Laif S.p.a.**  
Viale dell'Artigianato, 13  
35010 Vigonza (PD) Italy

Distributed in the US by:  
**Veto-pharma**  
12/14/ avenue du Quebec  
91140 Villebon-sur-Yvette - France

**[Graphics]**

# ApiLifeVar



- #1** 1<sup>st</sup> application  
Leave 7 to 10 days
- #2** 2<sup>nd</sup> application  
Leave 7 to 10 days
- #3** 3<sup>rd</sup> application  
Leave 12 days

**[End of Graphics]**

[ ] Denotes language that is optional

{ } Denotes language that does not appear on the market labeling.