



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

August 22, 2024

David Lewis
Agent
Quimas SA
c/o Lewis & Harrison LC
2461 South Clark Street, Suite 710
Arlington, VA 22202

Subject: Label Amendment – Adding packaging sizes and post-harvest blueberry use
Product Name: SmartPac
EPA Registration Number: 83131-1
Application Date: October 18, 2023
Case Number: 492649

Dear David Lewis:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Sodium metabisulfite Final and/or Interim Decision, and has concluded that your submission is acceptable.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. 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 18 months from the date of this letter. After 18 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.

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 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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Thomas Harty at 202-566-0394 or at harty.thomas@epa.gov.

Sincerely,

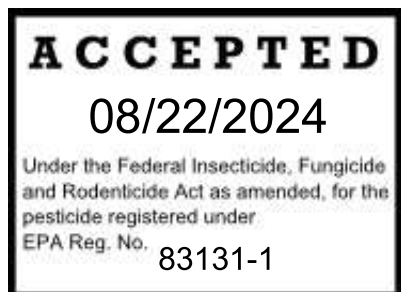
A handwritten signature in black ink, appearing to read 'Kable Bo Davis', enclosed within a hand-drawn oval.

Kable Bo Davis
Senior Regulatory Specialist
Office of Pesticide Programs
Registration Division, Immediate Office

Enclosure

[WHOLESALE LABEL]

INTELLIPACK



SODIUM METABISULFITE	GROUP	M2	FUNGICIDE
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SMARTPAC

U.S. EPA Reg. No. 83131-1
U.S. EPA Est. No. 83342-CHL-001

For use as a preservative on table grapes and blueberries.

ACTIVE INGREDIENT: Sodium Metabisulfite ($\text{Na}_2\text{S}_2\text{O}_5$)..... 8.6625%
INERT INGREDIENTS:..... 91.3375%
TOTAL:..... 100.0000%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See [[Side] [Back] [Left] [Right] [Other] Panel] [Below] for Additional Precautionary Statements

[Note to Reviewer: Please note that Quimas is not including the statements "Harmful if Inhaled" and "Avoid breathing dust" given that these statements are not applicable for this type of product. SMARTPAC is manufactured as a plastic liner where sodium metabisulfite is part of the liner matrix itself. As a result, if the liner is torn or broken, the sodium metabisulfite will not be released in any shape or form given that it is part of the liner matrix itself.]

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION. Harmful if swallowed. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wear long sleeved shirt, long pants, shoes plus socks, and chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. This liner contains sodium metabisulfite, which may trigger asthmatic response in sulfite sensitive individuals.

FIRST AID:	
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 a 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 to 20 minutes. 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 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 further treatment advice.
If Inhaled:	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. Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

[WHOLESALE LABEL]

Table grapes					
Sheets					
Tick Correct Package	Number of pads in pack & pad size		Weight of Grapes	Weight AI/pad	Net contents total weight of pack
	750	495 x 1020 mm	6 kg	3 g	2.2 kg
			13.2 lb	0.11 oz	4.8 lb
Liners					
	300	1020 x 570 mm	9 kg	7 g	.1kg
			19.8 lb	0.25 oz	4.6 lb
	500	1000 x 545 mm	8.2 kg	4 g	2.0 kg
			18 lb	0.14 oz	4.4 lb

Blueberries					
Sheets					
Tick Correct Package	Number of pads in pack & pad size		Weight of Blueberries	Weight AI/pad	Net contents total weight of pack
	1000	375 x 765mm	2 kg	1 g	1.0 kg
			4.4 lb	0.03 oz	2.2 lb
	1000	590 x 390mm	4 kg	2 x 1 g.*	1.0 kg
			8.8 lb	2 x 0.03 oz*	2.2 lb
*One sheet per layer of blueberries package (2 max)					
Liners					
Tick Correct Package	Number of pads in pack & pad size		Weight of Blueberries	Weight AI/pad	Net contents total weight of pack
	750	595x380	3.6 kg	1.8 g	1.3 kg
			7.9 lb	0.06 oz	2.9 lb
	500	720 x 445mm	4.8 kg	2.4 g	1.2 kg
			10.6 lb	0.08 oz	2.6 lb
	300	1020 x 570	8.8 kg	4.4g	1.3 kg
			19.4 lb	0.15 oz	2.9 lb

Personal Protective Equipment (PPE): Applicators and other handlers must wear long-sleeved shirt, long pants, shoes plus socks and chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride. Follow manufacturer's instructions for cleaning/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 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 immediately after handling the product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

[WHOLESALE LABEL]

DIRECTIONS FOR USE:

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

AGRICULTURAL USE:

To assure freshness by the fungicidal control of *Botrytis cinerea* on table grapes and blueberries.

For Liners:

1. Place grape bunches in carry bags and blueberries in plastic clamshells, if desired, and pack in SMARTPAC liner. Do not place more than 8.2 kg (18 lbs.) of grapes or 8.8 kg (19.40 lbs.) within each liner.
2. Place liner (with grapes) in an appropriate shipping container (box) and seal the container (box).
3. Place the boxes of packed grapes or blueberries in refrigerated storage at 0°C (32°F). Always keep liner closed during storage.
4. Before displaying, tear off the top part of the bag and dispose of it in an outdoor trash receptacle.

For Sheets:

1. Place grapes or blueberries in carry bags or plastic clamshells, and place them in the container (box). Place the SMARTPAC Sheet above the fruit and close the container.
2. Place the boxes in refrigerated storage at 0°C (32°F).
3. Remove the sheet before displaying and dispose of it in an outdoor trash receptacle.

[Note to Reviewer: Please note that Quimas is not including the statements "Remove the liner before display" and "Do not allow consumers access to liners" given that these statements are not applicable for this type of product. SMARTPAC is manufactured as a plastic liner where sodium metabisulfite is part of the liner matrix itself. When the SMARTPAC liner is used with grapes or blueberries, usually before displaying the fruit, the upper part of the bag is torn off (75% of the bag) and the bottom part of the bag (25% approximately) is left under the bagged bunches or plastic clamshells. The A.I. content of the bag is very low and the active ingredient will not be released out of the liner like in the case of conventional pads.]

STORAGE AND DISPOSAL:

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

Pesticide Storage: Keep this product in a tightly closed container when not in use. Store in a cool, dry, well-ventilated area away from heat and flame.

Pesticide Disposal: In case of decomposition, isolate container and flood area with large amounts of water to dissolve all material before discarding the liner. Flush with water down the sewer. Collect used and damaged liners for disposal in a plastic bag. Seal bag and place in an outdoor trash receptacle (dumpster).

Container Disposal: Individual Liners: Non-refillable bags. Do not reuse or refill bags. Offer for recycling, if available.

Outside Shipping Container: Non-refillable container. Do not re-use or refill this container. Offer for recycling, if available.

[Note to Reviewer: Please note that Quimas is not including the statement "If pad is torn: carefully dispose of pad, pad contents, and grapes which have contacted pad contents" given that these statements are not applicable for this type of product. If the SMARTPAC liner is indeed torn or broken, the sodium metabisulfite will not be released in any form or shape given that it is a part of the liner matrix itself.]

Batch No. _____

Manufactured by: **QUIMAS S.A.**

Los Yacimientos 1301 • Maipu • Santiago • Chile

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