

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 19, 2019

Norma Pangilinan Head of Regulatory Affairs North America SBM Life Science Corp Weston 1, 5th Floor 1001 Winstead Drive Cary, NC 27513

Subject: Label Amendment – revising directions for use for clarity, revising marketing

claims, adding sprayer types and related directions to label

Product Name: FDF Ready-to-Use EPA Registration Number: 92564-64

Application Date: 6/13/18 Decision Number: 542059

Dear Ms. Pangilinan:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, 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.

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 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.

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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 Marianne Lewis by phone at (703) 308-8043 or via email at lewis.marianne@epa.gov.

Sincerely,

Gene Benbow, Product Manager 7

See In

Invertebrate & Vertebrate Branch 3 Registration Division (7505P)

Office of Pesticide Programs

ACCEPTED

02/19/2019

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 000001 001

92564-64

[FRONT PANEL]

FDF Ready-to-Use

ABN: BioAdvanced™ Science-Based Solutions Dual Action Rose & Flower Insect Killer Ready-to-Use I; Bianova Advanced™ Dual Action Rose & Flower Insect Killer Ready-to-Use I; Fortifend Advanced™ Dual Action Rose & Flower Insect Killer Ready-to-Use I

ACTIVE INGREDIENTS:	
Flupyradifurone	0.008%
OTHER INGREDIENTS:	<u>99.992%</u>
TOTAL	400.000/
TOTAL:	100.00%

The 24 oz. bottle contains 0.0000125 lbs. of flupyradifurone.[The 1 gallon bottle contains 0.000668 lbs. of flupyradifurone.][The 1.3 gallon contains 0.000868 lbs. of flupyradifurone.][0.08 grams flupyradifurone active ingredient per liter]

Net Contents: 24 fl. oz., 1 Gal., and 1.3 Gal.

STOP - Read This Entire Label Before Use [Read the Label First]

KEEP OUT OF REACH OF CHILDREN

FOR RESIDENTIAL USE ONLY

CAUTION

See back panel booklet for ingredients and precautionary statements

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

[BACK PANEL]

This product provides up to 28 days [up to 1 month] [up to 4 weeks] protection against mealybugs, [whiteflies], [thrips], [leafhoppers], [and] [aphids] with a single application. Keeping your roses and flowers free of listed [*] pests has never been easier.

READ THE LABEL FIRST!

QUICK FACTS

Kills Listed[*] Insects by Contact

Keeps protecting against listed[*] insects mealybugs, [whiteflies], [thrips], [leafhoppers] [and] [aphids] for up to 28 days [for up to 1 month] [for up to 4 weeks]

Ready to Use -- No Mixing, No Measuring

INSECTS CONTROLLED	[ART: Aphid, Lace bugs, Whiteflies]			
	Aphids Lace bugs	Leafhoppers Mealybugs Plant bugs	Psyllids Scale insects (Citricola, Euonymus, Orange, Oystershell, San Jose)	Thrips Whiteflies
COVERAGE	Treats up to [X] medium-sized plants [Note to PM: for 24 oz bottle, x = 34; for a gallon bottle, x = 181; for 1.3 gallon bottle, x = 235]			
WHERE TO USE	Flowers, roses, houseplants, and shrubs Not for use on lawns			
WHEN TO USE	When insects or damage first appear			
☎ □	For questions or comments, call toll-free 1-877-229-3724 or visit our website at www.BioAdvanced.com [www.bianovaadvanced.com] [www.BioAdvancedScienceBasedSolutions.com] [www.fortifendadvanced.com].			

ACTIVE INGREDIENTS:	
Flupyradifurone	. 0.008%
OTHER INGREDIENTS:	99.992%
TOTAL:	100.000%

EPA Reg. No. 92564-64 EPA Est. No.

♣ 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 15-20 minutes. Call poison control center or doctor for treatment advice. 	

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-229-3763 for emergency medical treatment information.

Active Ingredients: 0.008% Flupyradifurone [CAS # 951659-40-8]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

- Harmful if swallowed.
- · Harmful if absorbed through skin.
- · Avoid contact with eyes, skin, or clothing.
- · Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

ENVIRONMENTAL HAZARDS

Do not apply directly to water or to areas where surface water is present or to intertidal areas below the mean high water mark.

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.

Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

Toxic to adult bees in laboratory studies via oral exposure, however, not toxic to bees through contact exposure, and field studies conducted with this product have shown no effects on honeybee colony development.

DIRECTIONS FOR USE

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

Before use, read and follow all label directions.

BEFORE USE	RESTRICTIONS:	
B	Do not spray the product into fish pools, ponds, streams, or lakes.	
Read and follow all label directions.	Remove animal feeding dishes prior to application.	
directions.	Do not use indoors or in small, enclosed areas where spray may be inhaled.	
	Do not apply to fruits or vegetables used for food.	
	Do not water the treated area to the point of run-off.	
	Do not make applications during rain.	
	 Do not allow children or pets to re-enter until sprays have dried. Not for use on edibles. Maximum application rate is 0.365 lbs. of flupyradifurone per acre per calendar year. Do not wet the foliage within one hour after applying. 	
	Do not use on lawns	
WHEN TO USE	 When insects or damage first appear. To avoid serious damage, eliminate pests early in the season before they multiply. 	
WHERE TO USE	 Outdoors on flowers, roses, shrubs and ground cover Outdoors on houseplants (including flowering houseplants) For houseplants, move them outside, treat, let dry, and bring back indoors. 	
HOW OFTEN	For severe infestations, repeat every 7 to 14 days as necessary but not to exceed the maximum application rate of 0.365 lbs flupyradifurone per acre per calendar year.	
HOW TO USE	 Hold sprayer about 12 inches from foliage. Spray leaves, stems, and tender new shoots. 	
Shake well before using.	Completely spray all leaf tissue surfaces.	

Apply until leaves are evenly coated with spray, but not dripping.
[Option 1 All Purpose Manual Sprayer] • [Adjust nozzle to desired spray pattern.]

[Option 2 Battery Powered Sprayer:]

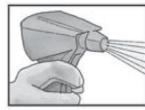
IMPORTANT! - READ BEFORE USE



How to Attach Sprayer to
Bottle Remove Power
Sprayer and hose from
side carrier. Replace bottle cap with cap attached
to Power Sprayer hose.



Prepare to Spray ■ Point Sprayer away from body. ■ Adjust nozzle to desired setting. Do not turn past "X" position. ■ Slide safety switch to ON position.



Spray ■ Squeeze trigger to dispense product.
Sprayer may require several seconds to prime before spraying.

After Use

■ Slide safety switch to LOCK position. ■ Return Power Sprayer to side carrier for storage.

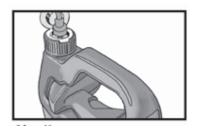


4 AA Batteries Included For important battery information – see booklet.

[Option 3 Manual Remote Sprayer:]







ATTACH SPRAYER

- Remove sprayer from bottle.
- Remove twist tie.
- Pull down and extend hose.
- Open flip-cap on bottle.
- Insert hose and plug into flip-cap opening until it snaps into place.
- Move tab to open position.

SPRAY

- Adjust nozzle to stream or spray position.
- Point sprayer downward and squeeze trigger repeatedly until liquid is released.

AFTER USE

- Turn sprayer nozzle to X (off) position.
- Do not unplug hose.
- Return sprayer to bottle. Sprayer will snap into place.

[Option 4 ERGO-GRIP® Spray Wand:] How To Use Your Sprayer:

- 1. Remove ERGO-GRIP® spray wand from pocket
 - Remove wrap from coiled hose
 - Remove protective battery strip from sprayer handle



2. REMOVE STICKER & CAP COVER

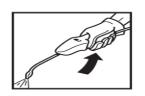


3. CONNECT HOSE TO CAP Insert plug at end of coiled hose into hole on cap and push firmly until secure.

Remove sticker and cap cover before inserting hose plug.







4 AA Batteries Included For important battery

information – see booklet.

4. OPEN SPRAY WAND

- Unfold spray wand until it snaps into place
- Point spray nozzle away from body.
- Adjust spray nozzle to desired setting.

5. TURN POWER ON

Slide OFF-ON switch to ON position.

6. SQUEEZE

- Squeeze trigger to dispense product. Sprayer may require several seconds to prime before product is released.
- Release trigger to stop spraying.

Storage

- Slide OFF-ON switch to OFF position.
- Do not unplug hose. Leave connected to cap.
- Turn spray nozzle to the off position.
- Fold spray wand down against sprayer handle.
- Return ERGO-GRIP® spray wand to pocket for storage.

To Replace Batteries

- Open battery compartment [with a small screwdriver].
- Remove used batteries and replace with new batteries in correct position as indicated inside battery compartment.
- Securely close battery compartment door [and screw closed].

Proper use of Batteries

- Never mix old batteries with new.
- Do Not mix Alkaline with Standard (carbon zinc) or Rechargeable (nickel cadmium) batteries.
- When storing sprayer for long periods, remove batteries to prevent leakage.
- Dispose of used batteries according to manufacturer's instructions or in household trash.

[Option 5/HUDSON SPRAYER (GUN DESIGN)]

HOW TO ATTACH SPRAYER TO BOTTLE

- Remove Power Sprayer and hose from side carrier.
- Replace bottle cap with cap attached to Power Sprayer hose.

PREPARE TO SPRAY

- Point Sprayer away from body.
- Adjust nozzle to desired setting.
- Slide safety switch to ON position.

SPRAY

Squeeze trigger to dispense product. Sprayer may require several seconds to prime before spraying.

AFTER USE

- Slide safety switch to LOCK position
- Return Power Sprayer to side carrier for storage.]

[Option 6/PROPOSED GENERIC WAND-STYLE SPRAYERS]

PREPARE TO SPRAY

- Remove spray wand from carrier. Extend hose to full length.
- Remove safety tab to activate batteries.
- Connect hose to bottle by removing cap cover and inserting hose plug into cap, pushing firmly until secure.
- [Connect hose to bottle by removing existing cap and applying hose-end cap, turning until secure.]

SPRAY

- Unfold spray wand until it snaps into place.
- Point spray nozzle away from body.
- [Unlock trigger.]
- Squeeze to spray. Sprayer may require several seconds to prime before spraying begins.

[If necessary, adjust nozzle to desired setting.]

AFTER USE

- [Move trigger lock to CLOSED position.]
- Fold wand down against handle.
- Return sprayer to carrier for storage.

[Option 7/PROPOSED GENERIC GUN-STYLE SPRAYERS]

PREPARE TO SPRAY

- Remove sprayer from carrier. Extend hose to full length.
- Remove safety tab to activate batteries.
- Connect hose to bottle by removing cap cover and inserting hose plug into cap, pushing firmly until secure.
- [Connect hose to bottle by removing existing cap and applying hose-end cap, turning until secure.]

SPRAY

- Point spray nozzle away from body.
- [Unlock trigger.]
- Squeeze to spray. Sprayer may require several seconds to prime before spraying begins.

[If necessary, adjust nozzle to desired setting.]

AFTER USE

- [Move trigger lock to CLOSED position.]
- Return sprayer to carrier for storage.

applicable state or local guidelines.

STORAGE AND DISPOSAL			
Do not contaminate water, food, or fe	eed by storage or disposal.		
Pesticide Storage	Store in an area out of the reach of children, preferably a locked storage cabinet. Protect from freezing.		
Container Handling	If Empty: Non-refillable container. Do not refill or reuse container. Place empty container in trash or offer for recycling if available If Partly Filled: Call your local solid waste agency or toll free 1-877-229-3724 for disposal instructions. Never place unused product down any indoor or outdoor drain.		

Important: Use all of the product in accordance with label directions. If it is necessary to dispose of unused product, please follow any

NOTICE

Research and testing have determined that the "Directions for Use" are appropriate for the proper use of FDF Ready-to-Use under expected conditions. To the extent consistent with applicable law, the Buyer assumes responsibility for lack of performance or safety if not used according to the directions.

Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

PRODUCED FOR

[DISTRIBUTED BY]

 $BioAdvanced^{\otimes}$ [Fortifend AdvancedTM] [Bianova AdvancedTM] is a trademark of SBM Life Science Corp. ERGO-GRIP[®] is a trademark of SBM Life Science Corp.

SBM Life Science Corp. 1001 Winstead Drive, Suite 500 Cary, North Carolina 27513

FPF Ready-to-Use 2/15/2019

[Marketing claims:]

- For use on: Roses, Flowers, Houseplants (treated outside), Ground Covers, Vines, Ornamentals, Shrubs, and Trees
- Use on houseplants (treated outside)
- Just one application [quickly] kills [controls] listed[*] insects [whiteflies]
- Up to 28 days [up to 1 month] [up to 4 weeks] protection [guard, defense, shield] against listed[*] insects
- Protects against listed[*] insects [for up to 28 days] [for up to 1 month] [for up to 4 weeks]
- Keeps protecting against listed[*] insects for up to 28 days [for up to 1 month] [for up to 4 weeks]
- Rainproof Protection [after 30 minutes]
- Protection against listed[*] insects will not wash off
- Kills listed[*] insects by contact
- Long lasting protection [for up to 28 days] [for up to 1 month] [for up to 4 weeks]
- Residual action, keeps protecting against listed[*] insects for up to 1 month [4 weeks]
- Xylem mobility to protect against listed[*] insect damage
- Protects against listed[*] insects, on roses, flowers, houseplants [treated outside], ground covers, vines, ornamentals, shrubs, and trees
- Controls [Kills] listed[*] insects [that harm roses, flowers, houseplants (treated outside), ground covers, vines, ornamentals, shrubs, and trees]
- Protects plants from listed[*] insect pests
- Knocks out whiteflies
- Controls [Kills] aphids [and other listed[*] insects]
- Kills listed[*] insects by contact and keeps protecting against listed[*] insects for up to 4 weeks [up to 1 month]
- Kills listed[*] insects through contact and protects against listed[*] insects for up to 4 weeks [up to 1 month]
- Proprietary Formula [controls listed[*] insects]
- The Rose & Flower enhancer
- Maintains [and] [restores] colorful, beautiful blooms
- The Rose and Flower defender [guardian, protector]
- Kills aphids and other listed[*] insect pests
- Rainproof after 30 minutes
- For use on indoor plants (treated outside)
- Also kills listed[*] pests
- Long lasting protection
- Kills listed[*] insects by ingestion [after foliar penetration into the plant] [after foliar penetration into leaves]
- Kills aphids, [whiteflies], [psyllids], [Lace bugs], [Leafhoppers], [Mealybugs], [Plant bugs], [Thrips]
- [Can provide] control of listed[*] pests on the underside of leaves
- Is [readily] absorbed into leaf tissue
- Contains Butenolide chemistry
- ERGO-GRIP[®] Spray Wand
- Grip controlled sprayer reduces hand fatigue
- Grip control make it easier to spray
- Contours and grip control reduce hand fatigue
- Contours and grip control make it easy to spray
- Contours and grip control take the pressure off your hands
- Contours and grip control for better comfort
- Grip controlled sprayer for your comfort
- Grip control and contours for easier spraying
- Contoured grip control for your comfort
- Contoured grip control reduces hand fatigue
- Comfortable, accurate, easy to store
- Designed for comfort, accuracy, easy storage
- Controls hidden listed[*] insects
- Fits [compatible with] IPM (Integrated Pest Management) practices
- Protects against nymphs [&] [adults] of listed[*] insects
- Protects against [feeding] damage from listed[*] insects
- Causes listed[*] insects to stop feeding fast!
- Rapid translaminar movement
- Rapid movement through foliage
- Protects against hidden listed[*] pests
- Knocks out whiteflies
- Knocks out psyllids

- For insecticidal [residual] activity on listed[*] insects
- Stops honeydew production within 90 minutes [even on aphids feeding on the undersides of treated leaves]
- Stops Asian citrus psyllid feeding
- Quickly stops Asian citrus psyllid feeding
- For control of listed[*] [sucking] pests, both adult and immature [nymph] stages
- Works on listed[*] insects feeding on the underside of leaves
- [Provides] rapid knockdown of aphids [and] [psyllids]
- Up to 1 month [28 days] [4 weeks] protection against listed[*] insect damage
- On-going protection against listed[*] insects [lasts up to] [1 month] [28 days] [4 weeks]
- Protects for up to 1 month [28 days] [4 weeks] against listed[*] insect damage
- Effectively controls [kills] listed[*] pests
- Effective control of listed[*] pests
- Rapidly stops [damage caused by] aphid feeding
- Rapidly stops ACP (Asian citrus psyllid) feeding to help reduce the transmission of citrus greening disease (Huanglongbing/HLB)
- Extremely fast feeding cessation effects on Asian citrus psyllids (ACP) to help reduce the transmission of citrus greening disease (Huanglongbing/HLB)

*listed [Note to PM: The word "listed" can appear as a footnote on the same page with the appropriate phrase *listed pests/insects]

† ladybugs, predatory mites, lacewings, hoverflies

[ART]

PROTECTION FOR YOUR YARD [Royation U.S.	or your money back
OUR LABS	READ
LAB-DEVELOPED SOLUTIONS LOUR YERO	