



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 5, 2019

Prachi Pandya
Federal Regulatory Associate
SBM Life Science Corporation
1001 Winstead Drive, Suite 500
Cary, NC 27513

Subject: Notification per PRN 98-10 – Addition of fertilizer statements to the label
Product Name: Merit 2.5 PR
EPA Registration Number: 92564-73
Application Date: May 13, 2019
Decision Number: 551729

Dear Ms. Pandya:

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.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

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.

If you have any questions, you may contact please contact Jasmin Jackson at 703-347-0732 or by email at jackson.jasmin@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Jasmin Jackson" with a flourish at the end. Below the signature, the word "for" is written in a smaller, simpler font.

Venus Eagle, Product Manager 1
Invertebrate & Vertebrate Branch 3
Registration Division (7505P)
Office of Pesticide Programs

(Front Panel)

Merit 2.5 PR

(ABNs) BioAdvanced™ Science-Based Solutions 2-in-1 Insect Control Plus Fertilizer Plant Spikes; Bianova Advanced™ 2-in-1 Insect Control Plus Fertilizer Plant Spikes; Fortifend Advanced™ 2-in-1 Insect Control Plus Fertilizer Plant Spikes; BioAdvanced™ Science-Based Solutions Plant Food Plus Insect Control Spikes; Bianova Advanced™ Plant Food Plus Insect Control Spikes; Fortifend Advanced™ Plant Food Plus Insect Control Spikes; BioAdvanced™ Science-Based Solutions Insect Control Plus Plant Food Spikes; Bianova Advanced™ Insect Control Plus Plant Food Spikes; Fortifend Advanced™ Insect Control Plus Plant Food Spikes

- GUARANTEED SATISFACTION**
- READY TO USE
- Contains X-X-X Fertilizer
- For Potted Plants, Indoors & Outdoors
- Stops Insects Now & Later
- Kills Existing Listed[*] Insects
- Kills aphids and other listed[*] insects
- Protects Against Further listed[*] Infestations
- Protects Against Damage From Listed Insects
- Protects Against listed[*] Insect Damage [for up to 8 weeks]
- Protects Against listed[*] Insect Damage Now & Later
- No spraying, no mess, just push spikes into soil
- Contains BITREX®
- 2-in-1 action kills listed[*] insects while feeding your plants
- Feeds your plants and protects from insect damage
- Provides up to 8 weeks Rainproof Protection
- No unpleasant Odor
- Protects Against Listed[*] Insect Infestation
- Protects & Feeds for up to 8 weeks
- For indoor & outdoor potted plants
- 100% Satisfaction Guaranteed## (or your money back)

NOTIFICATION

92564-73

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:

08/05/2019



##or your money back

* listed [note to PM: The word "listed" can appear as a footnote on the same page.]

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

ACTIVE INGREDIENT:

Imidacloprid 2.5 %

OTHER INGREDIENTS: 97.5 %

TOTAL:..... 100.0%

Net Contents : 10-12 gram plant spikes **Total :** 0.8 oz (20 grams)

STOP – READ THE LABEL BEFORE USE

KEEP OUT OF REACH OF CHILDREN

CAUTION


See Back Panel for Additional Ingredients and Precautionary Statements

(BACK PANEL)

This product's Dual [Double] Action formula feeds and protects against listed damaging insects. Just push spikes into soil and your potted plant is protected (from insects) for up to 2 months. Growing beautiful plants has never been easier.

QUICK FACTS (Product Facts)

- Easy-To-Use Plant Spikes
- Dual [Double] Action Formula kills listed[*] insects while feeding your plants
- Long-lasting, effective protection against listed[*] insects for up to 8 weeks
- Two-in-one formula kills listed[*] insects while feeding your plants
- Highly effective, lasting protection against listed[*] insects for up to 8 weeks
- Long-lasting protection against aphids, whiteflies and other listed insects for up to 8 weeks
- Use in potted plants, indoors or outdoors
- Feeds plants and kills listed[*] insects for up to 8 weeks
- Kills listed[*] insects and feeds plants for up to 2 months

KILLS	Aphids, leafhoppers, mealybugs, plant bugs, scales, thrips, and whiteflies
FEEDS	X-X-X slow release fertilizer feeds plants for up to 2 months
COVERAGE	This package will treat 4 to 5 eight-inch pots
WHERE TO USE	In potted plants except edible plants, herbs, fruits, or vegetables. Use in potted roses, palms, ficus, houseplants, hibiscus, flowers, vines, and containerized shrubs and trees.
WHEN TO USE	Every two months
HOW MUCH TO USE	Varies with pot size; see use directions.
	Questions, comments, or medical information call 1-877-229-3724 or www.BioAdvanced.com www.bianovaadvanced.com www.BioAdvancedScienceBasedSolutions.com www.fortifendadvanced.com .

FOR INDOOR / OUTDOOR RESIDENTIAL USE ONLY

ACTIVE INGREDIENT:

Imidacloprid 2.5 %

OTHER INGREDIENTS: 97.5 %

TOTAL: 100.0%

EPA Reg. No. 92564-73

EPA Est. No. _-AA-_

FERTILIZER ANALYSIS X-X-X

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

- Harmful if swallowed or absorbed through skin.
- Causes eye irritation.
- Avoid contact with eyes, skin, or clothing.
- Wash hands thoroughly with soap and water after handling.

+ FIRST AID

IN CASE OF ACCIDENTAL . . .	IMMEDIATELY . . .
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.
Contact with skin:	Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.
Contact with eyes:	Hold eye open and rinse eye 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.
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 1-877-229-3763 for medical emergency information. Active ingredient: Imidacloprid [CAS # 138261-41-3].	

ENVIRONMENTAL HAZARDS

- This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to lakes, streams, rivers, or ponds.

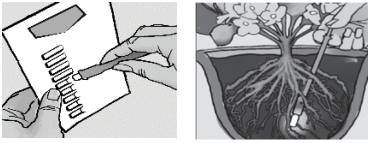
DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all label directions.


BEFORE YOU USE	RESTRICTIONS
	<ul style="list-style-type: none"> • Do not use this product in fish pools, ponds, streams, or lakes. • Do not use for potted vegetables, fruits, or herbs. • Do not apply this product, by any application method, to linden, basswood, or other Tilia species.

HOW TO USE

[ART DIAGRAM SHOWING SPIKES BEING PUSHED INTO THE SOIL WITH UNIFORM SPACING]



- No Spraying!
- Place the spike in the applicator's tip
- Just push applicator into soil
- Press to release spike and water in
- With watering, spikes will slowly dissolve to release fertilizer and the insecticide into the soil. [ART: WATERING ICON]



- For the first 10 days, avoid flushing water through the pot to the point where it flows out the bottom. This is to avoid washing the insecticide from the soil. After a few days, the insecticide will bind to the soil where it can be taken up by the root.

The number of spikes needed depends on the amount of soil the pot contains. For shallow pots, the lower number of spikes may be needed, for deep pots, you may want to use the higher number.

Pot Diameter	Number of spikes
4 inch	1/2 spike
5 inch	1 spike
8 inch	2 to 3 spikes
10 inch	3 spikes
12 inch	4 spikes
14 inch	4 to 5 spikes
16 inch	5 to 6 spikes
Window boxes, irregular shapes	Use 1 spike per 4" of length and width (16 square inches of surface)

HOW MUCH TO USE

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE:	Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.
PESTICIDE DISPOSAL AND CONTAINER HANDLING:	If Empty: <ul style="list-style-type: none">• Non-refillable container. Do not refill or reuse container.• Place empty container in trash or offer for recycling if available If Partly Filled: <ul style="list-style-type: none">• 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.

NOTICE: The directions for use of this product must be followed carefully. The Buyer assumes, to the extent consistent with applicable law, responsibility for lack of performance or safety if not used according to the directions. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of SBM Life Science Corp. All such risks shall be assumed by the user or buyer.

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

BioAdvanced [Fortifend Advanced™] [Bianova Advanced™] is a trademark of SBM Life Science Corp.

**PRODUCED FOR:
[DISTRIBUTED BY:]**

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

Merit 2.5 PR ~~11/13/2018~~ 04/17/2019 07/11/2019

[For placement under Fertilizer Guarantee Section]

{Note to EPA: The maximum amount of N will not exceed 16}

[Merit 2.5 PR XX-X-X]

GUARANTEED ANALYSIS

Total Nitrogen (N).....XX.0%

XX% Urea Nitrogen*

Soluble Potash (K₂O).....X.0%

Sulfur (S) Total.....X.X%

X.X% Free Sulfur (S)

X.X% Combined Sulfur (S)

F2414

[Derived From: Urea, Polymer Coated Sulfur Coated Urea, & Potassium Sulfate]

[*Contains XX.X% slowly available Nitrogen from Polymer Coated Sulfur Coated Urea]

[This product does not contain live microbial inoculum.]

[Fertilizer components are all synthetically derived.]

[Microbiological guarantees are not claimed on this product.]

[ALSO CONTAINS NON-PLANT FOOD INGREDIENTS]

[SOIL AMENDMENT GUARANTEED ANALYSIS]

Information regarding the contents and levels of metals in this product are available on the Internet at www.bioadvanced.com [<http://www.aapfco.org/metals.html>].

Net Weight: X lbs