

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

January 06, 2025

SENT BY EMAIL

Michael Barber michael.barber@sbm-company.com SBM LIFE SCIENCE CORP.

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 - Additional symbols and

graphics with associated text, correction of typographical errors.

Product Name: ESP720 AIO Granules

Admin Number: 92564-77 EPA Receipt Date: 12/15/2022 Action Case Number: 00606339

Dear Michael Barber:

The U.S. Environmental Protection Agency is in receipt of your application for notification under Pesticide Registration Notice 98-10 for the above referenced product. The EPA 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.

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 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 statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

If you have questions, please contact Ralph Narain by telephone at 202-566-2853 or via email at narain.ralph@epa.gov.

Sincerely,

Melissa Bridges, Product Manager 07

IVB3, RD

Office of Pesticide Programs

Ralph Marain for

NOTIFICATION

92564-77

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:

(Front Panel)

ESP720 AIO Granules

01/06/2025

[ABNs] BioAdvanced® Science-Based Solutions All-in-One Rose & Flower Care Granules; BioAdvanced® Science-Based Solutions All-in-One Flower & Rose Care Granules I: BioAdvanced® Science-Based Solutions All-in-One Flower Care Granules; BioAdvanced® Science-Based Solutions All-in-One Systemic Rose & Flower Care Granules; BioAdvanced® Science-Based Solutions All-in-One Systemic Flower & Rose Care Granules; BioAdvanced® Science-Based Solutions All-in-One Systemic Flower Care Granules

Active Ingredients:

Flupyradifurone	0.53%
Azoxystrobin	0.36%
Other Ingredients:	99.11%
Total:	100.00%

KEEP OUT OF REACH OF CHILDREN **CAUTION**

FOR RESIDENTIAL [OUTDOOR] USE ONLY NOT FOR USE ON TURF LAWNS

See Back Panel for Precautionary Statements

NET WEIGHT: [X lb. (XXX kg)]

EPA Reg No. 92564-77

[4 lb. (1.8 kg)]

[5 lb. (2.3 kg)]

[6 lb. (2.7 kg)]

[7 lb. (3.2 kg)]

[8 lb. (3.6 kg)]

[9 lb. (4.1 kg)]

[10 lb. (4.5 kg)]

Active Ingredients: Flupyradifurone [CAS # 951659-40-8], Azoxystrobin [CAS # 131860-33-8]

EPA Est. No. _-AA-_

FIRST AID		
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 treatment advice.	
NOTE: Have the pro	duct container or label with you when calling a poison control center or doctor or going for treatment. You may	
contact 1-877-229-3	7 <mark>63</mark> 24 for emergency medical treatment information.	

(BACK PANEL)

ESP720 AlO Granule's exclusive [3-in-one] [all-in-one] formula feeds and protects against listed[*] insects & plant diseases in one easy step. It provides up to 4 weeks [1 month] [28 days] protection against the major listed[*] [problem] pests of roses, hibiscus, iris and other flowers and shrubs. Easy to use, no spraying or mixing. Growing beautiful roses, flowers and shrubs has never been easier!

[Read the Label First!]

QUICK FACTS (Product Facts)

- 3 Products in One
 - Fertilizer
 - Insect Control
 - Disease Control
- Protects Against listed[*] insects and [&] diseases for [up to] 4 weeks [plus feeds]
- Feeds and Protects in One Easy Step

{Note to PM: May choose any claim from marketing claims list.}

(Note to PM: May choos	se any claim from marketing claims list.}	
CONTROLS	[Listed[*] insects and diseases.] Aphids, Lace Bugs, Mealy Bugs, Psyllids, Rose Slugs (suppression only), Thrips, Whiteflies [and other	
30N1N323	listed[*] insects.]	
FEEDS	XX-XX-XX fertilizer for strong roots, shoots, and blooms.	
WHERE TO USE	Roses, Flowers and Shrubs.	
	When listed[*] insects are present.	
WHEN TO USE	Prior to listed[*] disease infecttion or at the first sign of infection.	
WHEN TO USE	Every 4 weeks throughout the growing season. (See seasonal limitations in Directions for Use.)	
	To reduce frost damage, stop applications 8 weeks before the first frost.	
	Treats up to 34 roses & other shrubs or up to 202 sq. ft. of flowerbed {4 lb. size}.	
	[Treats up to 42 roses & other shrubs or up to 252 sq. ft. of flowerbed {5 lb. size}.]	
COVERAGE	[Treats up to 51 roses & other shrubs or up to 303 sq. ft. of flowerbed {6 lb. size}.]	
	[Treats up to 59 roses & other shrubs or up to 353 sq. ft. of flowerbed {7 lb. size}.]	
	[Treats up to 68 roses & other shrubs or up to 403 sq. ft. of flowerbed {8 lb. size}.]	
	[Treats up to 76 roses & other shrubs or up to 454 sq. ft. of flowerbed {9 lb. size}.]	
	[Treats up to 85 roses & other shrubs or up to 504 sq. ft. of flowerbed {10 lb. size}.]	
	Questions, comments, or medical information call 1-877-229-3724 or visit our website at	
	www.BioAdvanced.com [www.BioAdvancedScienceBasedSolutions.com] .	
	[Use your phone(to) [scan][the][tag][or][this code][to learn][or][to][see/view] [more][uses][or][information][the][M]SDS][Videos] [(on)how to use][this product][for] [how to(use)] [tips]	
	QR code for example only	
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	1,75,77,75,0741 7,75,65,37,65,05	
	北京和大学研究工 工	

Active Ingredients:

Flupyradifurone	0.53%
Azoxystrobin	0.36%
Other Ingredients:	99.11%
Total:	
EPA Reg. No. 92564-77	EPA Est. NoAA

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

- Toxic to freshwater and estuarine/marine fish and aquatic invertebrates.
- 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.



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RESTRICTIONS:

- Do not apply near fish pools, lakes, streams, rivers, or ponds.
- Do not apply to plants grown for food.
- Outdoor use only.
- Do not apply by hand.
- Do not make applications during rain.
- Do not water the treated area to the point of run-off.
- Do not use measuring utensils such as measuring cups and measuring spoons for any food or drinking water purposes after use with this product.
- Do not allow children or pets to re-enter until product is incorporated into soil.
- Do not make more than three applications per rose bush per calendar year.
- Maximum application rate is 0.365 lb. flupyradifurone [x bottles] per acre per calendar year. This bottle contains [x] lb. of flupyradifurone.

HOW TO USE

- Measure the appropriate amounts of granules according the table below.
- Slowly apply as close to the base of the plant as possible.
- When finished, water the product in with one quart of water.

WHERE TO USE	Azaleas, Camelias, Rhododendrons, Roses, Shrubs, Flowerbeds Not for use on Lawns	
HOW MUCH TO USE	Fill measuring cap to top of inner co	ircle [top of screw threads]: [equivalent to 2 oz. or
	Azaleas, Camelias, & Rhododendrons	½ capful [1 oz.] [27 g] per foot of plant height
	Roses	1 capful [2 oz.] [54 g] per plant
	Shrubs	½ capful [1 oz.] [27 g] per foot of plant height
	Flowerbeds	2 capfuls [4 oz.] [108 g] per 12 sq. ft. (3' x 4' bed area)
HOW TO APPLY	 Apply granules to soil around base of plant, sprinkling evenly in the area under the branches. Work granules into top 1 to 2 inches of soil. Water thoroughly after applying. For flowerbeds, sprinkle granules evenly over the bed, cultivate lightly into the soil, and water in thoroughly. 	
FOR BEST RESULTS	 Begin using this product in the spring when plants are actively growing. To control diseases, apply preventatively or at first sign of infection. This product will not cure severe disease infection. Reapply every 4 weeks for a total of 3 applications per year. To reduce frost damage, stop applications 8 weeks before the first frost. Keep rose, flower and shrub beds clean. This minimizes harborage sites for diseases and insects (for additional cultural practices, consult your local County Extension Service). Ensure the product gets down into the root zone by pulling mulch away from plants to be treated. sprinkling granules evenly around the plant and watering thoroughly. 	
HOW IT WORKS	Water moves the product down into the root zone where it is taken up & moved into the plant. The entire plant, even new growth, is fed and protected against listed[*] insects and diseases. Rain or watering cannot wash off this systemic protection.	

INSECTS AND DISEASES CONTROLLED*: INSECTS CONTROLLED		
Aphids Lace Bugs Leafhoppers Mealybugs Plant Bugs (Including Western Plant Bugs and Tarnished Plant Bu Psyllids Rose Slugs (Suppression) Scale Insects (Citricola, Euonymus, Orange, Oystershell and San Thrips Whiteflies		
DISEASES CONTROLLED	PLANTS	
Black Spot Downy Mildew Leaf Spot Powdery Mildew Rust	Roses	

Downy Mildew Leaf Blight Leaf Spot Powdery Mildew Rust Scab	Flowers
Black Spot Leaf Spot Powdery Mildew Rust	Shrubs, Ground Covers, and Vines

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 in a locked storage cabinet.
CONTAINER HANDLING:	Non-refillable container. Do not reuse or refill this container. If empty: place in trash or offer for recycling, if available. If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

NOTICE: Research and testing have determined that the "Directions for Use" are appropriate for the proper use of this product 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.

^{‡‡}or your money back

{Note to PM: Batch code to be added at time of production}

BioAdvanced® is a registered trademark of SBM Life Science Corp.

PRODUCED FOR: [DISTRIBUTED BY:]

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

ESP720 AIO Granules 06/19/2020 12/15/2022

Marketing Claims

Pesticide Claims

- 1. Just one application kills [controls] listed[*] insects [whiteflies]
- 2. Kills listed[*] insects by contact
- Controls [Kills] listed[*] insects that harm [roses] flowers [ground covers] [vines] [ornamentals] [and] [shrubs]
- 4. Protects plants from listed[*] insect pests
- 5. Knocks out whiteflies
- 6. Controls [Kills] aphids [and other listed[*] insects]
- Kills listed[*] insects and keeps protecting against listed[*] insects for up to 4 weeks [up to 1 month]
- 8. Kills listed[*] insects and protects against listed[*] insects for up to 4 weeks [up to 1 month]
- 9. Kills [Controls] aphids and other listed[*] insect pests
- Kills listed[*] pests
- 11. Listed[*] insects bite the leaves [foliage] and die
- Kills [Controls] aphids, [whiteflies,] [psyllids,] [Lace bugs,] [Leafhoppers,] [Mealybugs,]
 [Plant bugs,] [Thrips]
- 13. Controls Rose Slugs (suppression only)
- 14. [Can provide][Provides] control of listed[*] pests on the underside of leaves
- 15. Controls [Kills] hidden listed[*] insects
- 16. Protects against nymphs [&] [adults] of listed[*] insects
- 17. Protects against [feeding] damage from listed[*] insects
- 18. Causes listed[*] insects to stop feeding
- 19. Protects against hidden listed[*] pests
- 20. Knock out thrips and other listed[*] pests
- 21. Kills whiteflies [aphids][psyllids]
- 22. Knocks out whiteflies and [&] [psyllids]
- 23. Knocks out psyllids
- 24. Kills thrips and aphids
- 25. Stops honeydew production within 90 minutes [even on aphids feeding on the undersides of treated leaves]
- 26. Stops Asian citrus psyllid feeding
- 27. For control of listed[*] [sucking] pests, both adult and immature [nymph] stages
- 28. Kills all stages of listed[*] [sucking] pests
- 29. Works on listed[*] insects feeding on the underside of leaves
- 30. [Provides] rapid knockdown of aphids [and] [psyllids]
- 31. Effectively controls [kills] listed[*] pests
- 32. Effective control of listed[*] pests
- 33. Stops [damage caused by] aphid feeding
- Stops ACP (Asian citrus psyllid) feeding to help reduce the transmission of citrus greening disease (*Huanglongbing*/HLB)
- Feeding cessation effects on Asian citrus psyllids (ACP) to help reduce the transmission of citrus greening disease (Huanglongbing/HLB)
- 36. Provides up to 4 weeks listed[*] insect and disease protection [plus feeds]
- 37. Kills Aphids, Lace Bugs, Rose Slugs (suppression only), Thrips, and Other Harmful listed[*] Insects
- 38. Kills harmful listed[*] Insects
- 39. One application protects for up to 4 weeks
- 40. Controls [Kills] Aphids, Thrips, Whiteflies and Other listed[*] Insects
- 41. Protects Against listed[*] Insects & Diseases for up to 4 Weeks
- 42. Even Protects New Growth

- 43. For Control of listed[*] Diseases on Roses, Flowers, and Shrubs
- 44. Prevents, [Stops] [Cures] listed[*] Diseases of Roses, Flowers, and Shrubs
- 45. Controls listed[*] Diseases That Harm Roses, Flowers, and Shrubs
- 46. Protects Roses, Flowers, and Shrubs from listed[*] Insects & Diseases
- 47. Restores beauty of roses, flowers and shrubs [by supporting new [healthy][strong][vigorous] growth]
- 48. Stops spreading of disease [on to new growth]
- 49. Prevents new infestations with listed[*] diseases
- 50. Protects against listed[*] insects for up to 28 days [for up to 1 month] [for up to 4 weeks]
- 51. Keeps protecting against listed[*] insects for up to 28 days [for up to 1 month] [for up to 4 weeks]
- 52. Residual action, keeps protecting against listed[*] insects for up to 1 month [4 weeks]
- 53. For insecticidal [residual] activity on listed[*] insects

Kill Claims

- 54. Is [readily] absorbed into leaf tissue
- 55. Rapid translaminar movement
- 56. Alternative chemistry to BioAdvanced Science-Based Solutions All-in-One Rose & Flower Care Ready-to-Use Granules [*ABN]
- 57. Alternative formula to BioAdvanced Science-Based Solutions All-in-One Rose & Flower Care Ready-to-Use Granules [¥ABN]
- 58. Feeds and protects [against listed[*] insects and diseases in one [easy] step
- 59. Feeds and [&] Protects Against listed[*] Insects & Diseases in One Easy Step
- 60. Up to 1 month [28 days] [4 weeks] protection against listed[*] insect damage
- 61. Up to 28 days [up to 1 month] [up to 4 weeks] protection [guard] [defense] [shield] against listed[*] insects
- 62. On-going protection against listed[*] insects lasts up to 1 month [28 days] [4 weeks]
- 63. Protects for up to 1 month [28 days] [4 weeks] against listed[*] insect damage
- 64. Protects Against listed[*] Insects & Diseases for up to 4 weeks [plus feeds]
- 65. 1 [One] application protects for up to 4 weeks

Fertilizer Claims

- 66. Starts to work instantly
- 67. Promotes beautiful results
- 68. Promotes Strong Roots and Beautiful Blooms
- 69. Promotes stronger roots systems
- 70. Fertilizer Feeds & Renews
- 71. Feeds for up to 4 weeks
- 72. Keeps on feeding for up to 4 weeks
- 73. Continuous feeding for up to 4 weeks
- 74. Feeds and renews for up to 4 weeks
- 75. Improves plant growth
- 76. Revitalize roses, flowers and shrubs
- 77. Spurs roses, flowers and shrub recovery
- 78. Stimulates roses, flowers & shrub recovery
- 79. Increases plant growth
- 80. Provides slow release feeding {fertilizer}
- 81. Slow-release feeding. [Feeds up to 4 weeks.]
- 82. Grows bigger, more beautiful plants vs. unfed plants
- 83. Feeds consistently over 4 weeks[28 days] [1 month]
- 84. The Rose & Flower enhancer
- 85. Maintains [and] [restores] colorful, beautiful blooms

General Claims

- 86. Xylem mobility to protect against listed[*] insect damage
- 87. Proprietary Formula [controls listed[*] insects]
- 88. 100% Satisfaction Guaranteed or your money back‡‡
- 89. 3 Products in One [3-way protection] [Triple Action formula]
 - a. Fertilizer Feeds & Renews
 - b. Insect Control
 - c. Disease Control
- 90. Complete Rose and Flower Care
- 91. Easy to use....
- 92. No spraying or mixing
- 93. Protects and feeds entire ornamental plant [rose,] [flower,] [shrub]
- 94. Easy to use measuring cap [cup]
- 95. No messy spraying
- 96. 3 Products in One
 - a. Fertilizer Promotes strong roots & Beautiful blooms
 - b. Insect Control Aphids, [Rose Slugs (suppression only),] [Thrips,] [Whiteflies] [& other listed[*] pests]
 - c. Disease Control Black Spot, [Powdery Mildew] [Rust] [Leaf Spot] [Scab] [Downy Mildew] [Leaf Blight] [& other listed[*]diseases]
- 97. All-in-One Rose & Flower Care
- 98. All-in-One Flower & Rose Care
- 99. Guaranteed not to burn when used as directed

Water Based Claims

- 100. Rainproof Protection [after 30 minutes]
- 101. Protection against listed[*] insects will not wash off
- 102. Rainproof after 30 minutes

Location of Use Claims

- 103. FOR OUTDOOR USE ON:
 - a. Azaleas, Camellias and Rhododendrons
 - b. Flowering Shrubs
 - c. Flowers, Roses, Shrubs, and bedding plants
 - d. Promotes Beautiful Roses, Shrubs and Flowers
- 104. For use on: [Roses] Flowers [Ground Covers] [Vines] [Ornamentals] [and] [Shrubs]
- 105. Protects against listed[*] insects, on [roses] flowers [ground covers] [vines] [ornamentals] [and] [shrubs]
- 106. For Control of Listed[*] Diseases on [Roses,] Flowers, [and] [Shrubs]
- 107. Prevents and Stops Listed[*] Diseases that harm [Roses,] Flowers, [and] [Shrubs]

Packaging Claims

- 108. Gripper [Ridged] Cap [Lid] [Top] makes the product [bottle] easy to open
- 109. EZ Open [Gripper] [Ridged] Cap [Lid] [Top]
- 110. Easy Open [Gripper] [Ridged] Cap [Lid] [Top]
- 111. Easy Screw Off Cap [Lid] [Top]
- 112. EZ Open Grip
- 113. Easy Open Grip
- 114. Cap [Lid] [Top] opens easily
- 115. Cap [Lid] [Top] opens with ease

- 116. Ridged Cap makes the bottle easy to open
- 117. EZ Open Ridged Cap
- 118. Easy Open Ridged Cap
- 119. No more struggling to remove [open] the cap with the EZ ridged cap
- 120. Easy Twist Off Cap [Lid] [Top]
- 121. Remove cap [lid] [top] easily
- 122. Easy twist off design
- 123. Fill line helps you see how much to use
- 124. No more guessing how much to use
- 125. Fill measuring cap to the FILL LINE [indicated on the exterior of the cap] [(X oz.)]

Bonus Size/Promotional Language

- 126. 25% MORE vs. 8 lb. Size
- 127. 25% MORE vs. 4 lb. Size
- 128. 50% MORE vs. 4 lb. Size
- 129. 20% MORE vs. 5 lb. Size
- 130. Value Pack
- 131. Multi-Pack
- 132. 2-Pack
- 133. 2-Pack Value Pack
- 134. Treats up to [XX] Rose Bushes or up to xx square feet {x lb size}
- 135. Treats [XXX] sq. ft.
- 136. Free Sample
- 137. 33% more vs. 3 lb. size (4 lb. size)
- 138. 25% more vs. [4 lb. size] [5 lb. size]
- 139. Save \$XX.XX [on] BioAdvanced® Science-Based Solutions Tree & Shrub products [12 Month Tree & Shrub Protect & Feed] [ABN+]
- 140. \$XX.XX coupon [Good on] BioAdvanced® Science-Based Solutions Tree & Shrub products [12 Month Tree & Shrub Protect & Feed] [ABN+]
- 141. [Get] \$XX.XX off [coupon for] BioAdvanced® Science-Based Solutions Tree & Shrub products [12 Month Tree & Shrub Protect & Feed] [ABN+]
- 142. Try BioAdvanced® Science-Based Solutions Tree & Shrub [12 Month Tree & Shrub Protect & Feed] [ABN+]
- 143. Get money saving coupon on BioAdvanced ®Science-Based Solutions Tree & Shrub products [12 Month Tree & Shrub Protect & Feed] [ABN+]
- 144. Save on BioAdvanced® Science-Based Solutions Tree & Shrub products [12 Month Tree & Shrub Protect & Feed] [ABN+]

^{‡‡}{Note to PM – this claim will be located in the vicinity of the (symbol listed)}

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

+{Note to PM – ABN of SBM product to be promoted with coupon to be added here.}

*{Note to PM-ABN of alternate SBM product will be added.}

{For placement under Fertilizer Guarantee Section}

{Note to PM: Maximum 12.22% Nitrogen}

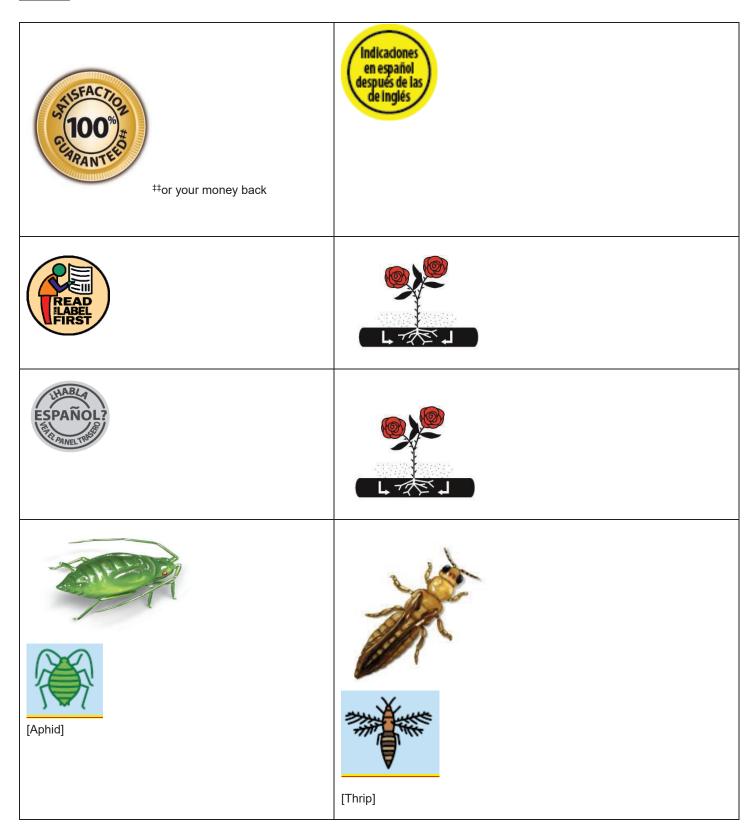
[Derived From: Urea, Polymer Coated Sulfur Coated Urea, & Potassium Sulfate] [†Contains XX.X% slowly available Nitrogen from Polymer Coated Sulfur Coated Urea] [This product does not contain live microbial inoculum.] [Fertilizer components are all synthetically derived.] [Microbiological guarantees are 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 lb.

[ART]





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