



## OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

September 29, 2025

### **SENT BY EMAIL**

Clorinda Johnson  
clorinda.johnson@indigoag.com  
INDIGO AG, INC.

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling and Formulation Amendment -  
Addition of an alternate formulation and an update to the label  
Product Name: INDIGO 405 FP  
Admin Number: 95213-6  
EPA Receipt Date: 08/24/2023  
Action Case Number: 00489216

Dear Clorinda Johnson:

The amended label and Confidential Statements of Formula (CSFs) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, are 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. Pursuant to 40 CFR 156.10(a)(6) 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.

Please note that the record for this product currently contains the following CSF(s):

- Basic CSF dated 05/12/2022
- Alternate CSF #1 dated 09/17/2025

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. See FIFRA section 2(p)(2). 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, FIFRA section 12(a)(1)(B). 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 Assurance.

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

If you have questions, please contact Andrew Queen via email at [queen.andrew@epa.gov](mailto:queen.andrew@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Jennifer Odom-Douglas". The script is elegant and cursive, with the first letters of each word being capitalized and prominent.

Jennifer Odom-Douglas, Risk Manager  
MPB, BPPD  
Office of Pesticide Programs



# INDIGO® 405 FP

{Alternate Brand Names: biottrinsic Z15 FP, biottrinsic Z25 FP, biottrinsic Z35 FP, and biottrinsic Z45 FP}

## Microbial Seed Treatment for protection against and control of listed nematodes

### ACTIVE INGREDIENT:

*Streptomyces* sp. strain SYM00257.....3.00%

OTHER INGREDIENTS:.....97.00%

TOTAL:.....100.00%

\*Contains a minimum of  $1 \times 10^6$  cfu/g

EPA Reg. No. 95213-6

EPA Est. No.

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

First Aid	
IF IN EYES:	<ul style="list-style-type: none"> <li>Hold eyes 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 a poison control center or doctor for treatment advice.</li> </ul>
<p>HOTLINE NUMBER: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may contact the Poison Help Line at 1-800-222-1222 for emergency medical treatment information.</p> <p>For general information on this product, contact the National Pesticides Information Center (NPIC) at 1-800-858-7378, Monday through Friday, 8 AM to 12 PM PST, or at <a href="http://npic.orst.edu">http://npic.orst.edu</a>.</p>	

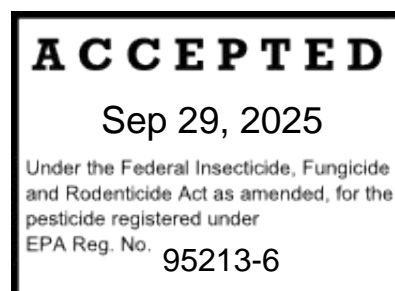
See additional precautionary statements and directions for use in booklet.

**Net Weight:**

**Lot#:**

**Not for sale or use after:** [Date stamped/placed on labeling will be 6 months after the date of manufacture.]

Indigo Ag, Inc.  
500 Rutherford Avenue  
Charlestown, MA 02129  
Ph. (901) 250-5737



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## PRECAUTIONARY STATEMENTS

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### HAZARDS TO HUMANS & DOMESTIC ANIMALS

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.

### PERSONAL PROTECTIVE EQUIPMENT (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Socks plus shoes
- Protective eyewear
- Waterproof gloves

Mixers/loaders and applicators must wear a minimum of a NIOSH-approved particulate filtering facepiece respirator with any R, or P filter; OR a NIOSH-approved elastomeric particulate respirator with any R, or P filter; OR a NIOSH-approved powered air- purifying respirator with an HE filter. (Repeated exposures to high concentrations of microbial proteins can cause allergic sensitization.

Follow the 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
<ul style="list-style-type: none"><li>• Users should remove clothing / PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.</li><li>• Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.</li></ul>



### ENVIRONMENTAL HAZARDS

For terrestrial uses. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Do not apply when weather conditions favor drift or runoff from treated areas. Cover or collect treated seeds spilled during loading.

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## DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

For any requirements specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation

## AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval (REI). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

**DO NOT** enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 4 hours.

**EXCEPTION:** If the product is soil-injected or soil incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

PPE required for early entry to treated areas (that is permitted under the Worker Protection Standard and that involves contact with treated seed is:

- Coveralls over long-sleeved shirt and long pants
- Socks plus shoes
- Protective eyewear
- Waterproof gloves

## NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses that are NOT within the scope of the Worker Protection Standard (WPS) for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses.

Keep unprotected persons out of treatment area until seeds have dried or been packaged

## PRODUCT INFORMATION

Indigo® 405 FP is a microbial seed treatment for protection against and control of listed nematodes.

This product is a mixture of a live microbe and inert powder. To maintain the performance of the live microbe, the product must be applied and stored as specified.

## APPLICATION INSTRUCTIONS

### Seed Treatment Application

For suppression of listed pests. See Crop Application Table.

### Seed Treatment Use

Indigo® 405 FP can be applied to seed following one of two methods:

- The product can be applied using commercial equipment designed to meter dry products onto seed as they are being transferred up a conveyor or auger either on the farm or at a seed treatment facility. Be sure the product is applied evenly over the seed as it enters the conveyor or auger.
- The product can be applied using a measuring cup as seed is being loaded into the central hopper of the planter/seeder or individual row unit. Make sure the product is evenly dispersed onto the seed as it fills the hopper or row unit. If applied at the individual row unit, a power drill with an auger bit can be used to evenly disperse the product onto the seed.

**Crop Application Table**

Crops	Pest	Application Rate
<b>Animal Feed (non grass):</b> Alfalfa; Bean, velvet; Clover; Kudzu; Lespedeza; Lupin; Sainfoin; Trefoil; Vetch; Vetch, crown; Vetch, milk	Alfalfa Stem Nematode <i>Ditylenchus spp.</i>  Root Knot Nematode <i>Meloidogyne spp.</i>  Lesion Nematode <i>Pratylenchus spp.</i>	0.28 – 4.00 ounces/ cwt of seed
<b>Bulb Vegetables:</b> Chive; Daylily; Elegans; Fritillaria; Garlic; Kurrat; Leek; Lily; Onion; Shallot	Root Knot Nematode <i>Meloidogyne spp.</i>  Stem Nematode <i>Ditylenchus spp.</i>  Stubby-Root Nematode <i>Paratrichodorus spp.</i>	0.28 – 4.00 ounces/ cwt of seed
<b>Cereal Grains (except corn and rice):</b> Barley; Buckwheat; Millet, pearl; Millet, proso; Oats; Popcorn; Rye; Sorghum; Teosinte; Triticale; Wheat; Wild rice	Root Knot Nematode <i>Meloidogyne spp.</i>  Cyst Nematode <i>Heterodera spp.</i>  Lesion Nematode <i>Pratylenchus spp.</i>  Stem Nematode <i>Ditylenchus spp.</i>	0.28 – 4.00 ounces / cwt of seed
<b>Corn (fresh sweet corn and dried field corn)</b>	Root Knot Nematode <i>Meloidogyne spp.</i>  Cyst Nematode <i>Heterodera zeae</i>  Sting Nematode <i>Belonolaimus spp.</i>  Needle Nematode <i>Longidorus spp.</i>  Lance Nematode <i>Hoplolaimus spp.</i>  Stubby-Root Nematode <i>Paratrichodorus minor</i>  Dagger Nematode <i>Xiphinema spp.</i>  Lesion Nematode <i>Pratylenchus spp.</i>  Spiral Nematode <i>Heliocotylenchus spp.</i>	0.28 – 4.00 ounces / cwt of seed

Crops	Pest	Application Rate
	Stunt Nematode <i>Tylenchorhynchus spp.</i>	
<b>Cotton (including cottonseed, cultivars, varieties, and/or hybrids of these)</b>	Root Knot Nematode <i>Meloidogyne spp</i>  Reniform Nematode <i>Rotylenchulus reniformis</i>  Lance Nematode <i>Hoplolaimus spp.</i>  Sting Nematode <i>Belonolaimus spp.</i>	0.28 – 4.00 ounces / cwt of seed
<b>Cucurbit Vegetables:</b> Chayote; Chinese waxgourd; Citron melon; Cucumber; Gherkin; Gourd, edible; Muskmelon; Pumpkin; Squash; Watermelon	Root Knot Nematode <i>Meloidogyne spp.</i>  Lesion Nematode <i>Pratylenchus spp.</i>  Needle Nematode <i>Longidorus spp.</i>  Stubby-Root Nematode <i>Paratrichodorus spp.</i> and <i>Trichodorus spp.</i>	0.28 – 4.00 ounces/ cwt of seed
<b>Legume Vegetables (except soybean):</b> Bean ( <i>Lupinus spp.</i> ) (includes grain lupin, sweet lupin, white lupin, and white sweet lupin); bean ( <i>Phaseolus spp.</i> ) (includes field bean, kidney bean, lima bean, navy bean, pinto bean, runner bean, snap bean, tepary bean, wax bean); bean ( <i>Vigna spp.</i> ) (includes adzuki bean, asparagus bean, blackeyed pea, catjang, Chinese longbean, cowpea, Crowder pea, moth bean, mung bean, rice bean, southern pea, urd bean, yardlong bean); broad bean (fava bean); chickpea (garbanzo bean); guar; jackbean; lablab bean (hyacinth bean); lentil; pea ( <i>Pisum spp.</i> ) (includes dwarf pea, edible-podded pea, English pea, field pea, garden pea, green pea, snowpea, sugar snap pea); pigeon pea; sword bean	Root Knot Nematode <i>Meloidogyne spp.</i>  Cyst Nematode <i>Heterodera spp.</i>  Lesion Nematode <i>Pratylenchus spp.</i>  Spiral Nematode <i>Heliocotylenchus spp.</i>  Reniform Nematode <i>Rotylenchulus reniformis</i>  Lance Nematode <i>Hoplolaimus spp.</i>  Sting Nematode <i>Belonolaimus spp.</i>	0.28 – 4.00 ounces / cwt of seed
<b>Oil Seeds (except cottonseed):</b> Borage; calendula; castor oil plant; Chinese tallowtree; crambe; cuphea; echium; euphorbia; evening primrose; flax seed; gold of pleasure; hare's ear mustard; jojoba; lesquerella; lunaria; meadowfoam; milkweed; mustard	Root Knot Nematode <i>Meloidogyne spp</i>  Lesion Nematode <i>Pratylenchus spp.</i>	0.28 – 4.00 ounces / cwt of seed

Crops	Pest	Application Rate
seed; niger seed; oil radish; poppy seed; rapeseed; rose hip; safflower; sesame; stokes aster; sunflower; sweet rocket; tallowwood; tea oil plant; vernonia; cultivars, varieties, and/or hybrids of these		
<b>Peanut</b>	Root Knot Nematode <i>Meloidogyne spp.</i>  Lesion Nematode <i>Pratylenchus spp.</i>  Sting Nematode <i>Belonolaimus spp.</i>  Peanut Ring Nematode <i>Mesocrionema ornatum</i>	0.28 – 4.00 ounces/ cwt of seed
<b>Root and Tuber Vegetables:</b> Artichoke; Carrot; Potato; Radish; Sugar beet; Sweet potato; Cassava; Ginger; True yam; Dasheen (taro)	Root Knot Nematode <i>Meloidogyne spp.</i>  Cyst Nematode <i>Heterodera spp.</i>  Needle Nematode <i>Longidorus spp.</i>  Lesion Nematode <i>Pratylenchus spp.</i>  Stubby-Root Nematode <i>Paratrichodorus spp.</i>	0.28 – 4.00 ounces/ cwt of seed
<b>Soybean</b>	Root Knot Nematode <i>Meloidogyne spp.</i>  Cyst Nematode <i>Heterodera spp.</i>  Lesion Nematode <i>Pratylenchus spp.</i>  Spiral Nematode <i>Heliocotylenchus spp.</i>  Reniform Nematode <i>Rotylenchulus reniformis</i>  Lance Nematode <i>Hoplolaimus spp.</i>  Sting Nematode <i>Belonolaimus spp.</i>	0.28 – 4.00 ounces/ cwt of seed

Note: This product does not contain dye. All seed treated commercially with this product must be colored with an EPA-approved dye or colorant of a suitable color to prevent accidental use as food for humans or feed for animals.



The Federal Seed Act requires that bags containing seed treated with this product shall be labeled with the following information: "This seed has been treated with *Streptomyces* sp. strain SYM00257. DO NOT use for food, feed or oil purposes."

Do not use treated seed for food or feed purposes or process for oil. Treat only those seeds needed for immediate use, minimizing the interval between treatment and planting.

### Seed Treatment Compatibility

Please consult with your Indigo Certified Agronomist if there are questions on compatibility of specific chemical seed treatments and corresponding planting windows. Contact Indigo Supply Chain at 901-250-5737.

Indigo® products may not yet be registered in all states. Check with your Indigo representative for the registration status in your state.

Information about this lot of microbial seed treatment may be obtained by writing to Indigo Ag, Inc. 500 Rutherford Avenue, Charlestown, MA 02129 and giving the lot number which is found on the front panel of this label.

### STORAGE AND DISPOSAL

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

#### Pesticide Storage

Store in a cool, dry place away from direct sunlight, heat sources, and below 75°F, until used. Do not allow product to freeze. Do not open package until it is ready to be used. Do not store this product near food or feed. If there is remaining product in the package, seal the package tightly with the desiccant pouch and store as described above.

#### Pesticide Disposal

To avoid wastes, use all material in this container by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program (often such programs are run by state or local governments or by industry).

#### Container Handling

Nonrefillable Container. Do not reuse or refill this container. Completely empty bag into application equipment, then offer for recycling if available or dispose of empty bag in a sanitary landfill or by incineration. Do not burn, unless allowed by state and local ordinances. If burned, stay out of smoke. If outer box is contaminated, dispose of it in the same manner as required for the bag.

## Limitations of Use

Any buyer or user (each a "Customer") agrees to handle and use this product in conformity with all limitations of use, including the prohibition of analyzing for content, reverse engineering, extracting, purifying, or otherwise obtaining any material, for any use whatsoever, from the product in any form.

This prohibition includes the growing or culturing of any material for further use of such material for any use whatsoever including research. Customer agrees that this product will only be used as instructed on the product label and only for the crop and purpose stated therein.

## Conditions of Sale and Limitation of Warranty and Liability Notice

The directions for application and use of this product must be followed carefully and in accordance with applicable law. It is impossible to eliminate all risks inherently associated with the use, storage and disposal of this product. Crop loss, ineffectiveness or other unintended consequences may result because of such factors including improper application or use, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Indigo. To the extent consistent with applicable law, all such risks shall be assumed by the Customer, and the Customer agrees to hold Indigo harmless for any claims relating to such factors. Indigo warrants that this product conforms to the description on the corresponding label within reasonable tolerances. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, INDIGO MAKES NO OTHER WARRANTIES AND DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING, BUT NOT LIMITED TO, WARRANTIES OF MERCHANTABILITY AND FITNESS FOR AN INTENDED PURPOSE.

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Indigo Ag, Inc.  
500 Rutherford Avenue  
Charlestown, MA 02129



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