



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

October 7, 2024

Robert Avalos
Sr. Regulatory Manager
Zenavis, LLC
940 NW Cary Parkway, Suite 200
Cary, NC 27513

Subject: Notification per PRN 98-10 – Primary brand name change and company name change.
Product Name: Zen Spinosad Technical
EPA Registration Number: 103050-13
Application Date: 9/6/2024
Case Number: 628850

Dear Robert Avalos

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 placed in our records.

The primary brand name “ZEN Spinosad Technical” has been added to the product record.

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 (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.

If you have any questions, please contact David Drawbaugh at Drawbaugh.David@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

{Note to reviewer: [Text] in brackets denotes optional text. {Text} in braces denotes where in the final label text will appear and notes to reviewer. }

ARG-ZEN

Spinosad Technical

Insecticide for Manufacturing Use Only

ACTIVE INGREDIENT	% BY WT
Spinosad*	93.8%
OTHER INGREDIENTS	6.2%
TOTAL	100.0%

*including: **Spinosyn A** (2-[(6-deoxy-2,3,4-tri-O-methyl- α -L-mannopyranosyl)oxy]-13-[[5-(dimethylamino)tetrahydro-6-methyl-2H-pyran-2-yl]oxy]-9-ethyl-, 3,3a,5a,5b,6,9,10,11,12,13,14,16a,16b-tetradecahydro-14-methyl-1H-as-Indaceno[3,2-d]oxacyclododecin-7,15-dione, [2R]-2R*, 3aS*, 5aR*, 5aS*, 9S*, 13S*(2R*, 5S*, 6R*), 14R*, 16aS*, 16bR*)[[9C]] and **Spinosyn D** (2-[(6-deoxy-2,3,4-tri-O-methyl- α -L-mannopyranosyl)oxy]-13-[[5-(dimethylamino)tetrahydro-6-methyl-2H-pyran-2-yl]oxy]-9-ethyl-, 3,3a,5a,5b,6,9,10,11,12,13,14,16a,16b-tetradecahydro-4,14-dimethyl-1H-as-Indaceno[3,2-d]oxacyclododecin-7,15-dione, [2S]-2R*, 3aS*, 5aR*, 5bR*, 9R*, 13R*(2S*, 5R*, 6S*), 14S*, 16aR*, 16bR*)[[9C]]

KEEP OUT OF REACH OF CHILDREN

CAUTION

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 a poison control center or doctor for treatment advice.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-844-685-9173 24-hours a day for emergency medical treatment information.	

[See side panel for additional Precautionary Statements including Storage and Disposal Instructions.]

For Chemical Spill, Leak, Fire, or Exposure, call CHEMTREC 1-800-424-9300

Manufactured for:	EPA Reg. No.: 103050-1387373-432
ArgiteZenavis, LLC	EPA Est. No.:
940 NW Cary Parkway, Suite 200	NET WEIGHT:
Cary, NC 27513	Lot No.: See container

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Harmful if absorbed through the skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Only for formulation into insecticides for the following uses: (1) uses for which USEPA has accepted the required data and/or citations of data that the formulator has submitted in support of registration; (2) uses for experimental purposes that are in compliance with US EPA; (3) **Terrestrial Food/Food Uses:**

Crop groups/subgroups:	
Root and tuber vegetables (Group 1)	Caneberry (Subgroup 13-07A)
Leaves of root and tuber vegetables (Group 2)	Bushberry (Subgroup 13-07B)
Onion, bulb (Subgroup 3-07A)	Small fruit vine climbing, except fuzzy kiwifruit (Subgroup 13-07F)
Onion, green (subgroup 3-07B)	Low growing berry (Subgroup 13-07G), except cranberry
Leafy vegetable (Group 4-16)	Low growing berry, except strawberry (Subgroup 13-07H)
Brassica head and stem vegetable (Group 5-16)	Tree nuts (Group 14-12)
Edible-podded legume vegetable (Subgroup 6A)	Cereal grains (Group 15)
Succulent shelled pea and bean (Subgroup 6B)	Forage, fodder, and straw of cereal grains (Group 16), except rice
Dried shelled pea and bean (Subgroup 6C)	Grass forage, fodder, and hay (Group 17)
Foliage of legume vegetable (Group 7)	Nongrass animal feeds (Group 18)
Fruiting vegetable (Group 8-10)	Herb (Subgroup 19A)
Cucurbit vegetable (Group 9)	Spice (Subgroup 19B), except black pepper
Citrus fruit (Group 10-10)	Cottonseed (Subgroup 20C)
Pome fruit (Group 11-10)	Leafy petiole vegetable (Subgroup 22B)
Stone fruit (Group 12-12)	
Miscellaneous crops:	
amaranth, grain	soybean
artichoke, globe	spearmint
asparagus	ti, leaves
celtuce	tropical fruits:
coffee	acerola
com grown for seed	atemoya
fennel, Florence (finochio)	avocado
grass grown for seed	banana
hops	biriba
kohlrabi	canistel
peanut	cheirimoya
peppermint	custard apple
quinoa	dates
	feijoa
	fig
	guava
	ilama
	soursop
	Spanish lime

(4) Terrestrial Non-Food Uses:

- non-crop areas (recreational areas, roadsides, rights-of-way, industrial areas, farmsteads, corrals, around agricultural animal premises)
- residential use in home gardens, lawns, ornamentals
- turf and ornamental
- (5) **Terrestrial Non-Food Crops:** nursery grown plants, ornamentals (including greenhouse), sod farms, tobacco, tree farms or plantations, pastures and rangelands

NOTIFICATION

103050-13

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:

10/07/2024

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- (6) **Indoor Non-Food Uses:** birdseed; in or around agricultural animal premises
- (7) **Pests on Poultry and livestock;**
- (8) **Other Uses:** commercial aquatic plants; mosquito and midge larvae in non-crop sites (temporary standing water, other freshwater sites, freshwater swamps and marshes, marine/coastal areas, stormwater/drainage systems, wastewater, dormant rice fields, natural and artificial containers) and Ag/crop sites (pasture/hayfield, rangeland, orchard, citrus grove)

STORAGE AND DISPOSAL

DO NOT contaminate water, food or feed by storage, disposal.

PESTICIDE STORAGE: Store in original container only. In case of leak or spill, contain material with absorbent materials and dispose as waste.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at any approved waste disposal facility.

CONTAINER HANDLING: Non-refillable fiber drums with liners: Nonrefillable container. Do not reuse or refill this container. Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into formulation equipment. Then offer for recycling if available or dispose of liner in a sanitary landfill, or by other methods approved by state and local authorities. If drum is contaminated and cannot be reused, dispose of it in the manner required for its liner.

CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

NOTICE: Read the entire Directions for Use and conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded. The Direction for Use of this Product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, presence of other materials or other influencing factors in the use of the product, which are beyond the control of [ArgiteZenavis](#) LLC or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold [ArgiteZenavis](#) LLC and Seller harmless for any claims relating to such factors. [ArgiteZenavis](#) LLC warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or [ArgiteZenavis](#) LLC, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, [ARGITEZENAVIS](#) LLC MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE. To the extent consistent with applicable law, neither [ArgiteZenavis](#) LLC nor Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF [ARGITEZENAVIS](#) LLC AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF [ARGITEZENAVIS](#) LLC OR SELLER, THE REPLACEMENT OF THE PRODUCT. [ArgiteZenavis](#) LLC and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of [ArgiteZenavis](#) LLC.

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