



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 29, 2021

Walter G. Talarek, Agent
W. Neudorff GmbH KG
c/o Law Office of Walter G. Talarek
5153 Allison Marshall Drive
Warrenton, VA 20187-8980

Subject: Label Amendment – Adding, Revising, and Removing Optional Marketing Claims and Other Updates
Product Name: Neudorff’s Insecticidal Soap RTU
EPA Registration Number: 67702-21
Application Date: 12/6/2017
Resubmission Date: 3/24/2021
Decision Number: 567915

Dear Mr. Talarek:

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. Your release for shipment of the product constitutes acceptance of these conditions. If these

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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 David Drawbaugh by phone at 703-731-8818, or via email at Drawbaugh.David@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Walsh', written over a light blue horizontal line.

Michael Walsh
Product Manager 11
Invertebrate & Vertebrate Branch 2
Registration Division
Office of Pesticide Programs

Attachment

{Note to reviewer:

Text appearing in braces { } will not appear on the final label.

Text appearing in parentheses () will appear on the final label in parentheses. Text appearing in brackets [] is optional and may of may not appear on the final label.}

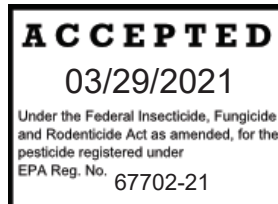
NEUDORFF'S INSECTICIDAL SOAP RTU

[ABN: HydroWorxx Insecticidal Soap 3 in 1 Ready-to-Use]

[(ABN: HydroCraft Insecticidal Soap 3 in 1 Ready-to-Use)]

[(ABN: HydroPower Insecticidal Soap 3 in 1 Ready-to-Use)]

Active Ingredient	By Wt.
Potassium Salts of Fatty Acids.....	1%
Other Ingredients	99%
Total.....	100%



KEEP OUT OF REACH OF CHILDREN

CAUTION

NET CONTENTS: 8 fl. oz, 16 fl. oz, 24 fl. oz, 32 fl. oz, 40 fl. oz, 64 fl. oz, 1 gallon, 1.33 gallons

Registration #: 67702-21

Establishment #: 67702-

PRECAUTIONARY STATEMENTS

Environmental Hazards: This product may be hazardous to aquatic invertebrates. 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 or 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.

{Note to reviewer: The storage and disposal information is container dependent, and one of these boxes will appear on the label.}

[

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

PESTICIDE DISPOSAL AND CONTAINER HANDLING:

If empty: Nonrefillable. Do not reuse or refill this container. 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.

{OR}

STORAGE AND DISPOSAL [For use with Quick Connect Sprayer]

PESTICIDE STORAGE: Completely discharge product in sprayer prior to storage. Flip down [colour] spout to close. **NO NEED TO DISCONNECT [TRIGGER SPRAYER.** Close nozzle on trigger sprayer. Snap sprayer back into place.] Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

PESTICIDE DISPOSAL AND CONTAINER HANDLING:

If empty: Nonrefillable. Do not reuse or refill this container. 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.

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BATCH CODE:

DIRECTIONS FOR USE

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

For residential indoor, outdoor and non-commercial greenhouse use only.

{Note to reviewer: Registrants must use one of the following:}

[

Please read entire label before using. Use only as directed.

Shake container before use. Thoroughly spray insect pests or powdery mildew to wetting on all plant parts, including undersides of leaves. Repeat treatment weekly or bi-weekly if needed. May be used on edible crops up to and including day of harvest.

Do not use on sweet peas, nasturtiums, delicate ferns. Use with care on new seedlings, transplants and blooms. Do not spray during full sun. If concerned about sensitivity of plants, apply to individual plants or small areas of plants and wait 2 days to determine if plant damage occurs prior to treatment of larger areas.

PESTS

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE will control powdery mildew and the following listed insect pests: adelgids (woolly aphids), aphids, lacebugs, mealybugs, mites, grasshoppers, leafhoppers, scale insects, plant bugs, sawfly larvae (pear and rose slugs), psyllids, tent caterpillars, thrips, spider mites, earwigs and whitefly.

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

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For use indoors, outdoors and in greenhouses on: fruit and nut trees (e.g., apples, cherries, peaches, pears, pecans, almonds); corn; soybeans; melons; tomatoes; vegetables (e.g., beans, cabbage, cucurbits, peas, potatoes); figs; small fruits (e.g., grapes, strawberry, raspberry); citrus; houseplants; ornamental and bedding plants; ornamental and shade trees (e.g., birch, evergreens, holly, oak).

{OR}

<p>Before You Use Please read entire label before using.</p>	<ul style="list-style-type: none"> - Use only as directed - Shake container before use. - Do not use on sweet peas, nasturtiums, or delicate ferns. - Use with care on new seedlings, transplants and blooms. - Do not spray during full sun. - If concerned about sensitivity of plants, apply to individual plants or small areas of plants and wait 2 days to determine if plant damage occurs prior to treatment to larger areas.
<p>How to Use</p>	<p>Shake container before use. Thoroughly spray insect pests to wetting on all plant parts, including undersides of leaves. Repeat treatment weekly or bi-weekly if needed. May be used on edible crops up to and including day of harvest.</p>
<p>Use Site Indoor, Outdoor and Greenhouse Fruit and Nut Trees such as: apple, cherry, peach, pear, pecans, and almonds. Corn, soybeans, melons, tomatoes. Vegetables such as: beans, cabbage, cucurbits, peas, potatoes. Figs Small Fruits such as: grapes, strawberry, raspberry. Citrus, houseplants, ornamental and bedding plants. Ornamental and shade trees such as birch, evergreen, holly and oak.</p>	<p>Pests Controlled adelgids (woolly aphids), aphids, lacebugs, mealybugs, mites, grasshoppers, leafhoppers, scale insects, plant bugs, sawfly larvae (pear and rose slugs), psyllids, tent caterpillars, thrips, spider mites, earwigs, whitefly and powdery mildew.</p>

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{Note to reviewer: The registrant may use one or more of these optional warranty statements:}

[
NOTICE TO BUYER

To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on this label and is reasonably fit for purposes stated on this label only when used in accordance with directions under normal use conditions. This warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to seller. To the extent consistent with applicable law, buyer assumes all risk of any such use. To the extent consistent with applicable law, seller makes no other warranties, either expressed or implied.

{OR}

[The Neudorff] Guarantee- If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.




{OR}

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

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{Note to reviewer: Optional sprayer instructions are container dependent and will be used where applicable:}

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	Attach Sprayer <ul style="list-style-type: none">■ Remove sprayer from bottle and extend hose.■ Open flip-cap on bottle.■ Insert hose and plug into flip-cap opening until it snaps into place.		Spray <ul style="list-style-type: none">■ Adjust nozzle to stream or spray position.■ Point sprayer downward and squeeze trigger repeatedly until liquid is released.		After Use <ul style="list-style-type: none">■ Turn sprayer nozzle to X (off) position. Do not unplug hose.■ Return sprayer to bottle. Sprayer will snap into place.
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{Note to reviewer Optional: For Use with Quick Connect Sprayer}

[
Quick Connect® Sprayer

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

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- Remove sprayer. Pull cord ALL THE WAY OUT.
- Insert {{optional insert color of plug}} plug into spout [on cap] until it clicks.



- Flip up spout. Open nozzle at end of sprayer.



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{Note to reviewer: The following is an optional section that will be used when optional hydroponic claims are made for the product}

[For plants in hydroponic systems, do not apply directly to water in the hydroponic growing systems. Apply as a foliar spray only. Discarded water from hydroponic growing systems may be used in greenhouses and for irrigating site vegetation. Water from these systems is prohibited from being discarded directly into a water source. Apply as soon as pests appear following the application directions above.]

{Marketing claims and product information that may be presented on the product's container or label wording:}

[

- Insecticidal soap
- Insecticide/Miticide
- [Insecticidal]/[Fungicidal]/[Miticidal] soap
- 3 in 1: Insecticide, Miticide, Fungicide
- [Insecticide]/[Miticide]/[Fungicide]
- Insect spray
- roses and flowers
- houseplants and gardens
- fruits and vegetables
- rose and flower insecticide
- ideal for roses
- ideal for houseplants
- kills listed insects in minutes
- kills insects fast- in minutes!
- fast acting- in minutes!
- kills bugs through contact
- kills listed insects through contact
- provides quick control of pests in minutes
- indoor – outdoor
- For use on plants—indoors and outdoors

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- For use indoor and outdoor
- [May be] use[d] up to day of harvest
- can be used right up until day of harvest
- May be applied to edibles up to day of harvest
- Rapidly degraded by soil microbes
- Insecticidal soap degraded rapidly by soil microbes
- Contact insecticide.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE is a contact spray and pests must be sprayed directly to achieve control.
- Read the label first!
- Quick Facts:
 - Multipurpose insect killer
 - Easy to use, fast acting in minutes
 - use up to and including day of harvest
- Kills listed insects
- For use on vegetables, fruit and nut trees, citrus, berries, ornamentals, shrubs, flowers, and trees in homes, gardens and greenhouses.
- For use on vegetables, flowers, fruits, & houseplants
- Can be used in vegetable gardens.
- Patented technology
- patented formula.
- Read Entire Container Label Before Using This Product.



- For Organic Gardening
- CONTROLS: [Adelgids], [aphids], [earwigs], [grasshoppers], [lacebugs], [mealybugs], [mites], [plant bugs], [leafhoppers], [psyllids], [sawfly larvae], [scale insects], [tent caterpillars], [thrips], [whitefly], [woolly aphids], [powdery mildew] and other listed pests
- KILLS: [Adelgids], [aphids], [earwigs], [grasshoppers], [lacebugs], [mealybugs], [mites], [plant bugs], [leafhoppers], [psyllids], [sawfly larvae], [scale insects], [tent caterpillars], [thrips], [whitefly], [woolly aphids], [powdery mildew] and other listed pests
- KILLS spider mites, aphids, mealybugs, whiteflies and other listed pests.
- Where to Use: For use [indoors], [outdoors], and [in greenhouses].
- When to Use: When listed insects, or insect damage first appears.
- Satisfaction Guaranteed
- Unconditionally Guaranteed
- Money back guarantee
- Easy to Use
- Can be used as part of an Integrated Pest Management System
- Compatible with Biological Control Agents, Beneficial Insects and Mites
- Do not spray when plants are under stress.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE can be used to treat plants prior to biological control agent release and to treat "hot spots" for listed pest control in greenhouses with subsequent release of beneficial mites and insects.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE is a contact killer for both insect and mite pests.

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- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE penetrates the body of pests and results in rapid death. It kills pests by disrupting membrane and cellular function.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE contains specially selected soaps [(fatty acid salts)] chosen for effective pest control.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE has been formulated to provide optimum spreading.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE is effective against the adult, larval and nymph stages of listed pests. Pupal stages of some pests (e.g., whitefly) may also be affected.
- This product will control listed insect pests on [vegetables], [houseplants], [ornamentals] and [fruit and nut trees] and is effective against adult, larvae, and nymph stages of pests.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE is a contact killer for [insects], [mites], and [powdery mildew].
- Multi-purpose
- Insect killer
- Insect and powdery mildew spray
- Kill listed insects through contact in minutes
- Controls Powdery Mildew, Insects and Mites
- Specially-formulated pesticidal soap to protect plants
- People and pets can enter the area after product is dried
- Controls powdery mildew
- Spray and harvest the same day
- www.neudorff.com



- [Houseplants], [Flowers], [Fruits], [Vegetables], [Trees], [Shrubs]
- For use indoors-outdoors
- [For] hydroponic gardening
- For hydroponic growing
- For use in homes, gardens and greenhouses
- For household home garden use.
- For questions or comments call toll-free X-XXX-XXX-XXXX
- Questions, comments [or medical information] X-XXX-XXX-XXXX
- © 20XX Licensed . World rights reserved.
- Manufactured.
- Made in/Produced in:_____ [from US and imported products/parts]
- See back (booklet) label (panel) for additional precautionary statements
- See additional precautionary statements on back panel.
- This container is made with a minimum X% recycled material
- See [back][booklet][panel] for [additional precautionary statements] and [directions for use] {Note to Agency Reviewer: This statement is not intended to make the Directions for Use optional.}
- See booklet for directions for use and additional precautions {Note to Agency Reviewer: This statement is not intended to make the Directions for Use optional.}

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

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- Superscript is first letter of lot number
- Manufactured under[a] license of W. Neudorff GmbH KG [, Germany]
- Sold under a license of W. Neudorff GmbH KG
- Listed by the Organic Materials Review Institute (OMRI) for use in organic gardening.
- OMRI Listed



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Registrant: W. Neudorff GmbH KG
An der Mühle 3,
31860 Emmerthal, Germany