UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

October 20, 2017

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

Subject: Notification per PRN 98-10 – Adding Pests and Optional Marketing Claims Product Name: NEU1138I Concentrate EPA Registration Number: 67702-44 Application Date: October 6, 2017 Decision Number: 534765

Dear Mr. Talarek:

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 Rebecca Whalen at 703-347-8228 or via email at whalen.rebecca@epa.gov.

Sincerely,

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

MASTER LABEL

NEU1138I CONCENTRATE

Active Ingredients	By Wt.
Potassium Salts of Fatty Acids	18.8%
Spinosad (a mixture of spinosyn A	
and spinosyn D)	0.1%
Other Ingredients	<u>81.1</u> %
Total	. 100.0%

Contains 0.0085 lbs Spinosad and 1.6 lbs potassium salts of fatty acids per gallon of concentrate.

KEEP OUT OF REACH OF CHILDREN

CAUTION

SUBLABEL A: Home and Garden Use SUBLABEL B: Commercial Turf and Ornamental Use

EPA REG. NO. 67702-44

EPA EST. NO.

Registrant: W. Neudorff GmbH KG An der Muhle 3, Postfach 1209 31860 Emmerthal, Germany www.neudorff.com

Home and Garden Use: NET CONTENTS: 16 ounces, 24ounces, 32 ounces, 1 gallon, 5 gallons, 55 gallons, 200 gallons and 211 gallons (800 Liters), 250 gallons

Commercial Turf and Ornamental Use: NET CONTENTS: 1 gallon, 2.5 gallons, 5 gallons, 10 gallons, 20 gallons, 40 gallons, 45 gallons, 50 gallons, 200 gallons, 211 gallons or 250 gallons

NOTIFICATION

67702-44 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:

10/20/2017

SUBLABEL A: Home and Garden Use

NEU1138I CONCENTRATE

For use on outdoor residential sites and in non-commercial greenhouses.

Active Ingredients	By Wt.
Potassium Salts of Fatty Acids	. 18.8%
Spinosad (a mixture of spinosyn A	
and spinosyn D)	. 0.1%
Other Ingredients	. <u>81.1</u> %
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Reg. No. 67702-44 EPA Est. No.

	FIRST AID	
IF ON SKIN OR	Take off contaminated clothing.	
CLOTHING	Rinse skin immediately with plenty of water for 15-20 minutes.	
	Call a poison control center or doctor for treatment advice.	
IF IN EYES Hold eye open and rinse slowly and gently with water for 15-20		
	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.	
Have the product container or label with you when calling a poison control center or		
doctor or going for treatment. For emergency information concerning this product, call		
the poison control center at 1-800-222-1212. [alternately insert supplemental		
distributor's toll free n	umber and hours of operation].	

NET CONTENTS XXXX

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear protective eyewear (goggles, face shield, or safety glasses). 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: This product is toxic to bees exposed to treatment for 3 hours following treatment. Do not apply this pesticide to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period. This product is toxic 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. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

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.

CONTAINER DISPOSAL:

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.

DIRECTIONS FOR USE

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

For outdoor residential use in home gardens, lawns, greenhouses, and ornamentals. Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

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

[The registrant must use one of the following applicator directions sections, either Subsection A for Applicator Directions for Mixing (for containers with no hose-end sprayer) or Subsection B for Applicator Directions for Hose-End Sprayer (for containers with hose-end sprayers).

A. Applicator Directions: For a 5% dilution, mix 7 oz. NEU1138I concentrate with 1 gallon of water (or 1 part concentrate with 19 parts water). Shake well before use.

OR

B. Applicator Directions for Hose-End Sprayer [registrant must choose one of the following]

[ILLUSTRATION]	٠	Connect sprayer to hose.
Connect:	•	Turn on water.

[ILLUSTRATION] Spray:	 To begin spraying, point nozzle in the direction you want to spray. With thumb slide trigger completely forward to the ON position. Spray evenly over measured area at a rate of XXXXX.
[ILLUSTRATION] Finish:	 To STOP spraying, slide thumb activation switch backward to OFF position. Turn off water. Relieve water pressure by sliding thumb switch to WATER position until water slows to a drip. Then, slide switch back to OFF position. Disconnect sprayer from hose.

OR

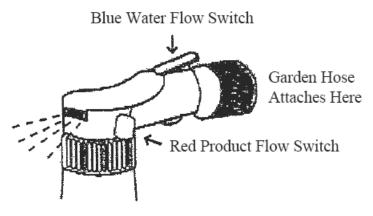
[For use with Gumby sprayer]

Apply the contents of this container to XXX square feet.

Hose-End Sprayer Directions

How to Use This Sprayer: Shake Container Well Before Getting Started

- 1. Before you start, the blue flow switch should be in the 'OFF' position, and the red flow switch should be in the up, 'CLOSED' position.
- 2. Shake container well and attach it to your garden hose, while holding sprayer at waist level and pointing in a direction away from face and body.
- 3. Turn on water from the faucet.
- 4. When you are ready to spray, turn the blue flow switch to 'ON' position; turn red flow switch to the forward, 'OPEN' position, and begin spraying.
- 5. When you are finished spraying or if you have to stop spraying at any time, turn the blue flow switch back to the 'OFF' position and the red flow switch to the 'CLOSED' position.
- 6. Turn off the water at the faucet.
- 7. Remove the container from the garden hose; then rinse thoroughly and store according to storage instructions.



OR

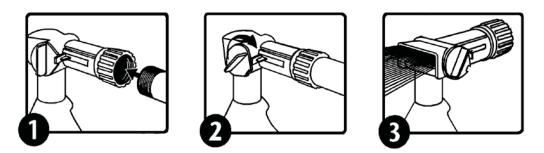
- 1. Attach garden hose to spray nozzle. Turn on water supply.
- 2. Bend safety tab down and turn control to "water".
- 3. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.

To Stop Spraying:

1. When you are finished spraying or if you have to stop spraying at any time, turn the blue knob back to the OFF position.

]

- 2. Turn off the water from the faucet.
- 3. Turn the blue knob to H20 then OFF, to drain the water from the hose.
- 4. Unscrew spray nozzle from hose. Remove hose end from container.
- 5. Reseal the container with the child-resistant closure. Rinse the hose-end applicator



OR

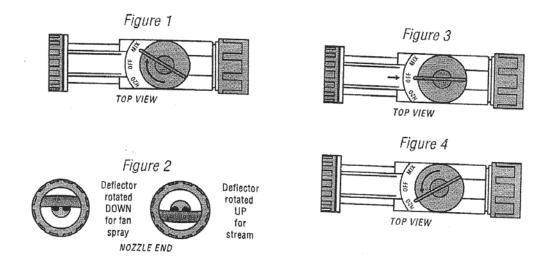
To Use This Sprayer

- 1. Shake container well.
- 2. Connect spray nozzle to garden hose.
- 3. Turn on the water from the faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don't come in contact with the treated area.
- 4. When you are ready to spray, turn the knob on top so that it points to the MIX position on the spray head. (Fig. 1)

5. The spray deflector on the front of the hose-end applicator can be rotated to give a stream or fan spray. (Fig. 2)

To Stop Spraying

- 1. When you are finished spraying or if you have to stop spraying at any time, turn the knob back to the OFF position. (Fig 3)
- 2. Turn off the water from the faucet.
- 3. Turn the knob to H20 then OFF, to drain the water from the hose. (Fig 4)



[Assembly Instructions for Use with Gumby Refill Cartridge:]

- 1. Before each use check to make sure you are using the correct Gumby product for your (problem)(chore)(application).
- Shake the (refill)(cartridge)(bottle) vigorously (hard)(well) before each use. For (lengthy)(long)(big) spraying jobs, (re-agitate)(shake) the (refill)(cartridge) (bottle) every (1/2 hour)(1 hour)(2 hours).
- 3. (Remove)(unscrew) (pop off) (twist off) the cap.
- (Insert)(lock)(press)(snap)(refill)(cartridge)(bottle)(in place)(to device)(attach)(snap)(twist)(push)(slide)(refill)(cartridge)(bottle) into (sprayer)(multi sprayer)(feeder)(mechanism)(device).
- To change (refill)(cartridge)(bottle) or when (refill)(cartridge)(bottle) is empty, hold (sprayer)(multi sprayer)(feeder) (mechanism)(device) with one hand and (unscrew) (pop-off) (push button) to release (refill)(cartridge)(bottle) from (sprayer)(multi sprayer)(feeder) (mechanism)(device).

[Note to reviewer: The assembly instructions will vary depending on the specific design of the applicator. The following alternate assembly instructions may be added to or could replace portions of the basic assembly instruction above to accommodate potential configurations of the device.]

Attach (refill)(cartridge)(bottle) to (sprayer)(multi sprayer)(feeder) (mechanism)(device)

Twist cap to close

Align (arrows)(marks) on (refill)(cartridge)(bottle) with arrows on (sprayer)(multi sprayer)(feeder)(mechanism)(device) and ensure (refill)(cartridge)(bottle) is properly inserted.

Replace (refill)(cartridge)(bottle) if empty

Pull lever back, insert (refill)(cartridge)(bottle), release lever to retain (refill)(cartridge)(bottle)

Slide (refill)(cartridge)(bottle) into (chamber)(slot)(orifice). Click in place, close cover. Use only Gumby product (refill)(cartridge)(bottle) with this (sprayer)(multi sprayer)(feeder)(mechanism)(device).

Ensure you are using the correct (refill)(cartridge)(bottle) for the job.

Double check that you have the correct (refill)(cartridge)(bottle).

Press tabs to release (refill)(cartridge)(bottle).

Before inserting new (refill)(cartridge)(bottle), wipe seals clean from dirt and debris. After insertion, spray for XXX (minutes)(seconds) to start the flow of product.

Attach (refill)(cartridge)(bottle) to (sprayer)(multi sprayer)(feeder)(mechanism) (device). Turn (refill)(cartridge)(bottle) until it clicks into place.

Align the corresponding (arrow)(mark) on the (sprayer)(multi sprayer)(feeder) (mechanism)(device) with the corresponding (arrow)(mark) on the (refill) (cartridge) (bottle).

The cap (attachment)(feature)(component)(ring) on the (refill)(cartridge)(bottle) is not removable. Do not remove attached cap (attachment)(feature)(component) (ring) to (refill)(cartridge)(bottle). Do not removed insert in (refill) (cartridge)(bottle). Do not removed (black)(red)(other specified color) cap.

Only use with specialized (sprayer)(multi sprayer)(feeder)(mechanism)(device). Quick disconnect. Pull back collar to release (refill)(cartridge)(bottle).

(Refill)(cartridge)(bottle) reseals itself automatically, no spills, no leaks.

Remove cap, align tabs, insert and turn (right)(left) until it stops.

Insert (refill)(cartridge)(bottle) into (sprayer)(multi sprayer)(feeder)(mechanism)(device) until you hear a click. (Do not overtighten)

Remove overcap, open door on (sprayer)(multi sprayer)(feeder) (mechanism)(device) and insert refill until you hear it click or button pops out.

Place hand under the (sprayer)(multi sprayer)(feeder)(mechanism)(device) and press the release button on the side. The (refill)(cartridge)(bottle) will drop from the (sprayer)(multi sprayer)(feeder)(mechanism)(device).]

[End Subsection B]

Apply when listed pests are present. Thoroughly spray all plant parts with diluted product to wetting, including undersides of leaves. Repeat applications may be made as indicated in the Use Restrictions section.

Do not use on sweet peas, nasturtiums, or delicate ferns.

Do not spray when plants are under stress. Use with care on new seedlings, transplants and blooms. Do not spray during full sun. Spray early in morning or evening or when

overcast. Potassium salts of fatty acids spray may cause marking of some varieties. If concerned about sensitivity of plants, apply to individual plants or small areas of plants and wait to determine if plant damage (phytotoxicity) occurs prior to treatment of larger areas.

Apply when the first signs of powdery mildew appear and repeat at 7-10 day intervals. Do not exceed restrictions listed in the Use Restrictions section. This product must come into contact with powdery mildew to be effective. Complete coverage is essential for maximum control.

PESTS

Insects: Adelgids (wooly aphids), ants (excluding fire ants, harvester ants, Pharaoh ants and carpenter ants), aphids, armyworms, beetles (including Colorado potato beetle, Japanese beetle, elm leaf beetle larvae), borers, caterpillars (including tent caterpillar), chinch bugs, codling moth, cutworms, earwigs, fruit flies (including spotted wing *Drosophila*), grubs, lace bugs, leafhoppers, leafminers, leafrollers, loopers, moths (including gypsy moth, light brown apple moths, European grapevine moths, buck moth larvae), mealybugs, mites (including spider mites, rust mites), mole crickets, plant bugs, psyllids (including Asian citrus psyllid), sawfly larvae (including pear and rose slugs), scale insects, thrips, webworms, weevils (including black vine weevil), and whiteflies.

Powdery Mildew: This product provides curative control of powdery mildew.

USE SITES

For use outdoors and in non-commercial greenhouses on berries, fruit and nut trees, citrus, corn, figs, melons, tomatoes, vegetables, herbs, lawns, and outdoor ornamentals.

USE RESTRICTIONS

PHI - Do not apply within this many days of harvest.

Timing – Do not make applications less than this many days apart.

Max # of AppIn. – Do not make more than the specific number of applications for the given time period.

PHI	Сгор	Timing	Max # of Appln.
1 day	Caneberries (blackberry, loganberry, raspberry)	5 days	6/year*
	Strawberry	5 days	5/year
3 days	Bushberries (blueberry, currant, elderberry,	6 days	3/crop or
	gooseberry, huckleberry)		6/year
21 days	Cranberry	7 days	6/year

BERRIES

* year = calendar year

FRUITS

PHI	Сгор	Timing	Max # of Appln.
1 day	Citrus (grapefruit, lemons, limes, oranges, tangerines)	6 days	3/year*
	Tropical tree fruits (avocado, guava, mango, papaya, passion fruit)	7 days	2/year
	Stone fruits (nectarines, peaches)	7 days	3/year
7 days	Grape	5 days	5/year
	Stone fruits (cherries, plums, prunes)	7 days	N/A
	Fig	7 days	4/year
	Dates	7 days	3/year
	Pome fruits (apples, crabapples, pears, mayhaw, quince)	10 days	4/year
	Pomegranate	N/A	3/year
	Pineapple (only for use in Hawaii)	7 days	6/year
14 days	Apricots	7 days	N/A
8 weeks	Banana and plantain (California, Florida, Hawaii and Texas only)	7 days	4/crop or 6/year

* year = calendar year

VEGETABLES

PHI	Сгор	Timing	Max # of Appln.
1 day	Bulb vegetables (onion, garlic, green onion, leek, shallot)	4 days	5/year*
	<i>Brassica</i> (cole) crops (bok choy, broccoli, Brussels sprouts, cabbage, cauliflower, collards, kale)	4 days	6/year
	Corn (sweet corn, popcorn, seed corn)	N/A	6/year
	Cucumber	5 days	6/crop
	Fruiting vegetables (eggplant, pepper, tomato) and okra	4 days	6/year
	Leafy vegetables (except <i>Brassica</i> ; arugula, celery, lettuce, dock, endive, fennel, parsley, rhubarb, spinach, Swiss chard); watercress	4 days	6 year
2 days	Artichoke	7 days	4/crop
3 days	Legume vegetables (beans, peas, blackeyed peas)	5 days	6/crop
	Cucurbits (melons, cantaloupe, pumpkin, squash, watermelon)	5 days	6/crop
	Leaves of root, tuber and legume vegetables	4 days	6/year
	Root vegetables – Carrot, ginseng, parsnip	5 days	4/year
	Root vegetables – Radish, rutabaga, turnip	5 days	3/year
	Tuberous and Corm Vegetables (beets, sugarbeets)	7 days	4/crop
7 days	Potatoes, ginger, sweet potatoes, yams	7 days	4/crop
60 days	Asparagus**	4 days	3/crop

* year = calendar year ** For post harvest protection of ferns only. Do not apply within 60 days of spear harvest. Do not feed treated ferns to meat or dairy animals.

TREE NUTS, PEANUTS AND PISTACHIOS

PHI	Сгор	Timing	Max # of Appln.
1 day	Tree nuts (almond, cashew, chestnut, filbert, macadamia nut, pecan, walnut); Pistachios	7 days	3/year
3 days	Peanut (not for use in California)	7 days	3/year*

* year = calendar year

HERBS

PHI	Сгор	Timing	Max # of Appln.
1 day	Herbs (angelica, balm, basil, borage, burnet, chamomile, catnip, chervil (dried), chive, clary, coriander, costmary, cilantro, curry, dillweed, horehound, hyssop, lavender, lemongrass, lovage, marigold, marjoram, nasturtium, parsley, pennyroyal, rosemary, rue, sage, savory, sweet bay, tansy, tarragon, thyme, wintergreen, woodruff and wormwood)	5 days	3/crop or 5/year*
7 days	Mint	4 days	3/crop or 4/year

* year = calendar year

Lawns, Turf, Outdoor Container-Grown Plants and Ornamentals (Herbaceous and Woody)

Uniformly spray foliage to point of runoff. Uniform coverage of upper and lower leaf surfaces is essential for effective insect control. Do not make applications less than 7 days apart.

Greenhouses (non-commercial)

Make localized area treatments of ornamental plants where pest problems are anticipated to occur rather than general area-wide broadcast treatments. Do not apply this product more than 10 times per year inside a greenhouse. If this product is being used for thrips, leafminer, spider mite and/or diamondback moth control, do not apply more than 6 times per year inside a greenhouse.

BATCH CODE:

[The registrant may use one or both of these two optional statements, either:

WARRANTY

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 the purposes stated on this label only when used in accordance with directions under normal use conditions. To the extent consistent with applicable law, 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, seller makes no other warranties, either expressed or implied."

or

OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product or refund your money. Simply send your name, address and proof of purchase to [insert name and address of supplemental registrant]."]

[The following claims and product information may or may not be presented on the product's label and labeling:

-Quick Facts

-Product Facts

-What it does: Kills listed insects

-Where to Use: For use around vegetables, fruit and nut trees, citrus, berries, ornamentals, shrubs, flowers, trees, lawns, gardens and in greenhouses

-Read the Label First!

- US patent number 8007820.

-Patent Pending

-Patented technology

-Patented insect killer

- -Patented formula
- -Liquid concentrate
- -Insecticide(/Miticide)(/Fungicide)
- -Insect Spray

-Kills listed insects

-Contact insecticide

-For control of foliage-feeding insect pests

-For control of lepidopterous larvae, leafminers, thrips, and other listed pests

-(CONTROLS) (KILLS): (Adelgids (woolly aphids)), (ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)), (aphids), (armyworms), (beetles (including Colorado potato beetle, Japanese Beetle)), (borers), (caterpillars), (chinch bugs), (codling moth), (earwigs), (fruit flies (including spotted wing *Drosophila*)), (gypsy moth), (lace bugs), (leafhoppers), (leafminers), (leafrollers), (loopers), (mealybugs), (mites), (mole crickets), (plant bugs), (psyllids), (sawfly larvae (e.g. pear and rose slugs)), (scale insects), (spider mites), (tent caterpillars), (thrips), (webworms), (weevils (including black vine weevil)), (whiteflies) and other listed insect pests.

-Controls Japanese Beetle

-(Controls)(Kills) listed insects

-Proven insect (killer)(kill)(control)

-Kills listed insects in minutes

-Kills listed insects through contact

-Control black vine weevils in rhododendrons

-Contains spinosad

-Spinosad is derived from the fermentation of a naturally occurring soil dwelling organism -For use on (vegetables), (fruit and nut trees), (citrus), (berries), (herbs), (ornamentals), (shrubs), (flowers), (lawns), and (trees) (in homes, gardens, and non-commercial greenhouses) -Can be used in vegetable gardens

-Read entire container label before using this product

-Satisfaction guaranteed (or your money back)

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

-Unconditionally guaranteed by [insert name of supplemental registrant]

-People and pets can enter treated area once spray has dried

-Easy to use

-Formulated to provide optimum spreading

-This container is made from XX% recycled materials

-www.neudorff.com

-Manufactured under a license of W. Neudorff GmbH KG, Germany

-Sold under a license of W. Neudorff GmbH KG



-Neudosan[™] is a trademark of W. Neudorff GmbH KG

-Made with Neudosan[™] Insecticidal Soap, a trademark of W. Neudorff GmbH KG

-Contains Neudosan[™] Insecticidal Soap, a trademark of W. Neudorff GmbH KG]

-For questions or comments call toll-free X-XXX-XXX-XXXX

-Questions, comments (or medical information) X-XXX-XXX-XXXX

-© 20XX Licensed (insert company name). World rights reserved.

-Manufactured/Distributed by: (insert company name)

-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

-For Organic Gardening

• Listed by the Organic Materials Review Institute (OMRI) for organic gardening

OMRI Listed



]

Registrant:

W. Neudorff GmbH KG, Postfach 1209, An der Mühle 3, D-31860 Emmerthal, Germany 011-49-5155-624-100 <u>www.neudorff.com</u> [in the alternative, the distributor's telephone number and website address may be used] SUBLABEL B: Commercial Turf and Ornamental Use

NEU1138I CONCENTRATE

[For Commercial Use]

Active Ingredients	By Wt.
Potassium Salts of Fatty Acids	18.8%
Spinosad (a mixture of spinosyn A	
and spinosyn D)	0.1%
Other Ingredients	<u>81.1</u> %
Total	100.0%

Contains 0.0085 lbs Spinosad and 1.6 lbs potassium salts of fatty acids per gallon of concentrate.

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Reg. No. 67702-44 EPA Est. No.

	FIRST AID	
IF ON SKIN OR	Take off contaminated clothing.	
CLOTHING	Rinse skin immediately with plenty of water for 15-20 minutes.	
	Call a poison control center or doctor for treatment advice.	
IF IN EYES Hold eye open and rinse slowly and gently with water for 15-20		
	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.	
Have the product container or label with you when calling a poison control center or		
doctor or going for treatment. For emergency information concerning this product, call		
the poison control center at 1-800-222-1212. [alternately insert supplemental		
distributor's toll free number and hours of operation].		

NET CONTENTS XXXX

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wear protective eyewear (goggles, face shield, or safety glasses). 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.

Personal Protective Equipment (PPE) Requirements:

Handlers who may be exposed to the diluted product through application or other tasks must wear:

- Protective eyewear (goggles, face shield, or safety glasses)
- Long-sleeved shirt and long pants
- Shoes plus socks.

Handlers who may be exposed to the concentrate through mixing, loading, application, and other tasks must wear:

- long-sleeved shirt and long pants shoes plus socks chemical-resistant gloves, such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride and vitron;

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users should:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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.

Environmental Hazards: This product is toxic to bees exposed to treatment for 3 hours following treatment. Do not apply this pesticide to blooming, pollen-shedding or nectar-producing parts of plants if bees may forage on the plants during this time period. This product is toxic to aquatic invertebrates. Do not apply directly to water, 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 washwaters. Do not apply where runoff is likely to occur. Do not apply when weather conditions favor drift from treated areas. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Apply this product only as specific on the label.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or 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: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows:

(For containers equal to or less than five gallons use these directions:) Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling, if available.

(For containers greater than five gallons use these directions:) Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Offer for recycling, if available.

DIRECTIONS FOR USE

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

Read all Directions for Use carefully before applying.

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 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), restricted-entry interval, and notification to workers. 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 area during the restricted-entry interval of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: coveralls over short-sleeved shirt and short pants; chemicalresistant gloves, such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, polyvinyl chloride and vitron, chemical-resistant footwear and socks; protective eyewear; and chemical-resistant headgear for overhead exposure.

Non-Agricultural Use Requirements

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

Do not enter or allow others to enter the treated area until sprays have dried.

PRECAUTIONS

Insecticide Resistance Management (IRM)

NEU1138I Concentrate contains spinosad, a Group 5 insecticide. Insect/mite biotypes with acquired resistance to Group 5 insecticides may eventually dominate the insect/mite population if Group 5 insecticides are used repeatedly in the same field or area, or in successive years as the primary method of control for targeted species. This may result in partial or total loss of control of those species by NEU1138I Concentrate or other Group 5 insecticides. Currently, only spinetoram and spinosad active ingredients are classified as Group 5 insecticides. These two insecticide active ingredients share a common mode of action and must not be rotated with each other for control of pests listed on this label. Spinetoram and spinosad may be rotated with all other labeled insecticide active ingredients.

To delay development of insecticide resistance, the following practices are recommended:

- Carefully follow the specific label guidelines within the use directions sections of this label, especially in regard to IRM recommendations.
- Avoid use of the same active ingredient or mode of action (same insecticide group) on consecutive generations of insects. However, multiple applications to reduce a single generation are acceptable. Treat the next generation with a different active ingredient that has a different mode of action or use no treatment for the next generation.
- Avoid using less than labeled rates of any insecticide when applied alone or in tank mixtures.
- Applications should be targeted against early insect developmental stages whenever possible.
- Base insecticide use upon comprehensive IPM programs including crop rotations.
- Monitor treated insect populations in the field for loss of effectiveness.
- Contact your local extension specialist, certified crop advisor, and/or manufacturer for insecticide resistance management and/or IPM recommendations for the specific site and resistant pest problems.

DIRECTIONS FOR MIXING

To make a 5% dilution, mix 5 gal of product/100 gal of water. Add sufficient water to the mixing tank to allow proper agitation by pump or paddles. Continue stirring while adding first the NEU1138I Concentrate then the remaining water.

Hard water in excess of 300 ppm should be conditioned to reduce its hardness prior to mixing with NEU1138I Concentrate.

APPLICATION INSTRUCTIONS

For field applications apply a 5% dilution at a rate of 50-200 gal/acre using ground spray equipment. For best results commence treatment when infestation is first noticed. Thoroughly spray insect pests on plants with diluted product to wetting. Minimize run-off to reduce plant injury on sensitive plants.

Application Rate Reference Table:

Contains 0.0085 lbs Spinosad and 1.6 lbs potassium salts of fatty acids per gallon of concentrate.

Use the following table to assist in calculating the applied active ingredient spinosad per acre in diluted spray.

Application Rate of Diluted Spray (gal/ac)	Spinosad Equivalent (Ib ai/acre)
50	0.021
60	0.026
70	0.030
80	0.034
90	0.038
100	0.043
110	0.047
120	0.051
130	0.055
140	0.060
150	0.064
180	0.077
200	0.085

PESTS/SITES

Insects: This product will control pests such as: Asian Citrus Psyllid , adelgids (woolly aphids), ants (excluding fire ants, harvester ants, Pharaoh ants and carpenter ants), aphids, armyworms, beetles, caterpillars, chinch bugs, earwigs, gypsy moth, lace bugs, leafhoppers, leafminers, leafrollers, loopers, mealybugs, mites, mole crickets, plant

bugs, psyllids, sawfly larvae (e.g. pear and rose slugs), scale insects, spider mites, tent caterpillars, thrips, webworms, weevils (including black vine weevil), whiteflies, and other listed pests below.

Powdery Mildew: This product provides curative control of powdery mildew. Apply a 2.5-5% solution of this product when the first signs of powdery mildew appear and repeat at 7-10 day intervals. This product must come into contact with powdery mildew to be effective. Complete coverage is essential for maximum control. In general, adequate coverage requires a minimum of 50 gallons of total spray volume per acre. Higher volumes may be required on larger perennial crops. Do not exceed crop-specific use restrictions listed below.

Turf, Grass Grown for Seed, Tree Plantations, Landscape Trees and Shrubs, Ornamentals (Herbaceous and Woody), Flowers and Bedding Plants

Site	Pest	Application Rate		Restrictions
		lb ai/acre spinosad	gal spray solution/acre	
Turfgrass (lawns, athletic field and recreational areas, commercial turf, sod, and golf courses)	Ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), aphids, armyworms, cutworms, earwigs, grubs, mole crickets, sod webworms, chinch bugs, mites	0.077	180	Do not apply more than 3 times in any 21-day period. Do not make more than 6 applications per season. Do not make applications less than 7 days apart. Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per season.
Grass crops, grass grown for seed production, pastures, rangeland, and non-crop areas (grass barrier strips and buffers around gardens, crop areas, and ornamentals; forests, parks, playgrounds, cemeteries, picnic areas, roadsides, campgrounds, industrial sites, fallow land)	Ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), armyworms, cutworms, earwigs	0.030-0.060	70-140	Do not use within 3 days of harvest for hay or fodder. No preharvest interval for forage. Do not make more than 6 applications per season. Do not apply more than a total of 0.186 lb ai spinosad (including foliar uses) per acre per season.
Outdoor and greenhouse ornamentals	Adelgids, ants (excluding fire ants, harvester ants,	0.026-0.085	60-200	Do not make applications less than 7 days apart. For greenhouses, see

(herbaceous and woody), landscape trees and shrubs,	Pharaoh's ants and carpenter ants), aphids, buck moth			specific restrictions below. For tent caterpillars and gypsy
flowers and	larvae, earwigs, elm			moth eggs and larvae,
bedding plants	leaf beetle larvae,			apply at a rate of 3%
	sawfly larvae (e,g,			formulation directly on larvae. See use
	pear and rose slugs), gypsy moth eggs			restrictions for sensitive
	and larvae,			ornamental species. Do
	Japanese beetles,			not apply more than a
	lace bugs,			total of 0.45 lb ai
	leafhoppers,			spinosad (including
	mealybugs, rust			foliar uses) per acre
	mites, phylloxera, spider mites, shore			per year.
	fly, plant bugs,			
	psyllid, scale insects,			
	tent caterpillars,			
	exposed thrips,			
	weevils, whitefly			
Tree Farms or Plantations	Adelgids, ants (excluding fire ants,	0.026-0.085	60-200	Do not apply more than a total of 0.45 lb ai
(Conifers, including	harvester ants,			spinosad per acre per
Christmas trees,	Pharaoh's ants and			year. Do not make more
and deciduous	carpenter ants),			than 6 applications per
trees)	aphids, buck moth			calendar year. For tent
	larvae, earwigs, elm			caterpillars and gypsy
	leaf beetle larvae,			moth eggs and larvae,
	European grapevine			apply at a rate of 3%
	moths, Japanese beetles, lace bugs,			formulation directly on larvae.
	leafhoppers,			Do not apply more than
	lepidopterous larvae			a total of 0.45 lb ai
	(such as bagworm,			spinosad (including
	fall webworm, Gypsy			foliar uses) per acre
	moth eggs and			per year.
	larvae, Hemlock loopers, jackpine			
	budworms,			
	pine tip moths,			
	redhumped			
	caterpillars, spruce			
	budworms, tent			
	caterpillars, tussock			
	moths), light brown apple moths,			
	mealybugs, rust			
	mites, phylloxera,			
	sawfly larvae (such			
	as European pine,			
	pear, redhead pine),			
	spider mites, shore fly, plant bugs,			
	psyllid, scale insects,			
	tent caterpillars,			
	exposed thrips,			

whitefly, Asian Citrus		
Psyllid		

USE RESTRICTIONS

Do not spray when plants are under stress. Do not apply to new seedlings and transplants without determining sensitivity (phytotoxicity) first. Do not spray during full sun. Spray early in morning or evening when overcast. Do not apply to evergreens during drought and use caution when tender new foliage is present. If concerned about sensitivity of plants, apply to individual plants or small areas and wait a couple of days to determine if plant damage occurs prior to treatment of larger areas.

Do not use on sweet peas, nasturtiums or delicate ferns.

Use with care when used on azaleas, bleeding heart, camellia, corn, euphorbia, fuchsia, gardenia, geraniums, impatiens, hawthorn, horse chestnut, jade plant, Japanese maple, lantana, mountain ash, ornamental ivy, palms, succulents. Sensitivity varies with plant varieties.

Use with care on blooms. Determine sensitivity before spraying.

Poinsettias may be sensitive. Do not apply after coloring of bracts has begun.

Do not use within 3 days of a sulfur application.

Greenhouses

Make localized area treatments of ornamental plants where pest problems are anticipated to occur rather than general area-wide broadcast treatments. Apply a 5% dilution at a rate of 50-200 gal/acre. Do not apply this product more than 10 times per year inside a greenhouse. If this product is being used for thrips, leafminer, spider mite and/or diamondback moth control, do not apply more than 6 times per year inside a greenhouse.

[The registrant may use one or both of these two optional statements, either:

"WARRANTY

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 the purposes stated on this label only when used in accordance with directions under normal use conditions. To the extent consistent with applicable law, 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, seller makes no other warranties, either expressed or implied."

or

"OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product or refund your money. Simply send your name, address and proof of purchase to [insert name and address of supplemental registrant]."

[The following claims and product information, may or may not be presented on the product's label and labeling:

-Insecticide (/Miticide) (/Fungicide)

-Insect spray

-Contact insecticide

-For control of foliage-feeding insect pests

-For control of lepidopterous larvae, leafminers, thrips, and other listed pests

-(CONTROLS) (KILLS): (Adelgids (woolly aphids)), (ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)), (aphids), (armyworms), (beetles), (caterpillars), (chinch bugs), (earwigs), (gypsy moth), (lace bugs), (leafhoppers), (leafminers), (leafrollers), (loopers), (mealybugs), (mites), (mole crickets), (plant bugs), (psyllids), (sawfly larvae (e.g. pear and rose slugs)), (scale insects), (spider mites), (tent caterpillars), (thrips), (webworms), (weevils (including black vine weevil)), (whiteflies) and other listed insect pests.

-Effective against a wide variety of listed insects

-Controls black vine weevils in rhododendrons

-(Controls) (Kills) listed insects

-Proven insect (killer) (kill) (control)

-Liquid concentrate

-Contains spinosad

-Spinosad is derived from the fermentation of a naturally occurring soil dwelling organism

-Treats (will treat) x,xxx sq. ft.

-Read entire container label before using this product

-Satisfaction guaranteed (or your money back)

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

-Unconditionally guaranteed by [insert name of supplemental registrant]

-Easy to use

-Formulated to provide optimum spreading

-This container is made from XX% recycled materials

-Patent pending

- US patent number 8007820.

-Patented technology

-Patented formula

-www.neudorffpro.com

-Manufactured under a license of W. Neudorff GmbH KG, Germany

NEUDORFF

-Neudosan[™] is a trademark of W. Neudorff GmbH KG

-Made with Neudosan[™] Insecticidal Soap, a trademark of W. Neudorff GmbH KG -Contains Neudosan[™] Insecticidal Soap, a trademark of W. Neudorff GmbH KG

-For Organic Production

- Listed by the Organic Materials Review Institute (OMRI) for organic production
- OMRI Listed



]

Registrant: W. Neudorff GmbH KG, Postfach 1209, An der Mühle 3, 31860 Emmerthal, Germany 011-49-5155-624-100 <u>www.neudorffpro.com</u> [in the alternative, the distributor's telephone number and website address may be used]