

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

March 5, 2020

Karen E. Warkentien Director, Regulatory Affairs Certis USA, LLC 9145 Guilford Road Columbia, MD 21046

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – Deletion of OMRI Seal and Homeowner sublabel from product Labeling Product Name: NeemAzad 1% EC EPA Registration Number: 70051-104 Application Date: December 5, 2019 OPP Decision Number: 557994

Dear Ms., Warkentien:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or 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 (1) copy of the final printed labeling before you release this 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 your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false

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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 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 any questions, please contact James Parker by phone at (703) 306-0469 or via email at parker.james@epa.gov.

Sincerely,

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Andrew Bryceland, Team Leader Biochemical Pesticides Branch Biopesticides and Pollution Prevention Division (7511P) Office of Pesticide Programs

Enclosure

NeemAzad[™] 1% EC

INSECT GROWTH REGULATOR

Kills/repels a variety of insect pests including whiteflies, caterpillars, leafminers, aphids, and diamondback moths.



FOR ORGANIC PRODUCTION

KEEP OUT OF REACH OF CHILDREN CAUTION

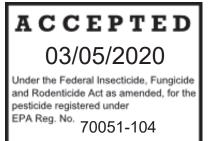
Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

See Side/Back Panel for Additional Precautionary Statements and First Aid

Manufactured by: Certis USA, LLC 9145 Guilford Road, Suite 175 Columbia, MD 21046



Net Contents: _____ EPA Reg. No. 70051-104 EPA Est. No. _____ Lot No.: _____



FIRST AID

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.

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.

Have product container or label with you when calling a poison control center or doctor, or going for treatment. Hot Line Number: 1-800-255-3924.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment:

Some materials that are chemical-resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical-resistance category selection chart.

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants.
- Chemical-resistant gloves, such as barrier laminate or butyl rubber or nitrile rubber or neoprene rubber or polyvinylchloride (PVC) or Viton.
- Shoes plus socks.
- Protective Eyewear

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not re-use them.

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 hazardous to fish and aquatic invertebrates. 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 washwaters or rinsate.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSIS-TENT 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 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. 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.

For early entry into 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, wear:

- Coveralls.
- Chemical-resistant gloves, such as barrier laminate or butyl rubber or nitrile rubber or neoprene rubber or polyvinylchloride (PVC) or Viton.
- Shoes plus socks.
- Protective Eyewear

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard 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 treated areas until sprays have dried.

GENERAL

- Botanical Insecticide Concentrate.
- Kills larval stages of insects only.
- Not for use in food-handling establishments.
- Shake well before using.
- Spraying directly onto the pest and a longer duration of leaf wetting increases effectiveness. Apply in early to mid-morning or late afternoon.
- The pH of spray solution containing NeemAzad[™] 1% EC must be kept between 3 and 8. Use spray solutions within several hours of preparation for maximum effectiveness. Do not store diluted solution for later use.
- Do not apply to wilted or otherwise stressed plants, or to newly transplanted material prior to root establishment. Do not apply to known spray sensitive plants without testing.
- NeemAzad[™] 1% EC has been found to be compatible when used in conjunction with most beneficial insects. Conduct a small trial to assure compatibility before using on a large scale.
- For indoor and outdoor use.

TANK MIXING

NeemAzad[™] 1% EC Botanical Agricultural Insecticide has been found to be compatible with most commonly used fungicides, insecticides, and fertilizers. Check physical compatibility first by using the correct proportion of products in a small jar test. Then, test tank-mix combinations for phytotoxicity on a sample of plants prior to use. This must be done with combinations used before as environmental conditions can alter the interaction between compounds. *Due to the wide variation in climatic conditions, cultural practices, and other factors, the user assumes full responsibility for any crop damage or other liability resulting from the use of NeemAzad[™] 1% EC in a tank mix combination. Do not mix NeemAzad[™] 1% EC with oxidizing agents such as bleach, or strong acids and bases as they will destabilize the product.*

DIRECTIONS FOR FOOD CROP APPLICATION

General Directions

- Use care when applying near streams, ponds, lakes or other bodies of water.
- Do not apply NeemAzad® 1% EC when weather conditions favor drift or when the likelihood of runoff is high.

GREENHOUSE

- For use to control whiteflies, thrips, mealybugs, leafminers, and aphids in and around greenhouses and commercial nurseries.
- Neemazad® 1.0% EC may be used on all fruits, vegetables, vegetable transplants, and herbs both inside and outside of the greenhouse.
- Dilute Neemazad® 1.0% EC at 1 to 2.25 pints (16 36 fluid oz.) per 100 gallons of water (1 1/8 to 2 1/4 teaspoon of Neemazad® 1.0% EC per gallon of water). Mix thoroughly. Apply at 25-40 psi with hand sprayer or 100-200 psi with power sprayer as a fine spray to both leaf surfaces to runoff. Use 1-2 gallons of spray solution/1,000 sq. feet. Avoid excessive application.
- For low volume application, apply 2.25 pint of Neemazad® 1.0% EC per acre in sufficient water to provide adequate coverage.
- Apply sprays on a preventative 7-day schedule or at the first sign of insect presence. This schedule is effective under low insect pressure. Under high insect pressure, apply every 3-4 days.
- For drench applications in greenhouse or nursery plantings, use 10 fluid ounces per 100 gallons and apply at the rate of 4.5 quarts of diluted solution per square foot of growing media surface. Repeat at 14-day intervals during the growing season.

Specific Crop Directions

Application Rate: Apply 1 1/8 - 4 1/2 pints (18.0-72.0 fluid oz.) of Neemazad® 1.0% EC per acre using suitable ground or aerial application equipment, in a manner to obtain uniform and complete plant coverage. For agronomic crops apply using conventional ground application equipment in a minimum of 30 gallons of water and aerial application equipment in a minimum of 3 gallons of water and aerial application equipment in a minimum of 3 gallons of water. Avoid over-spraying to the point of excessive runoff. Refer to table for application rates. Use the low rate as a preventative when pest pressure is low, or if used in conjunction with adulticide products. Otherwise, use the high rate. The maximum application rate is 20 grams active ingredient or less per acre according to the tolerance exemption (40 CFR 180.1119).

Mode of Action

This product controls targeted insect larvae when ingested or come in contact with it, by interfering with the insects' ability to molt. It is effective on all larval stages and pupae. It also reduces damage by repelling and deterring feeding of all stages of insect.

Application Rate for Whiteflies, Aphids, Leafminers, Armyworms, and Other Pests					
Pest	Rate NeemAzad 1% EC per Acre* (fluid ounces)	Frequency	Remarks		
Sweetpotato Whitefly Low Pressure High Pressure	18.0 – 31.5 fluid oz. 36.0 – 72.0 fluid oz.	4 – 10 days 3 – 7 days	Foliar application to larvae and nymphs		
Aphids	22.5 – 31.5 fluid oz.	7 – 10 days	Suppression and adult feeding deterrence		
Leafminers	18.0 – 31.5 fluid oz.	14 – 21 days	Foliar application to larvae and nymphs		
Leafhoppers	31.5 – 72.0 fluid oz.	7 – 10 days	Foliar application to nymphs		
* Apply in sufficient water to obtain adequate plant coverage.					

CITRUS, POME AND STONE FRUITS

Crops (including, but not limited to)

Apples Apricots Avocado Cherries Crabapples Grapefruits Jujubes Kumquats Lemons Limes Nectarines Oranges Peaches Pears Plums Prunes Quinces

CUCURBITS

Crops (including, but not limited to)

- Balsam pears Cantaloupes Chinese waxgourds Cucumbers
- Gherkins Gourds Honeydew melons Mangoes
- Pumpkins Squashes Watermelons

BULB, COLE AND LEAFY VEGETABLES

Crops (including, but not limited to)

Asparagus	Collards	Mustard greens
Arugula	Cress	Onions
Broccoli	Endive	Parsley
Bok choy	Fennel	Rhubarb
Brussels sprouts	Garlic	Shallots
Cabbage	Kale	Spinach
Cauliflower	Kohlrabi	Swiss chard
	-	

LEGUME AND FRUITING VEGETABLES

Crops (including, but not limited to)

Beans Chick peas Eggplants Ground cherries Lentils Peanuts Peas Peppers Soybeans Tomatoes

ROOT AND TUBER VEGETABLES

Crops (including, but not limited to)

Artichokes Beets Carrots Cassava Ginger Ginseng Horseradish Parsnips Potatoes Radishes Rutabaga Sweet potatoes Turmeric Turnips Yam beans Yams

SMALL FRUITS AND BERRIES

Crops (including, but not limited to)

Blackberries Blueberries Boysenberries Cranberries Currants Dewberries Elderberries Gooseberries Grapes Huckleberries Loganberries Raspberries Strawberries Youngberries

HERBS AND SPICES

Crops (including, but not limited to)

Anise Balm Basil Borage Chamomile Caraway Catnip Celery Chives Coriander Cumin Curry leaf Dandelion Dill Fennel Marigold Marjoram Mint Pennyroyal Peppermint Rosemary Rue Sage Savory Spearmint Sweet bay Tarragon Thyme Wintergreen

NUTS

Crops (including, but not limited to)

Almonds Beech nuts Brazil nuts Butternuts Cashews Chestnuts Filberts Hickory nuts Macadamias Pecans Pistachios Walnuts

MISCELLANEOUS

Crops (including, but not limited to)

Cotton Sweet Corn Alfalfa Corn Other crops grown for seed

INSECT PEST CONTROL BY NEEMAZAD™ 1% EC

Aphids: Cotton Aphid Green Peach Aphid	Thrips: Thrips Palmi	Strawberry Beetle (soil drench) Mexican Bean Beetle
Black-Margined Aphid Filbert Aphid	Whiteflies: Greenhouse Whitefly Silverleaf Whitefly	Miscellaneous: Fruitfly
Leafhoppers: Grape Leafhopper	Sweetpotato Whitefly	Grasshopper Squash Bug
Potato Leafhopper Variegated Leafhopper	Psyllids	Cabbage Maggot (soil drench) Onion Maggot (soil drench) Lygus Bug San Jose Scales Calico Scales Frosted Scales Pecan Leaf Phylloxera Pecan Stem Phylloxera
Aster Leafhopper	Spittle Bugs	
Leafminers: Holly Leafminer Serpentine Leafminer Vegetable Leafminer	Mealybugs Beetles, Grubs and Weevils: Colorado Potato Beetle Black Vine Week (soil drench)	

CHEMIGATION

Refer to supplemental labeling entitled "Certis's Chemigation Bulletin" for use directions for chemigation. Do not apply this product through any irrigation system unless the supplemental labeling on chemigation is followed.

STORAGE AND DISPOSAL

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

Pesticide Storage: Keep in original container. Store in a cool, dry place, away from direct sunlight, feed or foodstuffs. Keep container tightly sealed when not in use. Do not store below 50°F (10°C) or above 95°F (35°C).

Pesticide Disposal: Wastes resulting from the use of this product must be disposed of on-site or in an approved waste disposal facility.

Container Handling: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent). Then offer for recycling, or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, if allowed by state and local authorities. If burned, stay out of smoke.

WARRANTY

Certis USA LLC warrants that the material contained herein conforms to the description on the label and is reasonably fit for the purposes referred to in the directions for use. Timing and method of application, weather, watering practices, nature of soil, the insect problem, condition of the crop, incompatibility with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the seller. Buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herein. NO OTHER EXPRESS OR IMPLIED WARRANTY OF THE FITNESS OR MERCHANTABILITY IS MADE.

Chemigation Bulletin

GENERAL INFORMATION:

Apply this product only through drip (trickle); sprinkler (solid set, lateral move, end tow, sideroll, center pivot, or hand move); flood (basin); furrow; or border irrigation systems. Do not apply this product through any other type of irrigation system.

Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from nonuniform distribution of treated water.

If you have questions about calibration, contact State Extension Service specialists, equipment manufacturers or other experts.

Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.

A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

Public water system means a system for the provision to the public of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year.

Chemigation systems connected to public water systems must contain a functional, reduced pressure zone, backflow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, discharge the water from the public water system into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe.

The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection.

The pesticide injection pipeline must contain a functional, normally closed, solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.

The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops, or in cases where there is no water pump, when the water pressure decreases to the point where pesticide distribution is adversely affected.

Systems must use a metering pump, such as a positive displacement injection pump (e.g., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

Do not apply when wind speed favors drift beyond the area intended for treatment.

DRIP TRICKLE CHEMIGATION:

- 1. The system must contain a functional check valve, vacuum relief valve and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.
- 2. The pesticide injection pipeline must contain a functional, automatic, quick-closing valve to prevent the flow of fluid back toward the injection pump.
- 3. The pesticide injection pipeline must also contain a functional, normally closed, solenoidoperated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
- 4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
- 5. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
- 6. Systems must use a metering pump such as a positive displacement injection pump (i.e., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
- 7. Dilute the product in water following the label mixing directions. It may be premixed in a supply tank with water, fertilizer, or other appropriate tank-mixed agricultural chemicals. Agitation is necessary. Apply to moderately moist soils. Use volumes that thoroughly wet the soil but that do not cause significant runoff or excessive drip from pots. Application should be continuous in sufficient water to apply the application rate evenly to the entire treated area.

SPRINKLER CHEMIGATION:

- 1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.
- 2. The pesticide injection pipeline must also contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
- 3. The pesticide injection pipeline must also contain a functional, normally closed, solenoidoperated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
- 4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
- 5. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
- 6. Systems must use a metering pump such as a positive displacement injection pump (i.e., diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
- 7. Dilute the product in water following the label mixing directions. It may be premixed in a supply tank with water, fertilizer, or other appropriate tank-mixed agricultural chemicals. Agitation is necessary. Apply when soils are moderately moist. Use volumes that thoroughly wet the

foliage and/or soil but that do not cause significant runoff or excessive drip from pots. Application should be continuous in sufficient water to apply the application rate evenly to the entire treated area.

8. Do not apply when wind speed favors drift beyond the area intended for treatment.

FLOOD (BASIN), FURROW AND BORDER CHEMIGATION:

- 1. Systems using a gravity flow pesticide dispensing system must meter the pesticide into the water at the head of the field and downstream of a hydraulic discontinuity such as a drop structure or weir box to decrease potential of water source contamination from the backflow if water flow stops.
- 2. Systems utilizing a pressurized water and pesticide injection system must meet the following requirements:
 - a. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow.
 - b. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
 - c. The pesticide injection pipeline must also contain a functional, normally closed, solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
 - d. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
 - e. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
 - f. Systems must use a metering pump, such as a positive displacement injection pump (i.e., diaphragm pump), effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
- 3. Dilute the product in water following the label mixing directions. It may be premixed in a supply tank with water, fertilizer, or other appropriate tank-mixed agricultural chemicals. Agitation is necessary. Apply to moderately moist soils. Use volumes that thoroughly wet the soil but that do not cause significant runoff. Application should be continuous in sufficient water to apply the application rate evenly to the entire treated area.