

8033-21

7/2/2010

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



OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

July 2, 2010

John J. Wrubel
Nisso America, Inc.
45 Broadway, Suite 2120
New York, NY 10006

Dear Mr. Wrubel:

Subject: Label Notification per Pesticide Registration Notice 98-10
(Add marketing claim "Designed for Independent Retailers")

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10, dated June 14, 2010, for the product "Acetamiprid RTU Insecticide," EPA Registration Number 8033-21.

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 information submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please contact me directly at 703-308-8735 or email me at chao.julie@epa.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Julie A. Chao".

Julie A. Chao
Insecticide-Rodenticide Branch
Registration Division (7505P)
Office of Pesticide Programs

2012

 EPA United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other:	OPP Identifier Number
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Application for Pesticide - Section I

1. Company/Product Number <p style="text-align: center;">8033-21</p>	2. EPA Product Manager V. Eagle / J. Chao	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Acetamiprid RTU Insecticide	PM# <p style="text-align: center;">Team 1</p>	
5. Name and Address of Applicant (Include ZIP Code) Nippon Soda Co., Ltd. c/o Nisso America Inc. 45 Broadway, Suite 2120 New York, NY 10006 <input type="checkbox"/> Check if this is a new address		6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: <div style="text-align: right; font-weight: bold; font-size: 1.2em;"> NOTIFICATION JUL - 2 2010 </div> EPA Reg. No. _____ Product Name _____

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)
NOTIFICATION of minor text change in marketing statements.
NO FEE REQUIRED.
 This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR § 152.46 and no other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR §152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per container Included but not limited to 12 oz. 2 per barrier bag	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container Including but not limited to 32 oz.	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Other <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name John J. Wrubel	Title Regulatory Affairs Director	Telephone No. (include Area Code) 212-490-0351
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Data Application Received (Stamped)
2. Signature 	3. Title Regulatory Affairs Director	
4. Typed Name John J. Wrubel	5. Date	

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NISSO AMERICA INC.
45 Broadway, Suite 2120
New York, NY 10006

Phone: (212) 490-0350

Fax: (212) 972-9361

June 14, 2010

NOTIFICATION
JUL - 2 2010

Document Processing Desk [NOTIF]
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Rm S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Re: NOTIFICATION of Minor Text Change on the Acetamiprid RTU Insecticide Label
(EPA Reg. No. 8033-21) as per PR Notice 98-10.

Dear Sir/Madam:

Nippon Soda Co., Ltd. is hereby notifying US EPA of a minor revision to the text regarding a marketing claim on the Acetamiprid RTU Insecticide label (EPA Reg. No. 8033-21) as per PR Notice 98-10. We are including the phrase "Designed for Independent Retailers."

No other changes to the label are made.

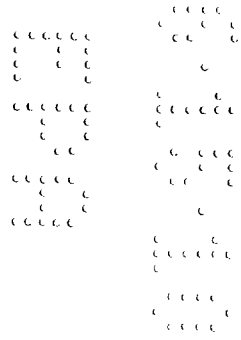
There are no fees associated with this action.

Nippon Soda Co., Ltd. in care of Nisso America Inc. (Nisso) is submitting a copy of the revised label. The change is highlighted for ease in review. Nisso certifies that no other changes to the label have been made. We are also enclosing a completed notification form (EPA Form 8570-1) and a "clean" copy of the label for your convenience.

Thank you for processing this notification and should you have any questions please contact me directly at 212-490-0351 or e-mail at j.wrubel@nissoamerica.com.

Sincerely,

John J. Wrubel
Regulatory Affairs Director



encs.

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NOTE:

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[Bracketed information is optional text]. Text separated by / denotes and/or options.

Acetamiprid RTU Insecticide

For Residential Use

ACTIVE INGREDIENT:

Acetamiprid.....0.006%
Other Ingredients..... 99.994%
Total.....100.000%

EPA Reg. No. 8033-21

EPA Est. No. _____

NOTIFICATION

JUL - 2 2010

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See back panel [booklet] for additional precautionary statements.

PRODUCT FACTS	
KILLS INSECTS	Aphids, Caterpillars, Japanese Beetles, Leafhoppers, Leafminers, Mealybugs, Psyllids, Scales, Thrips, Whiteflies and other garden pests/listed insects.
WHERE TO USE	On roses, flowers, shrubs, listed fruits and vegetables, and houseplants.

Questions, Comments, or Medical Information?

[phone icon] X-XXX-XXX-XXXX

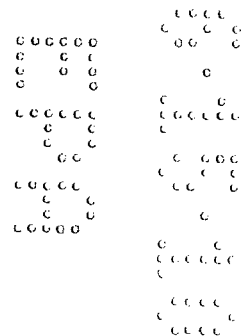
[Text for Booklet Labels]

Open Resealable Label for Directions & Precautions

PRESS TO RESEAL

Optional Instructions for Side Clip Tape

PULL / PEEL HERE [TO REMOVE TAPE]



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----- **SPRAYER APPLICATOR LANGUAGE SECTION** -----

OPTION # 1 APPLICATOR DIRECTIONS FOR NESTED SPRAYERS

QUICK CONNECT SPRAYER [illustrations]

1. Remove sprayer. Pull cord **ALL THE WAY OUT**.
2. Insert red plug into spout (on cap) **until it clicks**.
3. Flip up spout. Open nozzle on end of sprayer.

OPTION # 2 APPLICATOR DIRECTIONS FOR PULL 'N SPRAY

[Wand Sticker]

IMPORTANT! Follow directions and illustrations on back to assemble and use Pull 'N Spray correctly.

[Illustration 1]

- Remove sprayer from side carrier and unwrap hose completely.
- Insert red plug at end of hose into spout on cap **until it clicks**.
- Flip up spout. Spout must remain up while spraying.

[Illustration 2]

- Point sprayer away from body.
- Grasp sprayer by the handle.
- Slowly pull ring at the bottom of sprayer handle until it stops and hold for 2 seconds to ready the sprayer.

[Illustration 3]

- Twist nozzle at end of sprayer to adjust spray pattern.
- Press and hold button on sprayer to begin spraying.
- Pull ring at sprayer bottom again as needed to continue spraying.

OPTION # 3 APPLICATOR DIRECTIONS FOR BATTERY POWERED WAND [insert applicator name]

(Applicator Device Directions)

- **[1. Remove]** Remove [applicator name] Wand from side (holder, clip) (Illustration #1&2)
 - o [Unwrap hose completely]
 - o [Remove protective strip from battery compartment to activate batteries]
- **[2. Connect]** Insert (color of plug) plug at end of hose into (color of spout) spout on cap **until it clicks**. Flip up spout. Spout must remain up while spraying (Illustration #3)
- **[3. Extend]** Flip open [applicator name] wand until it locks into position (Illustration #4)
- **[4. Spray]** Twist nozzle at end of [applicator name] wand to desired spray pattern. [Ensure trigger lock is disengaged before spraying.] Hold (color of trigger) trigger for continuous spray. (Illustration #5)

HOW TO APPLY/USE: [icon]

Follow illustrations and instructions above. Twist nozzle at end of [applicator name] wand to desired spray pattern. Point [applicator name] wand away from body and hold (color of trigger) trigger for continuous spray. Release trigger to stop spray. Direct spray toward the upper and lower leaf surfaces and stems where pests appear. Spray only until plant surface is wet. Do not over-apply or plant damage may occur. To avoid spray drift, hold wand nozzle 2 feet or less from the plant to be treated.

[Optional HOW TO APPLY/USE WHEN USING MARKER]

Follow illustrations and instructions above. Twist nozzle at end of sprayer to desired spray pattern. [Turn sprayer nozzle to desired position – FOAM or STREAM. FOAM marks treated areas allowing you to easily see where you've sprayed. STREAM provides a coarse spray that does not foam.] [Both settings provide the same insect control results.] Point sprayer away from body and hold (color of trigger) trigger for continuous spray. Release trigger to stop spray. [end optional language]

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[After Use: twist nozzle to OFF position. [Engage trigger lock.] Flip the [applicator name] wand closed and store on the side [carrier] [holder] [clip].

Important Use Information: Do not submerge in water. When storing sprayer for long periods, remove batteries.

To replace batteries: Open battery compartment at bottom of [applicator name] wand. Remove used batteries and replace with four new AA batteries in correct position as marked per diagram inside battery compartment. Securely close battery compartment door. Always use a complete set of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.

OPTION #4 APPLICATOR DIRECTIONS FOR EASY SHOT SYSTEM

[APPLICATOR DEVICE DIRECTIONS]

[Insert:] Attach refill bottle by removing cap and twisting into [applicator name]. Do not over-tighten. [Illustration #1]

[Spray:] Twist nozzle at end of wand to desired spray pattern. Hold [color of trigger] trigger for continuous spray. [Illustration #2]

For hard to reach areas

[Extend:] Extend wand by sliding wand forward until it locks into place [Illustration #3]

[Remove:] Remove wand and aim at target while holding the [applicator name] facing toward the ground. [Illustration #4]

[OPTIONAL DIRECTIONS]:

[Clean:] Remove cartridge and clean applicator after each use. [Always clean applicator before switching from one [Insert Subregistration Brand Name] product to another.] See [applicator name] applicator for cleaning directions.

- Remove refill cartridge from [applicator name]
- Remove cap from cleaning cartridge and fill with tap water
- Replace cap and insert cleaning cartridge by twisting into [applicator name]
- Spray in an area that is designated by this product label until cleaning cartridge is empty.]

HOW TO APPLY/USE: *[icon]*

Follow illustrations and instructions above. Twist nozzle at end of sprayer to desired spray pattern. Point sprayer away from body and hold [color of trigger] trigger for continuous spray.

[After Use:] Twist nozzle to CLOSED position.

Important Use Information: Do not submerge in water. When storing sprayer for long periods, remove batteries.

To replace batteries: Open battery compartment on side of [applicator name]. Remove used batteries and replace with four new AA batteries in correct position as marked per diagram inside battery compartment. Securely close battery compartment door. Always use a complete set of the same type when replacing batteries. Never mix alkaline, carbon-zinc or rechargeable batteries.

[OPTIONAL TROUBLESHOOTING SECTION FOR BATTERY POWERED WAND OR EASY SHOT SPRAYER]

Troubleshooting Tips:

Problem: Sprayer does not spray (function).
Possible Cause: Batteries not installed properly.

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Solution: See instructions for correct battery placement.

Problem: Sprayer makes a straining noise (Sprayer runs but nothing (no product) comes out).
Possible Cause: Nozzle is turned Off.
Solution: Turn nozzle to (desired) spray setting (position).
Possible Cause: Red (color) plug at end of hose is not flipped up.
Solution: Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks and flip up spout.
Possible Cause: Sprayer is not primed.
Solution: Press and hold button on sprayer for about X (10, 15, 20, 30) seconds to prime the sprayer.

Problem: Spray pattern is weak (or uneven) (product flow is uneven or dribbles out of nozzle).
Possible Cause: Weak batteries.
Solution: Install a fresh set of batteries.
Possible Cause: Red (color of plug) plug at end of hose is not flipped up.
Solution: Insert (color of plug) plug at end of hose into (color of spout) spout on cap until it clicks. (Attach coupler to the cap) and flip up spout. Possible Cause: Nozzle not fully open.
Solution: Turn nozzle to (desired) spray setting (position).

DIRECTIONS FOR USE	
It is a violation of Federal Law to use this product in any manner inconsistent with its labeling.	
Shake container gently before using.	
HOW TO APPLY	<ul style="list-style-type: none"> ▪ Adjust spray nozzle to give a fine spray. ▪ Hold sprayer 8 to 12 inches from the plant to be treated. ▪ Direct spray toward the upper and lower leaf surfaces and stems where pests appear. ▪ Spray only until plant surface is wet.
WHEN TO APPLY	Apply to indoor and outdoor plants as soon as insect problems are noticed.

RESTRICTIONS
<ul style="list-style-type: none"> ▪ For indoor and outdoor residential use only. ▪ Do not apply this product in a way that the spray will contact persons, either directly or through drift. ▪ Keep children and pets out of treated areas until sprays have thoroughly dried. ▪ Do not apply if wind speed exceeds 10 mph. ▪ Always stand "up wind" when applying this product.

[GARDEN/LANDSCAPE/INDOOR] INSECTS CONTROLLED
Aphids (including Green Peach, Woolly, Melon, and Cotton), Army Worms (including Fall Army Worm, and Southern Army Worm), Banded Grape Bug, Beetles (including Bean Leaf Beetle, Colorado Potato Beetle, Flea Beetle, Japanese Beetle, Mexican Bean Beetle and Oriental Beetle), Cucumber Beetle (including Spotted, Striped and Western Striped), Bollworm, Borers (including Dogwood Borer, European Corn Borer, Peach Twig Borer and Squash Vine Borer), Budworm (including Tobacco Bud Worm), Caterpillars (including Red Humped Caterpillar, Tomato Fruitworm, and Cabbage Looper), Rose Chafer, Plum Curculio, European Chafer, European Pine Sawfly, Filbertworm, Flea Hopper, Fruit Fly (including Cherry, Black Cherry and Western Cherry), Western Grapeleaf Skeletonizer, Hickory Shuckworm, Hornworms, Katydid, Phylloxera (aerial form only), Leafhoppers (including Glassy Wing Sharpshooter and Potato Leaf Hopper), Leaf Miners (including Chrysanthemum, Citrus, and Tentiform), Lesser Apple Worm, Apple Maggot, Mealybugs (including Citrus, Grape, Obscure, Longtail, Pink Hybiscus, and Maderia), Melonworm, Moths (including Codling, Diamondback Moth, Gypsy Moths and Oriental Fruit

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Moth), Navel Orangeworm, Pecan Nut Casebearer, Pickleworm, Plantbugs (including Tarnished, and Mullein Plant Bug), Psyllids, European Apple Sawfly, Scale (including Asian Cycad Scale, Caribbean Black Scale, California Red Scale, Citricola Scale, Cottony Maple Scale, Euonymus Scale, Fletcher Scale, Florida Wax Scale, Green Shield Scale, Indian Wax Scale, Oyster Shell Scale, Pine Needle Scale, Red Scale, San Jose Scale and Tea Scale), Squash Bug, Stinkbug, Swede Midge, Thrips (including Citrus, Cotton, Palm, and Western Flower), Weevils (including Pecan Weevil, Pepper Weevil and Strawberry Weevil), Whiteflies (including Greenhouse, Sweet Potato, Silverleaf, Banded and Giant)

	DAYS TO WAIT TO HARVEST	DAYS TO WAIT TO REAPPLY	MAX APPLICATIONS PER SEASON
Flowers, Ornamental Plants, and Houseplants	N/A	7	5
Vegetables Amaranth, Arrugula, Broccoli, Brussels Sprouts, Cabbage, Cardoon, Cauliflower, Celery, Celtuce, Chervil, Chrysanthemum (edible leaved, garland), Collards, Corn Salad, Cress (garden, upland), Dandelion, Dock, Eggplant, Endive, Florence Fennel, Groundcherry, Kale, Kohlrabi, Lettuce (head, leaf), Mizuna, Mustard Greens, Mustard Spinach, Orach, Parsley, Pepino, Pepper (bell pepper, chili pepper, cooking pepper, pimento, sweet pepper), Purslane (garden, winter), Radicchio, Rape Greens, Rhubarb, Spinach (leaf, vine, New Zealand), Swiss Chard, Tomatillo, Tomato	7	7	4
Citrus Fruits Calamondin, Citrus hybrids (chironja, tangelo, tangor), Grapefruit, Kumquat, Lemon, Lime, Mandarin (tangerine), Orange (sour, sweet), Pummelo, Satsuma mandarin	7	7	5
Pome Fruits Apple, Crabapple, Loquat, Mayhaw, Pear, Quince	7	12	4

STORAGE AND DISPOSAL

Option 1 for Nested Sprayers

STORAGE AND DISPOSAL [Illustration] [Icon]	
Do not contaminate water, food, or feed by storage or disposal.	
PESTICIDE STORAGE	Flip down spout to close. No need to disconnect trigger sprayer. Close nozzle on trigger sprayer. Snap sprayer back in place. Store unused product in a cool, ventilated, dry, locked area. Do not allow prolonged storage in areas where temperatures frequently exceed 115° F (46° C). NEVER TRANSFER THIS PRODUCT TO ANOTHER CONTAINER FOR STORAGE.
PESTICIDE CONTAINER DISPOSAL	If empty: Non-refillable container. 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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Option 2 for the PULL 'N SPRAY

STORAGE AND DISPOSAL [Illustration] [Icon] Do not contaminate water, food, or feed by storage or disposal.	
PESTICIDE STORAGE	Completely discharge/dispense product in sprayer prior to storage. Twist sprayer nozzle to the OFF position. Flip down (color of spout) spout on cap. NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP. Place sprayer back in side carrier on bottle with nozzle facing down. Store unused product in a cool, ventilated, dry, locked area. Do not allow prolonged storage in areas where temperatures frequently exceed 115° F (46° C). NEVER TRANSFER THIS PRODUCT TO ANOTHER CONTAINER FOR STORAGE.
PESTICIDE CONTAINER DISPOSAL	If empty: Non-refillable container. 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.

Option 3 for the Battery Powered Wand [insert applicator name]:

STORAGE AND DISPOSAL [Illustration] [Icon] Do not contaminate water, food, or feed by storage or disposal.	
PESTICIDE STORAGE	Flip down (color of spout) spout on cap. NO NEED TO DISCONNECT SPRAYER HOSE FROM CAP. Completely discharge/dispense product in sprayer prior to storage. Twist sprayer nozzle to the OFF position. [Engage trigger lock.] Flip [the applicator] name wand closed and place sprayer back in side carrier [clip] [holder]. Store unused product in a cool, ventilated, dry, locked area. Do not allow prolonged storage in areas where temperatures frequently exceed 115° F (46° C). NEVER TRANSFER THIS PRODUCT TO ANOTHER CONTAINER FOR STORAGE.
PESTICIDE CONTAINER DISPOSAL	If empty: Non-refillable container. 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.

Option 4 for the [Easy-Shot System] [and Trigger Spray]:

STORAGE AND DISPOSAL [Illustration] [Icon] Do not contaminate water, food, or feed by storage or disposal.	
PESTICIDE STORAGE	[Replace cap.] Store unused product in a cool, ventilated, dry, locked area. Do not allow prolonged storage in areas where temperatures frequently exceed 115° F (46° C). NEVER TRANSFER THIS PRODUCT TO ANOTHER CONTAINER FOR STORAGE.
PESTICIDE CONTAINER DISPOSAL	If empty: Non-refillable container. 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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PRECAUTIONARY STATEMENTS

CAUTION
HAZARDS TO HUMANS (& DOMESTIC ANIMALS)
Harmful if inhaled or absorbed through the skin. Avoid breathing vapors or spray mist. Avoid contact with eyes, skin or clothing. Keep out of reach of children and domestic animals. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS:
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 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 treatment area. This pesticide is toxic to wildlife. This product is toxic to bees exposed to direct treatment. Do not apply this product while bees are visiting the treated area.

FIRST AID

IF SWALLOWED:	<ul style="list-style-type: none"> ▪ Immediately call a poison control center or doctor for treatment advice. ▪ Do not induce vomiting unless told to do so by a poison control center or doctor. ▪ Have person sip a glass of water if able to swallow. ▪ Do not give anything by mouth to an unconscious person.
IF IN EYES:	<ul style="list-style-type: none"> ▪ 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. ▪ Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING:	<ul style="list-style-type: none"> ▪ 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.
IF INHALED:	<ul style="list-style-type: none"> ▪ Move person to fresh air. ▪ If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. ▪ Call a poison control center or doctor for further treatment advice.

For MEDICAL emergencies, Call 24 Hours a Day 1-800-424-9300
Have the product container or label with you when calling a poison control center or doctor or going for treatment.

NOTE TO PHYSICIAN: There is no specific antidote. All treatments should be based on observed signs and symptoms of distress in the patient. Overexposure to other materials other than this product may have occurred.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Users of this product must wear long-sleeved shirt, long pants, shoes and socks.

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. As soon as possible, wash thoroughly and change into clean clothing.

Net Contents: _____

Lot No.: _____

Nippon Soda Co., Ltd.
c/o Nisso America Inc.
45 Broadway, Suite 2120
New York, NY 10006

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Additional Optional Marketing Claims

Efficacy

- Kills a wide range of insect/bugs/pests
- Kills [up to] [1, 2, 3... 111] [Garden/Landscape] bugs/insects
- Kills 111 [garden/landscape] bugs/insects
- Kills 100+ insect/bugs [Fast/by/through Contact]
- Kills over 100 Insects/Bugs [by/through Contact]
- Kills existing pests and prevents new attack
- Systemic Insect killer
- Dual Action: by/through Contact + Systemic Insect Killer
- Dual Action Insect Killer
- Dual Action Insect Protection/Defense/Control/Prevention for Roses & Flowers
- Dual Action Insect Control for Roses & Flowers
- 2 in 1
- Kills/Controls Insects
- Protects/Defends the entire plant from sucking insects
- Kills by/through contact/quickly/fast
- Protects/Defends/Prevents/Controls/Guards/Safeguards against new bug/insect attacks/invasions
- Kills and protects/controls/prevents/defends
- Kills insects/bugs by/through contact and systemically
- Systemic – works from inside the plant to kill tough bugs/pests/insects
- Protect/Defend/Guard/Safeguard your landscape/garden/roses/fruits/vegetables from invading insects
- Kills & Prevents [up to] [1, 2, 3... 111] [landscape/garden/ornamental] insects
- Protect/Defend/Guard your landscape [& Garden] from Invading Insects
- Won't Harm Plants or Blooms
- Guaranteed Results or your money back

Speed

- Rapid action and up to 3/4 week protection/control/defense
- Fast acting [formula]
- Fast acting plus up to 3/4 week [protection/control]

Residual

- Protects/Defends/Prevents/Controls Insects for up to three/four weeks
- Controls for up to three/four weeks
- Kills existing pests and prevents new attacks for up to 3/4 weeks/keeps killing for up to 3/4 weeks
- Up to 3/4 week protection/control/defense [protection/control/defense] [for your landscape/garden/roses/fruits/vegetables/flowers]
- Up to 3/4 week protection/control/defense control [for your landscape/garden/roses/fruits/vegetables/flowers]
- Up to 3/4 week Protection/Control/Defense for your Roses & Flowers
- Up to 3/4 week Control for your Roses & Flowers
- Up to 3/4 week Protection/Control/Defense Against Damaging Insects
- Up to 3/4 week Control Against Damaging Insects

Usage

- Can be used on /Developed/Formulated/Designed for flowers, roses and ornamental plants
- Can be used on /Developed/Formulated/Designed for home/residential use
- Can be used on /Developed/Formulated/Designed for [use in/on/around] gardens and landscapes
- Can be used on /Developed/Formulated/Designed for [use on] Edibles
- Can be used on /Developed/Formulated/Designed for [use in/on/around] landscaped areas
- Can be used on /Developed/Formulated/Designed for [use on] Roses [& Flowers]
- Designed for Independent Retailers

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Applicator Claims:

- Pull 'N Spray® - The Easy Way To Spray!
- Pull 'N Spray®, 1 Pull provides up to 20 Seconds of Continuous Spray.
- Reduce Hand Fatigue, 1 Pull = up to 20 Seconds of Continuous Spray
- Less Hand Fatigue; Continuous Spray Applicator.
- One Pull = 34 Trigger Sprays

Plants & Vegetables

- Won't harm plants or blooms
- Protects/Defends/Prevents/Controls/Guards [against insect damage on] flowers and edibles [for up to 3/4 weeks]
- Controls [against] insect damage on flowers and edibles [for up to 3/4 weeks]
- Protects/Defends/Prevents/Controls/Guards [against insect damage on] fruit and vegetables [for up to 3/4 weeks]
- Controls [against] insect damage on fruits and vegetables [for up to 3/4 weeks]
- Protects/Defends/Prevents/Controls/Guards [against insect damage on] gardens and landscapes [for up to 3/4 weeks]
- Controls [against] insect damage on gardens and landscapes [for up to 3/4 weeks]

Indoor Houseplants

- Protects/Defends/Prevents/Controls/Guards [against insect damage on] Indoor and/& Outdoor Plants
- Controls [against] insect damage on Indoor and/& Outdoor Plants
- Indoor and/& Outdoor Plant Protection/Control/Defense/Prevention
- For use on both Indoor and Outdoor Plants
- Protects/Defends/Guards Houseplants from Insects/Pests/Bugs
- Controls [and Prevents] Insects/Pests/Bugs on Indoor Houseplants
- Non-staining formula
- Can be used on /Developed/Formulated/Designed for houseplants

WARRANTY: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

Satisfaction guaranteed or your money back. If for any reason you are not satisfied with this product, mail us proof of purchase to obtain full refund of your purchase.

[Insert Subregistrant Company Name] 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.