



062719-00314-052699

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**Systems Integration Group, Inc.**

MAY 26 1999

Mr. Robert F. Bischoff  
Regulatory Manager  
Regulatory Success-Americas  
Dow AgroSciences LLC  
9330 Zionsville Road  
Indianapolis, IN 46268

Subject: Dow NAF-371 (A.I. SPINOSAD)  
EPA Registration No. 62719-314  
Final Label Dated January 29, 1999

Dear: Mr. Bischoff

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable subject to the comments listed below. A stamped copy of the label is enclosed for your records.

1. Delete the phrase: "Active ingredient derived from a naturally occurring organism" from the bottom of page 1.
2. Delete the sentence: "The active ingredient, spinosad, is derived from a naturally occurring organism" from the paragraph found on page 4 beginning with "NAF-371 [Naturalyte\* insect control/...and other listed ingredients".

If you have any questions, please call Dr. William Sproat of my team at 703-308-8587.

Sincerely,

George T. LaRocca  
Product Manager 13  
Insecticide Branch  
Registration Division (7505C)

| Enclosure |         | CONCURRENCES |  |  |  |  |  |
|-----------|---------|--------------|--|--|--|--|--|
| SYMBOL    | 7585C   |              |  |  |  |  |  |
| SURNAME   | Sproat  |              |  |  |  |  |  |
| DATE      | 5/26/99 |              |  |  |  |  |  |

# NAF-371

## FOR HOME GARDEN USE ONLY

For control of foliage feeding worms (caterpillars) and other listed pests in: fruiting vegetables, such as tomato, pepper and eggplant; cole crops (brassica), such as broccoli, cabbage and cauliflower; leafy vegetables, such as lettuce, spinach and celery; apple, and citrus trees.

See "Crop Treatment Recommendations" table in Directions for Use for a complete listing of crops.

[Editor's note : Graphic devices illustrating plants which may be treated and/or pests which attack crops and/or predatory beneficials and/or natural enemies which may be used in conjunction with the below listed statements.]

[Editor's note : Additional Statements for Use as Sale Copy]

and/or

Liquid concentrate

and/or

Easy to use

and/or

User friendly

and/or

No guesswork

and/or

CONCENTRATE

and/or

Makes up to \_\_ gallons of spray [Editor's note : dilution rate is 1.65 fl oz/gal]

and/or

For vegetables, apples, and citrus trees

and/or

Controls worms (caterpillars)

and/or

Kills worms (caterpillars)

and/or

Controls Colorado potato beetle

and/or

Kills Colorado potato beetle

and/or

Controls certain insects in vegetable gardens

and/or

Controls certain insects in the garden

and/or

Stops certain insects in vegetable gardens

and/or

For vegetables

and/or

No odor water-based formula

and/or

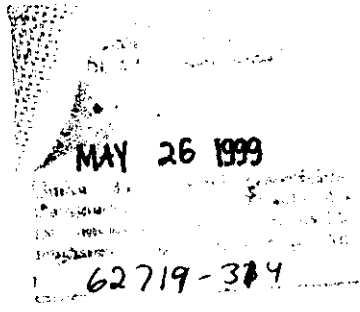
Water-based formula

and/or

Active ingredient derived from a naturally occurring organism

and/or

Contains spinosad



and/or

New active ingredient [Editor's note: this claim may appear on the label for 6 months after the date of registration]

and/or

New mode of action [Editor's note: this claim may appear on the label for 6 months after the date of registration]

and/or

Do-it-yourself home garden insect control

and/or

No unpleasant odor

and/or

Leaves no oily residue or unpleasant odor

and/or

Leaves no unpleasant odor

and/or

Kills certain home garden insect pests

and/or

Short post-harvest interval

and/or

Spray vegetables today and pick tomorrow - pick apples 7 days after spraying

and/or

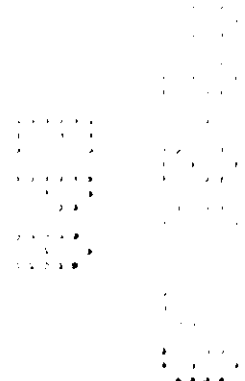
Contains [trademark] Naturalyte\* insect control†

and/or

A [trademark] Naturalyte\* insect control product

\*Trademark of Dow AgroSciences

†[Editor's note : The trademark "Naturalyte" cannot be used in product labels which contain use patterns for professional turf or ornamental markets.]



Active Ingredient:

|  |        |
|--|--------|
| spinosad (a mixture of spinosyn A<br>and spinosyn D) ..... | 0.5%   |
| Inert Ingredients.....                                     | 99.5%  |
| Total Ingredients.....                                     | 100.0% |

Contains 0.04 pounds of active ingredient per gallon.

U.S. Patent No. 5,496,931

**Keep Out of Reach of Children**

**CAUTION      PRECAUCION**

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.)

**Refer to back/side panel for Directions for Use including Storage and Disposal.**

**Notice:** Read the entire label. Use only according to label directions. **Before buying or using this product, read "Warranty Disclaimer" and "Limitation of Remedies".**

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994.

**Shake Well Before Use -- Avoid Freezing**

EPA Registration No. 62719-314

EPA Est. \_\_\_\_\_

\*Trademark of Dow AgroSciences LLC  
Dow AgroSciences LLC • Indianapolis, IN 46268 U.S.A.

**Insect Control Product**

Net Contents \_\_\_\_\_

(back/side panel)

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## Precautionary Statements

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### Hazards to Humans and Domestic Animals

## CAUTION

Causes moderate eye irritation.

Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

### First Aid

If in eyes: Flush eyes with plenty of water. Call a physician if irritation persists.

### Environmental Hazards

This product is toxic to aquatic invertebrates. This product is highly toxic to bees exposed to direct spray on blooming crops or other vegetation. Avoid use when bees are actively foraging. Do not apply directly to water. Do not contaminate water by cleaning of equipment or disposal of equipment washwaters.

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## Directions for Use

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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.

For use on apple and citrus trees and vegetables in home gardens. Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

## Storage and Disposal

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

**Storage:** Store in original container only in secure or locked storage area.

**Disposal:** Securely wrap original container in several layers of newspaper and discard in trash.

NAF-371 [Naturalyte\* insect control/insect control product] is intended for control of worms (caterpillars) and other listed insects. The active ingredient, spinosad, is derived from a naturally occurring organism. The active ingredient in NAF-371 works to preserve predatory beneficial insects, predatory mites, and spiders while controlling target pests. Susceptible insect pests may be observed on plants up to several hours after treatment, but will have ceased active feeding before being killed.

## How To Apply

NAF-371 may be applied with trigger sprayer, hand-held, backpack, or hose-end sprayers. Use a hose-end sprayer which can be adjusted to provide a dilution ratio of about 1.65 fl oz (3 1/3 Tbs) of product per gallon of spray.

## Mixing

### Shake Well Before Use

Add the required amount of NAF-371 to the recommended amount of water, mix thoroughly, and apply uniformly to plant foliage to point of runoff. It is recommended to mix only as much spray as needed for a single treatment. In vegetable gardens it is recommended to use not more than 3.0 gal of spray for 1,000 sq ft of area.

| Unit of Measure <sup>†</sup> | Amount of NAF-371 To Use     |                               |                                 |
|------------------------------|------------------------------|-------------------------------|---------------------------------|
|                              | Per Pint (16 fl oz) of Spray | Per Quart (32 fl oz) of Spray | Per Gallon (128 fl oz) of Spray |
| Fluid Ounces (fl oz)         | 0.2 fl oz                    | 0.4 fl oz                     | 1.65 fl oz                      |
| Milliliters (ml)             | 6 ml                         | 12 ml                         | 50 ml                           |
| Tablespoons (Tbs)            | 1/2 Tbs                      | 3/4 Tbs                       | 3 1/3 Tbs                       |
| Teaspoons (tsp)              | 1 1/4 tsp                    | 2 1/2 tsp                     | 10 tsp                          |

<sup>†</sup>Conversion factors: 1 fl oz = 30 ml = 2 tablespoons (Tbs) = 6 teaspoons (tsp) (1 teaspoon = 1/3 tablespoon)

### When to Apply

Apply when listed pests are present. Repeat applications may be made as indicated in the "Crop Treatment Recommendations" table.

### Crop Treatment Recommendations Table

| Crops  | Pests Controlled   | Minimum Days To Wait Before Reapplying | Maximum Number of Applications Per Season | Minimum Days To Wait From Last Application to Harvest |
|--|--|--|---|---|
| Apple trees  | leafminers<br>leafrollers  | 28                                     | 6   | 7   |
| Citrus trees, including, but not limited to: oranges, grapefruit, lemons, limes, and tangerines.   | worms (caterpillars)<br>katydids<br>thrips                             | 6                                      | 6   | 1   |
| <b>Cole Crops (Brassica Vegetables)</b> , including: broccoli, Chinese broccoli, broccoli raab, brussels sprouts, cabbage, Chinese cabbage (bok choy), Chinese cabbage (napa), cauliflower, cavalo, collards, kale, kohlrabi, mizuna, mustard greens, mustard spinach, Chinese mustard cabbage (gai choy) and rape greens. | worms (caterpillars)<br>leafminers                                     | 4                                      | 6   | 1   |
| <b>Fruiting Vegetables</b> , including: eggplant, ground cherry, pepino, pepper, tomatillo, and tomato.  | worms (caterpillars)<br>Colorado potato beetle<br>thrips<br>leafminers | 4                                      | 6   | 1   |
| <b>Leafy Vegetables</b> , including, but not limited to: head and leaf lettuce, celery, arugula, chervil, edible chrysanthemum, corn salad, cress, dandelion, dock, endive, fennel, parsley, garden purslane, radicchio, rhubarb, spinach, and Swiss chard.  | worms (caterpillars)<br>leafminers                                     | 4                                      | 6   | 1   |

**Warranty Disclaimer**

Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. SELLER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

**Inherent Risks of Use**

It is impossible to eliminate all risks associated with use of this product. Plant injury, lack of performance, or other unintended consequences may result because of such factors as use of the product contrary to label instructions (including conditions noted on the label, such as unfavorable temperature, soil conditions, etc.), abnormal conditions (such as excessive rainfall, drought, tornadoes, hurricanes), presence of other materials, the manner of application, or other factors, all of which are beyond the control of Seller. All such risks shall be assumed by Buyer.

**Limitation of Remedies**

The exclusive remedy for losses or damages resulting from this product (including claims based on contract, negligence, strict liability, or other legal theories), shall be limited to, at Seller's election, one of the following:

- 1. Refund of purchase price paid by buyer or user for product bought, or
- 2. Replacement of amount of product used.

Seller shall not be liable for losses or damages resulting from handling or use of this product unless Seller is promptly notified of such loss or damage in writing. In no case shall Seller be liable for consequential or incidental damages or losses.

The terms of the "Warranty Disclaimer" above and this "Limitation of Remedies" cannot be varied by any written or verbal statements or agreements. No employee or sales agent of the Seller or the seller is authorized to vary or exceed the terms of the "Warranty Disclaimer" or this "Limitation of Remedies" in any manner.

EPA-accepted: 01-29-99