

67702-5

06/30/2006

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

June 30, 2006

Walter G Talarek
W. Neudorff GmbH Kg
Postfach 1209
1008 Riva Ridge Dr.
Great Falls, VA 22066

SUBJECT: Amendment with extensive revisions to the existing registration for the following product:

Product Name: NEU116 1

EPA Registration Number: 67702-5

Date of Submission: February 8, 2006

Dear Mr. Talarek;

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below. *Note: Submit 3 copies of the revised labeling incorporating all of the changes identified below prior to releasing the product for shipment.*

1. Page 1 of 15:
 - a. Within the Ingredient Statement, revise "Inert Ingredients" to "Other Ingredients"
 - b. At the bottom of the page change "Registrant:" to "Manufactured by"
 - c. Revise the unit volume for the Home and Garden Use from "Home and Garden Use: NET CONTENTS: 16 oz, 24 oz, 32 oz, 1 gallon" to Net Contents: 16 fl.oz. 24 fl oz., 32 fl. oz., 1 gallon (128 fl.oz.)"
 - d. Revise the unit volumes for the Commercial Agriculture use from "Commercial Agriculture Use: NET CONTENTS: 1 gallon, 5 gallon, 20 gallon, 45 gallon" to "Commercial Agriculture Use: NET CONTENTS: 1 gallon, 5 gallons, 20 gallons, 45 gallons"
2. Page 2 of 15:
 - a. Within the Ingredient statement, revise "Inert Ingredients" to "Other Ingredients"
 - b. Within the First Aid statement, revise the "IF ON SKIN" to "IF ON SKIN OR CLOTHING"
 - c. Revise the unit volume for the Home and Garden Use from "Home and Garden Use: NET CONTENTS: 16 oz, 24 oz, 32 oz, 1 gallon" to Net Contents: 16 fl.oz. 24 fl oz., 32 fl. oz., 1 gallon (128 fl.oz.)"
 - d. You may delete the statement "Remove pets and cover fish aquariums before using." From the Hazards to Humans and Domestic Animals section, as it only pertains to products used in domestic indoor uses.
3. Page 3 of 15:
 - a. Revise the paragraph by removing the words "pests and" from the applicable sentence, as this is not usable information. "Please read entire label. Use only as

- a. Revise the paragraph by removing the words “pests and” from the applicable sentence, as this is not usable information. “Please read entire label. Use only as directed. Shake well before each use. Thoroughly wet all parts of the ~~pests and~~ plants. Repeat treatment in 1 - 2 weeks if necessary. May be used on edible crops up to and including day of harvest.”
- b. Revise the paragraph on page 3 as follows¹: “For a 1% solution mix 2 teaspoons of concentrate with 1 quart (32 fl. oz.) water, (or 1 fl. oz. concentrate with 3 quarts (96 fl. oz. ~~(water)~~). For a 2% solution mix 4 teaspoons of concentrate with 1 quart (32 fl. oz. water, (or 2 fluid oz. concentrate with 3 quarts (96 fl. oz. water). Shake well before each use and stir or shake diluted spray frequently during use.”
- c. Remove the following non-descript text. “This XXX ounce bottle will cover up to XXX square feet.” You must present this information in fl.oz. per units square feet exactly, but this information may not be left blank.
- d. The storage and disposal instructions must appear grouped together, preferably blocked, **within** the Directions for Use section 40 CFR 156.10 (i)(2)(ix). It is preferred that the storage and disposal instructions appear at the end of the Direction for Use section. This placement eliminates the break between the heading "Directions for Use" and the body of the use directions. Where the Directions for Use are contained in a label booklet, at a minimum, the container storage and disposal instructions should appear at the end of the Directions for Use on the container label.

4. Page 6 of 15:

- a. Revise the paragraph containing the listed pests. The available data for this product does not support “Control” as a claim, and does not support various species of ants that have been excluded in the revised text:

“NEU1 161 will ~~control~~ *kill* insect pests such as: aphids, beetles (~~e.g.~~, Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle), caterpillars (~~e.g.~~, gypsy moth caterpillars, tent caterpillar, diamondback moth larvae, leafrollers), ants (*except Fire Ant, Harvester Ants, Carpenter Ants, and Pharaoh Ants*), mealybugs, mites, lealhoppers, scale *insects*, whitefly, adelgids, plant bugs, fungus gnats, thrips, sawfly larvae, psyllids, spittlebugs, and phylloxera. Apply at a rate of 1% or 2% solution. For soft-bodied pests such as aphids and mites, a 1% solution is sufficient. Using hand-held trigger sprayers, hand sprayers or backpack sprayers, thoroughly spray insect pests with diluted product until plants are wet. Repeat treatment in 1-2 weeks if needed.”

- b. Revise the paragraph as follows: “For use ~~indoors~~, outdoors and in greenhouses on fruit and nut trees (~~e.g.~~, apples, cherries, peaches, pears, nuts); flowering, foliage and bedding plants; corn; soybeans; melons; tomatoes; vegetables (~~e.g.~~, beans, cabbage, cucurbits, peas, potatoes); figs; small fruits (~~e.g.~~, grapes, strawberry, raspberry); citrus; ornamental and shade trees (~~e.g.~~, birch, evergreens, holly, oak); *and* houseplants.”

Note: this product has not been reviewed for indoor residential use. In addition such statements as e.g. are open ended use site descriptions, and cannot be used.

5. Page 7 of 15:

¹ Note: Strikeouts are text to be deleted, italics text references text to be inserted.
Page 2 of 6
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- a. Revise the following paragraph, by removing and/or replacing text as follows:
~~Controls~~ Kills egg stages of pests present in dormant season and scale insects, mites and mealybugs on dormant shrubs (e.g., roses), evergreens, woody plants, fruit trees and shade trees. For dormant use apply a 2% solution. Thoroughly wet the dormant plants or trees.
- b. Revise the sub header "Use Precautions" to Use Restrictions" and revise the entire section as follows:

"USE RESTRICTIONS:

Do not apply within 21 days of a sulfur application.

Do not use NEU1 161 spray when temperatures are above 90°F.

Phytotoxicity:

Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Use a 1% solution on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar and Smoke Tree. Use ~~caution~~ **care** on blooms and buds. ~~If concerned about sensitivity of plants, t~~ **Test** spray a portion of the plant and wait several days to determine if burn occurs before spraying larger areas. Some plants are sensitive to this product. If in doubt, test-spray a small portion of the plant and wait several days to determine if burn occurs before spraying larger areas."

- c. Revise the following marketing claim as follows:
 "Dormant and growing season insect spray ~~for control of~~ **to kill** adelgids, aphids, armored scale, beetle larvae, cankerworms, caterpillars, fungus gnats, lace bugs, leafhoppers, leafminers, leafrollers, mealybugs, mites, plant bugs, psyllids, scale insects, spider mites, thrips, webworms and whiteflies.
- d. Delete the following marketing claim:
 "Provides broad spectrum control."
- e. Revise "Kills all stages of insects, including eggs." to "Kills ~~all stages of~~ listed insects, ~~including eggs.~~"²

6. Page 8 of 15:

- a. Delete the following marketing claim: "Based on plant oils."³
- b. Delete the following marketing claim, as it is false and misleading safety claim: "Does not persist for long periods in the environment."
- c. Delete the following marketing claim: "Insecticide from plants for plants." See footnote #3 below.
- d. Revise the marketing claim as follows: NEU1 161 is a contact killer for ~~both~~ **listed** insect and mite pests.
- e. Remove the following statements: "Satisfaction guaranteed", "Unconditionally guaranteed", "Money back guarantee" Remove the bracket after the marketing claim "Can be used in vegetable gardens}"

7. Page 9 of 15:

- a. Within the Ingredient Statement, revise "Inert Ingredients" to "Other Ingredients"
- b. Within the First Aid statement, revise the "IF ON SKIN" to "IF ON SKIN OR CLOTHING"
- c. Revise the unit volumes for the Commercial Agriculture use from "Commercial Agriculture Use: NET CONTENTS: 1 gallon, 5 gallon, 20 gallon, 45 gallon" to

² **Note:** Ants are nest dwelling insects, and as such, the directions for use do not address the treatment of nests to kill eggs or pupal stages.

³ Pyrethrins are not considered a plant oil. In addition, the product CSF does not support this claim.

“Commercial Agriculture Use: NET CONTENTS: 1 gallon, 5 gallons, 20 gallons, 45 gallons”

- d. Within the Hazards to Humans and Domestic Animals section of the label, revise the following statement: “Wash thoroughly with soap and water after handling.” To “Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.”
- e. You may delete the statement “Remove pets and cover fish aquariums before using.” From the Hazards to Humans and Domestic Animals section, as it only pertains to products used in domestic indoor uses.

8. Page 10 of 15:

- a. Revise the paragraph by removing the words “pests and” from the applicable sentence, as this is not usable information. **“Please read entire label.** Use only as directed. Shake (*to mix*) well before each use. Thoroughly wet all parts of the ~~pests and~~ plants. Repeat treatment in 1 - 2 weeks if necessary. May be used on edible crops up to and including day of harvest.”
- b. The storage and disposal instructions must appear grouped together, preferably blocked, **within** the Directions for Use section 40 CFR 156.10 (i)(2)(ix). It is preferred that the storage and disposal instructions appear at the end of the Direction for Use section. This placement eliminates the break between the heading "Directions for Use" and the body of the use directions. Where the Directions for Use are contained in a label booklet, at a minimum, the container storage and disposal instructions should appear at the end of the Directions for Use on the container label.
- c. Directly above the following text insert a subheader as follows:

“USE RESTRICTIONS

Do not apply this product in a manner that will contact workers or other persons, either directly or through drift. Only protected workers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency representative responsible for pesticide regulation.”

9. Page 12 of 15:

- a. Within the table for the following crops, remove the “(but not limited to)” statements: “Soybeans, melons, tomatoes, vegetables such as ~~(but not limited to)~~; asparagus, beans, beets, broccoli, Brussels sprouts, cabbage, cauliflower, celery, collards, cucurbits, eggplant, kale, lettuce, lima beans, mustard greens, peas, potatoes, peppers, radishes, spinach, squash, turnips.” , “Small fruits such as ~~(but not limited to)~~; grapes, strawberry, blueberry, raspberry, cranberry, blackberry.” and “Herbs and spices such as ~~(but not limited to)~~; anise (aniseed), basil, caraway, chicory, chives, coriander, cumin, dill, fennel (Italian and sweet), marjoram, sweet oregano, mint, nasturtium, paprika, parsley, rosemary, sage, savory, tarragon and thyme.”
- b. Within the table for the following crops, remove the “(Such as)” statement: “Nut crops ~~such as~~: almonds, filberts, macadamias, pecans, pistachios, walnuts”

10. Page 13 and 14 of 15:

- a. Within the table for the following crops, remove the “(Such as)” statement: “Ornamental and shade trees, ~~such as~~ (flower and foliage plants, birch, flowering cherry, dogwood, evergreens, hawthorn, holly, magnolia, maple, oak, flowering peach, privet, pyracantha, sycamores)”
- b. Revise the following statement to change the “control” claim to “kill”: ~~“Controls~~ Kills egg stages of pests present in dormant season and scale insects, mites and

mealybugs on dormant shrubs, evergreens, woody plants, fruit trees and shade trees.”

- c. Revise the section for “FOR TOMATOES AND FRUITS AFTER HARVEST USE” as follows:

“FOR UNPROCESSED TOMATOES AND FRUITS AFTER HARVEST USE

NEU1161 may be used to ~~control~~ kill vinegar flies and fruit flies. Apply at a rate of 2% solution (2 gallons per 100 gallons). Mix thoroughly. Thoroughly spray to harvested tomatoes and fruits. ~~They may be sprayed~~ *Tomatoes and fruits may be treated* in piles, in baskets, on trucks or in processing plants (*when not in operation*). Use a 2% solution and apply at a rate of ½ pint (8 fl. oz.) per bushel. The empty containers may be dipped into 2% solutions of NEU1161 to kill any larvae and pupae remaining.”

- d. Revise the sub header “Use Precautions” to Use Restrictions” and revise the entire section as follows:

“USE RESTRICTIONS:

Do not apply within 21 days of a sulfur application.

Do not use NEU1161 spray when temperatures are above 90°F.

Phytotoxicity:

Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Use a 1% solution on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar and Smoke Tree. Use caution on blooms and buds. If concerned about sensitivity of plants, test spray a portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

For foliage application the spray tank must be free of any sulfur residue before using this material. Do not combine sulfur sprays with this material on foliage during spring and summer months. Do not apply within 21 days of a sulfur application. If in doubt, spray portion of one tree previously treated with sulfur and wait several days to determine burn occurs.”

When used in combination with or immediately before or after spraying, this product may increase the phytotoxicity of fungicides such as Captan, or copper compounds. If in doubt, treat a small area with a combination spray and wait several days to determine if burn occurs.”

- e. **Note:** the last sentence implies that this product can be tank mixed. If this is the intend, the label must either include all of the language as outlined in PR Notice 82-1, or place a use restriction such as “This product cannot be tank mixed with other pesticides.” in the Use Restriction section of the label.
- f. Revise “IRRIGATION SYSTEM USE” to “CHEMIGATION” and change the verbiage as follows (Refer to PR Notice 87-1):

“CHEMIGATION

Do not apply this product through any other type of irrigation system.”

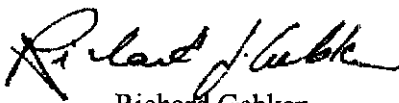
- g. Remove the following marketing claim: “Provides broad spectrum control.”
- h. Revise the marketing claim as follows: “Kills all accessible stages of insects, including eggs.”

- i. Remove the following marketing claim: "Based on plant oils." Refer to Page 3, footnote 3 for an explanation.
- j. Remove the following marketing claim: "Does not persist for long periods in the environment." This claim is a false and misleading safety claim.
- k. Remove the following marketing claim: "Insecticide from plants for plants."
- l. Modify the following marketing claim: "NEU1 161 is a contact killer for ~~both~~ listed insect and mite pests.
- m. Remove the following product guarantees: "Satisfaction guaranteed", "Unconditionally guaranteed", and "Money back guarantee". The "Notice to Buyer" statement limits any type of guarantee or other customer warranties.
- n. The Commercial Agricultural label must include the following:

Manufactured by:
 W. Neudorif GmbH KG
 An der Muhle 3, Postfach 1209
 D-3 1860 Emmerthal, Germany

If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely,



Richard Gebken
 Product Manager 10
 Insecticide Branch
 Registration Division (7505C)

Enclosure

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MASTER LABEL

NEU1161

Active Ingredients	By Wt.
Pyrethrins	0.5%
Canola Oil	89.5%
Inert Ingredients	10.0%
Total	100.0%

NEU1161
 JUN 30 2006
 Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 67702-5

This product contains 6.875 lbs. of canola oil and 0.038 lbs. of pyrethrins per gallon.

SUBLABEL A: Home and Garden Use
SUBLABEL B: Commercial Agriculture Use

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Reg. No. 67702-5
Patent #5,700,473

EPA Establishment # 67702-WG-1

Registrant: W. Neudorff GmbH KG
An der Muhle 3, Postfach 1209
D-31860 Emmerthal, Germany

Home and Garden Use: NET CONTENTS: 16 oz, 24 oz, 32 oz, 1 gallon

Commercial Agriculture Use: NET CONTENTS: 1 gallon, 5 gallon, 20 gallon, 45 gallon

SUBLABEL A: Home and Garden Use**NEU1161**

Active Ingredients	By Wt.
Pyrethrins	0.5%
Canola Oil	89.5%
Inert Ingredients	10.0%
Total	100.0%

This product contains 6.875 lbs. of canola oil and 0.038 lbs. of pyrethrins per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Reg. No. 67702-5
Patent #5,700,473

EPA Establishment # 67702-WG-1

FIRST AID	
IF ON SKIN	-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 SWALLOWED	-Call a poison control center or doctor immediately for treatment advice. -Have person sip a glass of water if able to swallow. -Do not induce vomiting unless told to by a poison control center or doctor. -Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact the National Pesticide Telecommunications Network hotline at 1-800-858-7378.	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION. Harmful if swallowed or absorbed through the skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove pets and cover fish aquariums before using.

Environmental Hazards: This product is toxic to fish. 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 cleaning equipment or disposing of equipment washwaters.

Home and Garden Use: NET CONTENTS: 16 oz, 24 oz, 32 oz, 1 gallon

STORAGE AND DISPOSAL

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

DISPOSAL:

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or 1-800-CLEAN-UP 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.

Please read entire label. Use only as directed. Shake well before each use. Thoroughly wet all parts of the pests and plants. Repeat treatment in 1 - 2 weeks if necessary. May be used on edible crops up to and including day of harvest.

APPLICATION DIRECTIONS

[The registrant may use one of these application directions, either

DIRECTIONS FOR MIXING

For 1% solution mix 2 teaspoons of concentrate with 1 quart water (or 1 oz. concentrate with 3 quarts water). For 2% solution mix 4 teaspoons of concentrate with 1-quart water (or 2 fluid oz. concentrate with 3 quarts water). Shake well before each use and stir or shake diluted spray frequently during use.

OR

Hose-End Sprayer Directions

Follow the directions for using the Hose-End sprayer. This XXX ounce bottle will cover up to XXX square feet.

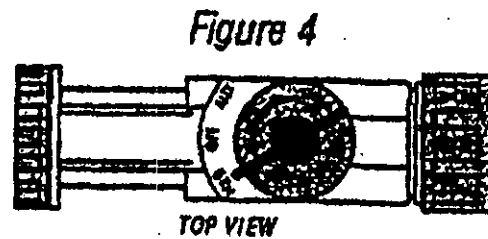
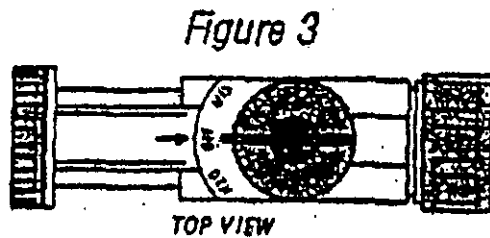
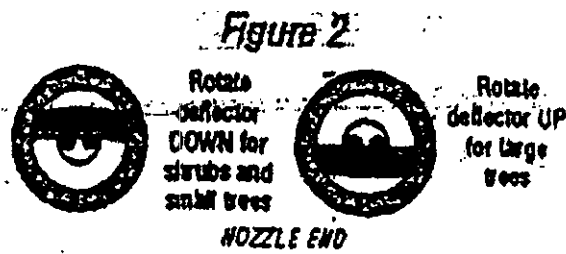
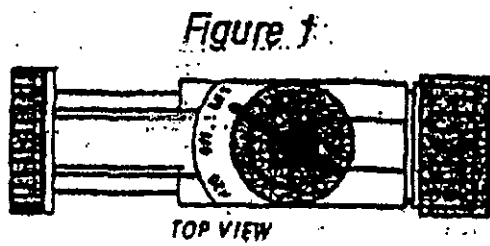
How to use hose-end sprayer:

1. Connect spray nozzle to garden hose.
2. Turn on the water from the faucet.
3. When you are ready to spray, turn the blue knob on top so that it points to the MIX position on the spray head. (Fig. 1)
4. 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 blue knob back to the OFF position. (Fig. 3)
2. Turn off the water from the faucet.
3. Turn the blue knob to H₂O then OFF, to drain the water from the hose. (Fig. 4)
4. Unscrew spray nozzle from hose. Remove hose-end from container.]

[Optional Figure:



OR

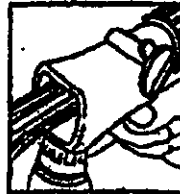
HOSE END SPRAYER INSTRUCTIONS

Shake before using.

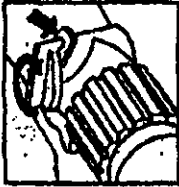
HOW TO USE:



1. Attach garden hose to spray nozzle.
2. Turn on water supply.



4. Point nozzle toward plants and turn water control knob to "On". Product will automatically mix with water. Spray upper and lower leaf surfaces thoroughly.



3. Bend safety tab down and turn control to "water".

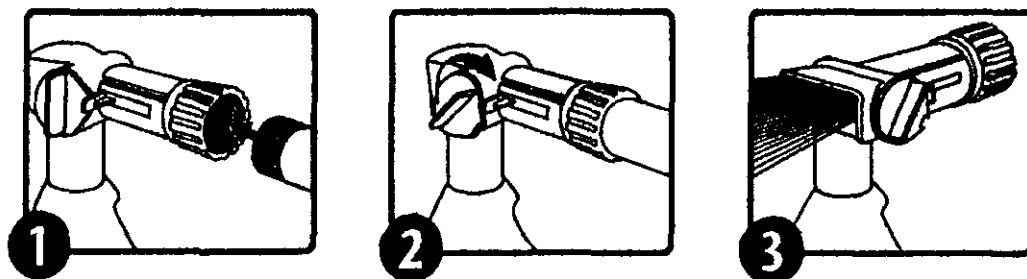


OR:

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 H₂O then OFF, to drain the water from the hose.
4. Unscrew spray nozzle from hose. Remove hose end from container.



]

PESTS/SITES AND APPLICATION INSTRUCTIONS

NEU1161 will control insect pests such as: aphids, beetles (e.g., Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle), caterpillars (e.g., gypsy moth caterpillars, tent caterpillar, diamondback moth larvae, leafrollers), ants, mealybugs, mites, leafhoppers, scale, whitefly, adelgids, plant bugs, fungus gnats, thrips, sawfly larvae, psyllids, spittlebugs, and phylloxera. Apply at a rate of 1% or 2% solution. For soft-bodied pests such as aphids and mites, a 1% solution is sufficient. Using hand-held trigger sprayers, hand sprayers or backpack sprayers, thoroughly spray insect pests with diluted product until plants are wet. Repeat treatment in 1-2 weeks if needed.

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

DIRECTIONS FOR DORMANT USE

Controls egg stages of pests present in dormant season and scale insects, mites and mealybugs on dormant shrubs (e.g., roses), evergreens, woody plants, fruit trees and shade trees. For dormant use apply a 2% solution. Thoroughly wet the dormant plants or trees.

USE PRECAUTIONS

Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Use a 1% solution on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar and Smoke Tree. Use caution on blooms and buds. If concerned about sensitivity of plants, test spray a portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

Some plants are sensitive to this product. If in doubt, test-spray a small portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

Do not apply within 21 days of a sulfur application.

Do not use NEU1161 spray when temperatures are above 90°F.

The registrant may use one of these optional statements, either:

“NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for purposes stated on this label only when used in accordance with directions under normal use conditions. To the fullest extent permitted by law, the seller shall not be liable for damages caused by buyers use of product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to seller. Seller makes no other warranties, either expressed or implied.”

[Marketing claims and product information that may or may not be presented on the container or supplemental labeling:

- Dormant and growing season insect spray for control of adelgids, aphids, armored scale, beetle larvae, cankerworms, caterpillars, fungus gnats, lace bugs, leafhoppers, leafminers, leafrollers, mealybugs, mites, plant bugs, psyllids, scale insects, spider mites, thrips, webworms and whiteflies.
- Provides broad spectrum control.
- Patent #5,700,473
- Kills all stages of insects, including eggs.

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NEU1161 LABEL
8/15

- Based on plant oils.
- Does not persist for long periods in the environment.
- Contact insecticide, ovicide.
- Insecticide from plants for plants.
- Easy to use
- Insecticide/miticide
- NEU1161 is a contact killer for both insect and mite pests.
- For best results, pests must be contacted directly with spray.
- Pyrol™ is a trademark of W. Neudorff GmbH KG
- Made with Pyrol™ Insecticide, a trademark of W. Neudorff GmbH KG
- Contains Pyrol™ Insecticide, a trademark of W. Neudorff GmbH KG
- www.neudorff.de



- This product contains 0.859 lbs. of canola oil and 0.005 lbs. of pyrethrins per pint.
- This product contains 1.718 lbs. of canola oil and 0.01 lbs. of pyrethrins per quart.
- May be used up to day of harvest
- May be used on edible crops up to and including day of harvest
- Can be used right up until day of harvest.
- Read Entire Container Label Before Using This Product
- Satisfaction guaranteed
- Unconditionally guaranteed
- Money back guarantee
- Multi-Purpose
- Roses and flowers
- Houseplants and gardens
- Fruits and vegetables
- Can be used in vegetable gardens]

NEU1161 LABEL
9/15

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SUBLABEL B: Commercial Agriculture Use

NEU1161

Active Ingredients	By Wt.
Pyrethrins	0.5%
Canola Oil	89.5%
Inert Ingredients	10.0%
Total	100.0%

This product contains 6.875 lbs. of canola oil and 0.038 lbs. of pyrethrins per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Reg. No. 67702-5
Patent #5,700,473

EPA Establishment # 67702-WG-1

FIRST AID	
IF ON SKIN	-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 SWALLOWED	-Call a poison control center or doctor immediately for treatment advice. -Have person sip a glass of water if able to swallow. -Do not induce vomiting unless told to by a poison control center or doctor. -Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact the National Pesticide Telecommunications Network hotline at 1-800-858-7378.	

Commercial Agriculture Use: NET CONTENTS: 1 gallon, 5 gallon, 20 gallon, 45 gallon

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION. Harmful if swallowed or absorbed through the skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove pets and cover fish aquariums before using.

Environmental Hazards: This product is toxic to fish. 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 cleaning equipment or disposing of equipment washwaters

Personal Protective Equipment (PPE) Requirements: Applicators and other handlers must wear: long-sleeved shirt and long pants; shoes plus socks; and waterproof gloves. Follow manufacturer's instructions for 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.
- Users should remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove clothing immediately after handling this product. If gloves are worn, wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

STORAGE AND DISPOSAL

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

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

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Triple rinse container. Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

DIRECTIONS FOR USE

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

Please read entire label. Use only as directed. Shake well before each use. Thoroughly wet all parts of the pests and plants. Repeat treatment in 1 - 2 weeks if necessary. May be used on edible crops up to and including day of harvest.

Do not apply this product in a manner that will contact workers or other persons, either directly or through drift. Only protected workers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency representative 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 of this box apply to uses of this product that are covered by the Worker Protection Standard (WPS).

There is a restricted-entry interval of 12 hours.

PPE required for early reentry 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 is: coveralls; shoes plus socks; and waterproof gloves.

DIRECTIONS FOR MIXING

Apply 1% or 2% solutions, 1 to 2 gal. per 100 gal., at a rate of 75 - 200 gal/acre.

1. Add sufficient water to the mixing tank to allow proper agitation by pump or paddles.
2. Continue stirring while adding first the NEU1161 then the remaining water.
3. Continue to stir throughout use.
4. If using equipment without pump or paddle, shake often during use.
5. Flush fluid in sprayer hose lines back into the tank if the solution has remained unstirred for more than 20 minutes.

PESTS/SITES AND APPLICATION INSTRUCTIONS

Repeat in 7 to 14 days, as needed, up to three applications for outdoor and greenhouse use. For soft-bodied pests such as aphids and mites, use a 1% dilution rate.

Crop	Pest	Application	Rate
Fruit trees such as (but not limited to); apples, apricots, cherries, nectarines, peaches, pears, plums, prunes	aphids, apple red bug, caterpillars, European red mite, fruittree leafroller, leafhoppers, mites, pear psylla, plant bugs, sawfly larvae, scales, spider mites	Dormant, pre-bloom and summer use	1 or 2%
Flowering, foliage and	aphids, caterpillars, fungus	Apply as	1 or

bedding plants - greenhouse and outdoors	gnats, lace bugs, leafminers, mealybugs, mites, scales, thrips, whiteflies	needed	2%
Sugar beets	leafminer, mites	As needed	1 or 2%
Cotton	aphids, mites, whiteflies, leafhoppers	When insects appear- repeat weekly as needed	1 or 2%
Soybeans, melons, tomatoes, vegetables such as (but not limited to); asparagus, beans, beets, broccoli, Brussels sprouts, cabbage, cauliflower, celery, collards, cucurbits, eggplant, kale, lettuce, lima beans, mustard greens, peas, potatoes, peppers, radishes, spinach, squash, turnips.	aphids, adelgids, armored scale, asparagus beetle, beetle larvae, blister beetles, cabbage looper, cabbage worms, cankerworms, caterpillars, Colorado potato beetle, diamondback moth larvae, earwigs, flea beetle, harlequin bug, imported cabbageworm, Japanese beetles, leafhoppers, leafminers, leafrollers, mealybugs, Mexican bean beetles, mites, psyllids, plant bugs, soft scales, sowbugs, stink bugs, thrips, spotted cucumber beetles, webworms, whiteflies	Summer use	1 or 2%
Small fruits such as (but not limited to); grapes, strawberry, blueberry, raspberry, cranberry, blackberry.	aphids, caterpillars, grape phylloxera, leafhoppers, Lygus bugs, mealybugs, mites, scales, spittlebugs, whiteflies	Dormant and summer use	1 or 2%
Nut crops such as: almonds, filberts, macadamias, pecans, pistachios, walnuts	aphids, caterpillars, leafhoppers, leafrollers, mites, plant bugs, scales, spittlebugs, thrips, whiteflies	Dormant, pre-bloom and summer use	1 or 2%
Citrus	aphids; citrus mealybug; mites; scales: red, black, yellow & purple	Post-bloom, summer or fall	1 or 2%
Houseplants	aphids, fungus gnats, mealybugs, mites, scales, springtails, thrips, whiteflies	As needed	1 or 2%
Herbs and spices such as (but not limited to); anise (aniseed), basil, caraway, chicory, chives, coriander, cumin, dill, fennel (Italian	aphids, caterpillars, mites, plant bugs, whiteflies	When insects appear, repeat weekly as needed.	1 or 2%

and sweet), marjoram, sweet oregano, mint, nasturtium, paprika, parsley, rosemary, sage, savory, tarragon and thyme.			
Ornamental and shade trees such as flower and foliage plants, birch, flowering cherry, dogwood, evergreens, hawthorn, holly, magnolia, maple, oak, flowering peach, privet, pyracantha, sycamores	aphids, adelgids, caterpillars, gall mites, gypsy moth caterpillars and adults, lace bugs, leaf beetle larvae, leafhoppers, mealybugs, mites, plant bugs (immature), psyllids, sawfly larvae, scales, spider mites, tent caterpillars, whiteflies	Dormant, pre-bloom and summer use	1 or 2%

DIRECTIONS FOR DORMANT USE

Controls egg stages of pests present in dormant season and scale insects, mites and mealybugs on dormant shrubs, evergreens, woody plants, fruit trees and shade trees.

Apply 2% solution, 2 gal. per 100 gal., at a rate of 75 - 200 gal/acre.

FOR TOMATOES AND FRUITS AFTER HARVEST USE

NEU1161 may be used to control vinegar flies and fruit flies. Apply at a rate of 2% solution (2 gallons per 100 gallons). Mix thoroughly. Thoroughly spray harvested tomatoes and fruits. They may be sprayed in piles, in baskets, on trucks or in processing plants. Use a 2% solution and apply at a rate of 1/2 pint per bushel. The empty containers may be dipped into 2% solutions of NEU1161 to kill any larvae and pupae remaining.

USE PRECAUTIONS

Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Use a 1% solution on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar and Smoke Tree. Use caution on blooms and buds. If concerned about sensitivity of plants, test spray a portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

For foliage application the spray tank must be free of any sulfur residue before using this material. Do not combine sulfur sprays with this material on foliage during spring and summer months. Do not apply within 21 days of a sulfur application. If in doubt, spray a portion of one tree previously treated with sulfur and wait several days to determine if burn occurs.

When used in combination with or immediately before or after spraying, this product may increase the phytotoxicity of fungicides such as Captan, or copper compounds. If in

doubt, treat a small area with a combination spray and wait several days to determine if burn occurs.

Do not apply within 21 days of a sulfur application.

Do not use NEU1161 spray when temperatures are above 90°F.

IRRIGATION SYSTEM USE

Do not apply this product through any type of irrigation system.

NOTICE TO BUYER

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for purposes stated on this label only when used in accordance with directions under normal use conditions. To the fullest extent permitted by law, the seller shall not be liable for damages caused by buyers use of product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to seller. Seller makes no other warranties, either expressed or implied.

[Marketing claims and product information that may or may not be presented on the container or supplemental labeling:

- Dormant and growing season insect spray for control of adelgids, aphids, armored scale, beetle larvae, cankerworms, caterpillars, fungus gnats, lace bugs, leafhoppers, leafminers, leafrollers, mealybugs, mites, plant bugs, psyllids, scale insects, spider mites, thrips, webworms and whiteflies.
- Provides broad spectrum control.
- Patent #5,700,473
- Kills all stages of insects, including eggs.
- Based on plant oils.
- Does not persist for long periods in the environment.
- Contact insecticide, ovicide.
- Insecticide from plants for plants.
- Easy to use
- Insecticide/miticide
- NEU1161 is a contact killer for both insect and mite pests.
- For best results, pests must be contacted directly with spray.
- Pyrol™ is a trademark of W. Neudorff GmbH KG
- Made with Pyrol™ Insecticide, a trademark of W. Neudorff GmbH KG
- Contains Pyrol™ Insecticide, a trademark of W. Neudorff GmbH KG
- www.neudorff.de



- This product contains 0.859 lbs. of canola oil and 0.005 lbs. of pyrethrins per pint.
- This product contains 1.718 lbs. of canola oil and 0.01 lbs. of pyrethrins per quart.

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NEU1161 LABEL
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- May be used up to day of harvest
- May be used on edible crops up to and including day of harvest
- Can be used right up until day of harvest.
- Read Entire Container Label Before Using This Product
- Satisfaction guaranteed
- Unconditionally guaranteed
- Money back guarantee
- Multi-Purpose]