

67702-6
10/19/2004
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OCT 19 2004

W. Neudorff GmbH KG
c/o Mr. Walter Talarek
1008 Riva Ridge Dr.
Great Falls, VA 22066

Subject: NEU1161RTU
EPA Registration No. 67702-6
Application dated August 5, 2003

Dear Mr. Talarek:

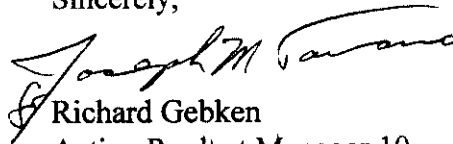
The proposed amendment to the registration of the product cited above under the Federal Insecticide, Fungicide And Rodenticide Act, as amended is acceptable subject to the comments listed below:

- 1) Delete the claim, "Residual protection against mites."
- 2) Delete the claim, "Acts as a repellent(ovipositional and feeding deterrent)".
- 3) Delete the statement, "Does not contain piperonyl butoxide[butyl-carbityl (6-propylpiperonyl) ether]."
- 4) Under Hazards to Humans and Domestic Animals add the statement, "Remove pets and cover fish aquariums before using."

A stamped copy of the draft label is enclosed for your records. Submit two copies of the corrected finished printed label before this product is released for shipment under this revised label.

If you have any questions please contact Joseph Tavano at (703) 305-6411.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joseph M. Tavano".

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

A small, stylized handwritten mark or signature, possibly initials.

NEU1161 RTU

Active Ingredient	By Wt.
Pyrethrins	0.01%
Canola Oil	1.00%
Inert Ingredients	98.99%
Total	100.00%

This product contains 0.0824 lbs. of canola oil and 0.0008 lbs. of pyrethrins per gallon.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID
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 the product container or label with you when calling a poison control center or doctor, or going for treatment.

NET CONTENTS: fluid ounces

EPA Registration #: 67702-6
Patent# 5,700,473

EPA Establishment # 67702-WG-1

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling

Environmental Hazards: This product is toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters or rinsate.

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
OCT 19 2004**
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
67702-6

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 needed. May be used on edible crops up to and including day of harvest.

PESTS/SITES AND APPLICATION INSTRUCTIONS

NEU1161 RTU 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, thrips, fungus gnats, whitefly, adelgids, plant bugs, sawfly larvae, psyllids, spittlebugs, and phylloxera.

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. 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 caution on blooms and buds and on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar and Smoke Tree. 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.

Do not apply within 21 days of a sulfur application.

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

[The registrant may use any of these optional statements:

"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. This warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to seller. Buyer assumes all risk of any such use. Seller makes no other warranties, either expressed or implied."

OR

"Unconditionally guaranteed by W. Neudorff GmbH KG. If for any reason you are not satisfied with this product, send proof of purchase to the address shown and we will gladly refund your purchase price."]

Marketing claims and product information that may 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.
- Does not contain piperonyl butoxide [butyl-carbityl (6-propylpiperonyl) ether].
- Provides broad spectrum control.
- Patented formulation.
- Unique, patented formula
- Kills all stages of insects, including eggs.
- Based on plant oils.
- Residual protection against mites.
- Does not persist in the environment.
- Does not persist for long periods in the environment
- Contact insecticide, ovicide.
- Insecticide from plants for plants.
- From plants for plants
- Acts as a repellent (ovipositional and feeding deterrent)
- Controls mites, whiteflies, aphids, and all stages of insects & eggs
- For household use only.

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- For roses, flowers & vegetables
- Manufactured under a license of Neudorff.
- 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



- Made from chrysanthemum flowers
- Made with natural, botanical pyrethrins from chrysanthemum flowers
- Derived from naturally occurring ingredients
- Easy to use
- Insecticide/Miticide
- Insect spray
- Roses and flowers
- Houseplants and gardens
- Fruits and vegetables
- NEU1161 RTU is a contact killer for both insect and mite pests.
- Contact insecticide
- For best results, pests must be contacted directly with spray.
- Fast-acting
- Kills insects fast
- Kills insects on contact
- Kills bugs on contact
- Provides quick control of pests
- Read entire container label before using this product
- Easy to use
- Satisfaction guaranteed
- Unconditionally guaranteed
- Money back guarantee
- May be used up to and including day of harvest.

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