



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 21, 2014

Walter Talarek, PC
W. Neudorff GmbH KG
c/o Law Office of Walter Talarek, PC
1008 Riva Ridge Drive
Great Falls, VA 22066-1620

Subject: Label Amendment – Multiple revisions to label including addition of several pests
Product Name: NEU1161 RTU
EPA Registration Number: 67702-6
Application Date: 9/25/14
Decision Number: 496498

Dear Mr. Talarek:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing 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 copy of the final printed labeling before you release the 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 the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements 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 Agency find or if it is brought to our attention that a website contains false 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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, you may contact Elizabeth Fertich at 703-347-8560 or via email at Fertich.elizabeth@epa.gov.

Sincerely,

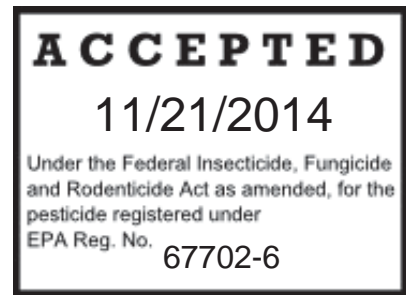
A handwritten signature in black ink, appearing to read 'Kable Bo Davis', enclosed within a hand-drawn oval.

Kable Bo Davis, Product Manager 3
Invertebrate and Vertebrate Branch 1 (IVB1)
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

NEU1161 RTU

Active Ingredients	By Wt.
Pyrethrins	0.01%
Canola Oil	1.00%
Other Ingredients	<u>98.99%</u>
Total	100.00%



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

[when The Scotts Company uses the brand name Ecosense when selling or distributing this product, it must place a qualifying symbol after the brand name and, in close proximity to the brand name, place the statement "economically sensible alternative pest control"]

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. [For emergency information concerning this product, call the poison control center 1-800-222-1222. [Alternately insert subregistrant's toll free number and hours of operation].]

NET CONTENTS: 16 fl. oz., 22 fl. oz., 24 fl. oz., 32 fl. oz, 1 gallon

EPA Registration No. 67702-6

EPA Establishment No.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

User Safety Recommendations

- Users should wash hands with plenty of soap and water 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.

Physical or Chemical Hazards: Combustible. Do not use or store near heat or open flame.

Environmental Hazards: This product is toxic to aquatic organisms including fish and invertebrates. 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 the treatment area.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.

DIRECTIONS FOR USE

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

Only for use in home gardens, home indoor houseplants, and home greenhouses. Read entire label. Use only as directed. Shake well before each use.

Thoroughly wet all parts of the plants. Do not wet plants to point of runoff or drip. Repeat treatment in 1-2 weeks if needed. Do not apply more than 20 fl. oz. per 100 square feet per application. May be used on edible crops up to and including day of harvest.

USE RESTRICTIONS

- Do not wet plants to point of runoff or drip.
- Do not allow adults, children, or pets to enter the treated area until sprays have dried.
- Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift.
- Remove pets, birds, and cover fish aquariums before spraying.
- Do not apply within 21 days of a sulfur application.
- Do not use NEU1161 RTU spray when temperatures are above 90°F.
- Do not apply more than 10 times per season.
- Do not reapply within 3 days except under extreme pest pressure.
- Do not apply more than 1 time per day.
- In case of extreme pest pressure do not reapply within 24 hours.
- Do not apply directly to or near water, storm drains, or drainage ditches. Do not apply when windy.
- To prevent product runoff, do not over water treated areas(s) or apply prior to heavy rainfall.

Phytotoxicity Note: Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Apply carefully to 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 by spraying a portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

PESTS/SITES AND APPLICATION INSTRUCTIONS

NEU1161 RTU kills exposed: Adelgids, Ants (including Foraging Ants, Sweet-Feeding Ants, Pavement Ants, Moisture Ants, Little Black Ants, Argentine Ants, Crazy Ants, Acrobat Ants, Bigheaded Ants, Cornfield Ants, Ghost Ants, Odorous House Ants, Thief Ants, Texas Leafcutting Ants, Field Ants, and other Common Ants) (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants), Aphids (including Green Peach Aphids), Armyworms (including Beet Army Worms, Western Yellow Striped Armyworms), Bagworms, Beetles (Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle, Blister Beetles, 12-spotted Cucumber Beetles, Cucumber Beetle, Darkling Beetles (lesser mealworm), Saw-toothed Grain Beetles, Elm Leaf Beetles, Bean Beetles, Mexican Bean Beetles), , Borers (including European Corn Borer, Branch and Twig Borers, Shot hole borers and Pacific flathead borers), Box Elder Bugs, Cabbageworms (including Cross-striped Cabbageworm and Imported Cabbageworm), Cankerworms, Caterpillars (Gypsy Moth Caterpillars, Tent Caterpillar, Eastern Tent Caterpillar, Forest Tent Caterpillar and Tomato Fruitworm Caterpillar), Corn Earworms, Crane Flies, Crickets, Diamondback Moth Larvae, Earwigs, Fireworms, Fungus Gnats, Fruit Flies (Including Cherry Fruit Fly), Glassy Winged Sharpshooter , Grape Leaf Skeletonizer, Grasshoppers, Green Fruit Worm, Harlequin Bugs, Hornworms (including Tomato Hornworm), Katydid, Lace Bugs, Leafhoppers (including Grape Leafhopper, and Potato Leafhoppers), Leafminers, Leafrollers (including Fruittree

Leafrollers), Leaf tiers, Loopers (including Cabbage Looper), Lygus, Maggots (including Apple Maggot, Cabbage Maggots, and Onion Maggot), Mealybugs (including Citrus Mealybugs, Grape Mealybugs and Vine Mealybugs), Non-biting Midges, Millipedes, Mites (including Clover Mites, European Red Mite and Spider Mites), Moths (including Artichoke Plume Moth, Codling Moth, Diamondback Moth, European Pine Tip Moth, Gypsy Moths, Indian Meal Moth, Mediterranean Flour Moth), Mushroom Flies, Navel Orangeworm, Plant Bugs (including Leaf footed Plant Bug, Tarnished Plant Bug), Psyllids (including Pear Psyllids), Sawfly Larvae (pear and rose slugs), Scale insects (including Soft Scale and Armoured Scale), Silverfish, Skippers, Sowbugs, Spittlebugs, Squash Bugs, Stink Bugs, Thrips (including Greenhouse Thrips), Vinegar Flies, Webworms, Weevils (including Boll Weevil, Carrot Weevil, Clover Weevil, Rice Weevil, Pepper Weevil), Whitefly and Phylloxera.

OUTDOOR USE

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

HOME GREENHOUSE USE

For use in home greenhouses: flowering, foliage plants; melons; tomatoes; vegetables (beans, cabbage, cucurbits, peas, potatoes); small fruits (grapes, strawberry, raspberry); houseplants.

INDOOR USE

For use indoors on houseplants.

DORMANT USE

Kills exposed egg stages of pests present in dormant season and pests on dormant shrubs (roses), evergreens, fruit trees, and shade trees. Thoroughly wet the dormant plants or trees.

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 AND CONTAINER HANDLING:

If empty: Nonrefillable 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.

BATCH CODE

[The registrant may use one or more of these optional statements:

“NOTICE TO BUYER

To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on this label and is reasonably fit for purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. To the extent consistent with applicable law, 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. To the extent consistent with applicable law, the seller shall not be liable for any such use. To the extent consistent with applicable law, the Seller makes no other warranties, either expressed or implied.”

OR

[The] (Insert Company Name) Guarantee- 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.”

OR

Satisfaction guaranteed

OR

Unconditionally guaranteed

OR

Money back guarantee

[Marketing claims and product information that may be presented on the container or supplemental labeling:

- Dormant and growing season insect spray
- (Kills)(Controls) (Use to kill) [Insert any or all of the following:] (Adelgids), (Ants (including Foraging Ants, Sweet-Feeding Ants, Pavement Ants, Moisture Ants, Little Black Ants, Argentine Ants, Crazy Ants, Acrobat Ants, Bigheaded Ants, Cornfield Ants, Ghost Ants, Odorous House Ants, Thief Ants, Texas Leafcutting Ants, Field Ants, and other Common Ants) (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants)), (Aphids), (Green Peach Aphids), (Armyworms), (Beet Army Worms), (Western Yellow Striped Armyworms), (Bagworms), (Beetles), (Colorado Potato Beetle), (Flea beetle), (Japanese Beetle), (Asparagus Beetle), (Blister Beetles), (12-spotted Cucumber Beetles), (Cucumber Beetle), (Darkling Beetles), (Saw-toothed Grain Beetles), (Elm Leaf Beetles), (Bean Beetles), (Mexican Bean Beetles), (Borers),(European Corn Borer), (Branch and Twig Borers), (Shot hole borers), (Pacific flathead borers), (Box Elder Bugs), (Cabbageworms), (Cross-striped Cabbageworm), (Imported Cabbageworm), (Cankerworms), (Caterpillars), (Gypsy Moth Caterpillars), (Tent Caterpillar), (Eastern Tent Caterpillar), (Forest Tent Caterpillar), (Tomato Fruitworm Caterpillar), (Corn Earworms), (Crane Flies), (Crickets), (Diamondback Moth Larvae), (Earwigs), (Fireworms), (Fungus Gnats), (Fruit Flies), (Cherry Fruit Fly), (Glassy Winged Sharpshooter), (Grape Leaf Skeletonizer), (Grasshoppers), (Green Fruit Worm), (Harlequin Bugs), (Hornworms), (Tomato Hornworm), (Katydids), (Lace Bugs), (Leafhoppers), (Grape Leafhopper), (Potato Leafhoppers), (Leafminers), (Leafrollers), (Fruittree Leafrollers), (Leaftiers), (Loopers), (Cabbage Looper), (Lygus), (Maggots) (Apple Maggot), (Cabbage Maggots), (Onion Maggots), (Mealybugs), (Citrus Mealybugs), (Grape Mealybugs), (Vine Mealybugs), (Non-biting Midges), (Millipedes), (Mites), (Clover Mites), (European Red Mite), (Spider Mites), (Moths), (Artichoke Plume Moth), (Codling Moth), (Diamondback Moth), (European Pine Tip Moth), (Gypsy Moths), (Indian Meal Moth), (Mediterranean Flour Moth), (Mushroom Flies), (Navel Orangeworm), (Plant Bugs), (Leaf footed Plant Bug), (Tarnished Plant Bug), (Psyllids), (Pear Psyllids), (Sawfly Larvae (pear and rose slugs)), (Scale) (Soft Scale), (Armoured Scale), (Silverfish), (Skippers), (Sowbugs), (Spittlebugs), (Squash Bugs), (Stink Bugs), (Thrips), (Greenhouse Thrips), (Vinegar Flies), (Webworms), (Weevils), (Boll Weevil), (Carrot Weevil), (Clover Weevil), (Rice Weevil), (Pepper Weevil), (Whitefly), (Phylloxera) (and other listed insect pests).
- (Kills)(Controls)(Use to kill) (adelgids), (Ants (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants)), (Aphids),(Armyworms), (Bagworms), (Beetles), (Borers), (Cabbage Looper), (Cabbageworms), (Cankerworms), (Caterpillars), (Crane Flies), (Crickets), (Diamondback Moth Larvae), (Earwigs), (Fireworms), (Fungus Gnats), (Fruit Flies), (Glassy Winged Sharpshooter), (Grape Leaf Skeletonizer), (Green Fruit Worm), (Harlequin Bug), (Hornworms), (Katydids), (Lace Bugs), (Leafhoppers), (Leafminers), (Leaftiers), (Loopers), (Leafrollers), (Lygus), (Maggots),(mealybugs), (Non-biting Midges), (Millipedes), (Mites), (Moths), (Mushroom Flies), (Navel Orangeworm), (Phylloxera), (Psyllid), (Scale), (Vinegar Flies), (Webworms), (Weevils), (Whiteflies) , (Phylloxera) (and other listed insect pests).

- For indoor and outdoor use
- (Controls)(Kills) 100+ (listed) (insects) (on contact)
- (Multi-Action:) Kills all stages of listed insects, including eggs.
- Kills listed insects on contact
- Indoor and Outdoor
- Includes new continuous spray technology
- Kills Japanese Beetles
- Patented formulation.
- Patented formula
- Patent #5,700,473
- Kills all accessible stages of listed insects, including eggs.
- Contact insecticide, ovicide.
- Kills mites, whiteflies, aphids, and all accessible stages of listed insects and eggs
- For roses, flowers, and vegetables
- Contains pyrethrins and canola oil
- For use on plants - indoors and outdoors
- Can use on (flowers), (vegetables), (fruits), and (roses)
- Easy to use
- Insecticide/Miticide
- Insect spray
- Roses and flowers
- Houseplants and gardens
- Fruits and vegetables
- NEU1161 RTU is a contact killer for both listed insect and listed mite pests.
- Contact insecticide
- For best results, pests must be contacted directly with spray
- Kills listed insects on contact
- Kills listed bugs on contact
- Read entire container label before using this product
- May be used up to and including day of harvest.
- Can be used up to and including day of harvest
- 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
- Questions, comments (or medical information) X-XXX-XXX-XXXX
- © 20XX Licensed (insert company name). World rights reserved.
- Manufactured. Distributed by: (insert company name)
- Made in/Produced in: _____(from US and imported products/parts)
- See back (booklet) label for first aid
- This container is made with a minimum X% recycled material
- Manufactured under [a] license of W. Neudorff GmbH KG[, Germany]
- Designed for Independent Retailers
- Superscript is first letter of lot number



Manufactured by: W. Neudorff GmbH KG
 Postfach 1209, An der Mühle 3
 31860 Emmerthal, Germany