



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 5, 2023

Walter G. Talarek
W. Neudorff GmbH KG
c/o Walter G Talarek, PC
5153 Allison Marshall Drive
Warrenton, VA 20187

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling and Formulation Amendment –Amending the Basic and Alternative CSFs to Reflect New Inert Sources. Amending the Label to Add Dips to Commercial Sublabel, to Make Optional Statements and to Update NOP Claims
Product Name: NEU 1128
EPA Registration Number: 67702-11
Application Date: 3/27/23
Action Code Case Number: 00443495

Dear Mr. Talarek:

The amended labeling and Confidential Statements of Formula (CSFs) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

Please note that the record for this product currently contains the following acceptable CSFs:

- Basic CSF dated 6/28/23
- Alternative CSF dated 6/28/23

Any CSFs other than that listed above are superseded/no longer valid.

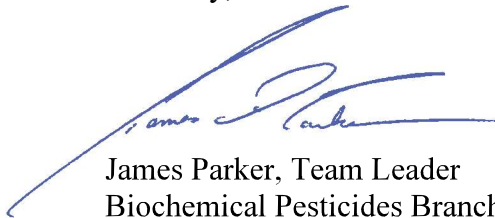
A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute 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 your company’s website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the 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 EPA find or if it is brought to our attention that a website contains statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA’s Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Chris Pfeifer of my team by phone at (703) 244-7991 or via email at pfeifer.chris@epa.gov.

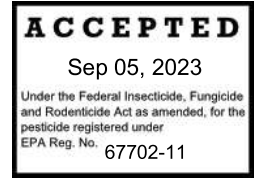
Sincerely,

A handwritten signature in blue ink, appearing to read "James Parker", is written over a horizontal line.

James Parker, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511M)
Office of Pesticide Programs

Enclosure

MASTER LABEL



{Text in braces is for informational purposes only and will not appear on label
Text in brackets is optional language and may or may not appear on the label
Text in parentheses is language that will appear on the label}

NEU1128

[ABN: KOPA INSECTICIDAL SOAP]
[ABN: HydroWorxx Insecticidal Soap 3 in 1 Concentrate]
[ABN: HydroCraft Insecticidal Soap 3 in 1 Concentrate]
[ABN: HydroPower Insecticidal Soap 3 in 1 Concentrate]

Active Ingredient	By Wt.
. Potassium Salts of Fatty Acids	47%
Other Ingredients.....	<u>53%</u>
Total.....	100%

Contains 4.07 lb Active Ingredient per Gallon

SUBLABEL A: Household Use

SUBLABEL B: Commercial/Agriculture Use

KEEP OUT OF REACH OF CHILDREN

WARNING/AVISO

Si usted no entiende la etiqueta busque 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.)

EPA REG. NO. 67702-11

EPA EST.

Registrant: W. Neudorff GmbH KG,
An der Mühle 3,
31860 Emmerthal, Germany

Household Use: NET CONTENTS: 0.64 oz., 8 oz., 16 oz., 24 oz., 32 oz., 40 oz., 64 oz., 1 gallon, 200 gallons, 211 gallons (800L), 250 gallons

Commercial Use: NET CONTENTS: 1 gallon, 2.5 gallons, 5 gallons, 20 gallons, 30 gallons, 50, 55 gallon, 200 gallons and 211 gallons (800 liters), 250 gallons

{SUBLABEL A: Household Use}

NEU1128

[ABN: KOPA INSECTICIDAL SOAP]

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WARNING/AVISO

EPA REG. NO. 67702-11

EPA EST. 67702-DEU-1

Registrant: W. Neudorff GmbH KG,
An der Mühle 3,
31860 Emmerthal, Germany

NET CONTENTS: 8oz, 16oz, 24oz, 32oz, 40oz, 64oz, 1 gallon, 200 gallons, 211 gallons (800L), 250 gallons

FIRST AID	
IF IN EYES	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 eye. Call a poison control center or doctor for treatment advice.
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 at 1-800-222-1212. [alternatively insert toll free numbers and hours of operation.]	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: WARNING. Causes substantial but temporary eye injury. Causes skin irritation. Do not get in eyes, skin or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating,

drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

Environmental Hazards: This product may be hazardous to aquatic 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 or 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. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

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. 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:

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 before using. Use only as directed. May be used on edible crops up to and including day of harvest after a minimum spray interval of 12 hours.

{Directions for use for all size containers except 0.64 oz. Use either A. 'Directions for Mixing' section or B. Hose End Sprayer Applicator Directions.}

A. DIRECTIONS FOR MIXING {for containers with no hose-end sprayer}

For 2% formulation mix 4 teaspoons of concentrate with 1 quart of water (or 2 oz. concentrate with 3 quarts of water). Shake well before use.

CONVERSIONS	
1 fluid ounce	6 teaspoons
1 pint	16 fluid ounces
1 quart	2 pints (32 fl. oz.)
1 gallon	4 quarts (128 fl. oz.)

B. {Hose End Sprayer Directions for containers with a hose end sprayer use one of the following:}

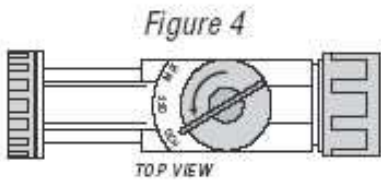
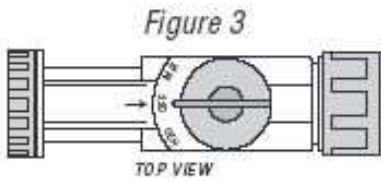
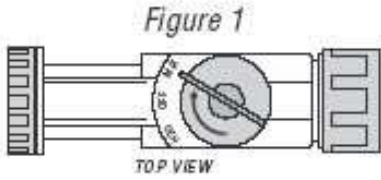
{hose end sprayer directions and graphics removed to reduce file size}

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.

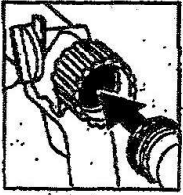


{OR:}

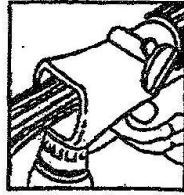
HOSE END SPRAYER INSTRUCTIONS

Shake before using.

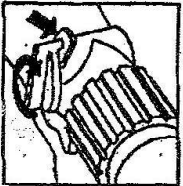
HOW TO USE:



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".

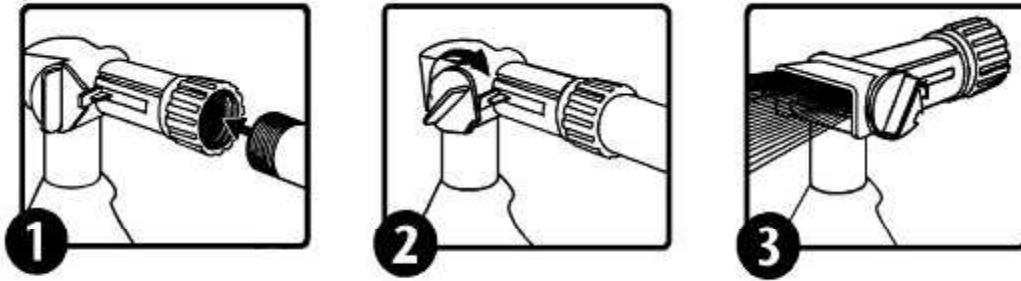


{OR:}

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.

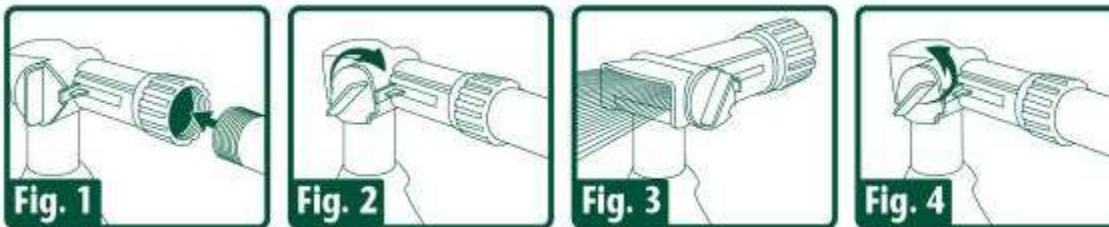
To Stop Spraying:

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.



{OR:}

1. Shake container well before using.
2. Connect a garden hose to the Ready Spray nozzle. Make sure the dial on the nozzle is in the “OFF” position with the safety tab in the valve notch. [Fig. 1]
3. Turn on the water at faucet. Extend hose to the farthest area to be treated and work back toward the faucet so you don’t come in contact with the treated area.
4. To BEGIN spraying, point nozzle toward treatment site and
 - a. Bend the safety tab back (located at the right of the yellow dial) with your thumb,
 - b. Using your other hand, QUICKLY turn the dial clockwise until it stops. Water will automatically mix with the product. [Fig 2]
5. Spray moss thoroughly. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas. [Fig. 3]
6. To STOP spraying, QUICKLY turn the dial in the opposite direction of “ON” until it stops and the safety tab engages the notch on the valve. [Fig. 4] Turn water off at faucet. To relieve pressure before removing nozzle from hose, bend the safety tab back and turn dial “ON” until water stops spraying.
7. To STORE unused product, make sure the dial is in the “OFF” position with safety tab in the valve notch. Place in cool area away from heat, sunlight or open flame.



{OR:}

Dynasty Hose End Sprayer Directions:

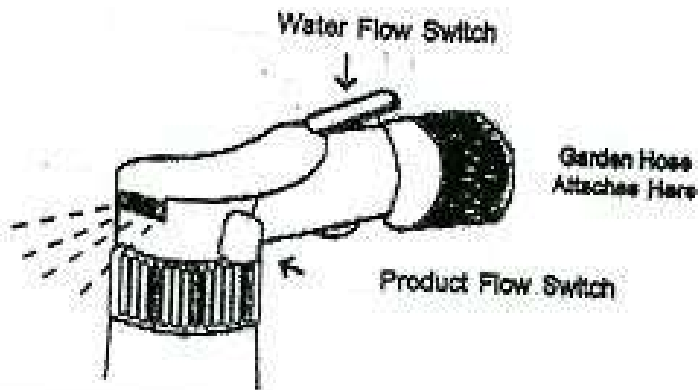
This xx ounce bottle will cover up to xxxx square feet.

1. Before attaching the sprayer to garden hose, make sure that the Water Flow Switch (top switch) is in the "OFF" (to the rear) position.
2. Connect spray nozzle to garden hose while pointing sprayer in a direction away from face and body.
3. Remove the safety pin in front of the Product Flow Switch (side switch).
4. Rotate Product Flow Switch pin forward 90 deg. to the "ON" position.
5. Aim front of nozzle toward area to be covered and begin spraying by moving water valve (top switch) to the "ON" position (forward).

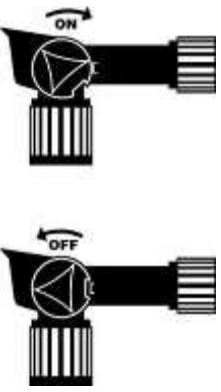
To Stop Spraying:

1. Turn Water Flow Switch (top switch) to "OFF" position (to the rear) and Product Flow Switch (side switch) back to the "OFF" position.
2. Turn off the water at the faucet.
3. Unscrew spray nozzle from garden hose, rinse outside of container and store any unused product according to the Storage and Disposal Directions.

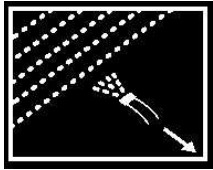
Optional Diagram



{OR:}

<p>HOW TO ATTACH AND SPRAY</p>  <p>The diagram shows two views of the spray nozzle. The top view shows the valve handle turned clockwise to the 'ON' position. The bottom view shows the valve handle turned counter-clockwise to the 'OFF' position.</p>	<ol style="list-style-type: none">1. Connect your garden hose to the bottle. Be sure the blue water control valve on top of the spray nozzle is in the OFF position.2. To begin spraying, turn on water at faucet. Point nozzle towards the area to be treated and Press lock tab while using other hand to turn sprayer valve to ON position.3. To stop spraying, turn the water control valve on top of the spray nozzle to OFF. Turn off faucet.4. Relieve water pressure by turning water control valve to the ON position until water slows to a drip. Turn water control valve back to OFF. Disconnect garden hose from bottle.5. The unused portion can be saved and used at a later date. <p>Tips for Applying</p> <ol style="list-style-type: none">1. Extend hose to the farthest plants to be treated and work back toward the faucet to avoid contacting wet, treated plants.2. Use an even sweeping motion, ensuring thorough coverage of both the top and bottom leaf surfaces.
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{OR}

<p>HOW TO USE Shake Well Before Use</p>	<p>CONNECT</p> <ol style="list-style-type: none">1. Shake well before use.2. Connect sprayer to garden hose.3. Turn on water. <p>SPRAY</p> <ol style="list-style-type: none">1. Extend hose to farthest area to be treated, point sprayer nozzle in direction to be sprayed.2. Begin spraying <Insert sprayer-specific language here> <i>Hayes HP-2 and Calmar RTS sprayers:</i> Press lock tab while using other hand to turn sprayer valve to ON position. <i>Green Garden RTS sprayer:</i> Turn sprayer valve to ON position.3. Walk at a steady pace while spraying, using an even sweeping motion, and slightly overlap the treated areas. Work back toward the faucet to avoid walking over wet, treated grass.  <p>FINISH</p> <ol style="list-style-type: none">1. To stop spraying, <Insert sprayer-specific language here.> <i>Hayes HP-2 RTS sprayer:</i> Press lock tab while using other hand to turn sprayer valve to OFF position. <i>Calmar & Green Garden RTS sprayers:</i> turn sprayer valve to OFF position.2. Turn off water at faucet.3. Relieve water pressure in hose by turning sprayer valve back to WATER position until water slows to a drip then turn sprayer valve to OFF position.4. Disconnect sprayer from hose.
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PESTS/SITES AND APPLICATION INSTRUCTIONS

NEU1128 is a contact spray and pests must be sprayed directly to achieve control. NEU1128 will control listed insect pests such as: adelgids (woolly aphids), aphids, lacebugs, mealybugs, mites, grasshoppers, leafhoppers, scale insects, plant bugs, sawfly larvae (pear and rose slugs), psyllids, tent caterpillars, thrips, spider mites, earwigs, whitefly and powdery mildew.

Apply a 2% diluted product using hand-held trigger sprayers, hand sprayers or backpack sprayers [for products sold with hose end sprayer, replace above options with 'hose end sprayer']. Thoroughly spray insect pests or powdery mildew on plants to wetting with diluted product. Repeat treatment weekly or bi-weekly if needed. NEU1128 is a contact spray and is effective in its liquid state. Efforts should be made to thoroughly reach all plant parts including undersides of leaves.

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

USE RECOMMENDATIONS

Do not use on sweet peas, nasturtiums, delicate ferns.

Do not spray when plants are under stress. Use with care on new seedlings, transplants and blooms. Do not spray during full sun. Spray early in morning or evening or when overcast. Soap spray may cause marking of some varieties. If concerned about sensitivity of plants, apply to individual plants or small areas of plants and wait to determine if plant damage (phytotoxicity) occurs prior to treatment of larger areas.

{Direction for use for 0.64 oz. refill bottle only}

[This package][NEU1128] is to be used as a refill for 32 fl. oz. bottles of NEU1128 RTU Only.

To refill NEU1128 RTU remove existing cap from top of [bottle][trigger]. Fill bottle [with 31.4 fl oz of tap water][to refill line (31.4 fl oz) with tap water]. Place [refill cap][refill cartridge][refill cartridge/cap] of NEU1128 on top of bottle and turn clockwise to secure cap and release refill concentrate into bottle. Shake vigorously for 15-30 seconds to mix bottle contents prior to reusing. Remove [Refill cap][Refill Cartridge] and discard. Replace original cap prior to product application.]

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 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. To the extent consistent with applicable law, buyer assumes all risk of any such use. To the extent consistent with applicable law, seller makes no other warranties, either expressed or implied.

{Marketing claims and product information that may be presented on the container or supplemental wording:}

- [
- Insecticidal soap
- [Insecticidal]/[Fungicidal]/ [Miticidal] soap
- Insecticide/Miticide
- 3 in 1: Insecticide, Miticide, Fungicide
- Insect spray
- May be used up to day of harvest
- Use up to day of harvest
- Can be used right up until day of harvest
- Rapidly degraded by soil microbes
- Insecticidal soaps are degraded rapidly by soil microbes
- Contact insecticide.
- For use on [vegetables], [fruit and nut trees], [citrus], [berries], [ornamentals], [shrubs], [flowers], and [trees] in [homes], [gardens] and [greenhouses].
- Can be used in vegetable gardens.
- [For use in] homes, gardens, and greenhouses
- Read Entire Container Label Before Using This Product.
- CONTROLS: [Adelgids], [aphids], [earwigs], [grasshoppers], [lacebugs], [mealybugs], [mites], [plant bugs], [leafhoppers], [psyllids], [sawfly larvae], [scale insects], [tent caterpillars], [thrips], [whitefly], [woolly aphids], [powdery mildew] and other listed pests
- KILLS: [Adelgids], [aphids], [earwigs], [grasshoppers], [lacebugs], [mealybugs], [mites], [plant bugs], [leafhoppers], [psyllids], [sawfly larvae], [scale insects], [tent caterpillars], [thrips], [whitefly], [woolly aphids], [powdery mildew] and other listed pests
- Satisfaction guaranteed or your money back
- Easy to Use
- Can be used as part of an Integrated Pest Management System
- Compatible with Biological Control Agents, Beneficial Insects and Mites
- Product Information:** NEU1128 can be used to treat plants prior to biological control agent release and to treat "hot spots" for pest control in greenhouses with subsequent release of beneficial mites and insects.
- Mode of Action:** NEU1128 is a contact killer for both insect and mite pests. It penetrates the body of pests and results in rapid death. NEU1128 kills pests by disrupting membrane and cellular function.
- Fast acting- kills listed pests on contact
- Mode of Action:** NEU1128 is a contact killer for [insects], [mites], and [powdery mildew].
- NEU1128 contains specially selected fatty acid salts (soaps) chosen for effective pest control. NEU1128 has been formulated to provide optimum spreading.
- NEU1128 is effective against the adult, larval and nymph stages of pests. Pupal stages of some pests (e.g. whitefly) may also be affected.
- May be applied to edibles up to day of harvest.
- Money back guarantee
- Insect Killer
- Insect and fungal plant disease spray
- [Insecticide]/[Miticide]/ [Fungicide]
- Controls powdery mildew, mites and listed insects
- See [back][booklet][panel] for [additional precautionary statements] [and directions for use]
- See booklet for directions for use and additional precautions
- www.neudorff.com



- Neudosan™ is a trademark of W. Neudorff GmbH KG
- Made with Neudosan™ Insecticidal Soap, a trademark of W. Neudorff GmbH KG
- Contains Neudosan™ Insecticidal Soap, a trademark of W. Neudorff GmbH KG
- [For use] indoor[s]-outdoor[s]
- [Houseplants], [Flowers], [Fruits], [Vegetables], [Trees], [Shrubs]
- Listed by the Organic Materials Review Institute (OMRI) for use in organic gardening.
- OMRI Listed



- For Organic Gardening
- Kills listed insects on contact
- Controls listed fungal plant diseases, insects and mites
- Specially-formulated pesticidal soap to protect plants
- Controls powdery mildew
- Spray and harvest the same day
- Tough on pests
- [Optional Statements for Use on 0.64 oz refill bottle only:
- [Economical [Concentrated] Refill
- [Refills][Refill for] NEU1128 RTU
- Less Packaging
- Save xx% vs. ready-to-use products
- Good Value!
- See [attached booklet][inside panel] for [additional] [Precautionary Statements], [First Aid Statements], [Directions for Use], and [Storage and Disposal Statements]
-]

{Optional statements that may be presented on the container or supplemental wording when product is packaged with a hose end sprayer}

- [
- Hose-End Sprayer Directions
- Follow the directions for using the Hose-End sprayer.
- No mixing-no mess!
- Attach to garden hose and spray
- This product is ready to spray. Just attach this bottle to your garden hose according to directions. Water automatically mixes with the concentrate as you spray.
- Hose 'n Go!
- Ready-to-Spray
-]

{SUBLABEL B: Commercial/Agricultural Use}

NEU1128

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Other Ingredients.....	53%
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KEEP OUT OF REACH OF CHILDREN

WARNING/AVISO

Si usted no entiende la etiqueta busque para que se la explique a usted en detaile. (If you do not understand the label, find someone to explain it to you in detail.)

EPA REG. NO. 67702-11

EPA EST. 67702-DEU-1

Registrant: W. Neudorff GmbH KG,
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NET CONTENTS: 1 gallon, 2.5 gallons, 5 gallons, 20 gallons, 30 gallons, 50 gallons, 55 gallon, 200 gallons and 211 gallons (800 liters), 250 gallons

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FIRST AID	
IF IN EYES	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 eye. Call a poison control center or doctor for treatment advice.
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 at 1-800-222-1212. [alternately insert toll free number and hours of operation.]	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: WARNING. Causes substantial but temporary eye injury. Causes skin irritation. Do not get in eyes, on skin or on clothing. Wear protective clothing (coveralls over short-sleeved shirt and short pants, chemical resistant footwear and socks), chemical resistant gloves, and protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse. After product is diluted in accordance with the directions for use, protective eyewear and gloves are not required.

Personal Protective Equipment (PPE) Requirements:

Handlers who may be exposed to the concentrate through mixing, loading, application, and other tasks must wear:

- protective eyewear (goggles, face shield or safety glasses);
- coveralls worn over short-sleeved shirt and short pants;
- chemical-resistant footwear and socks;
- chemical-resistant gloves, made of barrier laminate, butyl rubber \geq 14mils., nitrile rubber \geq 14mils., neoprene rubber \geq 14mils., polyvinyl chloride \geq 14mils, and viton \geq 14mils,;
- chemical resistant headgear for overhead exposure; and
- chemical-resistant apron when cleaning equipment, mixing or loading.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. When mixing and loading wear a chemical resistant apron. When cleaning equipment add a chemical resistant apron. Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exists, 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.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards: This product may be hazardous to aquatic invertebrates. 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 disposing of equipment washwater or rinsate.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or 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 HANDLING: Nonrefillable container. Do not re-use or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows:

{For containers equal to or less than five gallons use these directions:} Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the

container ¼ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling if available, or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

{For containers greater than five gallons use these directions:} Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available, or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by state and local authorities.

Batch Code:

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read all directions for use before applying.

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

Do not enter or allow worker entry into treated area during the restricted-entry interval of 12 hours

PPE required for early entry to 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 over short-sleeved shirt and short pants; chemical-resistant gloves, such as barrier laminate, butyl rubber ≥ 14mils, nitrile rubber ≥ 14mils, neoprene rubber ≥ 14mils, polyvinyl chloride ≥ 14mils or viton ≥ 14mils, chemical-resistant footwear and socks; protective eyewear; and chemical-resistant headgear for overhead exposure.

Non-Agricultural Use Requirements

The requirements of this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural workers (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries or greenhouses. Keep unprotected persons out of treated areas until sprays have dried.

DIRECTIONS FOR MIXING

For 2% formulation, mix 2 gal of product/100 gal of water (4.07 lb Tech/gal). Add sufficient water to the mixing tank to allow proper agitation by pump or paddles. Continue stirring while adding first the NEU1128 then the remaining water.

Hard water in excess of 300 ppm should be conditioned to reduce its hardness prior to mixing with NEU1128.

TANK MIXING

It is the pesticide user's responsibility to ensure that all products are registered for the intended use. Read and follow the applicable restrictions and limitations and directions for use on all product labels involved in tank mixing. Users must follow the most restrictive directions for use and precautionary statements of each product in the tank mixture.

NEU1128 may be combined with other pesticides to broaden the target spectrum, improve the level of kill, provide residual kill and enhance coverage. When used as a tank-mix, observe all directions for use, crops, use rates, dilution ratios, precautions, and limitations, which appear on the tank mix product label. Do not mix this product with any other product that prohibits such mixing. Tank mixtures are permitted only in those states where the tank mix partner is registered. For tank mixing with companion pesticides, use NEU1128 at a rate of 1% formulation (1 gallon of concentrate to 100 gallons of water). For example, certain caterpillars and leaf feeding beetles (e.g. Elm leaf beetle) can be controlled with tank mixes of 1 gallon of NEU1128 per 100 gallons of water plus a standard pesticide.

Order of Tank Mixing:

- water

- water conditioner (if needed)

 - conventional pesticide - add other products in the following order: water-soluble bags, wettable powders, dry flowables, liquid flowables, ECs, and soluble materials such as fertilizers.

- NEU1128

Also, if appropriate, give a Tank Mix Compatibility Test: Using a 2 quart jar, add the proportionate amounts of the products (in the order recommended above) to 1 qt water. After thorough mixing, let it stand for 5 minutes. If the combination remains mixed or can be re-mixed readily, it is compatible. Once compatibility is proven, use the same procedure for adding required products to the spray tank.

Manzate and dithane products are incompatible with NEU1128.

Combining this product with sulfur or applying this product within 3 days of sulfur application may increase the plant damage caused by sulfur on sensitive plants (e.g., grape). Do not tank mix NEU1128 with sulfur when temperatures are higher than 90°F.

Do not allow tank mixes to sit for longer than 24 hours. Mix and spray as soon as possible.

NEU1128 alone only requires stirring prior to use. Continue to stir tank mixes of NEU1128 with other pesticides throughout use. If using equipment without pump or paddle, shake often during use. Flush fluid in sprayer hose lines back into the tank if stirring is interrupted.

APPLICATION INSTRUCTIONS

For field applications apply 2% formulation, 2 gal of product/100 gal of water (4.07 lb Tech/gal), at a rate of 75 to 200 gal/acre (6.10 to 16.26 lbs ai/acre) using ground spray equipment. For best results commence treatment when infestation is first noticed. Thoroughly spray insect pests or powdery mildew on plants with diluted product to wetting. Minimize run-off to reduce plant injury on sensitive plants. NEU1128 is a contact spray and is effective in its liquid state. Pests need to be contacted with spray solution to be effective. Efforts should be made to thoroughly reach all plant parts including undersides of leaves.

Repeat treatment every one to two weeks as needed. Apply to a maximum of three consecutive applications to ensure plant injury does not occur. Additional applications may be possible if previous experience with repeat applications of the product under the same conditions have not produced plant injury.

May be used on edible crops up to and including day of harvest after a minimum spray interval of 12 hours.

Cutting Dips: Mix a 0.5% solution (3 fl. oz. in 5 gallons water). Do not use without determining crop sensitivity (phytotoxicity) first. Use a clean dipping tank and equipment. Stir solution thoroughly. Prepare as-needed; do not allow dip solution to sit for long periods prior to use. Dip whole-unrooted or bare root cuttings or the foliage of rooted cuttings (individually or in bunches) in the solution. Ensure the cuttings are not packed too tightly to promote maximum surface area coverage. Immerse for 5-10 seconds immediately before planting or transplanting. Prepare a new dip solution regularly to avoid potential accumulation of plant pathogens. Disinfect the dipping tank and equipment before a new dip solution is prepared. Avoid exposing dipped cuttings to full sun. Do not use on stressed/wilting cuttings.

PESTS/SITES

NEU1128 will control powdery mildew and listed insect pests such as: adelgids (woolly aphids), aphids, lacebugs, mealybugs, mites, leafhoppers, scale insects, plant bugs, sawfly larvae (e.g. pear and rose slugs), psyllids, tent caterpillars, thrips, spider mites, earwigs, whitefly.

Crop	Pest
Pome fruits (such as: apple, crabapple, pear and quince) Stone Fruits (such as: apricot, cherry, nectarine, peach, plum and prune), Nut trees (such as: pecans, almonds, chestnut, filbert, pistachio, black and English walnut)	aphids, mites, plant bugs, leafhoppers, earwigs, mealybugs, psyllids, sawfly larvae (pear slugs), scale insects, spider mites, tent caterpillars
Citrus (such as: citron, grapefruit, kumquat, lemon, lime, tangelo, and tangerine)	aphids, mealybugs, mites, scale insects
Olives	aphids, scale insects, spider mites

Additional restrictions for this use:

- Do not exceed a maximum spray volume of 400 gal/acre on apples.
- Do not exceed a maximum rate of 100 gal/acre on smooth skinned stone fruit up to fruit formation.
- Do not exceed a maximum rate of 175 gal/acre on peaches.

Additional recommendations for this use:

- For tent caterpillars apply at a rate of 3% formulation (3 gal of product/100 gal of water) directly on larvae.
- Use with care on pears after delayed dormant stage due to potential for fruit marking.
- Do not use on yellow skinned nectarines.
- If sooty mold is present on citrus, application of product may result in fruit marking.

Crop	Pest
Small fruits (such as: grapes, strawberry, blueberry, raspberry, cranberry, blackberry, cane berries, currants, boysenberry, and olallieberry)	aphids, mealybugs, mites, scale insects, leafhoppers, plant bugs, powdery mildew

Additional recommendations for this use:

- Do not use on table grapes once they become 6-7 mm in diameter (removes waxy bloom) or use at lowest recommended rate (75 gal/acre).

Crop	Pest
Ornamental and shade trees (flower and foliage plants, birch, flowering cherry, dogwood, evergreens, hawthorn, holly, magnolia, maple, oak, flowering peach, privet, pyracantha, sycamores)	aphids, lacebugs, mealybugs, mites, plant bugs, psyllids, sawfly larvae, leafhoppers, spider mites, whiteflies, woolly aphids (adelgids), tent caterpillars. powdery mildew
Flowering, foliage, bedding plants and houseplants – greenhouse and outdoors	aphids, lacebugs, mites, scale insects, spider mites, leafhoppers, whiteflies, sawfly larvae (rose slugs), earwigs, powdery mildew

Additional recommendations for this use:

- For tent caterpillars apply at a rate of 3% formulation (3 gal of product/100 gal of water) directly on larvae.
- For Cooley spruce gall adelgids apply at a rate of 4% formulation (4 gal of product/100 gal of water). Test for tree sensitivity before applying at this rate. Applications in early spring before bud break or in the fall on hardened off foliage is recommended.

Crop	Pest

Alfalfa, canola, cotton, peanuts, soybeans, tobacco, wheat	aphids, fleahoppers, mites, plant bugs, whiteflies
Corn (such as: field, sweet)	Aphids
Sugar beets	mites, aphids
Vegetables - field and greenhouse (Such as: Artichoke*, Asparagus, Brassica (cole), (such as: bok choy, broccoli, broccoli raab, Brussels sprout, cabbage, cauliflower, Chinese broccoli, Chinese cabbage, collard greens, kale, kohlrabi, mustard greens, napa cabbage and Swiss chard), Bulb (such as: green onion, leeks, garlic and onion), Cucurbit (such as: cucumber, melon, pumpkin and summer squash), Fruiting (such as: eggplant, pepper and tomato), Leafy (such as: celery, endive, escarole, lettuce and spinach), Legume (such as: bean, lima beans, pea and soybean), Root and tuber (such as: beet, carrot, horseradish, potato, radish, turnips, rutabaga, shallot, sugarbeet, potato, radish and yam), Watercress*	aphids, mites, plant bugs, whiteflies, powdery mildew
Herbs and spices: (such as: basil, chive, dill, marjoram, parsley and sage)	aphids, mites, plant bugs, whiteflies, powdery mildew.
Hemp* (field and greenhouse)	aphids, leafhoppers, mealybugs, mites, plant bugs, scale, exposed thrips, whiteflies, powdery mildew
Hops, banana, pineapple, coffee*	aphids, leafhoppers, mealybugs, spider mites, plant bugs, scale insects and whiteflies.

* Not approved for use in California

Additional recommendations for this use:

-To control green peach aphid, tank mixing with another pesticide is necessary.

-When applications are made in less than 25 gallons of water per acre, use 2 quarts of product per acre.

USE RECOMMENDATIONS

Do not spray when plants are under stress. Do not apply to new seedlings and transplants without determining sensitivity (phytotoxicity) first. Do not spray during full sun. Spray early in morning or evening or when overcast. Do not apply to evergreens during drought and use caution when tender new foliage is present. If concerned about sensitivity of plants, apply to individual plants or small areas and wait a couple days to determine if plant damage occurs prior to treatment of larger areas.

Do not use on sweet peas, nasturtiums, delicate ferns or Calmeria and Italia varieties of grapes.

Use with care when used on azaleas, bleeding heart, camellia, corn, euphorbia, fuchsia, gardenia, geraniums, impatiens, hawthorn, horse chestnut, jade plant, Japanese maple, lantana, mountain ash, ornamental ivy, palms, succulents. Sensitivity varies with plant varieties. If concerned about sensitivity of plants, apply to individual plants or small areas of plants and wait to determine if plant damage (phytotoxicity) occurs before treating larger areas.

Use with care on blooms. Determine sensitivity before spraying.

Poinsettias may be sensitive. Do not apply after coloring of bracts has begun.

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 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. To the extent consistent with applicable law, buyer assumes all risk of any such use. To the extent consistent with applicable law, seller makes no other warranties, either expressed or implied.

{Marketing claims and product information that may be presented on the container or supplemental wording:}

[

-[Insecticidal]/[Fungicidal]/[Miticidal] soap

-Insect spray

-Insect and fungal plant disease spray

-May be used up to day of harvest

-Can be used right up until day of harvest

-Rapidly degraded by soil microbes

-Insecticidal soaps are degraded rapidly by soil microbes

-Contact insecticide.

-For use on [vegetables], [fruit and nut trees], [citrus], [berries], [ornamentals], [shrubs], [flowers], and [trees]

-Can be used in vegetable gardens.

-Read Entire Container Label Before Using This Product.

-CONTROLS: [Adelgids], [aphids], [earwigs], [grasshoppers], [lacebugs], [mealybugs], [mites], [plant bugs], [leafhoppers], [psyllids], [sawfly larvae], [scale insects], [tent caterpillars], [thrips], [whitefly], [woolly aphids], [powdery mildew] and other listed pests

-KILLS: [Adelgids], [aphids], [earwigs], [grasshoppers], [lacebugs], [mealybugs], [mites], [plant bugs], [leafhoppers], [psyllids], [sawfly larvae], [scale insects], [tent caterpillars], [thrips], [whitefly], [woolly aphids], [powdery mildew] and other listed pests

-Satisfaction guaranteed or your money back

- See [back][booklet][panel] for [additional precautionary statements] [and directions for use]

- See booklet for directions for use and additional precautions

-Easy to Use

-[Insecticide]/[Miticide]/ [Fungicide]

-Can be used as part of an Integrated Pest Management System

-Compatible with Biological Control Agents, Beneficial Insects and Mites

-Product Information: NEU1128 can be used to treat plants prior to biological control agent release and to treat "hot spots" for pest control in greenhouses with subsequent release of beneficial mites and insects.

-Mode of Action: NEU1128 is a contact killer for both insect and mite pests. It penetrates the body of pests and results in rapid death. NEU1128 kills pests by disrupting membrane and cellular function.

Mode of Action: NEU1128 is a contact killer for [insects], [mites], and [powdery mildew].

-NEU1128 contains specially selected fatty acid salts (soaps) chosen for effective pest control. NEU1128 has been formulated to provide optimum spreading.

-NEU1128 is effective against the adult, larval and nymph stages of pests. Pupal stages of some pests (e.g. whitefly) may also be affected.

-www.neudorff.com



-Neudosan™ is a trademark of W. Neudorff GmbH KG

-Made with Neudosan™ Insecticidal Soap, a trademark of W. Neudorff GmbH KG

-Contains Neudosan™ Insecticidal Soap, a trademark of W. Neudorff GmbH KG]

-Listed by the Organic Materials Review Institute (OMRI) for use in production of organic food and fiber.

-Listed by the Organic Materials Review Institute (OMRI) for use in organic production.

-OMRI Listed



 -For Organic Production

-The active ingredient in this product is exempted from the requirement of a tolerance for residues in or on all food commodities when used in accordance with good agricultural practice.

- Kills listed insects on contact

-Controls listed fungal plant diseases, insects and mites

- Specially-formulated pesticidal soap to protect plants

- Controls powdery mildew

- Spray and harvest the same day

-Tough on pests

-See [attached booklet][inside panel] for [additional] [Precautionary Statements], [First Aid Statements], [Directions for Use], and [Storage and Disposal Statements]

]