

67702-13

08/26/2008

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



OFFICE OF
PREVENTION, PESTICIDES,
AND TOXIC SUBSTANCES

AUG 26 2008

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

Dear Mr. Talarek:

Subject: Application to amend label
NEU1128 RTU
EPA Reg. No. 67702-13
Your submission dated May 29, 2008

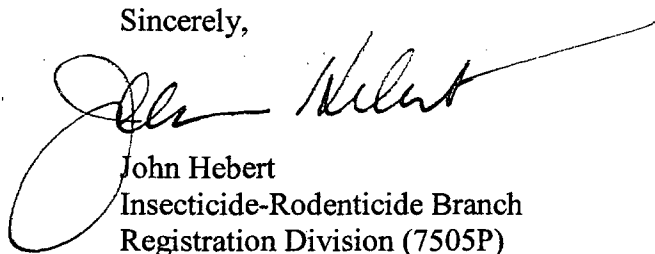
The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable with the following comments:

- On page 1, under the Environmental Hazards paragraph, insert the following text as the first sentence: *"This product may be hazardous to aquatic invertebrates."*
- On page 1, under the second paragraph of the Directions for Use, insert the following text after the first sentence: *"NEU1128 RTU is a contact spray and pests must be sprayed directly to achieve control."*
- On page 2, under the Notice to Buyer paragraph, revise the last sentence so it reads, *"To the extent consistent with applicable law, Seller makes no other warranties, either expressed or implied."*
- On page 3, the following marketing claim is contradicted by the text in the Notice to Buyer paragraph and must be deleted: *"Unconditionally Guaranteed."*
- On page 3, revise the marketing claim *"Satisfaction Guaranteed"* so it reads, *"Satisfaction Guaranteed or your money back."*

- Note: 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 Assurance.

A stamped copy is enclosed for your records. Submit two copies of your final printed labeling before you release the product for shipment. Should you have any questions, please contact Julie Chao at 703-308-8735 or chao.julie@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "John Hebert", is written over a large, stylized circular flourish.

John Hebert
Insecticide-Rodenticide Branch
Registration Division (7505P)

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NEU1128 RTU

ACCEPTED
With COMMENTS
In EPA Letter Dated:

| Active Ingredient | By Wt. |
|--------------------------------------|--------|
| Potassium Salts of Fatty Acids | 1% |
| Other Ingredients | 99% |
| Total | 100% |

Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

67702-13

KEEP OUT OF REACH OF CHILDREN

CAUTION

NET CONTENTS: 8 oz, 16 oz, 24 oz, 32 oz, 40 oz, 1 gallon

Registration #: 67702-13

Establishment #: 67702-DEU-1

PRECAUTIONARY STATEMENTS

Environmental Hazards: 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.

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: 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 or 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.

Shake container before use. Thoroughly spray insect pests to wetting on all plant parts, including undersides of leaves. Repeat treatment weekly or bi-weekly if needed. May be used on edible crops up to and including day of harvest.

Do not use on sweet peas, nasturtiums, delicate ferns. Use with care on new seedlings, transplants and blooms. Avoid spraying during full sun. If concerned

about sensitivity of plants, apply to individual plants or small areas of plants and wait to determine if plant damage occurs prior to treatment of larger areas.

PESTS

NEU1128 RTU will control 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 and whitefly.

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; ornamental and bedding plants; ornamental and shade trees (e.g., birch, evergreens, holly, oak).

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. Buyer assumes all risk of any such use. 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
- Insecticide/Miticide
- Insect spray
- roses and flowers
- houseplants and gardens
- fruits and vegetables
- rose and flower insecticide
- ideal for roses
- ideal for houseplants
- kills insects in minutes
- kills insects fast
- fast acting
- kills bugs on contact
- kills insects on contact
- provides quick control of pests
- indoor – outdoor
- may be used up to day of harvest

- can be used right up until day of harvest
- May be applied to edibles up to day of harvest
- Does not persist in the environment.
- Contact insecticide.
- NEU1128 RTU is a contact spray and pests must be sprayed directly to achieve control.
- 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.
- Patented technology
- Unique, patented formula.
- Read Entire Container Label Before Using This Product.



-For Organic Gardening

- CONTROLS: Adelgids, aphids, earwigs, grasshoppers, lacebugs, mealybugs, mites, plant bugs, leafhoppers, psyllids, sawfly larvae, scale insects, tent caterpillars, thrips, whitefly, woolly aphids 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 and other listed pests.
- KILLS spider mites, aphids, mealybugs and whitefly.
- Satisfaction Guaranteed
- Unconditionally Guaranteed
- Money back guarantee
- Easy to Use
- Ideal as part of an Integrated Pest Management System
- Compatible with Biological Control Agents, Beneficial Insects and Mites
- Do not spray when plants are under stress.
- NEU1128 RTU 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.
- NEU1128 RTU is a contact killer for both insect and mite pests.
- NEU1128 RTU penetrates the body of pests and results in rapid death. It kills pests by disrupting membrane and cellular function.
- NEU1128 RTU contains specially selected soaps (fatty acid salts) chosen for effective pest control.
- NEU1128 RTU has been formulated to provide optimum spreading.
- NEU1128 RTU is effective against the adult, larval and nymph stages of pests. Pupal stages of some pests (e.g. whitefly) may also be affected.
- Multi-purpose
- Insect killer
- 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 NeudosanTM Insecticidal Soap, a trademark of W. Neudorff GmbH KG
- Houseplants, Flowers, Fruits, Vegetables, Trees, Shrubs
- For use indoors-outdoors



- 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



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