

67702-21

08/31/2007

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Walter G. Talarek
W. Neudorff GmbH KG
1008 Riva Ridge Drive
Great Falls, VA 22066-1620

AUG 31 2007

Dear Mr. Talarek:

Subject: Labeling Amendment; Additional Organic Claims
Neudorff's Insecticidal Soap Ready-To-Use
EPA Registration No. 67702-21
Submission Date: April 25, 2007

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

1. Delete the claim "Kills bugs on contact". To have this claim added back on in the future, acceptable efficacy data must be submitted or cited.

A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the referenced label, incorporating the above changes, before releasing the product for shipment.

The Agency has also reviewed your submission for the revised Confidential Statement of Formula dated July 24, 2007 for the basic formulation. It has been determined that the Confidential Statement of Formula agrees with the label claim in compliance with PR Notice 91-2 and is acceptable. The Confidential Statement of Formula has been added to your file as part of the record and will replace the previously dated Confidential Statement of Formula for the basic formulation. If you have any questions regarding this letter, please contact me at (703) 306-0415.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", written over a horizontal line.

Kable Bo Davis
Entomologist
Insecticide-Rodenticide Branch
Registration Division (7505P)

Enclosure

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NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

NET CONTENTS XXX oz

PRECAUTIONARY STATEMENTS

Environmental Hazards: This product may be hazardous to aquatic invertebrates. Do not apply directly to water.

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 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 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.

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

AUG 31 2007

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
67702-21

PESTS

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE will control insect pests such as (but not limited to): 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).

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

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.

- 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

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

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- 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.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE 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



-For Organic Production

- 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.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE 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.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE is a contact killer for both insect and mite pests.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE penetrates the body of pests and results in rapid death. It kills pests by disrupting membrane and cellular function.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE contains specially selected soaps (fatty acid salts) chosen for effective pest control.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE has been formulated to provide optimum spreading.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE 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

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

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-www.neudorff.de



-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

For information on NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE, call
250-652-5888, Monday through Friday, 9 am to 5 pm PST.

Registration #: 67702-21

Establishment #: 67702-WG-1