



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 30, 2015

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

Subject: Label Amendment – response to Agency letter dated February 12, 2015
Product Name: Neudorff's Insecticidal Soap RTU
EPA Registration Number: 67702-21
Application Date: February 18, 2015
Decision Number: 499980

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.

Page 2 of 2
EPA Reg. No. 67702-21
Decision No. 499980

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 with FIFRA section 6. If you have any questions, please contact Linda A. DeLuise by phone at 703.305.5428, or via email at deluise.linda@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Gebken", written in a cursive style.

Richard Gebken
Product Manager 10
Invertebrate & Vertebrate Branch 2
Office of Pesticide Programs

Enclosure

NEUDORFF'S INSECTICIDAL SOAP RTU

Active Ingredient	By Wt.
Potassium Salts of Fatty Acids	1%
Other Ingredients	<u>99%</u>
Total.....	100%

ACCEPTED

06/30/2015

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

NET CONTENTS: 8 fl. oz, 16 fl. oz, 24 fl. oz, 32 fl. oz, 40 fl. oz, 64 fl. oz, 1 gallon

Registration #: 67702-21

Establishment #: 67702-

PRECAUTIONARY STATEMENTS

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.

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.

STORAGE AND DISPOSAL [For use with Quick Connect Sprayer]

PESTICIDE STORAGE: Completely discharge product in sprayer prior to storage. Flip down [colour] spout to close. NO NEED TO DISCONNECT [TRIGGER SPRAYER. Close nozzle on trigger sprayer. Snap sprayer back into place.] Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store unused material, tightly closed, in original container only, away from open flame.

PESTICIDE DISPOSAL AND CONTAINER HANDLING:

If empty: Nonrefillable. Do not reuse or refill this container. Place in trash or offer for recycling if available.

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

2/7

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.

For residential indoor, outdoor and non-commercial greenhouse use only.

[Registrants must use one of the following:

Please read entire label before using. Use only as directed.

Shake container before use. Thoroughly spray insect pests or powdery mildew 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. Do not spray during full sun. If concerned about sensitivity of plants, apply to individual plants or small areas of plants and wait 2 days to determine if plant damage occurs prior to treatment of larger areas.

PESTS

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE will control powdery mildew and the following listed insect pests: 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).

OR

Before You Use

- Use only as directed

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

3/7

<p>Please read entire label before using.</p>	<ul style="list-style-type: none"> - Shake container before use. - Do not use on sweet peas, nasturtiums, or delicate ferns. - Use with care on new seedlings, transplants and blooms. - Do not spray during full sun. - If concerned about sensitivity of plants, apply to individual plants or small areas of plants and wait 2 days to determine if plant damage occurs prior to treatment to larger areas.
<p>How to Use</p>	<p>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.</p>
<p>Use Site</p>	<p>Pests Controlled</p>
<p>Indoor, Outdoor and Greenhouse Fruit and Nut Trees such as: apple, cherry, peach, pear, pecans, and almonds. Corn, soybeans, melons, tomatoes. Vegetables such as: beans, cabbage, cucurbits, peas, potatoes. Figs Small Fruits such as: grapes, strawberry, raspberry. Citrus, houseplants, ornamental and bedding plants. Ornamental and shade trees such as birch, evergreen, holly and oak.</p>	<p>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.</p>

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[The registrant may use one or more of these optional warranty 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 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

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

4/7

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.

OR

[The] (Insert Company name) Guarantee- If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

OR

Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

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[Optional sprayer instructions:



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[Optional: For Use with Quick Connect Sprayer

Quick Connect® Sprayer

- Remove sprayer. Pull cord ALL THE WAY OUT.

- Insert (colour) plug into spout (on cap) until it clicks.

- Flip up spout. Open nozzle at end of sprayer.



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

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

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

5/7

-3 in 1: Insecticide, Miticide, Fungicide
-[Insecticide]/[Miticide]/[Fungicide]

- Insect spray
- roses and flowers
- houseplants and gardens
- fruits and vegetables
- rose and flower insecticide
- ideal for roses
- ideal for houseplants
- kills listed insects in minutes
- kills insects fast- in minutes!
- fast acting- in minutes!
- kills bugs through contact
- kills listed insects through contact
- provides quick control of pests in minutes
- indoor – outdoor
- For use on plants—indoors and outdoors
- For use indoor and 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
- Rapidly degraded by soil microbes
- Insecticidal soap degraded rapidly by soil microbes
- Contact insecticide.
- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE is a contact spray and pests must be sprayed directly to achieve control.
- Read the label first!
- Quick Facts:
 - Multipurpose insect killer
 - Easy to use, fast acting
 - use up to and including day of harvest
- Kills listed insects
- For use on vegetables, fruit and nut trees, citrus, berries, ornamentals, shrubs, flowers, and trees in homes, gardens and greenhouses.
- For use on vegetables, flowers, fruits, & houseplants
- Can be used in vegetable gardens.
- Patented technology
- 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), (powdery mildew) and other listed pests

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

6/7

-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

-KILLS spider mites, aphids, mealybugs, whiteflies and other listed pests.

-Where to Use: For use (indoors), (outdoors), and (in greenhouses).

-When to Use: When listed insects, or insect damage first appears.

-Satisfaction Guaranteed

-Unconditionally Guaranteed

-Money back guarantee

-Easy to Use

-Can be used 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 listed 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 listed pests. Pupal stages of some pests (e.g. whitefly) may also be affected.

-This product will control listed insect pests on (vegetables), (houseplants), (ornamentals) and (fruit and nut trees) and is effective against adult, larvae, and nymph stages of pests.

- NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE is a contact killer for (insects), (mites), and (powdery mildew).

-Multi-purpose

-Insect killer

-Insect and powdery mildew spray

- Kill listed insects through contact (in minutes)

-Controls Powdery Mildew, Insects and Mites

- Specially-formulated pesticidal soap to protect plants

- People and pets can enter the area after product is dried

- Controls powdery mildew

- Spray and harvest the same day

-www.neudorff.com



NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL

7/7

- (Houseplants), (Flowers), (Fruits), (Vegetables), (Trees), (Shrubs)
- For use indoors-outdoors
- For household home garden use.
- For questions or comments call toll-free X-XXX-XXX-XXXX
- 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 (panel) for additional precautionary statements
- See additional precautionary statements on back panel.
- This container is made with a minimum X% recycled material
- Designed for Independent Retailers
- www.whitneyfarms.com
- www.ortho.com
- www.espoma.com
- www.worryfreebrand.com
- www.bonideproducts.com
- www.gardensafe.com
- www.gardensalive.com
- www.killsbugsdead.com
- www.bayeradvanced.com
- Superscript is first letter of lot number
- Manufactured under[a] license of W. Neudorff GmbH KG[, Germany]
- Sold under a license 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



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[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”]

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

NEUDORFF'S INSECTICIDAL SOAP READY-TO-USE LABEL
8/7

Registration #: 67702-21

Establishment #: