



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

MAR 16 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Christine A. Dively
Director of Regulatory Affairs
Certis USA, LLC
9145 Guilford Road, Suite 175
Columbia, MD 21046

RE: Product Name: Neem Oil 70%
EPA Reg. No: 70051-2
Application for Label Notification Dated February 18, 2010 to add Garden Safe
Brand Neem Oil Extract Concentrate as an alternate brand name

Dear Ms.Dively:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under Pesticide Registration (PR) Notice 98-10 dated above. A preliminary screen of this request has been conducted for its applicability under PR Notice 98-10 and it has been determined that the action(s) requested falls within the scope of PR Notice 98-10. Our records have been duly noted, and the label submitted with this application has been stamped "Notification, received and reviewed" and will be placed accordingly in our records.

If you have any questions concerning this action, please feel free to contact Ms. Menyon Adams at (703) 347-8496 or email at adams.menyon@epa.gov.

Sincerely,

Linda Hollis

Linda Hollis, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention
Division (7511P)



United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 70051-2	2. EPA Product Manager Biochemical Pesticides Branch	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Neem Oil 70 %	PM# 91	
5. Name and Address of Applicant (Include ZIP Code) Certis U.S.A., L.L.C. 9145 Guilford Road, Suite 175 Columbia, MD 21046 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: <input checked="" type="checkbox"/> EPA Reg. No. _____ Product Name _____	

Section - II

NOTIFICATION

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed label is response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Date Reviewed: 03/16/10
Reviewed By: MKK

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Notification of Alternate Brand Name per PR Notice 98-10. This notification is consistent with the guidance in PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Metal <input checked="" type="checkbox"/> Plastic Glass Paper Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 8, 16, 20, 24 oz, 2 1/2, 250 gal		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Christine Dively	Title Director, Reg. Affairs	Telephone No. (include Area Code)	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature <i>Christine A. Dively</i>	3. Title Director, Reg. Affairs		
4. Typed Name Christine Dively	5. Date February 18, 2010		

MASTER LABEL

This master label bears directions for agricultural, commercial and homeowner use with various application rates specific to the associated container sizes

Neem Oil 70%
Fungicide/Miticide/Insecticide

Sublabel A: Agricultural Uses

Sublabel B: Commercial Greenhouse, Nurseries, Ornamentals

Sublabel C: Homeowner Use

Alternate Brand Names: Trilogy, Triact 70EC, Trilogy PHC, Ferti-lome Rose, Flower & Vegetable Spray, Ferti-lome Triple Action Plus, Garden Safe Brand Neem Oil Extract Concentrate, Garden Safe Fungicide 3 Concentrate, UltraStop Fruit Tree 3-in-1 Concentrate, Concern From the Earth For the Earth Garden Defense Multi-Purpose Spray Concentrate

Active Ingredient:

Clarified Hydrophobic Extract of Neem Oil.....70.00%

Other Ingredients.....30.00%

Total.....100.00%

EPA Registration Number: 70051-2

EPA Establishment Number: 70051-CA-001

Manufactured by:

Certis U.S.A., L.L.C.
9145 Guilford Road, Suite 175
Columbia, Maryland 21046

