



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 6, 2018

Karen Warkentien
Director, Regulatory Affairs
Certis USA LLC
9145 Guilford Road
Columbia, MD, 21046

Subject: Label Amendment – Removal of public health insects from label
Product Name: Trilogy® XL
EPA Registration Number: 70051-75
Application Date: 05-Jan-2018
Decision Number: 537314

Dear Ms. Warkentien:

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.

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

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with FIFRA section 6. If you have any questions, please contact Matthew Aubuchon by phone at 703-347-0477, or via email at Aubuchon.Matthew@epa.gov.

Sincerely,



for

Product Manager 3
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

Trilogy® XL

FUNGICIDE/MITICIDE/INSECTICIDE

{Alternate Brand Names: None}

Broad Spectrum Insecticide, Fungicide, and Miticide
For Control of Listed Insects, Diseases, and Mites on Vegetables, Fruits, Nuts, Herbs,
Spices, Roses, Flowers, Turfgrass and Shrubs Around the Home

Stops Powdery Mildew
Can Be Used Up to Day of Harvest

ACTIVE INGREDIENTS:

Pyrethrins	0.25%
Piperonyl Butoxide*	2.50%
Clarified Hydrophobic Extract of Neem Oil	70.00%

OTHER INGREDIENTS:	<u>27.25%</u>
Total:	100.00%

*(Butyl carbityl)(6-propylpiperonyl)ether and related compounds

KEEP OUT OF REACH OF CHILDREN
CAUTION

See Back or Side Panel or Back Panel Booklet for Additional
Precautionary Statements

MANUFACTURED BY:

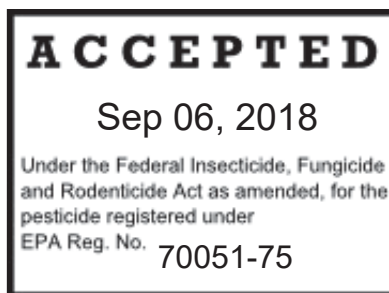
Certis USA LLC
9145 Guilford Road, Suite 175
Columbia, MD 21046

EPA Reg. No. 70051-75
EPA Est. No. _____

Lot Number: _____



Net Contents:



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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if inhaled. Avoid breathing vapor or spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

FIRST AID:

- **If inhaled:** Move the person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further 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.
- **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 swallowed:** Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Hotline Number: 1-800-255-3924. Have the product container or label with you when calling a poison control center or doctor or going for treatment.

ENVIRONMENTAL HAZARDS: This pesticide is toxic to aquatic organisms including fish and 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 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.

BEE HAZARD: This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are foraging the treatment area.

PHYSICAL AND CHEMICAL HAZARDS: Do not use or store near heat or open flame.

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DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

GENERAL INFORMATION:

SHAKE WELL BEFORE AND DURING USE.

Multi-purpose insecticide/fungicide/miticide. Kills eggs, larval and adult stages of listed insects. Prevents fungal attack of plants' tissues. Not for use in food handling areas. Trilogy® XL is most effective when applied in early to mid-morning or late afternoon when adult insect pests, such as whiteflies, are normally sedentary on the undersides of the foliage. Use spray solutions within several hours of preparation for maximum effectiveness. For best results maintain constant agitation in spray equipment. For optimal performance, do not mix with cold water or apply under cold ambient temperatures (less than 45°F). If product thickens (freezes) before using, place in a warm room (greater than 45°F) for a few days or in warm water (120°F) for 2 to 8 hours until completely thawed. Do not use partially thawed material.

Do not apply to wilted or otherwise stressed plants, or to newly transplanted material prior to root establishment. When using in conjunction with beneficial insects, conduct a small trial to assure compatibility before using on a large scale. As with other products that contain oils, exercise care in timing applications to early morning/late evening to minimize the potential for leaf burn. Do not add adjuvants (spreaders, stickers, extenders, etc.) to Trilogy® XL. Use with care on plants with tender tissue. Do not apply to known spray sensitive plant species such as: impatiens flowers, fuchsia flowers, hibiscus flowers, some rose flowers, ornamental olive trees, red maples, some carnation varieties or similar plants without prior testing.

FUNGICIDE USE: For use on FRUITS, NUTS, VEGETABLES, HERBS, SPICES, ROSES, HOUSEPLANTS, FLOWERS, SHRUBS and TURFGRASS

Application Instructions: Trilogy® XL is an effective fungicide for the prevention and control of various fungal diseases including powdery mildew, black spot, brown spot, dollar spot, snow mold, downy mildew, anthracnose, rust, leaf spot, botrytis, needle rust, scab and flower, twig and tip blight. As a preventative, apply Trilogy® XL on a 7 to 14 day schedule until the potential for disease development is no longer present. To control disease already present, apply Trilogy® XL on a 7 day schedule until disease pressure is eliminated. Then continue spraying on a 14 day schedule to prevent the disease from reoccurring. To prevent rust leaf spot diseases, anthracnose and scab, begin applications at the first sign of spring budding. To prevent powdery mildew, apply in mid-summer or when disease is first detected. For brown patch and dollar spot, begin spraying at first sign of disease on a 7 to 14 day interval. For snow mold, begin spraying on a 14 day interval in the fall before the first snow. Continue applications until disease pressure no longer exists.

Mixing Instructions: Mix Trilogy® XL at the rate of 2 tablespoons (1 fluid ounce) per gallon of water. Thoroughly mix solution and spray all plant leaf surfaces (including

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undersides of leaves) until completely wet. Excessive application is unnecessary and to be avoided.

INSECTICIDE USE: For use on FRUITS, NUTS, VEGETABLES, HERBS, SPICES, ROSES, HOUSEPLANTS, FLOWERS, SHRUBS and TURFGRASS

Application Instructions: Apply Trilogy® XL at first sign of listed insects/mites. Trilogy® XL provides for a quicker and more complete control, and acts as an "exciter" to flush insect pests out of hiding and into direct contact with spray residues. For control of aphids, spider mites, scale, mealybugs, whiteflies, beetles, loopers, leafminers, leafrollers, armyworms, webworms, weevils, tent caterpillars, fungus gnats, leafhoppers, cabbageworms, squash bugs, squash vine borer, stink bugs, thrips, tomato hornworm, lace bugs, boxelder bugs, grasshoppers, crickets, ants (except Carpenter, Harvester, Pharaoh, and Fire ants), earwigs, chinch bugs, and other listed insect pests. Trilogy® XL is most effective when applied on a 7 to 14 day schedule. For heavy insect populations, spray on a 7 day schedule.

Mixing Instructions: Mix Trilogy® XL at the rate of 2 tablespoons (1 fluid ounce) per gallon of water. Thoroughly mix solution and spray all plant leaf surfaces (including undersides of leaves) until completely wet. Excessive application is unnecessary and to be avoided. Frequently agitate solution as you spray.

Use Restrictions

Entry Restrictions: Do not allow adults, children or pets to enter the treated area until sprays have died.

Application Restrictions: Do not apply this product in a way that will contact adults, children or pets, either directly or through drift. Remove pets, birds, and cover fish aquariums before spraying. Not for use in outdoor residential misting systems. Do not make applications during rain. Do not wet plants to point of runoff or drip.

STORAGE AND DISPOSAL

Pesticide Storage: Do not store diluted solutions for later use.

Pesticide Disposal and Container Handling: Nonrefillable container. Do not reuse or refill this container.

{For containers equal to or less than 5 gallons}

If empty: Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

{For containers great than 5 gallons}

Triple rinse as follows: Empty the remaining contents into application equipment of a mix tank. Fill the container $\frac{1}{4}$ 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 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 puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY

Certis USA LLC warrants that the material contained herein conforms to the description on the label and is reasonably fit for the purposes referred to in the directions for use. Timing and method of application, weather, watering practices, nature of soil, the insect problem, condition of the crop, incompatibility with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the seller. To the extent consistent with applicable law, buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herein. NO OTHER EXPRESS OR IMPLIED WARRANTY OF THE FITNESS OF MERCHANTABILITY IS MADE.

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{Optional language that may or may not be on the product label}

- The Ortho Guarantee: If for any reason, you the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.
- Questions, Comments or Medical Information: Company phone #, company website

{Optional Language for Attaching Container to Garden Hose}

Hose End Sprayer Use Instructions

The sprayer attached to the container is ready-to-use. Simply attach to your garden hose and follow these instructions:

1. Ensure the large, round “on/off” knob is set to OFF.
2. Turn on Water.
3. PUSH IN small knob near front of sprayer. This allows water and product to mix.
4. Hold sprayer and container level and point towards area to be sprayed.
5. Turn large, round “on/off” knob to ON.
6. Begin spraying product evenly over area you wish to treat.
7. Spray to visibly wet.
8. To stop spraying, turn large, round knob to OFF.
9. PULL OUT small knob near front of sprayer. This prevents product from mixing with water.
10. Turn off water at faucet. Relieve water pressure in the hose by turning large, round “on/off” knob ON until water pressure is reduced.
11. Turn the knob to OFF for storage of unused product and/or disposal of empty container.

{-or-}

{Option 1}

HOW TO USE

Make sure water control knob on hose sprayer is in the “OFF” position. Hold by handle and shake vigorously, turning bottle as you shake. Attach the hose to spray nozzle. Blend safety tab back and break off. Turn control to “WATER” position. Slowly turn on water supply to moderate rate of flow. Point nozzle toward spray area, turn control knob to “ON”. Product will automatically mix with water. Slowly sweep the area to be treated. To stop spraying, turn control valve to the “OFF” position. Turn off water at faucet. To relieve pressure, turn control valve to the “WATER” position pointing sprayer away from self. Remove from hose.

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{Option 2}

TWIST & SHOOT™ READY TO SPRAY INSTRUCTIONS

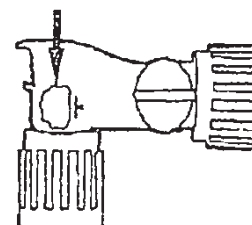
1. Make sure control knob is in “OFF” position, then connect to garden hose.
2. Turn water on at faucet. When spraying low growing plants, twist the control knob right, to the “FAN” position. When spraying taller trees, twist the control knob left to the “STREAM” position for extended reach and more uniform coverage. The product mixes automatically with the water as you spray.
3. To stop spraying turn the control knob lever to the “OFF” position. Turn off the water at the faucet and disconnect sprayer from garden hose.

{-or-}

Ready to Spray Instructions

For Outdoor Use Only

Double Knob Sprayer Instructions



The sprayer attached to the container is ready-to-use. Simply attach to the garden hose and follow these simple instructions.

1. Ensure the large, round “on/off” knob is set to OFF.
2. Turn on water.
3. Rotate the small, star-shaped product control knob to align the flat portion of the knob with the vertical portion of the lock tab and PUSH IN the knob to open. This allows product to mix with water.
4. Hold sprayer and container level and point towards area to be sprayed.
5. Turn large, round “on/off” knob forward (away from you) to ON.
6. Begin spraying product evenly over area you wish to treat.
7. To stop spraying, turn large, round “on/off” knob backward (toward you) to OFF.
8. PULL OUT and rotate the small, star-shaped product control knob. This prevents product from mixing with water.
9. Turn off water at the faucet. Relieve water pressure in the hose by turning large, round “on/off” knob to ON until water pressure is reduced.
10. Turn the knob to OFF for storage of unused product and/or disposal of empty container.

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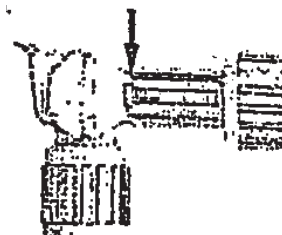
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SINGLE KNOB SPRAY INSTRUCTIONS

The sprayer attached to the container is ready-to-use. Simply attach to the garden hose and follow these simple instructions.

1. Turn on water.
2. Hold sprayer and container level and point towards area to be sprayed.
3. Bend yellow tab back and turn knob backward (toward you) to ON.
4. Begin spraying product evenly over area you wish to treat.
5. To stop spraying, turn knob forward (away from you) to OFF.
6. Turn off water.
7. Properly store unused product or dispose of empty container.



{-or-}

USING THE READY SPRAY NOZZLE

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.
3. Turn on 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 safety tab back (located at right of dial) with your thumb and b.) hold while turning the dial clockwise until it stops. Water will automatically mix with the product.
5. Spray until wet to control listed insects. Walk at a steady pace while spraying using an even sweeping motion, slightly overlapping treated areas.
6. To STOP spraying, QUICKLY turn the dial counterclockwise until it stops and the safety tab engages into the notch in the valve. 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 the safety tab in the valve notch. Place in a cool area away from heat, sunlight or open flame.

NOTE: This product is non-staining to most home siding depending on age and cleanliness. However, before using in areas where the spray may contact home siding (vinyl siding in particular), test in an inconspicuous area and recheck in a few hours. Do not use if any staining is observed.

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READY-TO-USE DIRECTIONS FOR OUTDOORS ONLY

HOW TO USE THE READY-TO-USE SPRAY SYSTEM

Connect

1. Shake well before using.
2. Connect Sprayer to hose.
3. Turn on water.

Spray

1. To begin spraying, point nozzle in the direction you want to spray.
2. [Bend small plastic tab back and] Turn knob [clockwise] to ON position.
3. Spray evenly to the area to be treated. Refer to the [sight gauge] clear view strip (graduated scale) on the side of the container to determine the amount of product sprayed.

Finish

1. To stop spraying, [turn knob counter clockwise] to OFF position.
2. Turn off water.
3. Relieve water pressure by [bending plastic tab back and] turning knob to ON position until water slows to a drip. Then turn knob back to OFF position.
4. Disconnect sprayer from hose.

{-or-}

Hose End Applicator Instructions:

1. Make sure knob is twisted fully clockwise to OFF position. Shake well, then attach to hose.
2. Turn Product Control Button clockwise until the flat portion is flush with the lock tab, then push button all the way in. Avoid squeezing bottle.
3. Turn water on at faucet, aim nozzle toward surface to be sprayed and turn knob counter-clockwise to begin spraying.
4. When finished, push Product Control Button to OFF position from opposite side. Return knob and faucet to OFF position. Discharge water pressure by turning knob ON and OFF again. Turn Product Control Button counter-clockwise away from lock tab to prevent accidental discharge. Store out of reach of children.

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