



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7505C) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460

EPA Reg. Number:

Date of Issuance:

70191-4

4/5/11

NOTICE OF PESTICIDE:

X Registration

___ Reregistration

(under FIFRA, as amended)

Term of Issuance:

Unconditional

Name of Pesticide Product:

Pathway Ready-to-Use K+NEEM Insecticide-Fungicide II

Name and Address of Registrant (include ZIP Code):

Pathway Holdings, LLC c/o BioNet International Consultants 9619 Evans Ford Rd. Manassas, VA 20111

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(5) provided that you:

- 1. Submit and/or cite all data required for registration/registration/registration review of your product when the Agency requires all registrants of similar products to submit such data.
- 2. Make the following label changes before you release the product for shipment:
 - a. Revise the EPA Registration Number to read, "EPA Reg. No. 70191-4".
- 3. Submit one copy of the revised final printed label for the record before you release the product for shipment.

Signature of Approving Official:

Date:

4/5/11

Venus Eagle, Product Manager (01)

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Insecticide-Rodenticide Branch, Registration Division (7505P)

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4. Storage stability (830.6317) and corrosion characteristics (830.6320) data must be submitted within 18 months from the date of this registration notice.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this notice, please contact Jennifer Urbanski at (703-347-0156) or urbanski.jennifer@epa.gov.

Venus Eagle Product Manager (01) Insecticide-Rodenticide Branch Registration Division (7505P)

Enclosure- Stamped Labeling

Pathway (logo)

Ready-to-Use

K[†]NEEM™

INSECTICIDE-FUNGICIDE II

MASTER LABEL

Sublabel A: Residential-Use

(Master label pages 2-4)

Sublabel B: Commercial or Agricultural Use

(Master label pages 5-8)

ACTIVE INGREDIENTS

BY WT.

Potassium Salts of Fatty Acids*...... 1.5%

*Derived from Neem Seed Oil.

OTHER INGREDIENTS: 98.5%

TOTAL 100.0%

EPA Reg. No. 70191-U EPA Est. No. 70191-FL-01

MADE IN THE USA BY:

Pathway Holdings, LLC 5002 US 41 North Palmetto, FL 34221 ACCEPTED APR 05 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under:

Page 1 of 8

EPA. Reg. No: 101

Pathway (logo)

Ready-to-Use

(Graphics)

K[†]NEEM[™]

INSECTICIDE-FUNGICIDE II

Controls Aphids, Mites, Whiteflies & Powdery Mildew on Roses & other Plants!

FOR INDOOR, HOME GREENHOUSE & HOME GARDEN USE

EDA Dom No. 70404 II

EPA Reg. No. 70191-U EPA Est. No. 70191-FL-01

Keep out of reach of children. CAUTION

See back panels for additional precautionary statements.

NET CONTENTS 24 FL.OZ (710ml), or 32 FL.OZ. (1QT.) (946ml)

[SEE PAGE 3 of 3 FOR ADDITIONAL MARKETING CLAIMS]

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its label.

IMPORTANT INFORMATION: This blend of potassium soaps derived from Indian Neem tree seed oil is specially formulated as a Ready-to-Use spray that kills listed mites and insect pests and powdery mildew spores, hyphae and colonies on contact. Target arthropod pests include adelgids, aphids, cabbageworms & other caterpillars, earwigs, fleabeetles, lace bugs, leaf hoppers, mealy bugs, psyllids, rose slugs, scale insects, sawfly larvae, spider mites, spittle-bugs, squashbugs, stinkbugs, tent caterpillars, thrips, and whiteflies on indoor and outdoor ornamental and food plants, shrubs, trees, foliage plants, flowers, home garden and greenhouse fruits, nuts and vegetables.

SHAKE WELL BEFORE USE. Contact and kill POWDERY MILDEW hyphae, colonies and spore on INDOOR & OUTDOOR ROSES, LILACS, ZINNIA and other susceptible indoor or outdoor plants. Wet all plant surfaces, particularly young stems, buds and upper leaf surfaces. Begin spraying when signs of powdery mildew first appear and repeat every 7 to 10 days to maintain control. Periodically (every 3 to 4 weeks) rinse foliage with clean water to avoid accumulation of product residues.

Contact and kill LISTED ARTHROPOD PESTS with spray when they first appear or as soon as damage is noticed. Spray infested plant surfaces thoroughly, including lower leaf surfaces, to point of runoff. Respray in one week if pests persist. For aphid and mealybug control, respray after 2 or 3 days to control high populations. Product can be used up to day of harvest on food plants. Cover aquaria before spraying.

FOR USE ON HOUSEPLANTS, such as ornamental foliage, flowering and food plants in homes, home greenhouses or interior plantscapes.

FOR USE ON FLOWERS, BEDDING PLANTS & PERENIALS, such as those growing OUTDOORS or around the home.

FOR USE ON WOODY LANDSCAPE SHRUBS & TREES, including deciduous and evergreen species such as dogwood, crabapple, crape myrtle, lilac, holly, and conifers.

Label version – 4 April, 2011 Page 3 of 8 pages

Pathway Ready-to-Use K+NEEM™ Insecticide-Fungicide II MASTER LABEL

FOR USE ON HOMEGROWN FRUITS & NUTS, such as apples, blackberries, cherries, cranberries, English walnuts, grapes, grapefruit, lemons, melons, nectarines, oranges, peaches, pears, pecans, plum, raspberries, strawberries, and many Exotic, Semitropical or Tropical fruiting plants.

FOR USE ON HOMEGROWN VEGETABLES, such as asparagus, beans, beets, broccoli, cabbage (& other cole crops), celery (and other leafy vegetables), cucumber (& other cucurbits), eggplant, herbs, lettuce, okra, peas, peppers, potatoes, radish, spices (various), spinach, squash & tomatoes.

USE RESTRICTIONS: Do not use on newly transplanted or drought stressed plants or on BLEEDING HEART, CROWN OF THORNS, GARDENIA, HORSE CHESTNUT, JADE PLANT, JAPANESE MAPLE, LANTANA, MOUNTAIN ASH OR SWEETPEAS, or tender new growth of conifers. Product use may discolor foliage of spruce or other conifers. Surface marking may result from presence of sooty molds on foliage or fruits of some plants, particularly citrus and some varieties of pome fruits. Never reapply spray more than twice within 21 days of original treatment unless product residues have been removed by heavy rains or a thorough rinsing of treated foliage...

Test a few inconspicuous leaves of BALD CYPRESS, BEGONIAS, CAMELLIAS, CHRYSANTHEMUMS, CUCURBITS, DELICATE FERNS, EUPHORBIAS, FUCHSIAS, GRAPE, IMPATIENS, IVIES, PALMS, PEPPERS, POINSETTIAS, NARROW LEAF EVERGREENS, SCHEFFLERA AND SUCCULENTS, and flowers of AFRICAN VIOLET, AGERATUM, AZALEA, BEGONIA, CHRYSANTHEMUM, DAHLIA, GERANIUM, IMPATIENS, LILY, MARIGOLD, PANSY, PETUNIA, SALVIA, SNAPDRAGON, VINCA AND ZINNIA for sensitivity before application (or reapplication) to entire plant. If wilting of leaves or flowers occurs within a few hours, rinse test plants with clean water.

PRECAUTIONARY STATEMENTS

Hazards to humans and domestic animals: CAUTION

Causes moderate eye and skin irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

FIRST AID		
If in eyes	Hold eyelids 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 on skin or clothing	Take off contaminated clothing. Rinse skin with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.	

Have the product container or label with you when calling a poison control center or doctor or going for treatment.

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 when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide the treatment area. Rinsing application equipment over the treated area will help avoid to water bodies or drainage systems.

Bee Hazard: This product is toxic to bees exposed to direct treatment. Do not apply this product while bees are actively visiting the treatment area.

STORAGE AND DISPOSAL

Pesticide Storage: Store in cool place (preferably in a locked storage area) and keep container tightly sealed. Do not contaminate water, food or feed by storage or disposal.

Pesticide Disposal and Container Handling: Nonrefillable container. If empty - Do not reuse or refill this container. Place in trash or offer for recycling if available. If partially filled - Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Pathway Ready-to-Use K⁺NEEM[™] Insecticide-Fungicide II MASTER LABEL

Notice: Pathway Holdings, LLC.,. makes no warranty, expressed or implied, for any purpose other than those contained on this label. Buyer assumes all responsibility for safety and consequences of damage or injury for product use, storage, handling or application, which are not in accordance with explicit label directions.

Manufactured and distributed by: Pathway Holdings, LLC.

5002 US 41 North Palmetto, FL 34221 Phone: 1-941-723-2122

EPA Reg. No. 70191-pending EPA Est. No. 70191-FL-01

|| BAR CODE ||

BATCH CODE

(ADDITIONAL/ALTERNATIVE MARKETING CLAIMS)

Kills and controls listed insects & powdery mildew

Kills common listed bugs — Aphids, Japanese beetles, Lacebugs, Mealybugs, Mites, Scales, & Spider mites.

Kills listed tree and shrub bugs — Adelgids, Gypsy moth caterpillars, Hemlock wolly adelgid, Lacebugs, Spittle Bugs, Spruce wooly aphids, & Tent Caterpillars.

Kills listed flower bugs — Grasshoppers, Japanese beetles, Leafminers, Mealybugs, Rose slugs, Sawflies, Sawfly larvae, & Thrips. Label version – 4 April, 2011 Page 4 of 8 pages

(ADDITIONAL/ALTERNATIVE MARKETING CLAIMS — Continued)

Kills listed vegetable bugs — Cabbage loopers, Cabbage worms, Colorado potato beetle, Grasshoppers, Mexican bean beetle, Mites, Aphids, Squash bugs, Stripped cucumber beetle, and Whiteflies.

Kills listed houseplant bugs — Aphids, mealybugs, Mites, Scale, and Whiteflies.

Powdery mildew — Contacts and kills powdery mildew on all plants.

Also kills powdery mildew.

Derived from Indian Neem Tree Seeds.

Specially formulated spray that kills listed mites, insect pests and powdery mildew spores, hyphae and colonies on contact.

For indoor and outdoor ornamentals and food plants, shrubs, flowers, home garden and greenhouse, fruits, nuts and vegetables.

Apply up to day of harvest.

For use on plants - Indoor & Outdoors

Can be used in Vegetable Gardens

Can be used on roses, vegetables, fruits & ornamentals

For use on roses, vegetables, fruits & ornamentals

Label version – 4 April, 2011 Page 5 of 8 pages

Pathway (logo)

Ready-to-Use

(Graphics)

K[†]**NEEM**[™]

INSECTICIDE-FUNGICIDE II

Controls Aphids, Mites, Whiteflies & Powdery Mildew on Roses & other Plants!

FOR COMMERCIAL OR AGRICULTURAL USE

Potassium Salts of Fatty Acids* 1.5%

*Derived from Neem Seed Oil.

OTHER INGREDIENTS: 98.5%

TOTAL 100.0%

EPA Reg. No. 70191-U EPA Est. No. 70191-FL-01

Keep out of reach of children. **CAUTION**

See back panels for additional precautionary statements.

NET CONTENTS 25, 50 or 55 Gallons

(For Commercial or Agricultural use or repackaging into 24 or 32 Fl. Oz. Residential-Use product sizes)

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its label. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS: Use this product only in accordance with its labeling and with the Worker Protection Standard (WPS), 40 CFR part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to the uses of this product that are covered by the Worker Protection Standard.

Personal Protective Equipment: Some materials that are chemically resistant to this product are listed below. If you want more options, follow the instructions for category C on an EPA chemical resistance category selection chart.

Handlers who may be exposed to the diluted product through application or other tasks must wear: long-sleeved shirt and long pants, shoes plus socks.

Handlers who may be exposed to the concentrate through mixing, loading, application, or other tasks must wear: Goggles or safety glasses, coveralls over short-sleeved shirt and short pants, chemical resistant gloves such as butyl rubber, nitrile rubber, neoprene rubber or PVC, chemically resistant headgear for overhead exposure, and chemically resistant apron when cleaning equipment, mixing or loading. Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Pathway Ready-to-Use K⁺NEEM[™] Insecticide-Fungicide II MASTER LABEL

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AGRICULTURL USE REQUIREMENTS - Continued:

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 12 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water, is: goggles or safety glasses, coveralls, waterproof gloves and shoes plus socks.

NON-AGRICULTURAL USE REQUIREMENTS: The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard (WPS) for agricultural pesticides, 40 CFR part 170. The WPS applies when product is used to produce agricultural plants on farms, forests, nurseries or greenhouses.

Personal Protective Equipment: Handlers who may be exposed to the product must wear goggles or safety glasses, coveralls, waterproof gloves and shoes plus socks.

READ ENTIRE LABEL. USE IN STRICT ACCORDANCE WITH LABEL DIRECTIONS & PRECAUTIONS.

IMPORTANT INFORMATION: This blend of potassium soaps derived from Indian Neem tree seed oil is specially formulated as a Ready-to-Use spray that kills listed mites and insect pests and powdery mildew spores, hyphae and colonies on contact. Target arthropod pests include adelgids, aphids, cabbageworms & other caterpillars, earwigs, fleabeetles, lace bugs, leaf hoppers, mealy bugs, psyllids, rose slugs, scale insects, sawfly larvae, spider mites, spittle-bugs, squashbugs, stinkbugs, tent caterpillars, thrips, and whiteflies on indoor and outdoor ornamental and food plants, shrubs, trees, foliage plants, flowers, home garden and greenhouse fruits, nuts and vegetables.

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and repeat every 7 to 10 days to maintain control. Periodically (every 3 to 4 weeks) rinse foliage with clean water to avoid accumulation of product residues.

Contact and kill LISTED ARTHROPOD PESTS with spray when they first appear or as soon as damage is noticed. Spray infested plant surfaces thoroughly, including lower leaf surfaces, to point of runoff. Respray in one week if pests persist. For aphid and mealybug control, respray after 2 or 3 days to control high populations. Product can be used up to day of harvest on food plants. Cover aquaria before spraying.

FOR USE ON HOUSEPLANTS, including ornamental foliage, flowering and food plants, in homes, home greenhouses or interior plantscapes.

FOR USE ON FLOWERS, BEDDING PLANTS & PERENIALS, including those growing OUTDOORS or around the home.

FOR USE ON WOODY LANDSCAPE SHRUBS & TREES, including deciduous and evergreen species, dogwood, crabapple, crape myrtle, lilac, holly, and conifers.

FOR USE ON HOMEGROWN FRUITS & NUTS, including apples, blackberries, cherries, cranberries, English walnuts, grapes, grapefruit, lemons, melons, nectarines, oranges, peaches, pears, pecans, plum, raspberries, strawberries, and many Exotic, Semitropical or Tropical fruiting plants.

FOR USE ON HOMEGROWN VEGETABLES, including asparagus, beans, beets, broccoli, cabbage (& other cole crops), celery (and other leafy vegetables), cucumber (& other cucurbits), eggplant, herbs, lettuce, okra; peas, peppers, potatoes, radish, spices (various), spinach, squash & tomatoes.

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Pathway Ready-to-Use K+NEEM™ Insecticide-Fungicide II MASTER LABEL

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Test a few inconspicuous leaves of BALD CYPRESS, BEGONIAS, CAMELLIAS, CHRYSANTHEMUMS, CUCURBITS, DELICATE FERNS, EUPHORBIAS, FUCHSIAS, GRAPE, IMPATIENS, IVIES, PALMS, PEPPERS, POINSETTIAS, NARROW LEAF EVERGREENS, SCHEFFLERA AND SUCCULENTS, and flowers of AFRICAN VIOLET, AGERATUM AZALEA, BEGONIA, CHRYSANTHEMUM, DAHLIA, GERANIUM, IMPATIENS, LILY, MARIGOLD, PANSY, PETUNIA, SALVIA, SNAPDRAGON, VINCA AND ZINNIA for sensitivity before application (or reapplication) to entire plant. If wilting of leaves or flowers occurs within a few hours, rinse test plants with clean water.

PRECAUTIONARY STATEMENTS

Hazards to humans and domestic animals: CAUTION

Causes moderate eye and skin irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

	FIRST AID
If in eyes	Hold eyelids 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 on skin or clothing	Take off contaminated clothing. Rinse skin with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
	roduct container or label with you when calling a poison control octor or going for treatment.
	HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-888-244-7336 for emergency medical treatment information on Monday through Friday, 9 am to 5 pm. On other days or at other hours call your poison control center.

User Safety Recommendations: Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

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 when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide 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 toxic to bees exposed to direct treatment. Do not apply this product while bees are actively visiting the treatment area.

STORAGE AND DISPOSAL

Pesticide Storage: Store in cool place (preferably in a locked storage area) and keep container tightly sealed. Do not transfer or dilute into food or drink containers. Do not contaminate water, food, or feed by pesticide storage and disposal.

Pesticide Disposal and Container Handling: Nonrefillable container. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container ¼ 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 it 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.

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

Pathway Ready-to-Use K⁺NEEM[™] Insecticide-Fungicide II MASTER LABEL

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Notice: Pathway Holdings, LLC., makes no warranty, expressed or implied, for any purpose other than those contained on this label. Buyer assumes all responsibility for safety and consequences of damage or injury for product use, storage, handling or application, which are not in accordance with explicit label directions.

Manufactured and distributed by: Pathway Holdings, LLC.

5002 US 41 North Palmetto, FL 34221 Phone: 1-941-723-2122

EPA Reg. No. 70191-U EPA Est. No. 70191-FL-01

|| BAR CODE ||

BATCH CODE _____

(ADDITIONAL/ALTERNATIVE MARKETING CLAIMS)

Kills and controls listed insects & powdery mildew

Kills common listed bugs — Aphids, Japanese beetles, Lacebugs, Mealybugs, Mites, Scales, & Spider mites.

Kills listed tree and shrub bugs — Adelgids, Gypsy moth caterpillars, Hemlock wolly adelgid, Lacebugs, Spittle Bugs, Spruce wooly aphids, & Tent Caterpillars.

Kills listed flower bugs — Grasshoppers, Japanese beetles, Leafminers, Mealybugs, Rose slugs, Sawflies, Sawfly larvae, & Thrips.

Powdery mildew - Contacts and kills powdery mildew on all plants.

(ADDITIONAL/ALTERNATIVE MARKETING CLAIMS — Continued)

Kills listed vegetable bugs — Cabbage loopers, Cabbage worms, Colorado potato beetle, Grasshoppers, Mexican bean beetle, Mites, Aphids, Squash bugs, Striped cucumber beetle, and Whiteflies.

Kills listed houseplant bugs — Aphids, mealybugs, Mites, Scale, and Whiteflies.

Also kills powdery mildew.

Derived from Indian Neem Tree Seeds.

Specially formulated spray that kills listed mites, insect pests and powdery mildew spores, hyphae and colonies on contact.

For indoor and outdoor ornamentals and food plants, shrubs, flowers, home garden and greenhouse, fruits, nuts and vegetables.

Apply up to day of harvest.

For use on plants - Indoor & Outdoors

Can be used in Vegetable Gardens

Can be used on roses, vegetables, fruits & ornamentals

For use on roses, vegetables, fruits & ornamentals