



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

April 2, 2009

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

Karen Pither
Regulatory Consultant for
EID Parry (India) Limited
Pither Consulting, L.L.C.
5813 N Kensington Street
Kansas City, MO 64119

RE: Product Name: NeemAzal T/S 1.2% EC Insecticide

EPA Reg. No: 71908-1

Application for Label Notification dated January 20, 2009, for Alternate Brand Names:

AzaMax and EcoGarden

Dear Ms. Pither:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under 98-10 dated above. A preliminary screen of this request has been conducted for its applicability under PRN 98-10 and it has been determined that the action(s) requested falls within the scope of PRN 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.

Questions concerning this action should be directed to Ms. Diana Hudson at (703) 308-8713 or email at hudson.diana@epa.gov.

Sincerely,

Linda Hollis

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

reed instructions	on reverse before comple	ri~a form.	Form App	roved. PMB No. 20	70-0060	THACT ONLY
&EPA	Environmenta	I Protection Agington, DC 20460	ency	Amendr × Other		OPP Identifier Number
		Application for	Pesticide - Sec	tion I		
1. Company/Product Nur EID Parry (India) Limit			2. EPA Product Ma Dennis Edwards	nagar	3. Pro	posed Classification
4. Company/Product (Na EID Parry (India) Limit	me) ted/NeemAzal T/S 1.2 E	C	PM# 91			None Restricted
EID Parry (India) Limi Bioproducts Division 234 NSC Bose RD, Ch		1 India I	(b)(i), my product to: EPA Reg. No Product Name			FIFRA Section 3(c)(3) mposition and labeling
·		<u>Se</u>	ction - II			· · · · · · · · · · · · · · · · · · ·
Amendment - Exp Resubmission in (X Notification - Exp	response to Agency lette	r dated	Agency let	ed labels in response tter dated NO Application. plain beloate Re	OTIFIC.	· •
Submission of Collate See attached letter fo	ral Labeling to accomp r explanation.		ction - III	C Sublabel 4 (Alte	rnate Brar	nd Name Azamax).
1. Material This Product	Will Do Dockood by	36	cuon - m			
Child-Resistant Peckegin Yes* X No * Certification must be submitted	Unit Packaging X Yes No	No. per	er Soluble Packaging Yes No No No. per kage wgt contain		Container Metal Plastic Glass Paper Other (S	pacify)
3. Location of Net Conte	nts Information	4. Size(s) Retail Con	lainer	5. Location of Lat		ns ·
Label Manner in Which Label	Container I a Affixed to Product	2,4,8,16,32 oz Lithograph Paper glued Stenciled	Oth	On Labe		panying product
			ction - IV		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
1. Contact Point <i>(Comp</i>	lete items directly below	for identification of inc	fividual to be contacted	i, if necessary, to pi	ocess this	epplication.)
Name Karen Pither		Title Regul	atory Consultant		Telephone (816) 393	a No. (Include Area Code) 2-5076
	tatements I have made or it any knowingly false or able law.			ine or imprisonment		6. Dots-Application Received Section (Stamped)
2. Signature Karen	Pither	3. Titte Regul	atory Consultant			
4. Typod Name Karen	Pither	5. Date 1/20/	2009		, ((((((((((((((((((((((((((((((((((((((



Email:pither@sbcglobal.net Cell Phone: (816) 392-5076

Pither Consulting, L. L. C. Consultant in Regulatory Science

Specialist in North American Pesticide Registration



5813 N Kensington St Kansas City, MO 64119 (816) 455-3429

January 20, 2009

Document Processing Desk (NOTIF) US Environmental Protection Agency Office of Pesticide Programs (7504C) One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202-4501

Subject:

Notification per PR Notice 98-10—Collateral Labeling NeemAzalTM T/S 1.2 (EPA Registration No. 71908-1)

Alternate Brand Names: AzaMax[™] or EcoGarden[™]

Dear Sir or Madam:

Enclosed please find a notification for Collateral Labeling to accompany the EPA Stamped Approved Label in the form of a product brochure for NeemAzalTM T/S 1.2, Sub label 4. There are no changes being made to the EPA stamped approved label at this time other than the use of the alternate brand name, AzaMaxTM. All text in the Collateral Label was taken directly from the EPA stamped label including potential marketing statements.

Graphics added are pictures of actual treated insects and/or plants. Use of symbols and graphics are allowed as a notification under PR Notice 98-10, Section I H provided that such graphics are not false or misleading. As the graphics included in the collateral label are actual photographs of treated insects or plants, they meet the qualifications for addition to the collateral labeling as a notification.

This notification is consistent with the provisions of 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 of 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 this notification 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 o FIFRA.

Included with this submission are the following:

- 1. EPA Application for Pesticide Form
- 2. One copy of EPA stamped label for NeemAzal T/S 1.2, Sub label 4
- 3. One copy of proposed Collateral Labeling with the location of each text section clearly linked to the section and page of the EPA stamped label.
- 4. One clean copy of proposed Collateral Labeling
- 5. A self-addressed stamped envelope for notification of acceptance of this submission as a notification.

If there are any questions, please contact me either by email at <u>pither@sbcglobal.net</u> or **by ph**one at (816) 392-5076.

Karen Pither

Karen Pither

Pither Consulting, LLC



NOTIFICATION

Date Reviewed: 4-2-09

Reviewed By: D. Hudson

Botanical Insecticide, Miticide, and Nematicide

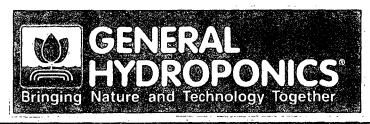
For use on

Indoor and Outdoor Ornamental Flowers, Trees, Shrubs, Vegetables, Fruit & Nut Trees, Plants, Including Plants Grown in Containers, Recirculatory, Aeroponic, and Hydroponic Systems, Interiorscapes, Home, and Garden



For Organic Production

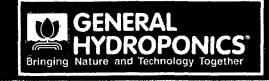
Brought to you exclusively by





Product Characteristics

- 100 % Vegetable Based Low Odor Formulation
- Three in one Product Insecticide, Miticide & Nematicide
- Controls Chewing & Sucking Insects
- For Foliar and Systemic Insect Control
- Broad Spectrum Insect and Mite Control







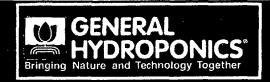
Single Product; Multiple Action

Quadruple Action Insect Control

- ·Anti-Feedant
 - ·Insects feed less or not at all
 - ·Foliage is not damaged
- Insect Growth Regulator (IGR)
 - ·Insects fail to mature and reproduce
 - ·Eliminating populations over time
- ·Anti-Ovipository
 - ·Insects do not lay eggs on treated plants
 - •Adds a preventive aspect to insect control
- •Repellant Insect do not prefer treated plants

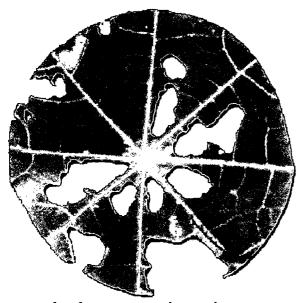
The Pure Power of PURER AZADIRACHTIN

Three Applications in 30 days Provides Complete Plant Protection



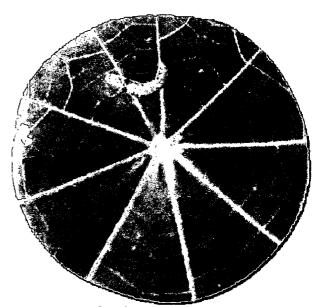


Untreated

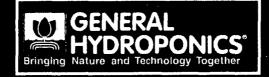


An Armyworm damaging untreated leaf

AzaMax_{TM} Treated

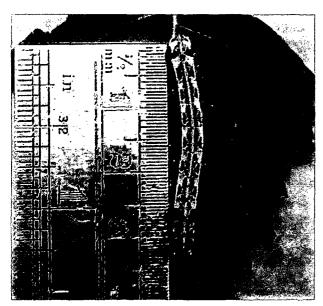


An Armyworm not feeding on AzaMax_™ treated leaf



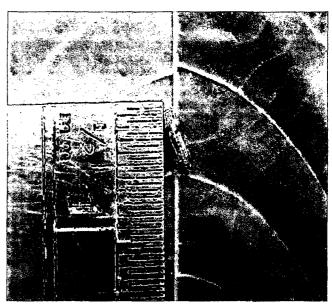


Untreated



A healthy and actively growing Armyworm

AzaMax_{TM} Treated



Growth suppressed
Armyworm due to AzaMax_{TM}





Untreated

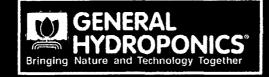


A healthy and actively growing Armyworm

AzaMax_{TM} Treated



Malformed Armyworm due to AzaMax_{TM}





Untreated

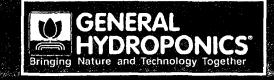


Healthy Eggs of Armyworm

AzaMax_{TM} Treated



Affected Eggs of Armyworm treated with AzaMax_{TM}

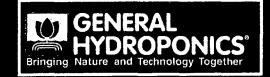




FOLIAR APPLICATION

USE	SPRAY CONCENTRATION %	Amounts of AzaMax _™	Amounts of AzaMax _™
		Fluid Ounces (Tbs.) Per Quart	Fluid Ounces (Tbs.) Per Gallon
Including trees, shrubs, flowers,	Lower rate ranges of 0.25 - 0.75% vol/ vol:		0.32 – 1.0 fl. oz. (2/3 – 2.0 Tbs.)
conifers, evergreens, herbaceous ornamentals, foliage	Medium rate ranges of 0.75 - 1.25% vol/ vol:	0.25 - 0.40 fl. oz. (1/2 - 5/6 Tbs.)	1.0 – 1.6 fl. oz. (2.0 Tbs. – 1 2/3 Tbs.)
plants, container- grown ornamentals & garden plants and groundcovers	Upper rate ranges of 1.25 - 1.70% vol/ vol:	0.40 - 0.50 fl. oz. (5/6 - 1.0 Tbs.)	1.6 – 2.0 fl. oz. (1 2/3 – 4 Tbs.)

- For the most effective control, apply AzaMax_™ when pest are expected to appear or as soon as possible after pests appear and are in immature stages.
- Spray at an interval of seven to ten days or as the situation warrants





DRENCH APPLICATION

- Use **AzaMax**_{τω} as a soil drench for effective control of soil-borne insect larvae, including soil-borne larvae of foliar pests, such as fungus gnats, nematodes, or soil borne thrips.
- Preventive applications as a soil drench may be warranted for certain pests.
- Soil drench applications of azadirachtin will have a slower rate of activity because of soil absorption when compared to foliar applications of AzaMax₁₁.
- Target the initial application of a soil drench treatment to coincide with the early stages of young larvae and young nymphs.
- With high insect pressure make applications every 5 to 6 days.
- Additional applications of **AzaMax**™ may be required with increased and prolonged pest infestation.
- Compatible with commonly used pesticides and fertilizers. Always check physical compatibility.

DILUTION TABLE FOR DRENCH APPLICATIONS

Gallons of	A	Application			
Water	0.4%	0.6%	0.8%	Interval	
1 gallon	1 Tbs.	1.5 Tbs.	2.0 Tbs.	10 - 14 days	
1 gallon	0.5 fl. oz.	0.8 fl. oz.	1.0 fl. oz.	10 - 14 days	
5 gallons	2.5 fl. oz.	4.0 fl. oz.	5.0 fl. oz.	10 - 14 days	
10 gallons	5.0 fl. oz.	8.0 fl. oz.	10.0 fl. oz.	10 - 14 days	





RECIRCULATORY, AEROPONIC, AND HYDROPONIC APPLICATION

- Use AzaMax_™ in recirculatory, aeroponic, or hydroponic systems for the control of foliar pests, soil borne insect larvae, including soil borne larvae of foliar pests such as fungus gnats, nematodes or soil borne thrips for interiorscapes, hydroponic, aeroponic and container plants.
- Make two to three (2-3) applications at 10-14 day intervals until the pest pressure has ended.
- With high insect pressure applications make applications every 5 to 7 days.
- Additional applications of **AzaMax**_™ may be required with increased and prolonged pest infestation.
- Compatible with commonly used pesticides and fertilizers. Always check physical compatibility.

DILUTION TABLE FOR RECIRCULATORY, AEROPONIC, AND HYDROPONIC APPLICATIONS

Gallons of Water		Application				
	0.1%	0.2%	0.4%	0.6%	0.8%	Interval
1 gallon	1/4 Tbs.	½ Tbs.	1 Tbs.	1.5 Tbs.	2.0 Tbs.	7 - 14 days
1 gallon	0.14 fl. oz.	0.25 fl. oz.	0.5 fl. oz.	0.8 fl. oz.	1.0 fl. oz.	7 - 14 days
5 gallons	0.7 fl. oz.	1.3 fl. oz.	2.5 fl. oz.	4.0 fl. oz.	5.0 fl. oz.	7 - 14 days
10 gallons	1.4 fl. oz.	2.6 fl. oz.	5.0 fl. oz.	8.0 fl. oz.	10.0 fl. oz.	7 - 14 days

Preventive applications as a recirculatory system application may be warranted for certain pests.





Product Uses

- For use with Recirculatory, Aeroponic and Hydroponic Systems
- For use on Flowers, Ornamentals and Landscape Plantings
- For use on Gardens Crops, Herbs, Spices, Fruits and Berries
- Can be used in Organic Gardening
- Can be Applied the Day of Harvest



NOTIFICATION

EcoGardenTM

Date Reviewed: 4-2

Botanical Insecticide, Miticide, and Nematicide Reviewed By: D

REPELLANT, ANTIFEEDANT AND INSECT GROWTH REGULATOR (IGR)

BOTANICAL PRODUCT FOR CONTROL OF INSECTS ON INDOOR AND OUTDOOR ORNAMENTAL FLOWERS, TREES, SHRUBS, VEGETABLES, FRUIT AND NUT TREES, PLANTS, INCLUDING PLANTS GROWN IN CONTAINERS, RECIRCULATORY, AEROPONIC, AND HYDROPONIC SYSTEMS, INTERIORSCAPES, HOME, AND GARDEN.

See the Directions for Use for a Complete List of Insects Controlled.

ACTIVE INGREDIENT: 1.2% Azadirachtin..... 98.8% 100.00%

Contains 0.35 grams azadirachtin per fluid ounce.

FOR ORGANIC PRODUCTION

KEEP OUT OF REACH OF CHILDREN CAUTION

	FIRST AID
If inhaled	Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call 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 first 5 minutes, then continue rinsing eyes. 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.
H	ave the product container or label with you when calling a poison control center or doctor or going for treatment.
	CALL THE POISON CONTROL HOTLINE 24 HOURS A DAY AT 1-888-478-0798.

NET CONTENTS: 2 fl. oz., 4 fl. oz., 8 fl. oz., 16 fl. oz., 32 fl. oz., or 128 fl. oz.

EPA Reg. No. 71908-1 EPA Est. No. 71908-IND-001 E.I.D. PARRY (INDIA) LIMITED **Bioproducts Division** 234 NSC Bose Road Chennai (Madras) 600 001 India

USA Phone Number: (916) 973-1351

Batch Number: xxxx

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION - Harmful if absorbed through skin or if inhaled. Avoid breathing vapor. Causes moderate eye irritation. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Wear chemical resistant gloves.

Personal Protective Equipment (PPE)

Applicators and handlers must wear:

- Long-sleeved shirt
- Long pants
- Socks and shoes
- Chemical resistant gloves

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates.

For Terrestrial Uses: Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwater or rinsate.

USER SAFETY RECOMMENDATIONS

Users should wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

DIRECTIONS FOR USE

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

READ ENTIRE LABEL. USE STRICTLY IN ACCORDANCE WITH PRECAUTIONARY STATEMENTS AND DIRECTIONS, AND WITH APPLICABLE STATE AND FEDERAL REGULATIONS. 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.

Do not apply this product through any type of irrigation system

Agricultural Use Requirements

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

Do not enter or allow any worker entry into treated areas during the restricted entry interval (REI) of 4 hours.

For early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with crything that has been treated, such as plants, soil, water, wear coveralls, chemical resistant gloves, shoes plus socks and protective eyewear.

MODE OF ACTION:

EcoGarden™ Botanical Insecticide, Miticide, and Nematicide controls target pests on contact or by ingestion. The product acts on pests by way of repellence, anti-feedance, and interference with the molting process.

Azadirachtin, an insect growth regulator (IGR), mimics the pests' hormones and disrupts distinct stages of growth and development of insects and mites. The primary mode of action of azadirachtin is an interference with synthesis and metabolism of ecdysone and the juvenile hormone. Ecdysone is the molting hormone of insects, and azadirachtin can regulate growth leading to death before or during molting.

EcoGarden™ will provide control results comparable to the synthetic insecticide standards. EcoGarden™ provides broad spectrum control with very low environmental impact. EcoGarden™ provides all the benefits of azadirachtin, a proven anti-feedant, insect growth regulator (IGR), anti-ovipository, and repellant, as well as a toxin to soft bodied insect larvae.

The active ingredient in EcoGarden™ - Azadirachtin – is a unique botanical insecticide, miticide and nematicide.

Mode of Action: Control of different	Anti-Feedant	Insects feed less or not at all on treated plants. Foliage is not damaged and insects ultimately starve to death.		
orders of insects or insects in different	Insect Growth Regulator (IGR)	Insects fail to mature and reproduce, eliminating populations over time.		
phases of their life cycle is due to the complexity of the azadirachtin molecule and the many modes of action inherent in azadirachtin.	Anti-ovipository	Insect do not lay eggs on treated plants. The likelihood of insect infestation is greatly decreased in treated plants. This adds a preventive aspect to your insect control.		
	Repellant	Insects do not prefer treated plants.		

PESTS CONTROLLED OR SUPPRESSED

Use **EcoGarden™** against the following pests.

TARGET PEST SPECIES OF EcoGarden™

	
HEMIPTERA AND HOMOPTERA	LEPIDOPTERA
including but not limited to:	including but not limited to:
true bugs including boxelder bugs, chinch	moths including European pine shoot moth,
bugs, lygus bugs and stink bug;	pine tip moth and Tussock moth; leafrollers
lacebugs; leafhoppers including grape	including blueberry leafroller, filbert leafroller,
leafhopper, spittlebug, potato leafhopper	fruitree leafroller, citrus leafminers, grape
and variegated leafhopper; mealy bugs	leafroller, oblique banded leafroller,
including apple mealy bugs, citrus mealy	omnivorous leafroller;
bugs, grape mealy bugs;	cutworms including black cutworm and citrus
whiteflies including greenhouse whitefly,	cutworm;
silverleaf whitefly and sweet potato whitefly	caterpillars and loopers including
and woolly whitefly; aphids including apple	bagworms, budworms, cabbage looper,
aphid, green peach aphid, melon aphid,	canker worms, case bearers, caseworms,
pea aphid, potato aphid and rose aphid;	com earworm, diamondback moth, fruit
psyllids including pear psyllids and scales	worms, grapeleaf skeletonizer, gypsy moth,
including black scale, brown soft scale,	hornworms, imported cabbageworm, navel
California red scale, coffee scale, olive	orangeworm, soybean looper, spruce
scale, San Jose scale, and cottony cushion	budworm, tent caterpillar, tip moths, tent
scale.	caterpillars, tobacco budworm, tobacco
	hornworm, tomato pinworm and tussock
	moth;
•	armyworms including beet armyworm, fall
·	armyworm, lawn armyworm, southern
	armyworm and yellow striped armyworm;
	webworms and leaf perforators.
COLEOPTERA	DIPTERA
including but not limited to:	including but not limited to:*
beetles, grubs and weevils including	flies including Caribbean fruit fly, cherry
Asian long-horned beetle, bark beetles,	maggots, crane fly, fungus gnat, Hessian fly,
black vine weevil, Colorado potato beetle,	oriental fruit fly, Mediterranean fruit fly, marsh
elm bark beetle, European chafer, flea	crane flies, melon fly, shore fly and walnut
beetles, Japanese beetle, June beetle, leaf	husk fly; leafminers including citrus
beetles, Mexican bean beetle, Northern	leafminers and serpentine leafminers.
masked chafer, rose chafer and Southern	
masked chafer and twig girders.	*Not intended for use on public health pests
THYSANOPTERA	ACARINA
including but not limited to:	Including but not limited to:*
thrips including citrus thrips, flower thrips,	mites including, red spider mites, brown
gladiolus thrips, onion thrips, thrips palmi	mite, clover mite, conifer spider mite,
and Western flower thrips.	European red mite, spruce spider mite, and
	two-spotted spider mite.
ODTUGOTE OA	*Not intended for use on public health pests
ORTHOPTERA	HYMENOPTERA (CCC)
including but not limited to:	including but not limited to:*
crickets; grasshoppers; locusts	sawflies including European sawflies, pear
	sawflies, red-headed pine sawflies, yellow-
	headed pin sawflies. ', ,
`	cerc
	*Not intended for use on public health pests:
NEMATODA.	l .
Nematodes (suppression)	<u> </u>

2

FOR USE ON ORNAMENTALS AND LANDSCAPE PLANTINGS

Ornamental Plants and Flowers including but not limited to:	Actinopteris, African violets*, ageratum, aglaonema, Algerian ivy, allamanda, alocasia, amaranthus, anthurium, aphelandra, arborvitae, Artemisia, aster, aucuba ilex, azalea, baby's breath, begonia, Boston fern, bougainvillea, boxwood, brachycome, cacti, calabrese, caladium, calathea, calendula, calla, camellia, carnation, ceanothus, chrysanthemum, cineraria, coleus, columbine, cotoneaster, cyclamen, daffodil, dahlia, daisy, daylily, delphinium, dianthus, dieffenbachia, dogwood, dusty miller, Easter lily, English ivy, euphorbia, fern, ficus, foliage plants, foxglove, freesia, fuschia, gaillardia, gardenia, geranium, gerbera, gladiola, gloxinia, gypsophilla, hedera, hibiscus, hyacinth, hydrangea, ilex, impatiens, iris, ivy, jasmine, lilac, lily, maidenhair fem, mandevilla, marigold, narcissus, nasturtium, orchid*, pansy, pelargonium, peony, peperomia, petunia, philodendron, phlox, photinia, pinks, pittosporum, poinsettia*, pothos, portulaca, primrose, pyracantha, rhododendron, rose*, rosemary, rubber plant, salvia, schefflera, sedum, sempervivum, snapdragon, spathiphyllum, stock, syngonium, tulip, verbena, vinca, wandering jew, yucca, zinnia *Please note that when making applications to these species, spotting of plant foliage and blossoms is possible.
Ornamental Trees and Shrubs including but not limited to:	Andromeda, arborvitae, ash, Austrian pine, azalea, beech, birch, birdsnest spruce, blue spruce, bougainvillea, boxwood, butternut, cedar, charmaecyparis, cherry, cotoneaster, crabapple, cyprus, dogwood, Douglas fir, elm, euonymus, firethorn, forsythia, hackberry, hawthom, hemlock, hickory, holly, honey locust, horse chestnut, juniper, larch, laurel, lilac, linden, London planetree, magnolia, mandevilla, maple, mimosa, mountain ash, myrtle, oak, pachysandra, peach, photinia, pine, planetree, poplar, privet, purpleleaf wintercreeper, quince, sage, spruce, sycamore, white cedar, white pine, yew

Waxy bloom on certain ornamental plants will be reduced after an application.

Applications will remove the glaucus 'blue' coloring from evergreens such as Colorado blue spruce and Koster spruce.

FOR USE ON GARDEN CROPS, VEGETABLES, HERBS, SPICES, FRUITS AND BERRIES

Leafy Vegetables including but not limited to:	Broccoli, Brussels Sprouts, Cabbage, Cauliflower, Collards, Endive, Kale, Lettuce, Spinach
Root Vegetables, including but not limited to:	Beet, Carrot, Horseradish, Parsnip, Potato, Radish, Sweet potato, Turnip, Yams
Fruiting Vegetables including but not limited to:	Eggplant, Pepper, Tomatillo, Tomato
Cucurbit Vegetables including but not limited to:	Cucumber, Gourd (edible), Muskmelon, Pumpkin, Squash, Watermelon, including Cantaloupe, Casaba, Gherkins, Melons (including hybrids), Zucchini
Legume Vegetables including but not limited to:	Bean, Chickpea, Lentil, Pea
Bulb Vegetables including but not limited to:	Gartic, Onion, Shallot
Berries including but not limited to:	Blackberry, Blueberry, Raspberry, Strawberry , others include: Boysenberry, Currants, Dewberry, Elderberry, Gooseberry, Loganberry
Herbs and Spices including but not limited to:	Chive, Dill, Fennel, Mustard , Sage, Sweet bay, others include: Anise, Balm, Basil , Black pepper, Borage, Caraway, Catnip, Chamomile, Coriander, Cumin, Curry leaf, Dandelion, Fenugreek, Horehound, Hyssop , Macjoram, Marigold , Mint, Nasturtium, Pennyroyal, Peppermint, Rosemary, Savory, Spearmint, Tansy, Tarragon, Thyme , Wintergreen, Woodruff, Wormwood
Nut Trees including but not limited to:	Almond, Brazil nut, Filbert, Hickory nut, Pecan, Pistachies, Walnut
Pome Fruits including but not limited to:	Apple, Quince, or Pear (Comice varieties: DO NO apply more than 24 floz/A. DO NOT apply after pink stage of flowering; test small areus of other varieties of pears for plant safety prior to full scale usings.)
Stone Fruits including but not limited to:	Apricot, Cherry, Nectarine, Peach, Plum
Citrus Fruits including but not limited to:	Grapefruit, Lemon, Lime, Orange others include: Citrus Citron, Mandarin (tangerine), Nectarine, Satsuma (orange mandarin), Jangerine

EcoGarden™ has been evaluated for phytotoxicity on a wide range of ornamentals and garden plants. However, since testing on all plant varieties is not feasible, test a small portion of the area to be treated for phytotoxicity before treating the entire area.

There are no restrictions on applying EcoGarden™ up to the time of harvest.

SPRAY PREPARATION

EcoGarden™ is an emulsifiable concentrate to be diluted with water.

This product forms an emulsion and which separates upon extended or prolonged standing. Re-agitate to assure uniformity of the spray mixture.

Prepare only the volume needed for the intended application, and use the spray mixture within 24 hours of preparation.

TANK MIXTURES

EcoGarden™ is an emulsifiable concentrate and is compatible with commonly used pesticides and fertilizers. Always check the physical compatibility using a jar test in the correct proportions if needed.

If a broader spectrum of control is required tank-mix **EcoGarden™** with insecticides or miticides. If a rapid knockdown of heavy populations is necessary, then include an effective contact insecticide/miticide in combination with **EcoGarden™**.

Always read and follow the directions for use, precautions and limitations for use on all product labels used in combination. Applications must follow the precautions and limitations of the most restrictive product label in the mixture. Do not exceed the dosage rates of any product.

Select the right companion products:

IPM uses a variety of control options including biological, chemical, and cultural practices. **EcoGarden™** is botanical with growth regulator effect on insects and mites. Companion products include pyrethroids, spinosyns, microbial toxins, and chloronicotinyls that complement azadirachtin. Formulations of bifenthrin, spinosad, abamectins, and imidacloprid are effective for different pests. Select the product that has been proven to provide adequate performance for the pests you are trying to control.

Physical Incompatibility

Do not use EcoGarden™ with Captan, Bordeaux mixture, triphenyltin hydroxide, lime sulfur, Rayplex iron or other highly alkaline materials as they can cause phytotoxicity and/or reduced efficacy on some target pests. Phytotoxicity will occur if tank-mix combinations with compounds known to be incompatible with oil-based formulations are used.

APPLICATION EQUIPMENT

Apply EcoGarden™ with hand-operated (manual) or power spray equipment suitable for low volume and/or high volume applications. Follow the recommendations of the equipment manufacturer when using backpack sprayers, hose-end sprayers, compression (pump-up) sprayers, and other sprayers suitable for foliar applications of insecticides.

APPLICATION SCHEDULE

For the most effective control, apply **EcoGarden** when pests are expected to appear or as soon as possible after pests appear and are in immature stages. Spray at an interval of seven (7) to ten (10) days or as the situation warrants.

During high pest infestation levels or when canopy is dense use higher dosage (use) rates and increase the spray frequency. For best results, spray in the morning or evening hours. Repeat spraying if rain occurs within two to three hours of spraying. For additional guidance, consult with your state agricultural experiment station or local extension horticulturalist/arborist for information in tactics and windows of application.

APPLICATION METHODS

Apply EcoGarden™ as directed to any food or non-food crop up to and including the day of harvest, at a maximum rate of 1.33 fl. oz. per 1,000 sq. ft. per application.

Dilute **EcoGarden™** with water at a rate of 0.5 - 4.0 tablespoons (Tbs) per gallon of water. For hose end sprayers, set the RATE PER GALLON at the dial setting of 1 to 4 Tbs. depending on the crop and pests. Use the lower RATE PER GALLON for low to moderate infestations and use the higher specified RATE PER GALLON for severe infestations.

FOLIAR APPLICATION

USE	SPRAY CONCENTRATION%	Amounts of EcoGarden™ Fluid Ounces (Tbs.) Per Quart	Amounts of EcoGarden™ Fluid Ounces (Tbs.) Per Gallon
Including trees, shrubs, flowers.	Lower rate ranges of 0.25 - 0.75% vol/vol:	0.08 – 0.25 fl. oz. (1/6 – 1/2 Tbs.)	0.32 – 1.0 fl. oz. (2/3 – 2.0 Tbs.)
conifers, evergreens, herbaceous	Medium rate ranges of 0.75 - 1.25% vol/vol:	0.25 – 0.40 fl. oz. (1/2 – 5/6 Tbs.)	1.0 – 1.6 fl. oz. (2.0 Tbs. – 1 2/3 Tbs.)
omamentals, foliage plants, container- grown omamentals &	Upper rate ranges of 1.25 - 1.70% vol/vol:	0.40 – 0.50 fl. oz. (5/6 – 1.0 Tbs.)	1.6 – 2.0 fl. oz. (1 2/3 – 4 Tbs.)
garden plants and groundcovers			,

DRENCH APPLICATION

Use EcoGarden™ as a soil drench for effective control of soil-borne insect larvae, including soil-borne larvae of foliar pests, such as fungus gnats, nematodes, or soil borne thrips. When applying as a drench, avoid excessive leaching.

Preventive applications as a soil drench may be warranted for certain pests. Soil drench applications of azadirachtin will have a slower rate of activity because of soil absorption when compared to foliar applications of **EcoGarden™**. Target the initial application of a soil drench treatment to coincide with the early stages of young larvae and young nymphs.

Dilute **EcoGarden™** with water for concentrations of 0.4 to 0.8% volume/volume. See use rate table below. Add the required amount of **EcoGarden™** to a clean bucket with at least one-half of the water to be drenched. Agitate the mixture thoroughly and then fill with the remaining water and continue agitation until the product is thoroughly dispersed.

Drench the soil in the pot with one (1) pint of finished product dilution per 1.0 gallon of soil. For fungus gnats, use the 0.4% spray concentration. For mushroom fly maggot control, use the 0.6% volume/volume spray concentration. For leafminers and other difficult to control pests, use the 0.8% volume/volume spray concentration. Make two to three (2 − 3) applications at 10 −14 day intervals until pest pressure has ended. With high insect pressure make applications every 5 to 6 days. Additional applications of **EcoGarden™** may be required with increased and prolonged pest infestation.

DILUTION TABLE FOR DRENCH APPLICATIONS

Gallons of	An	Application			
Water	0.4%	0.6%	0.8%	Interval	
1 gallon	1 Tbs.	1.5 Tbs.	2.0 Tbs.	10 - 14 days	
1 gallon	0.5 fl. oz.	0.8 fl. oz.	1.0 fl. oz.	10 - 14 days	
5 gallons	2.5 fl. oz.	4.0 fl. oz.	5.0 fl. oz.	10 - 14 days	
10 gallons	5.0 fl. oz.	8.0 fl. oz.	10.0 fl. oz.	10 - 14 days	

RECIRCULATORY, AEROPONIC, AND HYDROPONIC APPLICATION

Use EcoGarden™ in recirculatory, aeroponic, or hydroponic systems for the control of foliar pests, soil borne insect larvae, including soil borne larvae of foliar pests such as fungus gnats, nematodes or soil borne thrips for interiorscapes, hydroponic, aeroponic and container plants.

Dilute EcoGarden™ with water for concentrations of 0.1% to 0.8% volume/volume in a recirculatory or in a hydroponic liquid system. See use rate table below. Agitate the mixture thoroughly until the product is thoroughly dispersed.

For fungus gnats, use the 0.6% volume/volume concentration. For mushroom fly maggot control, use the 0.6% volume/volume concentration. For leafminers and other difficult to control pests, use the 0.8% volume/volume concentration. Make two to three (2-3) applications at 10-14 day intervals until the pest pressure has ended. With high insect pressure applications make applications every 5 to 7 days. Additional applications of **EcoGarden™** may be required with increased and prolonged pest infestation.

DILUTION TABLE FOR RECIRCULATORY, AEROPONIC, AND HYDROPONIC APPLICATIONS

Gallons of	Amount of EcoGarden™					Application
Water	0.1%	0.2%	0.4%	0.6%	0.8%	Interval
1 gallon	1/4 Tbs.	½ Tbs.	1 Tbs.	1.5 Tbs.	2.0 Tbs.	7 - 14 days
1 gallon	0.14 fl. oz.	0.25 fl. oz.	0.5 fl. oz.	0.8 fl. oz.	1.0 fl. oz.	7 - 14 days
5 gallons	0.7 fl. oz.	1.3 fl. oz.	2.5 fl. oz.	4.0 fl. oz.	5.0 fl. oz.	7 - 14 days
10 gallons	1.4 fl. oz.	2.6 fl. oz.	5.0 fl. oz.	8.0 fl. oz.	10.0 fl. oz.	7 - 14 days

Preventive applications as a recirculatory system application may be warranted for certain pests.

EcoGarden™ can also be applied through sub-surface treatment equipment. Always follow manufacturer's use directions.

FOLIAR APPLICATION - SPECIFIC PESTS OF GARDEN CROPS, VEGETABLES, HERBS AND SPICES, BERRIES AND FRUIT

		Dilution Rate for Sprayers		
CROP	PESTS such as:	Fl. Oz. of product per 1,000 Sq. Ft.	Tbs. of product per 1.0 gallon of water	
Leafy Vegetables including but not limited to: Broccoli, Brussels Sprouts, Cabbage,	Leafrollers, Cutworms, Loopers, Armyworms	0.19 - 0.96 fl. oz.	3/4 Tbs 4 Tbs./gal	
Cauliflower, Collards, Endive, Kale, Lettuce, Spinach	True Bugs, Leafhoppers, Whiteflies, Aphids, Beetles, Weevils, Flies, Thrips, Mites	0.24 - 0.96 fl. oz.	1 Tbs 4 Tbs./gal	
Root Vegetables, including but not limited to: Beet, Carrot,	Beetles, Weevils	0.11 – 0.25 fl. oz.	½ Tbs 1 ½ Tbs./gal	
Horseradish, Parsnip, Potato, Radish, Sweet potato, Turnip, Yams	True Bugs, Leafhoppers, Whiteflies, Aphids, Leafrollers, Cutworms, Loopers, Armyworms, Flies, Thrips, Mites	0.24 - 0.96 fl. oz.	1 Tbs 4 Tbs./gal	
Fruiting Vegetables including but not limited to: Eggplant, Pepper,	Beetles, Weevils	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
Tomatillo, Tomato	Thrips	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
	True Bugs, Leafhoppers, Whiteflies, Aphids, Leafrollers, Cutworms, Loopers, Armyworms, Flies, Mites	0.24 - 0.96 fl. oz.	1 Tbs 4 Tbs./gal	
Cucurbit Vegetables including but not limited to: Cucumber, Gourd	Beetles, Weevils	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
(edible), Muskmelon, Pumpkin, Squash, Watermelon, including	Thrips	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
Cantaloupe, Casaba, Gherkins, Melons (including hybrids), Zucchini	True Bugs, Leafhoppers, Whiteflies, Aphids, Leafrollers, Cutworms, Loopers, Armyworms, Flies, Mites	0.24 - 0.96 fl. oz.	1 Tbs 4 Tbs./gal	
Legume Vegetables including but not limited to: Bean, Chickpea,	Beetles, Weevils	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
Lentil, Pea	Thrips	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	

CROP	PESTS such as:	Duation Rate for Sprayers		
		Fl. Oz. of product per 1,000 Sq. Ft.	Tbs. of product per 1.0 gallon of water	
	True Bugs, Leafhoppers, Whiteflies, Aphids, Leafrollers, Cutworms, Loopers, Armyworms,	0.24 - 0.96 fl. oz.	1 Tbs 4 Tbs./gal	
Dully Variables including his and	Flies, Mites	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
Bulb Vegetables including but not limited to: Garlic, Onion, Shallot	Beetles, Weevils		J	
	Thrips	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
	True Bugs, Leafhoppers, Whiteflies, Aphids, Leafrollers, Cutworms, Loopers, Armyworms, Flies, Mites	0.24 - 0.96 fl. oz.	1 Tbs 4 Tbs./gal	
Berries including but not limited to: Blackberry, Blueberry,	Beetles, Weevils	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
Raspberry, Strawberry, others	Thrips	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
include: Boysenberry, Currants, Dewberry, Elderberry, Gooseberry, Loganberry	True Bugs, Leafhoppers, Whiteflies, Aphids, Leafrollers, Cutworms, Loopers, Armyworms, Flies, Mites	0.24 - 0.96 fl. oz.	1 Tbs 4 Tbs./gal	
Herbs and Spices including but	Beetles, Weevils	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
not limited to: Chive, Dill, Fennel, Mustard, Sage, Sweet	Thrips	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
bay, others include: Anise, Balm, Basil, Black pepper, Borage, Caraway, Catnip,	True Bugs, Leafhoppers, Whiteflies, Aphids, Leafrollers, Cutworms, Loopers, Armyworms,	0.24 - 0.96 fl. oz.	1 Tbs 4 Tbs./gal	
Chamomile, Coriander, Cumin, Curry leaf, Dandelion, Fenugreek, Horehound,	Flies, Mites			
Hyssop, Marjoram, Marigold, Mint, Nasturtium, Pennyroyal, Peppermint, Rosemary, Savory,				
Spearmint, Tansy, Tarragon, Thyme, Wintergreen, Woodruff, Wormwood				
Nut Trees including but not limited to: Almond, Brazil nut, Filbert,	Beetles, Weevils	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
Hickory nut, Pecan, Pistachios, Walnut	Thrips	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
	True Bugs, Leafhoppers, Whiteflies, Aphids, Leafrollers, Cutworms, Loopers, Armyworms, Flies, Mites	0.24 - 0.96 fl. oz.	1 Tbs 4 Tbs./gal	
Pome Fruits including but not	Beetles, Weevils	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
limited to: Apple, Quince, or Pear (Comice varieties: DO NOT	Thrips	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
apply more than 24 fl oz/A. DO NOT apply after pink stage of flowering; test small areas of other varieties of pears for plant	True Bugs, Leafhoppers, Whiteflies, Aphids, Leafrollers, Cutworms, Loopers, Armyworms,	0.24 - 0.96 fl. oz.	1 Tbs 4 Tbs./gal	
safety prior to full scale usage.) Stone Fruits including but not	Flies, Mites Beetles, Weevils	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
limited to: Apricot, Cherry, Nectarine, Peach, Plum	Thrips	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
necualing, reach, riulli	True Bugs, Leafhoppers, Whiteflies, Aphids, Leafrollers, Cutworms, Loopers, Armyworms, Flies, Mites	0.24 - 0.96 fl. oz.	1 Tbs 4 Tbs./gal	
Citrus Fruits including but not limited to: Grapefruit, Lemon,	Beetles, Weevils	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	
Lime, Orange others include: Citrus Citron, Mandarin	Thrips	0.29 - 0.96 fl. oz.	2 Tbs 4 Tbs./gal	

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	PESTS such as:	Duration Rate for Sprayers		İ
CROP		Fl. Oz. of product per 1,000 Sq. Ft.	Tbs. of product per 1.0 gallon of water	
(tangerine), Nectarine, Satsuma (orange mandarin), Tangerine	True Bugs, Leafhoppers, Whiteflies, Aphids, Leafrollers, Cutworms, Loopers, Armyworms, Flies, Mites	0.24 - 0.96 fl. oz.	1 Tbs 4 Tbs./gal	

STORAGE & DISPOSAL

Do not contaminate water, food, or feed by storage or disposal..

PESTICIDE STORAGE: Store in original containers in a dry, cool, well-ventilated area.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal

facility.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill container ¼ full with water and recap. Shake 10 seconds. Pour rinsate into application equipment or mix tank or store rinsate for later use or disposal. Drain for 10 seconds after flow begins to drip. Repeat this procedure two more times.

NOTICE ON CONDITIONS OF SALE

The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Plant injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of E.I.D. PARRY (INDIA) LIMITED. All such risks shall be assumed by the user or buyer.

EPA Approved 11-25-2008

Advertising claims that may be presented on the retail container label or on the labeling accompanying the product.

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- Controls mites, caterpillars, whiteflies, thrips, aphids, and other insects as listed on this label.
- Organic Certified
- · Controls chewing and sucking insects
- Low-odor formulation
- · Broad-spectrum control
- Can be applied the day of harvest
- For use on a wide variety of trees, shrubs, flowers, fruit and nut trees, garden vegetables and plants
- Low (Mild) odor
- · Organic Materials Review Institute (OMRI) Certified.
- Spray and Drench
- For use with recirculatory, aeroponic, and hydroponic systems
- Contains azadirachtin from E.I.D. PARRY (INDIA) LIMITED
- 100% Vegetable Based
- Can be used in Organic Gardening

FOR ORGANIC PRODUCTION

- · Tough Pests. Easy Solution.
- · Controls chewing and sucking insects
- Broad spectrum insect and mite control
- Can be applied up to and on the day of harvest for all food & non food use plants
- Rose Spray
- · For use on Roses and Flowers
- · Vegetable Garden Spray
- · For use on Tomatoes and Garden Vegetables
- Controls Japanese Beetle on Roses
- Insect and Mite Control for the Home Garden Vegetables
- Complete Insect and Mite Control for Flowers
- Three applications in 30 days provides complete plant protection
- Quadruple action insect control Antifeedant, Insect Growth Regulator, Anti-ovipository, Repellant
- The Pure Power of PURER azadirachtin
- Single product; multiple action
- A proven botanical pesticide born out of a decade of intense global research
- · Works effectively against a broad spectrum of pests on a stand alone basis on a variety of vegetable crops
- · Controls insect pest during various stages of growth
- · The Benefits to your insect control program are multiple
- Controls Insects Systemically
- Taken up through the roots, controls insects on the leaves
- Insects stop feeding when they feed on treated plants
- For foliar and systemic insect control.
- · For Use on Flowers, Ornamentals, and Landscape Plantings
- For Use on Garden Crops, Vegetables, Herbs, Spices, Fruits, and Berries
- Three in one product Insecticide, Miticide, and Nematicide
- Recommended by General Hydroponics Bringing Nature and Technology Together
- Brought to you Exclusively by General Hydroponics Bringing Nature and Technology Together