

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DIC. 20460.

PREVENTION, PESTICIDES AND FOXIC SUBSTANCES

NOTIFICATION

JUL 2 0 2007

Michael Kellogg Agent for Etigra LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th Street, NW Gig Harbor, WA 98332

SUBJECT: Applications for Pesticide Notification – Add CA Restrictions; Add Plant Pest

Imida E-Ag – 4 F Cotton Insecticide

EPA Reg. No. 81959-20

Application Dated June 21, 2007 Imida E-Ag 1.6 F Insecticide

EPA Reg. No. 81959-21

Application Dated June 14, 2007

Dear Mr. Kellogg:

The Agency is in receipt of your Applications for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above products. The Registration Division (RD) has conducted a preliminary screen of these requests for their applicability under PRN 98-10 and finds that the actions requested falls within the scope of PRN 98-10. The labels submitted with the applications have been stamped "Notification" and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

Linda Arrington

Notifications & Minor Formulations Team Leader Registration Division (7505P)

Office of Pesticide Programs

Please read instructions on	reverse before Lipli	eting form.		Form Appi	d. OMB No. 2	070-006	O. Approval expires 2-28-9
\$EPA	Environmenta	United States al Protection nington, DC 2046		✓	Registra Amendn Other		OPP Identifier Number
		Application	n for Pestici	ide - Section	11		
1. Company/Product Numb 81959-21	er		2. EPA J. Heb	Product Menager pert		3. Pro	oposed Classification
4. Company/Product (Name Etigra, LLC / Imida E-/	· ·)	PM#	7			
5. Name and Address of Ap Etigra LLC c/o Pyxis Regulatory Co 4110 136th St. NW Gig Harbor, WA 98332 Check if the	onsulting, Inc.	ode)	(b)(i), n to: EPA F Produ	ny product is sir	milar or identi	cal in co	FIFRA Section 3(c)(3) mposition and labeling
			Section - I	<u> </u>	·	·	-
	sponse to Agency letter	r dated		Final printed labo Agency letter da "Me Too" Applic	eted cation.		TIFICATION
Notification - Explain) below.			Other - Explain b	selow.	JU	IL 2 0 2007
Notice 98-10 and EPA regul product. I understand that if consistent with the terms of penalties under sections 12	it is a violation of 18 U.S. PR Notice 98-10 and 40	.C. Sec. 1001 to w	willfully make any f	false statement to E in violation of FIFR	EPA. I further u	nderstand	that if this notification is not
1. Material This Product Wi	ill Be Packaged In:						
Child-Resistant Packaging Yes No Certification must	Unit Packaging Yes No If "Yes" Unit Packaging wgt.	No. per . container	Water Soluble P. Yes No If "Yes" Package wgt	Packaging No. per container	2. Type of C	Container Metal Plastic Glass Paper Other (S	pecify)
3. Location of Net Contents		4. Size(s) Retail	l Container	5. Le	ocation of Labe On Label On Labeling		
6. Manner in Which Label is		Lithogra Paper gli Stenciled	ued d	Other			
	·	 	Section - I\	V			
1. Contact Point Complete	items directly below f	for identification	of individual to be	e contacted, if ned	cessary, to pro	cess this	application.)
Name Michael Kellogg		1 .	Title Agent				No. (Include Area Code)
	ements I have made on ny knowlinglly felse or Iaw.		ll attachments the			plete.	6. Date Application Received (Stamped)
2. Signature Mushau	May	Д	Title Agent			00.00	
4. Typed Name Michael Kellogg			Date (467	'		•	

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW Gig Harbor, WA 98332

Phone: 253-853-7369 Fax: 253-853-5516 www.PyxisRC.com

June 14, 2007

COURIER DELIVERY

John Hebert (PM 7)
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202-4501

NOTIFICATION
JUL 2 0 2007

RE: Etigra LLC – Imida E-Ag 1.6 F Insecticide (EPA Reg. No. 81959-21)
Notification of the Addition of a Plant Pest per PRN 98-10

Dear Mr. Hebert,

On behalf of Etigra LLC please find the enclosed label notification to add the plant pest "Asian citrus psyllid" to the directions for use of the Citrus section (p.12 of the enclosed label) of Etigra LLC's Imida E-Ag 1.6 F Insecticide label per PRN 98-10. No other changes to the Imida E-Ag 1.6 F Insecticide label have been made.

Etigra LLC believes this addition is allowed under section (II.B. Adding or Deleting Pests) of PRN 98-10. The added pest occurs on a specific site on the approved label; matches the type of product registered (insecticide); dosage, frequency, concentration and method of application does not change; no increase in exposure to humans or the environment will occur and the pest is not subject to quarantine by the U.S. Department of Agriculture.

In support of this notification, we submit the following documents:

- 1. Completed Application for Registration (EPA Form 8570-1)
- 2. One (1) copy of the Imida E-Ag 1.6 F Insecticide labeling with the change tracked
- 3. One (1) copy of the Imida E-Ag 1.6 F Insecticide labeling with the change incorporated
- 4. Letter of Authorization

Please feel free to call me if you have any questions or need any additional information.

Michael Kellogg

Sincerely

Enclosures



January 14, 2007

To Whom It May Concern:

JUL 2 0 2007

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agents for Etigra, LLC (EPA Company Number 81959), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Randall V. Canady Chief Operating Officer

cc: Pyxis Regulatory Consulting, Inc.

Imida E-Ag 1.6 F Insecticide FLOWABLE INSECTICIDE

NOTIFICATION
JUL 2 0 2007

For control of certain insects infesting various crops

ACTIVE INGREDIENT:		
Imidacloprid: 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine		17.4%
OTHER INGREDIENTS:	,	82.6%
TOTAL:		
Contains 1.6 lbs. of imidacloprid per gallon.	* * * * * * * * * * * * * * * * * * * *	•

KEEP OUT OF REACH OF CHILDREN CAUTION

	FIRST AID
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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.
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 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.
	HOT LINE NUMBER
	ct container or label with you when calling a poison control center or doctor, or going for may also contact 1-800-424-9300 for emergency medical treatment information.
	NOTE TO PHYSICIAN
No specific anti-	dote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

EPA Reg. No. 81959-21

EPA Est. No.

Manufactured for: Etigra, LLC 2214 Hwy 44 West Inverness, FL 34453

Imida E-Ag 1.6 F Insecticide contains imidacloprid, the active ingredient used in Prevado®.

Net Contents:

PERSONAL PROTECTIVE EQUIPMENT (PPE):

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Chemical-resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.
- Shoes plus socks

Follow 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.

Engineering Controls Statements:

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides [40 CFR 170.240(d)(4-6)], the handler PPE requirements may be reduced or modified as specified in the WPS.

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.
- 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.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area. This product is toxic to wildlife and highly toxic to aquatic invertebrates.

This chemical demonstrates the properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow may result in groundwater contamination.

OBSERVE THE FOLLOWING PERCAUTIONS WHEN MIXING AND APPLYING IN THE VICINITY OF AQUATIC AREAS SUCH AS LAKES; RESERVOIRS; RIVERS; PERMANENT STREAMS, MARSHES OR NATURAL PONDS; ESTUARIES AND COMMERCIAL FISH FARM PONDS.

SPRAY DRIFT MANAGEMENT

The interaction of many equipment and weather related factors determine the potential for spray drift. The applicator is responsible for considering all of these factors when making application decisions. <u>Avoiding spray drift is the responsibility of the applicator.</u>

Mixing and Loading Requirements

To avoid potential contamination of groundwater, the use of a properly designed and maintained containment pad for mixing and loading of any pesticide into application equipment is recommended. If containment pad is not used, maintain a minimum distance of 25 feet between mixing and loading areas and potential surface to groundwater conduits such as field sumps, uncased well heads, sinkholes, or field drains.

Aerial Applications

The spray boom should be mounted on the aircraft so as to minimize the drift caused by wing tip vortices. The minimum practical boom length should be used, and must not exceed 75% of the wing span or rotor diameter.

Importance of Droplet Size

An important factor influencing drift is droplet size. Small droplets (<150-200 microns) drift to a greater extent than large droplets. Within typical equipment specifications, applications should be made to deliver the largest droplet spectrum that provides sufficient control and coverage. Formation of very small droplets may be minimized by appropriate nozzle selection.

Wind Speed Restrictions

Drift potential increases at wind speeds of less than 3 mph (due to inversion potential) or more than 10 mph. However, many factors, including droplet size, canopy and equipment specifications determine drift potential at any given wind speed. Do not apply when winds are greater than 15 mph and avoid gusty and windless conditions. Risk of exposure to sensitive aquatic areas can be reduced by avoiding applications when wind direction is toward the aquatic area.

Restrictions During Temperature Inversions

Because the potential for spray drift is high during temperature inversions, do NOT make aerial or ground applications during temperature inversions. Temperature inversions restrict vertical air mixing, which causes small suspended droplets to remain close to the ground and move laterally in a concentrated cloud. Temperature inversions are characterized by increasing temperature with altitude and are common on nights with limited cloud cover and light to no wind. They begin to form as the sun sets and often continue into the morning. Their presence can be indicated by ground fog; however if fog is not present, inversions can also be identified by the movement of smoke from a ground source. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical mixing.

Airblast (Air Assist) Specific Recommendations for Tree Crops and Vineyards

Airblast sprayers carry droplets into the canopy of trees/vines via a radially, or laterally directed air stream. The following specific drift management practices should be followed:

- Adjust deflectors and aiming devices so that spray is only directed into the canopy;
- Block off upward pointed nozzles when there is no overhanging canopy;
- Use only enough air volume to penetrate the canopy and provide good coverage;
- Do not allow the spray to go beyond the edge of the cultivated area (i.e. turn of sprayer when turning at end rows);
- Only spray inward, toward the orchard or vineyard, for applications to the outside rows.

No-Spray Zone Requirements for Foliar Applications

Do not apply by ground within 25 feet, or by air within 150 feet of lakes; reservoirs; rivers; permanent streams, marshes or natural ponds; estuaries and commercial fish farm ponds.

Runoff Management

Do not cultivate within 10 feet of the aquatic areas to allow growth of vegetative filter strip. When used on erodible soils, best management practices for minimizing runoff should be employed. Consult your local Natural Resources Conservation Service for recommendations in your use area.

Endangered Species Notice

Under the Endangered Species Act, it is a Federal Offence to use any pesticide in a manner that results in the death of a member of an endangered species. Consult your local county bulletin, County Extension Agent, or Pesticide State Lead Agency for information concerning endangered species in your area.

Resistance Management

Some insects are known to develop resistance to insecticides after repeated use. As with any insecticide, the use of this product should conform to resistance management strategies established for the use area. Imida E-Ag 1.6 F Insecticide contains a Group 4A insecticide called imidacloprid. Insect biotypes with acquired or inherent tolerance to group 4A products may eventually dominate the insect population if Group 4A products are used repeatedly as the predominant method of control for targeted species. This may eventually result in partial or total loss of control of those species by Imida E-Ag 1.6 F Insecticide and to other Group 4A products.

The active ingredient in Imida E-Ag 1.6 F Insecticide is a member of the neonicotinoid chemical group. Avoid using a block of more than three consecutive applications of Imida E-Ag 1.6 F Insecticide and/or other Group 4A products having the same or similar mode of action. Following a neonicotinoid block of treatments, Etigra LLC strongly encourages the rotation to a block of applications with effective products of a different mode before using additional applications of neonicotinoid products. Using a block rotation or windowed approach, along with other IPM practices, is considered an effective use strategy for preventing or delaying an insect pests ability to develop resistance to this class of chemistry.

Foliar applications of Imida E-Ag 1.6 F Insecticide or other Group 4A products from the neonicotinoid chemical class should not be used on crops previously treated with a long-residual, soil-applied product from the neonicotinoid chemical class.

Other Group 4A, neonicotinoid products used as foliar treatments include: Actara®, Assail®, Calypso®, Centric®, Intruder™, Leverage® and Trimax™. Other 4A Group, neonicotinoid products used as soil treatment include: Admire® and Platinum®.

Contact your local extension specialist, certified crop advisor and/or product manufacturer for additional insect resistance management recommendations. Also, for more information on Insect Resistance Management (IRM), visit the Insecticide Resistance Action Committee (IRAC) on the web at http://irac-online.org/.

DIRECTIONS FOR USE

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

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, 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 uses of this product that are covered by the Worker Protection Standard.

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

Exception: If the product is soil-injected or soil-incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

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:

- Coveralls
- Chemical-resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton
- Shoes plus socks

GENERAL INFORMATION

Applying Imida E-Ag 1.6 F Insecticide to crops grown for production of true seed intended for private or commercial planting may be allowed under State specific supplemental labeling but is generally not recommended. As with any insecticide, care should be taken to minimize exposure of Imida E-Ag 1.6 F Insecticide to honey bees and other pollinators. Use of Imida E-Ag 1.6 F Insecticide on crops requiring bee pollination should be avoided during bloom and a minimum of 10 days prior to bloom. Do not apply more than 0.5 lb. active ingredient per acre, per crop season, regardless of formulation or method of application, unless specified within a crop specific recommended applications section for a given crop. Additional information on Imida E-Ag 1.6 F Insecticide uses for these crops and other questions may be obtained from the Cooperative Extension Service, PCA's, consultants or local Etigra, LLC representative.

Rotational Crops[†]

As soon as practical following the last application, treated areas may be replanted with any crop specified on an imidacloprid label, or any crop for which a tolerance exists for the active ingredient. For crops not listed on an imidacloprid label, or for crops for which no tolerances for the active ingredient have been established, a 12-month plant-back interval should be observed.

Immediate Plant-back:

All crops on this label plus the following crops not on this label: barley, canola, cardoon, Chinese celery, corn (field, sweet and pop), Celtuce, cranberry[†], cucurbits, Florence fennel, leafy petioles[†], mustard seed[†], rapeseed, rhubarb, sorghum, sugar beet, Swiss chard and wheat.

30-Day Plant-back:

Cereals (including buckwheat, millet, oats, rice; rye and triticale), soybeans, safflower

12- Month Plant-back:

All other crops

[†] Cover crops for soil building or erosion control may be planted any time, but do not graze or harvest for food or feed

Application Instructions

Imida E-Ag 1.6 F Insecticide should be applied as a directed or broadcast foliar spray using properly calibrated ground or aerial application equipment. For optimum insecticidal efficacy, thorough coverage of all target foliage without runoff is necessary. To obtain thorough coverage use adequate spray volumes, properly calibrated application equipment and a spray adjuvant if necessary. Failure to provide adequate coverage and retention of Imida E-Ag 1.6 F Insecticide on leaves and fruit may result in loss of insect control or delay in onset of activity. Minimum recommended spray volumes unless otherwise specified on crop specific recommended application sections are 10 gallons/acre by ground application and 5 gallons/acre through aerial equipment. Imida E-Ag 1.6 F Insecticide may also be applied by overhead chemigation (see additional CHEMIGATION DIRECTIONS FOR USE section below) if allowed in the crop specific recommended application section.

Mixing Instructions

To prepare the application mixture, add a portion of the required amount of water to the spray tank, begin agitation, and add the Imida E-Ag 1.6 F Insecticide. Complete filling tank with the balance of water needed. Be sure to maintain agitation during both mixing and application.

Imida E-Ag 1.6 F Insecticide may also be used with other pesticides and/or fertilizer solutions; refer to the **Compatibility Note** below. When tank mixtures of Imida E-Ag 1.6 F Insecticide and other pesticides are involved, prepare the tank mixture as recommended above and follow the suggested Mixing Order below.

Mixing Order

When pesticide mixtures are needed, add wettable powders first, Imida E-Ag 1.6 F Insecticide or other flowables second, and emulsifiable concentrates last. Ensure good agitation as each component is added and do not add an additional component until the previous is thoroughly mixed. A fertilizer / pesticide compatibility agent may be needed if a fertilizer solution is to be added to the mixture. Be sure to maintain constant agitation during both mixing and application to ensure uniformity of spray mixture.

Compatibility Note

Before adding Imida E-Ag 1.6 F Insecticide to the spray or mix tank, the compatibility of the intended tank mixture should be checked using the following test:

- 1) Add proportionate amount of each ingredient in the appropriate order to a pint or a quart jar;
- 2) Cap and shake for 5 minutes;
- 3) Let set for 5 minutes.

Poor mixing or formation of precipitates that do not readily re-disperse indicates an incompatible mixture that should not be used. For further information, contact your local Etigra, LLC representative.

CHEMIGATION DIRECTIONS FOR USE

Refer to the General Directions For Use section before proceeding with chemigation application.

Types of Irrigation Systems

Chemigation application of Imida E-Ag 1.6 F Insecticide may be made to crops through overhead sprinkler chemigation systems if specified in crop-specific recommendations sections. Do not apply Imida E-Ag 1.6 F Insecticide through any other type of irrigation system.

Water Volume

Imida E-Ag 1.6 F Insecticide chemigation application should be made as concentrated as possible. Retention of Imida E-Ag 1.6 F Insecticide on target site of insect infestation is necessary for optimum activity. Chemigation of Imida E-Ag 1.6 F Insecticide in water volumes exceeding 0.10 inches/acre are not recommended.

Uniform Water Distribution and System Calibration

The irrigation system must provide uniform distribution of treated water. Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water. The system must be calibrated to uniformly apply the rates specified. If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.

Chemigation Monitoring

A person knowledgeable of the chemigation system and responsible for its operation, or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise

Drift

Do not apply when the wind favors drift beyond the area intended for treatment.

Required System Safety Devices

The system must contain a functional check valve, vacuum relief valve and a low-pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from backflow. The pesticide injection pipeline must contain a functional automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump. The pesticide injection pipeline must also contain a functional, normally closed solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or normally shut down. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected. Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

Using Water from Public Water Systems

Public water system means a system for the provision to the public of piped water for human consumption if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year. Chemigation systems connected to public water systems must contain a functional, reduced-pressure zone, back flow preventer (RPZ) or the functional equivalent in the water supply line upstream from the point of pesticide introduction. As an option to the RPZ, the water from the public water system should be discharged into a reservoir tank prior to pesticide introduction. There shall be a complete physical break (air gap) between the outlet end of the fill pipe and to the top or overflow rim of the reservoir tank of at least twice the inside diameter of the fill pipe. The pesticide injection pipeline must contain a functional automatic quick-closing check valve to prevent the flow of fluid back toward the injection. The pesticide injection pipeline must contain a functional normally closed solenoid-operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops or in cases where there is no water pump, when the water pressure decreases to the point where pesticide distribution is adversely affected. Systems must use a metering pump such as a positive displacement injection pump

(e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.

FIELD CROPS

Apply specified rate per acre as foliar spray as pest populations begin to build. Thorough uniform coverage is necessary to achieve optimal control. A spray adjuvant may be used to improve coverage. Imida E-Ag 1.6 F Insecticide may not knockdown established and heavy insect populations. Two applications may be required to achieve control. Scout fields and retreat if needed. Imida E-Ag 1.6 F Insecticide may be tank mixed with other insecticides as recommended for knockdown of pests or for improved control of other pests.

COTTON

- Do NOT graze treated fields after any application of Imida E-Ag 1.6 F Insecticide.
- Pre-Harvest interval (PHI): 14 days
- Minimum interval between applications: 7 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per season: 22 fluid ounces/Acre (0.28 lb. Al/A)
- Maximum number of Imida E-Aq 1.6 F Insecticide applications per crop season: 6

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids Fleahoppers Lygus bug [†] (west of Rocky Mountains) Plant bugs (east of Rocky Mountains) Whiteflies [†]	3.8	Apply the specified amount of Imida E-Ag 1.6 F Insecticide to the infested area as a broadcast or directed spray using properly calibrated ground, aerial or chemigation application equipment. Be sure to thoroughly cover all target vegetation.

POTATO

- Pre-Harvest interval (PHI): 7 days
- Minimum Interval between applications: 7 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 15.0 fluid ounces/Acre (0.19 lb. Al/A)

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids Colorado Potato beetle Flea beetles Leafhoopers Psyllids	3.8	Apply the specified amount of Imida E-Ag 1.6 F Insecticide to the infested area as a broadcast or directed spray using properly calibrated ground, aerial or chemigation application equipment. Be sure to thoroughly cover all target vegetation.

TOBACCO

- Pre-Harvest interval (PHI): 14 days
- Minimum interval between application: 7 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 22.0 fluid ounces/Acre (0.28 lb. Al/A)

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids	2.0 – 4.0	Apply the specified amount of Imida E- Ag 1.6 F Insecticide to the infested area as a broadcast or directed spray using properly calibrated ground, aerial or
Flea beetle Japanese beetle	4.0	chemigation application equipment. Be sure to thoroughly cover all target vegetation.

VEGETABLE and SMALL FRUIT CROPS

Apply specified rate per acre as foliar spray as pest populations begin to build. Thorough uniform coverage is necessary to achieve optimal control. A spray adjuvant may be used to improve coverage. Imida E-Ag 1.6 F Insecticide may not knockdown established and heavy insect populations. Two applications may be required to achieve control. Scout fields and retreat if needed. Imida E-Ag 1.6 F Insecticide may be tank mixed with other insecticides as recommended for knockdown of pests or for improved control of other pests.

FRUITING VEGETABLES[†]

Eggplant, Ground cherry, Okra[†], Pepper, (including bell, chili, cooking, pimento and sweet), Tomato, Pepinos, Tomatillo

- [†] NOT for use on crops grown for seed unless allowed by state-specific supplemental labeling.
 - Pre-Harvest Interval (PHI): 0 days
 - Minimum interval between application: 5 days
 - Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 18.8 fluid ounces/Acre (0.24 lb. Al/A)

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids Colorado Potato beetle Leafhoppers Whiteflies	3.8	Apply the specified amount of Imida E-Ag 1.6 F Insecticide to the infested area as a broadcast or directed spray using properly calibrated ground or aerial equipment. Be sure to thoroughly cover all target vegetation.

Pepper weevil (Pepper only)	6.2	Prior to a damaging population becoming established, apply as a broadcast or directed spray by ground equipment to infested area. For optimal control, complete coverage of foliage and fruit is necessary. Imida E-Ag 1.6 F Insecticide must be incorporated into a full-season program, where alternations of effective products from multiple classes of chemistry and different modes of action are utilized in a blocked or windowed approach. For additional information, contact your Etigra representative, Extension Specialist or crop advisor.
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GLOBE ARTICHOKE

- Pre-Harvest Interval (PHI): 7 days
- Minimum interval between applications: 14 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 40.0 fluid ounces/Acre (0.50 lb. Al/A)

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids Leafhoppers	4.0 – 10.0	Apply to the infested area as a broadcast or directed spray using properly calibrated ground or aerial equipment. Be sure to thoroughly cover all target vegetation.

HEAD AND STEM BRASSICA VEGETABLES AND LEAFY VEGETABLES Not for use on crops grown for seed unless allowed by state-specific supplemental labeling

Broccoli, Broccoli raab (rapini), Brussels sprouts, Cabbage, Cauliflower, Cavalo broccoli, Chinese (gai Lon) Broccoli, Chinese (bok choy) cabbage, Chinese (napa) cabbage, Chinese mustard (gai choy) cabbage, Collards, Kale, Kohlrabi, Mizuna, Mustard greens, Mustard spinach, Rape greens, Turnip (tops or leaves)

Amaranth (leafy amaranth, Chinese spinach, tampala), Arugula (roquette), Chervil, Chrysanthemum (edible leaved and garland), Cilantro, Corn salad, Cress (garden), Cress (upland, yellow rocket, winter cress), Dandelion, Dock (sorrel), Endive (escarole), Lettuce (head and leaf), Orach, Parsley, Purslane (garden and winter), Raddicchio (red hickory), Spinach (including New Zealand and vine (Malabar Spinach, Indian spinach), Watercress (commercial production only)[†], Watercress (upland)[†]

[†] NOT FOR USE IN CALIFORNIA unless otherwise directed by supplemental labeling.

- Do NOT apply to native cress growing in streams or other bodies of water
- Pre-Harvest Interval (PHI): 7 days
- Minimum interval between applications: 5 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 18.8 fluid ounces/Acre (0.23 lb. Al/A)

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids Flea beetles Whiteflies	3.8	Apply to the infested area as a broadcast or directed spray using properly calibrated ground or aerial equipment. Be sure to thoroughly cover all target vegetation.

LEGUME VEGETABLES (except soybean, dry)

Not for use on crops grown for seed unless allowed by state-specific supplemental labeling

Edible podded and Succulent shelled pea and Bean and Dried Shelled Pea and Bean

- Bean Lupinus spp., includes grain lupin, sweet lupin, white lupin, and white sweet lupin
- Bean Phaseolus spp. (includes field bean, kidney bean, lima bean, navy bean, pinto bean, runner bean, snap bean, tepary bean, wax bean)
- Bean Vigna spp. (includes adzuki bean, asparagus bean, blackeyed pea, catjang, Chinese longbean, cowpea, Crowder pea, moth bean, mung bean, rice bean, Southern pea, urd bean, yard long bean)
- Pea Pisum spp. (includes dwarf pea, edible pea, edible-pod pea, English pea, field pea, garden pea, green pea, snow pea, sugar snap pea)

Other Beans and Peas – Broad bean (fava), chickpea (garbanzo bean), Guar, Jackbean, Lablab bean hyacinth bean, lentil, Pigeon pea, soybean (immature seed), Sword bean

- Pre-Harvest Interval (PHI): 7 days
- Minimum interval between applications: 7 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 10.5 fluid ounces/acre (0.13 lb. Al/A)

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids Leafhoppers Whiteflies	3.5	Apply to the infested area as a broadcast or directed spray using properly calibrated ground or aerial equipment. Be sure to thoroughly cover all target vegetation.

ROOT, TUBEROUS and CORM VEGETABLES

Not for use on crops grown for seed unless allowed by state-specific supplemental labeling For recommended applications on potato see the Field Crops section

Arracacha, Arrowroot, Artichoke (Chinese and Jerusalem), Beet (garden)[†], Burdock (edible)[†], Canna (edible, Queensland arrowroot), carrot[†], Cassava (bitter and sweet)[†], Celeriac[†], Chayote (root), Chervil (turnip-rooted)[†], Chickory[†], Chufa, Dasheen (taro)[†], Ginger, Ginseng, Horseradish, Leren, Parsley (turnip-rooted), Parsnip[†], Radish[†], Oriental radish (diakon)[†], Rutabaga[†], Salsify (black)[†], Salsify (oyster plant), Salsify (Spanish), Skirret, Sweetpotato, Tanier (cocoyam)[†], Tumeric, Turnip[†], Yam bean (jicama, manoic pea), Yam (true)[†]

- [†] Tops or greens from these crops may be utilized for food or feed.
 - Pre-Harvest Interval (PHI): 7 days
 - Minimum interval between applications: 5 days
 - Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 3.5 fluid ounces/Acre on radish 10.5 fluid ounces/Acre (0.13 lb. Al/A) on other crops.
 - Maximum Imida E-Ag 1.6 F Insecticide applications per crop season: 1 on radish
 3 on other crops

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids Flea beetles Leafhoppers Whiteflies	3.5	Apply to the infested area as a broadcast or directed spray using properly calibrated ground or aerial equipment. Be sure to thoroughly cover all target vegetation.

STRAWBERRY

- Do NOT apply during bloom or within 10 days prior to boom or when bees are actively foraging.
- Pre-Harvest Interval (PHI): 7 days
- Maximum interval between applications: 5 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 11.3 fluid ounces/Acre (0.14 lb. Al/A)

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids Spittlebugs Whiteflies	3.8	Apply to the infested area as a broadcast or directed spray using properly calibrated ground or aerial equipment. Be sure to thoroughly cover all target vegetation.

TREE, BRUSH and VINE CROPS

Recommended Applications

Apply specified rate per acre as foliar spray as pest populations begin to build. Thorough uniform coverage is necessary to achieve optimal control. A spray adjuvant may be used to improve coverage. Two applications may be required to achieve control of established and heavy insect populations. For knockdown of pests or for improved control of other pests, Imida E-Ag 1.6 F Insecticide may be tank mixed with other insecticides as recommended. Scout fields and retreat if necessary.

BUSHBERRY

Blueberry, Currant, Elderberry, Gooseberry, Huckleberry, Juneberry, Lingonberry, Salal

- Do NOT apply pre-bloom or during bloom or when bees are actively foraging
- Pre-Harvest Interval (PHI): 3 days
- Maximum interval between applications: 7 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 40.0 fluid ounces/Acre (0.5 lb. Al/A)
- Maximum number of Imida E-Ag 1.6 F Insecticide applications per crop season: 5
- Maximum application volume (water): 20.0 GPA for Ground Applications
 5.0 GPA Aerial Applications

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids Leafhoppers / Sharpshooters	3.0 – 4.0	Apply to the infested area as a broadcast or
Japanese beetles (adults) Thrips	6.0 - 8.0	directed spray using properly calibrated ground or aerial equipment. Be sure to thoroughly cover all target vegetation.
Blueberry maggot	8.0	an target vegetation.

CITRUS

Calamondin, Citrus citron, Citrus hybrids (includes chironja, tangelo and tangor), Grapefruit, Kumquat, Lemon, Lime, Mandarin (tangerine), Pummelo, Orange (sweet and sour), Tangelo, Satsuma mandarin, White sapote (Casimiroa spp) and other cultivars and/or hybrids of these

- Do NOT apply during bloom or within 10 days prior to bloom or when bees are actively foraging
- Pre-Harvest Interval (PHI): 0 days
- Maximum interval between applications: 10 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 40.0 fluid ounces/Acre (0.5 lb. Al/A)

	Application	on Rate	<u> </u> .
Pest	(fl. oz. / 100 gal.)	(fl. oz. / Acre)	Specific Instructions
Aphids Asian citrus psyllid Black fly Leafhoppers / Sharpshooters Leafminers Mealy bugs Scales Whiteflies Thrips [†]	3.5 – 5.0 (for dilute applications)	10.0 – 20.0 (depending on tree size, target pest and infestation pressure)	Apply to the infested area as a broadcast or directed spray using properly calibrated ground or aerial equipment. Be sure to thoroughly cover all target vegetation. NOTE: Aerial applications of Imida E-Ag 1.6 F Insecticide may result in slower activity and reduced control compared to results from ground application. Where concentrated applications are appropriate, increase the spray solution concentration to apply an equivalent rate per acre to that applied in the diluted application. The 20.0 fluid ounce/Acre rate is based on full sized trees. This rate may be reduced proportionally for smaller trees. Scales: Time applications to the crawler stage. Treat each generation.

GRAPE

American bunch grape, Muscadine grape and Vinferous grape

- Pre-Harvest Interval (PHI): 0 days
- Maximum interval between applications: 14 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 7.6 fluid ounces/Acre (0.1 lb. Al/A)

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Leafhoppers / Sharpshooters Mealybugs	3.0 – 3.8	Apply to the infested area as a broadcast or directed spray using properly calibrated ground or aerial equipment. Be sure to thoroughly cover all target vegetation.
Grapeleaf Skeletonizer	3.8	Grapeleaf Skeletonizer: Ground applications that provide thorough coverage of foliage should result in control. Aerial applications may provide suppression.

HOPS

- Pre-Harvest Interval: 28 days
- Maximum interval between applications: 21 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 24.0 fluid ounces/Acre (0.30 lb. Al/A)

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids	8.0	Apply to the infested area as a broadcast or directed spray using properly calibrated ground or aerial equipment. Be sure to thoroughly cover all target vegetation.

PECAN

NOT for use in California unless allowed by state-specific supplemental labeling

- Do NOT apply after shuck split.
- Pre-Harvest Interval (PHI): 7 days
- Minimum interval between applications: 10 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 28.0 fluid ounces/Acre (0.35 lb. Al/A)

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids [†] Phylloxera Spittlebugs	3.5 – 7.0	Apply to the infested area as a broadcast or directed spray using properly calibrated ground or aerial equipment. Be sure to thoroughly cover all target vegetation.
† Use higher rate for Black p	ecan aphid	all target vegetation.

POME FRUIT

Apple, Crabapple, Loquat, Mayhaw, Pear (including Oriental pear) Quince

- Do NOT apply pre-bloom or during bloom when bees are actively foraging.
- Pre-Harvest Interval (PHI): 7 days
- Maximum interval between applications: 10 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 40 fluid ounces/Acre (0.5 lb. Al/A)

,	Applicati	on Rate	
Pest	(fl. oz. / 100 gal.)	(fl. oz. / Acre) †	Specific Instructions
Leafhoppers	1.0 – 2.0	4.0 – 8.0	Apply to the infested area as a broadcast or directed spray using properly calibrated ground or aerial equipment. Be sure to thoroughly cover all target vegetation. NOTE: Aerial application of Imida E-Ag 1.6 F Insecticide may result in slower activity and reduced control when compared to results from ground applications. Leafhoppers: Apply while most leafhoppers are in the nymphal stage using the low rate for low to moderate infestations of white apple leafhoppers

Aphid (except woolly apple aphid) Leafminers San Jose Scale	2.0	8.0	and the high rate for severe infestations or for other leafhopper species. Leafminer: For first generation leafminer control, make application as soon as pollination is complete and bees are removed from the orchard. Greatest leafminer control will result from the earliest possible application. For second and succeeding generations of leafminer, optimal control is obtained from applications made early in the adult flight against eff and early instar larvae. A second application may be required 10 days
PEAR ONLY: Mealybugs Pear psylla	5.0	20.0	later if severe pressure continues or if generations are overlapping. A single application may result in suppression only. NOTE: Imida E-Ag 1.6 F Insecticide will not control late instar larvae. Mealybugs: Apply maximum gallonage for tree with ground equipment. Ensure good spray coverage of the trunk and scaffolding limbs or other resting sites of mealybugs. Rosy apple aphid: Apply prior to leaf-rolling caused by rosy apple aphid. San Jose Scale: Time applications to the crawler stage. Treat each generation.

The amount of Imida E-Ag 1.6 F Insecticide required per acre will depend on the tree size and volume of foliage present. The rate per acre is base on a standard of 400 gallons of dilute spray solution per acre for large trees. To calculate the rate needed on smaller trees, multiply the pest specific rate (e.g. for aphid control, 2 fluid ounces/100 gallons) times the number of 100 gallons of spray solution required to thoroughly wet foliage just prior to the point of runoff, on one acre of the trees being treated. For concentrated sprays, apply the same amount of Imida E-Ag 1.6 F Insecticide per acre as would be applied in a dilute spray based on tree size and foliage volume.

STONE FRUIT

Apricot, Cherry (including sweet and tart), Nectarine, Peach, Plum (including Chickasaw, Damson and Japanese), Plumcot, Prune (fresh and dried)

Apricot, Nectarine and Peach Restrictions:

- Do NOT apply pre-bloom or during bloom or when bees are actively foraging.
- Pre-Harvest Interval (PHI): 0 day
- Minimum interval between applications: 7 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 24.0 fluid ounces/Acre (0.30 lbs. Al/A)
- Minimum application volume (water): 50 GPA for ground application
 25 GPA for aerial application

Cherry, Plum, Plumcot and Prune Restrictions:

- Do not apply pre-bloom or during bloom or when bees are actively foraging.
- Pre-Harvest Interval (PHI): 7 days
- Minimum interval between application: 10 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 40.0 fluid ounces/Acre (0.50 lbs. Al/A)
- Minimum application volume (water): 50 GPA for ground application 25 GPA for aerial application

	Application Rate		
Pest	(fl. oz. / 100 gal.)	(fl. oz. / Acre)	Specific Instructions
Aphids Green June beetle Japanese beetle Leafhoppers/Sharpshooters	2.0	4.0 – 8.0	Apply to the infested area as a broadcast or directed spray using properly calibrated ground or aerial equipment. Be sure to thoroughly cover all target vegetation.
Plant bugs Rose chafer San Jose scale			NOTE: Aerial application of Imida E-Ag 1.6 F Insecticide may result in slower activity and reduced control when compared to results from

Cherry fruit fly (maggot of Eastern and Western) Plum curculio [†]	2.0	8.0	ground applications.
Stink bugs [†] † Suppression only.	<u> </u>		

TROPICAL FRUIT

Acerola, Avocado, Black sapote, Canistel, Feijoa, Jaboticaba, Guava, Longan, Lychee, Mamey sapote, Mango, Papaya, Passionfruit, Pulasan, Rambutan, Sapodilla, Spanish lime, Star apple, Star fruit, Wax jambu

- Do NOT apply pre-bloom or during bloom or when bees are actively foraging.
- Pre-Harvest Interval (PHI): 7 days
- Maximum interval between applications: 10 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 40.0 fluid ounces/Acre (0.50 lb. Al/A)
- Maximum number Imida E-Aq 1.6 F Insecticide applications per crop season: 5

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids Leafhoppers/Sharpshooters Thrips Whiteflies Scales [†]	8.0	Apply the specified amount of Imida E-Ag 1.6 F Insecticide to the infested area as a broadcast or directed spray using properly calibrated ground, aerial or chemigation application equipment. Be sure to thoroughly cover all target vegetation. NOTE: Aerial application of Imida E-Ag 1.6 F Insecticide may result in slower activity and reduced control when compared to results from ground applications.
[†] Suppression Only		

OTHER CROPS

Apply specified rate per acre as foliar spray as pest populations begin to build. Thorough uniform coverage is necessary to achieve optimal control. A spray adjuvant may be used to improve coverage. Imida E-Ag 1.6 F Insecticide may not knockdown established and heavy insect populations. Two applications may be required to achieve control. Scout fields and retreat if needed. Imida E-Ag 1.6 F Insecticide may be tank mixed with other insecticides as recommended for knockdown of pests or for improved control of other pests.

POPLAR/COTTONWOOD (including members of the genus *Populus* grown for pulp or timber) **NOT** for use in California unless allowed by state-specific supplemental labeling

- Do NOT apply pre-bloom or during bloom or when bees are actively foraging.
- Pre-Harvest Interval (PHI): 7 days
- Maximum interval between applications: 10 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 40.0 fluid ounces/Acre (0.50 lb. Al/A)

Pest	Application Rate	Specific Instructions

·	(fl. oz. / Acre)	
Aphids Leaf beetles	4.0 - 8.0	Apply the specified amount of Imida E-Ag 1.6 F Insecticide to the infested area as a broadcast or directed spray using properly calibrated ground, aerial or chemigation application equipment. Be sure to thoroughly cover all target vegetation. NOTE: Aerial application of Imida E-Ag 1.6 F Insecticide may result in slower activity and reduced control when compared to results from ground applications.

CHRISTMAS TREES

- Pre-Harvest Interval (PHI): 7 days
- Minimum interval between applications: 7 days
- Maximum Imida E-Ag 1.6 F Insecticide allowed per crop season: 40.0 fluid ounces/Acre (0.50 lb. Al/A)

Pest	Application Rate (fl. oz. / Acre)	Specific Instructions
Aphids Adelgids Sawflies	4.0 - 8.0	Apply the specified amount of Imida E-Ag 1.6 F Insecticide to the infested area as a broadcast or directed spray using properly calibrated ground, aerial or chemigation application equipment. Be sure to thoroughly cover all target vegetation. NOTE: Aerial application of Imida E-Ag 1.6 F Insecticide may result in slower activity and reduced control when compared to results from ground applications.
		Gall-Forming Adelgids: Applications of Imida E-Ag 1.6 F Insecticide are ineffective once galls form, for best results, time applications to coincide with full bud-swell or first budbreaking of earliest bud-breaking trees.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in cool, dry place and in such a manner as to prevent cross contamination with other pesticides, fertilizers, food and feed. Store in original container and out of the reach of children, preferably in a locked storage area.

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

CONTAINER DISPOSAL: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill, or incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

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