

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

December 4, 2015

Mr. James White President & CEO Antipesto, Inc. 777 Stevens Avenue, Suite 706 Portland, ME 04103

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – Acceptable Amendment to Add Additional Pests and Hydroponic Gardening. Product Name: Anti-Pest-O RTU EPA Registration Number: 87357-2 Application Date: October 20, 2015 OPP Decision Number: 510356

Dear Mr. White:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration

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process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Andrew Reighart of my team by phone at (703) 347-0469 or via email at reighart.andrew@epa.gov.

Sincerely,

andrew E. Buycelow

Andrew Bryceland, Team Leader Biochemical Pesticides Branch Biopesticides and Pollution Prevention Division (7511P) Office of Pesticide Programs

Enclosure

Anti-Pest-O[®] RTU

ACCEPTED

12/04/2015 [Ready-To-Use] [Residential Use] Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the [Plant Protection that Sends Pests PackingTM] pesticide registered under [Multi-species] EPA Reg. No. 87357-2 [Giving the Earth a BreakTM] [Sends pests packing] [Anti-Pest-O repels upon approach and landing, is a feeding deterrent and is an insect growth regulator.] [For use on turf grass, outdoor shrubs, trees and ornamentals] [For greenhouse, shade house, interiorscape and nursery use] [For use on all indoor and outdoor food and ornamental plants] [For use on all indoor and outdoor plants] [Effective deer repellent][*] [Effective rabbit repellent][*] [Effective spider mite repellent][*] [Effective groundhog repellent][*] [Effective ant repellent. Not for use against pharaoh, fire (all species), California harvester/harvester or carpenter.][*] [Effective Insect Repellent] [Controls and repels insects such as aphids[*], armyworms[*], beetles[*], budworms[*], cutworms^[*], fungus gnats^[*], leafhoppers^[*], leaf miners^[*], leaf rollers^[*], lepidopterous larvae[*], loopers[*], mushroom flies[*], sawflies[*], thrips[*], webworms[*], and whiteflies[*]; plant parasitic nematodes such as dagger[*], golden[*], and root knot nematodes^[*], spider mites^[*], and Japanese beetles^[*]. Anti-Pest-O Garden Products

For Use by Hydroponic Growers

ACTIVE INGREDIENTS:

Azadirachtin	.001964 %
Capsaicin	.000389 %
Garlic	.061639 %
OTHER INGREDIENTS	<u>99.936008</u> %
TOTAL	100.000000%

KEEP OUT OF REACH OF CHILDREN

FIRST AID	
If inhaled	 Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.
	• Call a poison control center or doctor for further treatment advice.
If on skin	• Take off contaminated clothing.
or clothing	• Rinse skin immediately with plenty of water for 15-20 minutes.
_	• Call a poison control center or doctor for further treatment advice.
If in eyes	• Hold eye open and rinse slowly and gently with water for 15-20 minutes.

	• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.	
	• Call a poison control center or doctor for further treatment advice.	
If	• Call poison control center or doctor immediately for treatment advice.	
swallowed	• 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.	
Hotline Number		
Have the product container or label with you when calling a poison control center, doctor, or going for		

treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 am to 4:30 pm Pacific Time (NPIC Web site: www.npic.orst.edu).

[See [back][side] [panel][booklet] for additional precautionary statements and use information.]

Manufactured by: Antipesto, Inc. 470 Riverside Street Building 4 Portland, ME 04103 Net Contents._____ [16, 32 fl. ozs.] [1 gallon or 128 fl. ozs.] [2.5 gallons] EPA Reg. No. 87357-2 EPA Est. No. 087357-ME-001 [Batch Code: XXXX] or [Lot #: XXXX] [printed or stickered anywhere on container except the closure, such as bottom, side or other]

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS CAUTION

Harmful if inhaled, absorbed through skin, or swallowed. Avoid contact with skin, eyes, or clothing. Avoid breathing spray mist. 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. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

ENVIRONMENTAL HAZARDS

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area.

DIRECTIONS FOR USE IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

Keep unprotected persons out of treated areas until sprays have dried.

Shake vigorously before each use.

[PRODUCT DESCRIPTION]

[Anti-Pest-O[®] RTU has been evaluated on a wide variety of ornamental, forestry, and food crops. No phytotoxicity has been observed at the prescribed application rates. Anti-Pest-O[®] RTU is an insect repellent and growth regulator that works on all stages of the insect life cycle. Anti-Pest-O[®] RTU controls insects in the larval, pupal, and nymphal stages by interfering with the metabolism of ecdysone. Insects typically die between larval to larval, larval to pupal, nymph to nymph molts, or during adult eclosion. Anti-Pest-O[®] RTU also repels the approach and landing of insects by interfering with the olfactory sensory organs.]

[Anti-Pest-O[®] RTU has been evaluated on a wide variety of ornamental and food plants. Anti-Pest-O[®] RTU is a growth regulator that works on all stages of the insect life cycle and its scent repels the approach and landing of insects.] [Anti-Pest-O[®] RTU effectively repels and controls insects.]

[Anti-Pest-O[®] RTU is an effective [deer][*][and][rabbit][*][and][groundhog][*] repellent that can be used on any plants that they eat.][*]

[• Multi-purpose insecticide/miticide/repellent-3 in 1 product]

[• Controls eggs, larvae and adult stages of insects. Also repels upon approach and landing.]

[• Anti-Pest-O[®] RTU is most effective when applied in early to mid-morning or late afternoon when adult pests are normally sedentary on the undersides of foliage.]

APPLICATION INSTRUCTIONS

Anti-Pest-O[®] RTU is a ready to use product that can be applied to all indoor and outdoor plants, including ornamental and food. Shake well before applying. Apply to plant foliage to ensure it is wet (top and bottom of foliage). Reapply on a 7-10 day schedule or as needed. For heavy insect populations, apply on a 7-day schedule. Complete coverage of all plant tissue is necessary for control. Do not apply to wilted, stressed or to newly transplanted plants.

[Spray Anti-Pest-O[®] RTU around the base of the plant, out 6-12 inches. Ensure thorough coverage of soil.]

[Anti-Pest-O[®] RTU is effective at repelling

[deer][*][and][,rabbit][*][and][,groundhog][*] from treated plants and foliage. Apply the product directly to plant foliage to ensure the plant is thoroughly wet. Reapply on a 7-10 day schedule as needed to maintain repellency. If feeding is heavy, reapply after 3 days.]

[Anti-Pest-O RTU is an effective Spider Mite[*] repellent. Use this product at the first sign of infestation. Apply to plants until runoff ensuring thorough coverage just before grow lights are turned off or sunset. Reapply on a 7-10 day schedule as needed. If infestation is heavy, reapply after 3 days.]

[Anti-Pest-O RTU is an effective Rabbit[*] repellent. Apply to plants foliage and ensure the plants are thoroughly wet. Reapply on a 7-10 day schedule as needed. If rabbit feeding is heavy, reapply after 3 days.]

[Anti-Pest-O RTU is an effective Groundhog[*] repellent. Apply to plants foliage and ensure the plants are thoroughly wet. Reapply on a 7-10 day schedule as needed. If groundhog feeding is heavy, reapply after 3 days.]

[Anti-Pest-O Concentrate is an effective ant[*] repellent. Not for use against pharaoh, fire (all species), California harvester/harvester or carpenter. Spray where ants are present, inside or out. Spray around foundation and thresholds or any areas ants may have access to your building. If the ant colony is found, spray the area around and above the entrance.]

Anti-Pest-O[®] can be used to control any of the following insects:

ANTS[*][: such as black or general ants. Not for use against pharaoh, fire (all species), California harvester/harvester or carpenter.]
APHIDS[*][: such as Cotton Aphid, Green Peach Aphid, Black Maringed Aphid, Filbert Aphid]
ARMYWORMS[*][: such as Beet Armyworm, Fall Armyworm, Southern Armyworm, Yellowstripped Armyworm]
BORERS[*][: such as

Peachtwig Borer, Peachtree Borer, Squash Vine Borer] CATERPILLARS & LOOPERS[*][: such as Cabbage Looper, Diamond Moth, Imported Cabbage Looper, Navel Orangeworm, Soybean Looper, Tobacco Budworm, Tomato Fruitworm, Grapeleaf Skeletonizer, Hornworm, Fall Webworm, Lesser Webworm, Pickleworm, Rindworm, Melonworm, Sod Webworm, Pecan Nut Casebearer, Walnut Caterpillar, Hickory Shuckworm, Corn Earworm] **BUDWORMS**[*][: such as Garden Webworm, Tomato Pinworm, Grapefruit Worm, Filbert Worm] **CUTWORMS**[*][: such as Black Cutworm, Citrus Cutworm] **LEAFHOPPERS**[*][: such as Grape Leafhopper, Potato Leafhopper, Variegated Leafhopper, Aster Leafhopper] **LEAFMINERS**[*][: such as Holly Leafminer, Serpentine Leafminer, Vegetable Leafminer] **LEAFROLLERS**[*][: such as Oblique Banded Leafroller, Omnivorous Leafroller, Grape Leafroller, Fruit Tree Leafroller, Blueberry Leafroller, Filbert Leafroller] **MOTHS**[*][: such as Artichoke Plume Moth, Codling Moth, Gypsy Moth, Diamondback Moth, Grape Berry Moth] **NEMATODES**[*] **THRIPS**[*][: such as Thrips Palmi] **WHITEFLIES**[*][: such as Greenhouse Whitefly, Silverleaf Whitefly, Sweetpotato Whitefly] PSYLLIDS[*] SAWFLIES[*] SCALES[*] **SPIDER MITES**[*] **SPITTLE BUGS**[*] MEALYBUGS[*] BEETLES[*], GRUBS[*] & WEEVILS[*][: such as Japanese Beetle, Squash Beetle, Lily Beetle, Pecan Weevil, Chestnut Weevil, Colorado Potato Beetle, Black Vine Weevil, Twig Girdlers, Strawberry Beetle, Potato Flea Beetle, Mexican Bean Beetle, Bean Leaf Beetle, Flea Beetle, Bollweevil] **[OTHER**[*]: such as

Fruitfly, Grasshopper, Squash Bug, Cabbage Maggot, Onion Maggot, Cherry Fruitworm, Grape Leaffolder, Pink Bollworm, Lygus Bug, San Jose Scales, Calico Scales, Frosted Scales, Pecan Leaf Phylloxera, Pecan Stem Phylloxera]

[Anti-Pest-O[®] RTU is effective at repelling

[deer][*][and][rabbits][*][and][groundhogs][*] from treated plants and foliage.][*]

[Anti-Pest-O[®] RTU is a ready to use product that can be applied to all indoor and outdoor plants, including ornamental and food.]

[Anti-Pest-O[®] RTU can be used on roses, flowers, houseplants, ornamental trees and shrubs, and fruits, berries, herbs/spices, and vegetables.]

[FOOD CROPS, such as:]

[Root and tuber vegetables, such as: Artichokes, beets, carrots, ginger, horseradish, potatoes, radishes, rutabagas, sweet potatoes, turmeric, turnips, yams]

[Leafy vegetables (including Brassica Leafy Vegetables), such as:]

[Amaranth, broccoli, Brussels sprouts, cabbage, cauliflower, celery, chervil, Chinese cabbage, collards, cress, endives, fennel, kale, kohlrabi, lettuce, mizuna, mustard greens, parsley, purslane, rape greens, rhubarb, spinach, Swiss chard]

[Legume vegetables, such as: beans (field, kidney etc.), chickpeas, cowpeas, guar, jack beans, lablab beans, lentils, peas, pigeon peas, soybeans, sword beans]

[Fruiting vegetables, such as: Eggplants, ground cherries, pepinos, peppers, pimentos, tomatillos, tomatoes]

[**Pome fruits, such as**: Apples, crabapples, loquats, may haws, oriental pears, pears, quinces]

[Stone fruits, such as: Apricots, cherries, nectarines, peaches, plums, prunes] [Berries, such as: Blackberries and cane berries, blueberries, currants, elderberries, gooseberries, huckleberries, loganberries, raspberries, strawberries, youngberries] [Cereal grains, such as: Barley, buckwheat, corn, millet, oats, popcorn, rice, rye, sorghum, teosintes, triticale hybrids, wheat, wild rice]

[Herbs and spices, such as: Allspice, angelica, anise, annatto, balm, basil, black and white peppers, borage, burnet, chamomile, caper buds, cardamom, caraway, cassia, catnip, celery seeds, chervil, chives, cinnamon, clary, cloves, coriander (cilantro), costmary, cumin, curry leaf, dills, fennels, fenugreek, grains of paradise, horehound, hyssop, juniper berry, lavender, lemongrass, lovage, mace, marigolds, marjoram, mustard seeds, nasturtium, nutmeg, parsley, pennyroyal, poppy seeds, rosemary, rue, saffron, sage, savory, sweet bay (bay leaf), tansy, tarragon, thyme, vanilla, wintergreen, woodruff, wormwood]

[Bulb vegetables, such as: Garlic, leeks, onions, shallots]

[**Tropical fruits, such as**: Atemoyas, bananas, breadfruits, cherimoyas, durians, guavas, malangas, mangos, papayas, passion fruits, star fruits]

[Ornamental plants, such as: Ageratum, aster, aucuba, begonia, cacti, calendula, calla, carnation, ceanothus, chrysanthemum, cineraria, coleus, cotoneaster, cyclamen, daffodil, dahlia, delphinium, fichus, foliage plants, fuchsia, gardenia, geranium, gloxinia, hyacinth, hydrangea, iris, ivy, lily, maidenhair fern, marigold, narcissus, orchid, pansy,

pelargonium, peony, phlox, pittosporum, poinsettia, pyracantha, rubber plant,

snapdragon, stock, tulip, wandering jew, yew, yucca, zinnia]

[Ornamental trees and shrubs, such as: Andromeda, arborvitae, ash, Austrian pine, azalea, beech, birch, birdsnest spruce, blue spruce, bougainvillea, boxwood, butternut, camellia, cedar, chamaecyparis, cherry, crabapple, cyprus, dogwood, douglas fir, elm, euonymus, firethorn, forsythia, hackberry, hawthorn, hemlock, hickory, holly, honey

locust, horse chestnut, ilex, juniper, larch laurel, lilac, linden, London plane, magnolia, manvilla, maple, mimosa, mountain ash, myrtle, oak, pachysandra, peach pine, photinia, planetree, pines, poplar, privet, quince, rhododendron, roses, spruce, sycamore, white cedar, white pine]

[**Turf and turfgrass, such as**: Bent grass, Bermuda grass, bluegrass, centipede grass, fescue, ryegrass, St. Augustine, wheatgrass, zoysia grass]

[The following text and associated links above maybe found on the label and changed as California reviews and accepts product efficacy data]

[*Not registered for use in California.]

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Do not store this product above 100 degrees F or below 20 degrees F for extended periods of time. Keep containers tightly closed and in original containers when not in use.

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

CONTAINER HANDLING: 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.

[Optional warranty statements] [IMPORTANT: PLEASE READ BEFORE USE

By using this product, the user accepts the following: LIMITED WARRANTY:]

[PLEASE READ BEFORE USE LIMITED WARRANTY]

[Antipesto, Inc. warrants that (a) this product conforms to the chemical description on its label; (b) this product is reasonably fit for the purposes stated on its label, subject to the inherent risks referred to herein, when used in accordance with its directions; and (c) that the directions, cautions and other statements on this label are based upon responsible experts' evaluations of reasonable tests of effectiveness, of toxicity to laboratory animals and plants, and upon reports of field experience. Testing has not been performed on all varieties of food crops and plants, or in all states, or under all application, weather and crop conditions.

THERE ARE NO EXPRESS WARRANTIES OTHER THAN THOSE SET FORTH HEREIN. ANTIPESTO PRODUCTS, INC. NEITHER MAKES NOR INTENDS, NOR DOES IT AUTHORIZE ANY AGENT OR REPRESENTATIVE TO MAKE, ANY OTHER WARRANTY, EXPRESS OR IMPLIED, INCLUDING NO IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY. TO THE **EXTENT CONSISTENT WITH APPLICABLE LAW, USER'S EXCLUSIVE REMEDY, AND ANTIPESTO, INC.'S OR SELLER'S EXCLUSIVE LIABILITY,** FOR ANY CLAIM LOSS, DAMAGE, OR INJURY RESULTING FROM THE **USE OR HANDLING OF THIS PRODUCT, WHETHER OR NOT BASED IN** CONTRACT, WARRANTY, NEGLIGENCE, STRICT LIABILITY IN TORT, OR **OTHERWISE, SHALL BE LIMITED, AT ANTIPESTO, INC.'S OPTION, TO REPLACEMENT OF, OR REPAYMENT OF THE PURCHASE PRICE FOR,** THE QUANTITY OF PRODUCT WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW **UNDER NO CIRCUMSTANCES SHALL ANTIPESTO PRODUCTS, INC. BE** HELD LIABLE FOR SPECIAL, CONSEQUENTIAL OR INDIRECT DAMAGES **RESULTING FROM THE USE, HANDLING, OR EXPOSURE TO THE PRODUCT.**

To the extent consistent with applicable law, This warranty does not extend to, and the user shall be solely responsible for, any loss, damage or injury that results from the use of this product in any manner that is not in strict conformity with this label's directions or cautions.

To the extent consistent with applicable law, buyers and all users are deemed to have accepted the terms of this limited warranty which may not be varied by any verbal or written agreement.]

OR

[To the extent allowed by state law, Buyer assumes all risks of use, storage or handling of this product not in accordance with label directions.]

Anti-Pest-O[®] is a registered Trademark of Antipesto, Inc. U.S. Patent pending.

[Optional label text and distributor logo that may be found anywhere on the label] [Approved by] [Distributed by] [Approved for distribution by]



[Effective rabbit repellent][*] [Effective groundhog repellent][*] [Effective deer repellent][*] [Effective spider mite repellent][*] [Effective ant repellent. Not for use against pharaoh, fire (all species), California harvester/harvester or carpenter.][*] [Effective Insect repellent] [For use on all indoor and outdoor plants] [Anti-Pest-O Garden Products] [For Use by Hydroponic Growers]