



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

**OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION**

January 13, 2022

Olav Messerschmidt
Registration Agent for Terramera, Inc
OMC Ag Consulting
3334 S. Indiana Ave
Milwaukee, Wisconsin 53207

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 – Add additional marketing claims, revise product description in label heading and revise company address on label.

Product Name: TER-RTU1 (EPA Reg. No. 88760-1 (Cold Pressed Neem Oil)
EPA Registration Number: 88760-1
Application Date: 10/12/2021
OPP Case Number: 00329774

Dear Mr. Messerschmidt:

The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

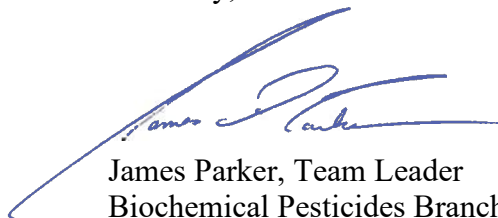
The labeling submitted with this application has been stamped “Notification” and will be placed in our records. You must submit one (1) copy of the final printed labeling with the modifications.

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 the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the 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 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.

Page 2 of 2
EPA Reg. No. 88760-1
OPP Decision No. 00329774

If you have any questions, please contact Cheryl Greene of my team by phone at via email at greenec Cheryl@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "James Parker", with a long, sweeping underline that extends to the left.

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

TER-RTU1 (EPA Reg. No. 88760-1)

[Alternate Brand Names: CIRKIL RTU, PROOF, CIRKIL]

MASTER LABEL

Sublabel A is for Commercial Use

Sublabel B is for Residential Use on Bed Bugs

Sublabel C is for Residential Use on Bed Bugs, Fleas and Dust Mites

Sublabel D is for Residential

NOTIFICATION

88760-1

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

01/13/2022

TER-RTU1

For use as an Insecticide for all listed pests [- bed bugs, fleas, dust mites, moisture ants, pavement ants, field ants, German cockroaches, spiders (except black widow spiders), house crickets, firebrats, silverfish, millipedes, centipedes, sow bugs, aphids and bottle flies]

For use as an Ovicide for control of eggs with Bed Bugs and German Cockroaches Only

Active Ingredient:

Cold Pressed Neem Oil.....	5.5%
Other Ingredients.....	94.5%
Total	100.0%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

READ ALL DIRECTIONS BEFORE USING THIS PRODUCT

If you do not understand the label, find someone to explain it to you in detail.

(Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.)

EPA Reg. No. 88760-1

EPA Est. No. 84830-IA-01

NET CONTENTS: 3, 3.4, 12, 16, 32 or 64 oz., 1 or 5 Gallons
Batch No.

Manufactured for:
Terramera, Inc.
6920 Salashan Pkwy E-100
Ferndale, WA 98248
[1-800-597-9509]

<i>{Optional marketing claims - GENERAL CLAIMS:</i>	
<ul style="list-style-type: none"> - Patent[ed][-pending] [formula] - Ready-to-Use [spray] [formula] - Made in [the] [USA][America] - Easy to use - 	<ul style="list-style-type: none"> - [For] Use as part of an Integrated Pest Management [program][strategy] - [Just] spray and [leave to dry] [walk away] - Smells strong [and] [but] it works - Use on [mattresses] [beds] [upholstery] [wood] [carpets] [rugs] [suitcases] [fabrics] - [For] use everywhere in [the] [house] [home] [kitchen] [bathroom] - [For] use [at the office] [at work] [while travelling][on the road] - [Convenient] [Travel][personal][home] size - [Use] The Power of Neem - Derived From Neem - plant-based [biopesticide][spray] - botanical insecticide - Non-toxic [mode of] [killing] action -

TER-RTU1 (EPA Reg. No. 88760-1)
Sublabel A: Commercial Use

[Alternate name: *CIRKIL RTU*]

TER-RTU1

For use as an Insecticide for all listed pests [- bed bugs, fleas, dust mites, moisture ants, pavement ants, field ants, German cockroaches, spiders (except black widow spiders), house crickets, firebrats, silverfish, millipedes, centipedes, sow bugs, aphids and bottle flies]

For use as an Ovicide for control of eggs with Bed Bugs and German Cockroaches Only

Active Ingredient:

Cold Pressed Neem Oil.....	5.5%
Other Ingredients.....	94.5%
Total	100.0%

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EPA Reg. No. 88760-1

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Batch No.

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Manufactured for:
Terramera, Inc.
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First Aid	
If in eyes	<ul style="list-style-type: none">• 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.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• 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 by a poison control center or doctor.• Do not give anything to an unconscious person.
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)	

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution: Causes moderate eye irritation. Harmful if swallowed. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

PHYSICAL AND CHEMICAL HAZARDS

Flammable. Keep away from heat and open flame. Do not spray around open flame or heat sources or in electrical sockets. Any goods or equipment that use power must be unplugged before being treated. Check to ensure any electrical equipment is completely dry before reconnecting to a power source.

ENVIRONMENTAL HAZARDS

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 disposing of equipment washwater or rinsate.

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.

GENERAL INFORMATION

TER-RTU1 is a Ready-to-Use spray for indoor and outdoor use, containing 5.5% pure cold-pressed neem oil. **TER-RTU1** can be used as a spot or crack and crevice treatment for bed bugs and their eggs, fleas, dust mites, moisture ants[†], pavement ants[†], field ants[†], German cockroaches and their eggs (**on non-porous surfaces only**), **spiders (Except black widow spiders)**, house crickets[†], firebrats[†], silverfish[†], millipedes[†], centipedes[†], sow bugs[†], aphids[†] and bottle flies[†] in indoor areas, and for moisture ants[†], pavement ants[†], field ants[†], crickets[†], aphids[†], millipedes[†], centipedes[†], sow bugs[†], and bottle flies[†] in outdoor areas. [†] *Not registered for use in California*

GENERAL PRECAUTIONS:

- **TER-RTU1** may cause damage or discolor certain surfaces and materials, including paper, freshly painted surfaces, soft plastics, plastic varnishes, flooring and finishes, photographs, artwork, wallpaper and consumer electronics].] Make small inconspicuous test of all surfaces and fabrics for colorfastness, discoloration or damage before making treatment.
- Do not spray around open flame or heat sources or in electrical sockets. Ensure any equipment requiring power is unplugged before treating, and allow to dry thoroughly before re-use.
- Do not allow excessive dripping or run-off on surfaces to avoid potential material damage.
- Treatment of smooth floor surfaces may leave slippery residue. Exercise caution.
- Allow treated surface to dry completely before use.
- Overspray or excess drift to household plants may injure or kill. Avoid contacting residential plants.
- Do not make outdoor applications during rain [or if rain is expected within 4 hours].

Do not dilute. Shake well prior to use.

INDOOR PESTS:

Use **TER-RTU1** to [control][kill] bed bugs and their eggs and German cockroaches and their eggs (**on non-porous surfaces only**). To control [kill] fleas, dust mites, moisture ants[†], pavement ants[†], field ants[†], **spiders (Except black widow spiders)**, house crickets[†], firebrats[†], silverfish[†], millipedes[†], centipedes[†], sow bugs[†], aphids[†] and bottle flies[†].

[†] *Not registered for use in California*

Use **TER-RTU1** in indoor areas including residential homes, multi-dwelling units, apartments, dormitories, schools, hospitals, nursing homes, prisons, temporary shelters, aircraft, buses, marine vessels, airports, offices, theaters, hotels, motels, restaurants, lounges, arenas, retail stores, conference centers and other indoor spaces. Do not use on surfaces inside these facilities near or on food. Cover all exposed food prior to treatment.

WHERE TO APPLY:

Treat areas where pests are found, or may hide or feed. Use **TER-RTU1** on indoor surfaces, fabrics or materials [such as floors, ceilings, walls, windows, doors, baseboards, moldings, painted and unpainted wood, mattresses, linens, furniture, upholstery, curtains, rugs, suitcases,] and anywhere listed pests may harbor. Spot test fabrics prior to treatment.

HOW TO APPLY:

1. Use for spot or crack and crevice treatments, or for treatments to small and defined areas where a need for rapid dry time or concern about water damage prevents use of CIRKIL CX (e.g. artwork, picture frames, keyboards, luggage, etc).
2. Spray listed pests directly, and spray surfaces until moist. Allow treated surface to dry completely before contacting. Use approximately one ounce of TER-RTU1 per 1.5 to 6 sq. ft. of surface area depending on pest and material treated. Porous surfaces such as carpets or wood may require more volume (e.g. one ounce per 1.5~3 sq.ft.) than non-porous hard surfaces such as vinyl floors (e.g. one ounce per 3~6 sq.ft.).
3. Re-apply as needed when listed pests reappear.
4. For optimal performance, close doors and windows and turn off air circulation (e.g. heaters and air conditioners), leave treated area, and keep site of application undisturbed for at least 4 hours after treatment if possible. After 4 hours, ventilate the treated area well and allow reentry.

<p>Bed Bugs</p>	<p>TER-RTU1 provides effective knockdown, residual and preventative control of bed bugs, including pyrethroid-resistant bed bugs, and their eggs. TER-RTU1 kills bed bugs and eggs and helps manage the spread of pesticide resistance. Spray bed bugs, nymphs or eggs directly or apply to surfaces where bed bugs are found, may harbor or lay eggs for residual control of bed bugs for up to 2 weeks and eggs for up to 3 weeks.</p> <p>Apply to indoor surfaces, fabrics and materials, [such as painted and unpainted wood, under beds, box springs, bed frames, headboards, mattresses, linens, under and behind night stands, closets, dressers, drawers, curtains, blinds, under and behind wall hangings, carpets, rugs, upholstery, wall and window treatments, suitcases, seams, points where carpets and wall meet, moldings,] and anywhere bed bugs may harbor or their eggs may be found. Ensure to inspect and spray tufts, folds, seams, edges, cracks and crevices to minimize further infestation.</p> <p>When treating suitcases, remove loose clothing and other articles and treat both inside and outer surface of the suitcase, especially seams, tufts and pockets.</p> <p>For bed bugs adults, nymphs and eggs, re-apply every 1 to 2 weeks or as needed.</p> <p>For ongoing control of bed bug eggs only, re-apply every 2 to 3 weeks or as needed.</p>
<p>Moisture ants, pavement ants, field ants</p>	<p>Spray directly over and around listed ants at one ounce per 1.5 ~3 sq.ft. to ensure sufficient exposure to treatment. Treat floors, walls, baseboards, under furniture, and other areas where ants are seen or may aggregate for food or water. Apply to ant trails and nest sites. Spray around the perimeter of ant aggregations first before applying directly to live ants in order to prevent them from escaping. On non-porous surfaces, apply one ounce per 3~6 sq.ft.</p>

	On porous surfaces, apply one ounce per 1.5~3 sq.ft.
Fleas	TER-RTU1 controls fleas as a direct spray and surface treatment. Spray areas where fleas may be present, especially fibrous surfaces such as carpets, rugs or linens and areas where pets rest or travel. Apply one ounce per 3~6 sq.ft. on non-porous surfaces such as vinyl floor, and apply one ounce per 1.5~3 sq.ft. on porous surfaces such as carpet or linen.
German Cockroaches (and Eggs), (on non-porous surfaces)	Apply directly over and around German cockroaches on non-porous surfaces at the rate of one ounce per 1.5 sq.ft. for continuous exposure to kill them. Treat areas where cockroaches may feed, hide or lay eggs such as under kitchen appliances, in and around cabinets, sinks, around water pipes or other water sources, baseboards, cracks and crevices. If German cockroaches are flushed out of hiding, spray them directly. Treat entry points and areas around them. Apply one ounce per 1.5 sq.ft. for adults, and one ounce per 3~6 sq.ft. for eggs.
Dust Mites	Spray surfaces where the presence of dust mites is suspected. Porous surfaces such as carpets, linens, mattress and bedding are ideal breeding sites for dust mites. Also treat areas around bed such as walls, floors, headboards and baseboards to kill and prevent spread of dust mites. Apply one ounce per 1.5~3 sq.ft.
Spiders (Except black widow spiders)	Spray directly over and around spiders for continuous exposure at the rate of one ounce per 1.5 sq.ft. A direct spray immobilizes spiders within 5 minutes and kills brown recluse and other spiders (except black widow spiders) within 4 hours. Black widow spiders recover from immobility after approximately eight hours.

OUTDOOR/PERIMETER PESTS:

Use **TER-RTU1** to control moisture ants[†], pavement ants[†], field ants[†], crickets[†], aphids[†], millipedes[†], centipedes[†], sow bugs[†], and bottle flies[†] in outdoor areas.

[†] *Not registered for use in California.*

WHERE TO APPLY:

Use **TER-RTU1** in outdoor areas including around structures, exterior building surfaces, exterior structural elements, patios, sidewalks, garbage cans, dumpsters, parks, recreational areas, and other outdoor areas.

Apply to outdoor surfaces and entry points such as the exterior building surfaces, building foundations, around doors, windows, cracks, crevices, and exterior holes. Apply to outdoor ground surfaces, including sidewalks, driveways, foundation perimeters and soil.

HOW TO APPLY:

1. Spray listed pests directly where possible, and/or spray surfaces until moist. Allow to dry completely. Use one ounce of **TER-RTU1** per 1.5 to 6 sq. ft. of surface area depending on

<p>material treated.</p> <p>2. Re-apply as needed when listed pests reappear.</p> <p>3. Overspray or excess drift to plants may injure or kill vegetation. Avoid contacting plants.</p>	
<p>Moisture, pavement and field ants</p>	<p>Spray directly over and around the listed ants at the rate of one ounce per 1.5~3 sq.ft. to ensure continuous exposure to treatment. Spray around the perimeter of ant aggregations first before applying directly to live ants. Treat entry points (e.g. doors, windows, and around pipes) and areas around them.</p>
<p>crickets[†], aphids[†], millipedes[†], centipedes[†], sow bugs[†], and bottle flies[†]</p>	<p>Spray directly where possible at the rate of one ounce per 3~6 sq.ft. Treat surfaces where the listed insects are found or may hide at the rate of one ounce per 1.5~3 sq.ft.</p>

STORAGE AND DISPOSAL

DO NOT contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Do not reuse container.

PESTICIDE STORAGE: Do not store this product above 104°F or below 20°F for extended periods of time. Store in original containers and keep it tightly closed when not in use. Protect containers from sunlight or moisture.

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

CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. Offer for recycling if available or place in trash or in a sanitary landfill.

IMPORTANT: READ BEFORE USE WARRANTY STATEMENT

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

The Directions For Use of this product reflects the opinion of experts based on experimental use and tests. The directions are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks inherently associated with the use, handling and transport of this product. Damage to products, materials, treated surfaces or fabrics, ineffectiveness or other unintended consequences may result because of factors such as environmental conditions, the presence of other materials, the manner of use or application, the use of the product in a manner inconsistent with its labeling, or other unknown reasons, all of which are beyond the control of Terramera. To the extent allowed by applicable law, all such risks shall be assumed by the user or buyer.

To the extent consistent with applicable law, Terramera or the Seller make no other warranties, guarantees or representations of any kind, either express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of Terramera or the Seller is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Terramera and the Seller disclaim any liability for special, consequential, incidental, or indirect damages resulting from the use, transport, or handling of this product.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the User or Buyer and the exclusive liability of Terramera for any and all losses, injuries or damages resulting from the use, handling, or transport of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid for the product, or at Terramera' election, the replacement of product.

[Terramera and CIRKIL are registered trademarks of Terramera, Inc.]

<i>{Optional marketing claims – Specific to Sublabel A:</i>	
<ul style="list-style-type: none"> - Controls bed bug[s] [infestations] [for up to 2 weeks when used as directed] - Manages bed bug[s] [infestations] [for up to two weeks][when used as directed] - Prevents bed bug[s] [infestations] [for up to two weeks][when used as directed] - 	<ul style="list-style-type: none"> - Kills bed bugs [fleas][dust mites] - Kills Bed Bug Adults, Nymphs and Their Eggs - Effective against [pyrethroid] [chemical] [pesticide] resistant bed bugs [when used as directed] - Kills Bed Bug Eggs and Prevents Them from Hatching when used as directed - [Plus,] Controls Other Listed Indoor & Outdoor Pests when used as directed

TER-RTU1 (EPA Reg. No. 88760-1)
Sublabel B: Residential Use on Bed Bugs

[Alternate name: PROOF]

TER-RTU1

For use as an Insecticide and Ovicide on Bed Bugs

Active Ingredient:

Cold Pressed Neem Oil.....	5.5%
Other Ingredients.....	94.5%
Total	100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION

STOP - Read the Label Before Use

EPA Reg. No. 88760-1
EPA Est. No. 84830-IA-01
Batch No.

NET CONTENTS: 3, 3.4, 12, 16, 32, or 64 fl.oz.

Manufactured for:
Terramera, Inc.
6920 Salashan Pkwy E-100
Ferndale, WA 98248
[1-800-597-9509]

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution: Causes moderate eye irritation. Harmful if swallowed. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

	First Aid
If in eyes	<ul style="list-style-type: none">• 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.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• 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 by a poison control center or doctor.• Do not give anything to an unconscious person.
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).	

PHYSICAL AND CHEMICAL HAZARDS

Flammable. Keep away from heat and open flame. Do not spray around open flame or heat sources or in electrical sockets. Any goods or equipment that use power must be unplugged before being treated. Check to ensure any electrical equipment is completely dry before reconnecting to a power source.

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.

TER-RTU1 is a Ready-to-Use insecticide and ovicide spray for indoor use on bed bugs [, containing 5.5% pure cold-pressed neem oil]. Use **TER-RTU1** around the home and other indoor spaces.

TER-RTU1 works to kill bed bugs for up to 2 weeks and bed bug eggs for up to 3 weeks, and can be used to prevent bed bug infestations when re-applied every 2 weeks. Use **TER-RTU1** to control bed bugs and their eggs.

Do not dilute. Shake well before use.

Spray bed bugs or their eggs directly or spray fabrics or surfaces until moist. Do not allow excessive dripping or run-off on surfaces to avoid potential damage to treated surface. Allow all treated areas to dry completely before use. For optimal performance, close doors and windows and turn off air circulation (e.g. heaters and air conditioners). Leave treated areas undisturbed for at least 4 hours after treatment. Do not enter treated area for 4 hours after treatment, return to normal ventilation. For continuous effectiveness, do not wash treated surface and material for 2 weeks.

Use **TER-RTU1** on indoor surfaces, fabrics and materials [such as suitcases, travel bags, wood, under beds, box springs, mattresses, linens, under and behind night stands, curtains, blinds, under and behind wall hangings, carpets, rugs, upholstery, wall and window treatments, bed frames, headboards, closets, dressers, seams, points where carpets and wall meet, moldings,] and anywhere bed bugs harbor or their eggs may be found. Spray all surfaces, especially tufts, folds, edges, cracks and crevices.

When treating suitcases, remove loose clothing and other articles and treat both inside and outer surface of the suitcase, especially seams, tufts and pockets.

TER-RTU1 may cause damage or discolor certain surfaces and materials, including papers and soft plastics such as plexiglass, plastic varnishes, some flooring and finishes, frames, photographs, artwork, wallpaper and consumer electronics. Make small inconspicuous spot treatments to test all surfaces and fabrics for colorfastness, discoloration or damage before use.

Application Rates and Treatment Schedule:

- Use one ounce **TER-RTU1** per 1.5 to 6 sq. ft. of surface area depending on material treated.
- For bed bug adults, nymphs and eggs, re-apply every 1 to 2 weeks as needed or when bed bugs reappear.
- For ongoing control of bed bug eggs only, re-apply every 2 to 3 weeks or as needed.

STORAGE AND DISPOSAL

Store in a cool dry place out of reach of children and pets and away from direct sunlight, windows, flames and other sources of heat or ignitions. Keep containers tightly closed and in original containers when not in use. Do not store exposed to ultraviolet light (sunlight) or moisture. Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Warranty Statement

NOTICE: To the extent consistent with applicable law, research and testing have determined the “Directions for Use” are appropriate for the proper use of this product under expected conditions. To the extent consistent with applicable law, user assumes responsibility for the lack of performance or safety if not used as directed.

<i>{Optional marketing claims – Specific to Sublabel B}:</i>	
<ul style="list-style-type: none"> - Controls bed bug[s] [infestations] for up to 2 weeks when used as directed] - Manages bed bug[s] [infestations] [for up to two weeks][when used as directed] - Prevents bed bug[s] [infestations] [for up to two weeks][when used as directed] - Kills Bed Bug Adults, Nymphs and Their Eggs - Effective bed bug control [for up to two weeks] [when used as directed] - Effective treatment for fleas and dust mites [when used as directed] - - Stops bed bug infestations for up to 2 weeks [when used as directed] - Patent[ed][-pending] [formula] - Keeps on killing bed bug adults and nymphs for up to 2 weeks and bed bug eggs for up to 3 weeks - Prevents bed bug egg hatch for up to 3 weeks [when used as directed] - Prevents the [growth] [spread] of bed bug infestations [when used as directed] - Effective against [pyrethroid] [chemical] [pesticide] resistant bed bugs [when used as directed] - All-in-one protection from bed bugs - Provides Protection from bed bugs - [A] way to [Control] [Manage] [Protect] [Yourself] [Your Family] [From] Bed bugs - Ready-to-Use [spray] [formula] 	<ul style="list-style-type: none"> - [For] Use as part of an Integrated Pest Management [program][strategy] - [Just] spray and [leave to dry] [walk away] - Smells strong [and] [but] it works - Use on [mattresses] [beds] [upholstery] [wood] [carpets] [rugs] [suitcases] [fabrics] - [For] use everywhere in [the] [house] [home] [kitchen] [bathroom] - [For] use [at the office] [at work] [while travelling][on the road] - [Convenient] [Travel][personal][home] size - Provides Around the clock protection from Bed bugs [and their eggs] for up to 2 weeks [when used as directed] - [Use] The Power of Neem - Derived From Neem - Kills Bed bugs where they [live] [hide] [when used as directed] - Protect [yourself] [your home] [your family] from bed bugs - plant-based [biopesticide][spray] - botanical insecticide - Non-toxic [mode of] [killing] action - - Keeps on killing bed bugs [as a residual treatment] [on treated surfaces] for up to 2 weeks [when applied as directed] - Spray your suitcases and belongings, [in and around beds] [and] [living areas] [,and] [use it on the go] - [TER-RTU1’s] patent-pending technology

<ul style="list-style-type: none">- Made in [the] [USA][America]- Easy to use- Makes bed bugs dead bugs - Stops bed bug eggs from hatching for up to 3 weeks - Use in and around bedroom-	<p>unleashes the [botanical] power of [cold-pressed] neem [oil] to create a zone of protection [at home] [and] [while travelling].</p> <ul style="list-style-type: none">- This plant-based spray is even effective against pesticide-resistant bed bugs and eggs.
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TER-RTU1 (EPA Reg. No. 88760-1)

**Sublabel C: Residential Use
on Bed Bugs, Fleas and Dust Mites**

TER-RTU1

For use as an Insecticide for bed bugs, fleas and dust mites

For use as an Ovicide for control of eggs with Bed Bugs Only

Active Ingredient:

Cold Pressed Neem Oil.....	5.5%
Other Ingredients.....	<u>94.5%</u>
Total	100.0%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

STOP - Read the Label Before Use

EPA Reg. No. 88760-1
EPA Est. No. 84830-IA-01
Batch No.

NET CONTENTS: 3, 3.4, 12, 16, 32, or 64 fl.oz.

Manufactured for:
Terramera, Inc.
6920 Salashan Pkwy E-100
Ferndale, WA 98248
[1-800-597-9509]

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution: Causes moderate eye irritation. Harmful if swallowed. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

	First Aid
If in eyes	<ul style="list-style-type: none">• 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.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• 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 by a poison control center or doctor.• Do not give anything to an unconscious person.
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)	

PHYSICAL AND CHEMICAL HAZARDS

Flammable. Keep away from heat and open flame. Do not spray around open flame or heat sources or in electrical sockets. Any goods or equipment that use power must be unplugged before being treated. Check to ensure any electrical equipment is completely dry before reconnecting to a power source.

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.

TER-RTU1 is a Ready-to-Use liquid spray [containing 5.5% pure cold-pressed neem oil].

General Precautions:

- **TER-RTU1** may cause damage or discolor certain surfaces and materials, including papers and soft plastics such as acrylic, plastic varnishes, some flooring and finishes, frames, photographs, artwork, wallpaper and consumer electronics. **Always test materials to be treated before making broad applications.** To test, make small inconspicuous spot treatment of material or surface to be treated. If fabric or surface becomes discolored or damaged, do not treat the fabric or surface with this product.
- Do not spray around open flame or heat sources or in electrical sockets.

- Do not allow excessive dripping or run-off on surfaces to avoid potential material damage.
- Allow treated surface to dry completely before use.
- Do not make outdoor applications during rain or if rain is expected within 4 hours.

Spray pests directly, or treat surfaces and fabrics until moist. Use one ounce **TER-RTU1** per 1.5 to 6 sq. ft. of surface area depending on pests or material treated. For optimal performance, close doors and windows and turn off air circulation (*e.g.* heaters and air conditioners). Leave treated areas undisturbed for at least 4 hours after treatment. After 4 hours, return to normal ventilation and allow reentry. Re-apply every 1 to 2 weeks or as needed.

To Kill and Prevent Bed Bugs: **TER-RTU1** works to kill bed bugs for up to 2 weeks and bed bug eggs for up to 3 weeks, and can be used to prevent bed bug infestations when re-applied every 2 weeks. Apply **TER-RTU1** directly on bed bugs or their eggs to kill them. Treat surfaces and fabrics to kill or prevent bed bug infestations. Use **TER-RTU1** on indoor surfaces, fabrics and materials [such as suitcases, travel bags, wood, under beds, box springs, mattresses, linens, under and behind night stands, curtains, blinds, under and behind wall hangings, carpets, rugs, upholstery, wall and window treatments, bed frames, headboards, closets, dressers, seams, points where carpets and wall meet, moldings,] and anywhere bed bugs or their eggs may be found. Spray all surfaces, especially tufts, folds, edges, cracks and crevices.

For bed bug adults, nymphs and eggs, re-apply every 1 to 2 weeks or as needed.
For ongoing control of bed bug eggs, re-apply every 2 to 3 weeks or as needed.

To Kill and Prevent Fleas and Dust Mites (DO NOT APPLY TO HUMANS OR ANIMALS):
Spray fleas directly when found. Spray the areas where fleas and dust mites may be present, especially fibrous surfaces [such as carpets, rugs, linens, mattress, beddings, and couches], and areas around those surfaces [such as floors, headboards, baseboards, cracks and crevices]. For fleas, spray areas where pets rest or travel. Use approximately one ounce of product per 1.5 to 3 sq.ft. on fibrous surfaces, and one ounce per 3~6 sq.ft. on smooth surfaces.

STORAGE AND DISPOSAL

Store in a cool dry place out of reach of children and pets and away from direct sunlight, windows, flames and other sources of heat or ignitions. Keep containers tightly closed and in original containers when not in use. Do not store exposed to ultraviolet light (sunlight) or moisture. Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Warranty Statement

NOTICE: To the extent consistent with applicable law, research and testing have determined the “Directions for Use” are appropriate for the proper use of this product under expected conditions. To

the extent consistent with applicable law, user assumes responsibility for the lack of performance or safety if not used as directed.

<i>{Optional marketing claims – Specific to Sublabel C}:</i>	
<ul style="list-style-type: none"> - Controls bed bug[s] [infestations] for up to 2 weeks when used as directed] - Manages bed bug[s] [infestations] [for up to two weeks][when used as directed] - Prevents bed bug[s] [infestations] [for up to two weeks][when used as directed] - Kills Bed Bug Adults, Nymphs and Their Eggs - Effective bed bug control [for up to two weeks] [when used as directed] - Effective treatment for fleas and dust mites [when used as directed] - - Stops bed bug infestations for up to 2 weeks [when used as directed] - Patent[ed][-pending] [formula] - Keeps on killing bed bug adults and nymphs for up to 2 weeks and bed bug eggs for up to 3 weeks - Prevents bed bug egg hatch for up to 3 weeks [when used as directed] - Prevents the [growth] [spread] of bed bug infestations [when used as directed] - Effective against [pyrethroid] [chemical] [pesticide] resistant bed bugs [when used as directed] - All-in-one protection from bed bugs [fleas][dust mites] - Provides Protection from bed bugs - [A] way to [Control] [Manage] 	<ul style="list-style-type: none"> - [For] Use as part of an Integrated Pest Management [program][strategy] - [Just] spray and [leave to dry] [walk away] - Smells strong [and] [but] it works - Use on [mattresses] [beds] [upholstery] [wood] [carpets] [rugs] [suitcases] [fabrics] - [For] use everywhere in [the] [house] [home] [kitchen] [bathroom] - [For] use [at the office] [at work] [while travelling][on the road] - [Convenient] [Travel][personal][home] size - Provides Around the clock protection from Bed bugs [and their eggs] for up to 2 weeks [when used as directed] - [Use] The Power of Neem - Derived From Neem - Kills Bed bugs [fleas and dust mites] where they [live] [hide] [when used as directed] - Protect [yourself] [your home] [your family] from [bed bugs][fleas][dust mites] - plant-based [biopesticide][spray] - botanical insecticide - Non-toxic [mode of] [killing] action - - Kills bed bugs [fleas][dust mites] - Keeps on killing bed bugs [as a residual treatment] [on treated surfaces] for up to 2 weeks [when applied as directed] -

<p>[Protect] [Yourself] [Your Family] [From] Bed bugs</p> <ul style="list-style-type: none">- Ready-to-Use [spray] [formula]- Made in [the] [USA][America]- Easy to use- Makes bed bugs dead bugs- Makes fleas and dust mites dead bugs- Stops bed bug eggs from hatching for up to 3 weeks- Use in and around bedroom-	
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TER-RTU1 (EPA Reg. No. 88760-1)
Sublabel D: Residential Use on
German cockroaches (on non-porous surfaces), moisture ants, pavement ants, field ants, bed bugs,
fleas, dust mites, spiders (except black widow spiders), crickets, firebrats, silverfish, millipedes,
centipedes, sow bugs, aphids, bottle flies

TER-RTU1

For use as an Insecticide for all listed pests [- bed bugs, fleas, dust mites, moisture ants, pavement ants, field ants, German cockroaches, spiders (except black widow spiders), house crickets, firebrats, silverfish, millipedes, centipedes, sow bugs, aphids and bottle flies]

For use as an Ovicide for control of eggs with Bed Bugs and German Cockroaches Only

Active Ingredient:

Cold Pressed Neem Oil.....	5.5%
Other Ingredients.....	<u>94.5%</u>
Total	100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION

STOP - Read the Label Before Use

EPA Reg. No. 88760-1
EPA Est. No. 84830-IA-01
Batch No.

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Caution: Causes moderate eye irritation. Harmful if swallowed. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

	First Aid
If in eyes	<ul style="list-style-type: none">• 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.• Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">• 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 by a poison control center or doctor.• Do not give anything to an unconscious person.
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)	

PHYSICAL AND CHEMICAL HAZARDS

Flammable. Keep away from heat and open flame. Do not spray around open flame or heat sources or in electrical sockets. Any goods or equipment that use power must be unplugged before being treated. Check to ensure any electrical equipment is completely dry before reconnecting to a power source.

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.

Read entire label. Use strictly in accordance with precautionary statements and directions, and with applicable state and Federal regulations.

Use **TER-RTU1** to kill German cockroaches **on non-porous surfaces**, moisture ants[†], pavement ants[†], field ants[†] bed bugs, fleas, dust mites, spiders (**Except black widow spiders**), crickets[†], firebrats[†], silverfish[†], millipedes[†], centipedes[†], sow bugs[†], aphids[†] and bottle flies[†] in indoor areas, and to kill moisture ants[†], pavement ants[†], field ants[†], crickets[†], firebrats[†], silverfish[†], millipedes[†], centipedes[†], sow bugs[†], aphids[†] and bottle flies[†] in outdoor areas.

† Not registered for use in California

Do not dilute. Shake well before use.

General Precautions:

- **TER-RTU1** may cause damage or discolor certain surfaces and materials [including papers and soft plastics such as plexiglass, plastic varnishes, some flooring and finishes, frames, photographs, artwork, wallpaper and consumer electronics]. Make small inconspicuous spot test of all surfaces and fabrics for colorfastness, discoloration or damage before use.
- Do not spray around open flame or heat sources or in electrical sockets.
- Do not allow excessive dripping or run-off on surfaces to avoid material damage.
- Allow treated surface to dry completely before use.
- Do not make outdoor applications during rain or if rain is expected within 4 hours.

Spray listed pests directly, and treat surfaces until moist. Use one ounce of product per 1.5 to 6 sq.ft. of surface area depending on the pest or material treated. Re-apply as needed when listed pests reappear.

To Kill Moisture Ants, Pavement Ants and Field Ants: Spray directly over and around the listed ants at the rate of one ounce per 1.5~3 sq.ft. to ensure continuous exposure to treatment. Spray around the perimeter of listed ant aggregations first before applying directly to live ants. Treat floors, walls, baseboards, under furniture, and other areas where listed ants are seen or may aggregate.

To Kill German Cockroaches on Non-Porous Surfaces: Spray directly over and around cockroaches at the rate of one ounce per 1.5 sq.ft. to ensure continuous exposure to treatment. For control of eggs, spray one ounce per 3~6 sq.ft.

To Kill Bed Bugs, Fleas and Dust Mites: Spray bed bugs (and their eggs) and fleas directly when found. Spray indoor surfaces, fabrics and materials where bed bugs, fleas, and dust mites may be present. Ensure to spray tufts, folds, edges, cracks and crevices. For fleas and dust mites, treat fibrous surfaces such as carpets, rugs, linens, mattress, beddings, and couches, and areas surrounding those surfaces such as floors, headboards, baseboards, cracks and crevices. For fleas, spray areas where pets rest or travel. Apply one ounce per 1.5~3 sq.ft. on porous surfaces, and one ounce per 3~6 sq.ft. on non-porous surfaces.]

To Kill Spiders (Except black widow spiders): Spray directly over and around spiders for continuous exposure at the rate of one ounce per 1.5 sq.ft. to knock them down (i.e. immobilize). A direct spray immobilizes spiders within 5 minutes and kills brown recluse and other spiders (except black widow spiders) within 4 hours. Note that black widow spiders may recover from immobility after approximately eight hours.

To Kill (crickets, firebrats, silverfish, millipedes, centipedes, sow bugs, aphids, bottle flies): Spray pests directly if they are visible at the rate of one ounce per 3~6 sq.ft. Treat surfaces where the pests are seen or known to hide or breed until the surface is moist.

STORAGE AND DISPOSAL

Store in a cool dry place out of reach of children and pets and away from direct sunlight, windows, flames and other sources of heat or ignitions. Keep containers tightly closed and in original containers when not in use. Do not store exposed to sunlight or moisture. Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Warranty Statement

NOTICE: To the extent consistent with applicable law, research and testing have determined the “Directions for Use” are appropriate for the proper use of this product under expected conditions. To the extent consistent with applicable law, user assumes responsibility for the lack of performance or safety if not used as directed.

{Optional marketing claims – Specific to Sublabel D:

- | | |
|---|--|
| <ul style="list-style-type: none"> - Controls bed bug[s] [infestations] for up to 2 weeks when used as directed] - Manages bed bug[s] [infestations] [for up to 2 weeks][when used as directed] - Prevents bed bug[s] [infestations] [for up to 2 weeks][when used as directed] - Kills Bed Bug Adults, Nymphs and Their Eggs - Effective bed bug control [for up to two weeks] [when used as directed] - Effective treatment for fleas and dust mites [when used as directed] - - Stops bed bug infestations for up to 2 weeks [when used as directed] - Patent[ed][-pending] [formula] - Keeps on killing bed bug adults and nymphs for up to 2 weeks and bed bug eggs for up to 3 weeks - Prevents bed bug egg hatch for up to 3 weeks [when used as directed] - Prevents the [growth] [spread] of | <ul style="list-style-type: none"> - [Just] spray and [leave to dry] [walk away] - Smells strong [and] [but] it works - Use on [mattresses] [beds] [upholstery] [wood] [carpets] [rugs] [suitcases] [fabrics] - [For] use everywhere in [the] [house] [home] [kitchen] [bathroom] - [For] use [at the office] [at work] [while travelling][on the road] - Provides Around the clock protection from Bed bugs [and their eggs] for up to 2 weeks [when used as directed] - [Use] The Power of Neem - Derived From Neem - Kills Bed bugs [fleas and dust mites] where they [live] [hide] [when used as directed] - Protect [yourself] [your home] [your family] from [bed bugs][fleas][dust mites][spiders] - plant-based [biopesticide][spray] - botanical insecticide - Non-toxic [mode of] [killing] action - |
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<p>bed bug infestations [when used as directed]</p> <ul style="list-style-type: none">- Effective against [pyrethroid] [chemical] [pesticide] resistant bed bugs [when used as directed]- All-in-one protection from bed bugs [fleas][dust mites][German cockroaches][ants (moisture, pavement and field)][spiders (except black widow spiders)]- Be Bed bug Free- Provides Protection from bed bugs- [A] way to [Control] [Manage] [Protect] [Yourself] [Your Family] [From] Bed bugs- Ready-to-Use [spray] [formula]- Made in [the] [USA][America]- Easy to use- Makes bed bugs dead bugs- Makes fleas and dust mites dead bugs- Stops bed bug eggs from hatching for up to 3 weeks- Use in and around bedroom	<ul style="list-style-type: none">- Kills bed bugs [fleas][dust mites][German cockroaches on non-porous surfaces] [on contact] [when sprayed directly]- [knocks down] [disables] [immobilizes] spiders with in 5 minutes by direct spray- Spray spiders directly to immobilize them within 5 minutes [and kill them in 4 hours, except black widow spiders]- Keeps on killing bed bugs [as a residual treatment] [on treated surfaces] for up to 2 weeks [when applied as directed]- Kills moisture ants, pavement ants and field ants [on contact][when sprayed directly]- Kills Spiders (Except black widow spiders)- Kills ants* and cockroaches***Moisture, pavement, field ants**German cockroaches, when sprayed directly on non-porous surfaces <p>-</p>
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