

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

April 28, 2016

Olav Messerschmidt, Agent Terramera, Inc. c/o OMC AG Consulting, Inc. 828 Tanglewood Lane East Lansing, MI 48823

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – Add

"Indoor Use Only" and remove the Environmental Hazards Statement on Sublabels B and

C.

Product Name: TER-RTU2

EPA Registration Number: 88760-6 Application Date: March 17, 2016 OPP Decision Number: 516328

Dear Dr. Messerschmidt:

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

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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.

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 Menyon Adams of my team by phone at (703) 347-8496 or via email at adams.menyon@epa.gov.

Sincerely,

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

andrew . Buycelow

Enclosure

[Bracketed information is optional text.]

TER-RTU2 (**EPA Reg. No. 88760-6**) MASTER LABEL

Sublabel A is for Commercial Use

Kills bed bugs and their eggs, fleas, dust mites, moisture ants † , pavement ants † , field ants † , cockroaches and their eggs, spiders (Except black widow spiders), house crickets[†], firebrats[†], silverfish[†], millipedes[†], centipedes^{\dagger}, sow bugs^{\dagger}, aphids^{\dagger} and bottle flies^{\dagger} in indoor areas, and for moisture ants^{\dagger}, pavement ants^{\dagger}, field ants † , crickets † , aphids † , millipedes † , centipedes † , sow bugs † , and bottle flies † in outdoor areas.

Sublabel B is for Residential Use on Bed Bugs

Kills bed bugs and their eggs

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

Kills bed bugs (and their eggs), fleas and dust mites

Sublabel D is for Residential Use

Kills cockroaches (and their eggs), moisture ants † , pavement ants † , field ants † , bed bugs (and their eggs), fleas, dust mites, spiders (**Except black widow spiders**), crickets[†], firebrats[†], silverfish[†], millipedes[†], centipedes^{\dagger}, sow bugs^{\dagger}, aphids^{\dagger} and bottle flies^{\dagger} in indoor areas, and to kill moisture ants^{\dagger}, pavement ants^{\dagger}, field ants † , crickets † , firebrats † , silverfish † , millipedes † , centipedes † , sow bugs † , aphids † and bottle flies † in outdoor areas.

[†] Not registered for use in California

TER-RTU2

For Use as an Insecticide for all Listed Pests For Use as an Ovicide on Bed Bugs and Cockroaches

Active Ingredient:

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

KEEP OUT OF REACH OF CHILDREN

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. 88760-6 EPA Est. No. XXXXX-A

NET CONTENTS: 3, 3.4, 12, 16, 22, 24, 32 or 64 fl. oz.,1 or 5 Gallons

Batch No.

Manufactured by: Terramera, Inc. 6920 Salashan Pkwy D-109 Ferndale, WA 98248 1-800-597-9509

pesticide registered under EPA Reg. No. 88760-6

ACCEPTED

Under the Federal Insecticide, Fungicide

and Rodenticide Act as amended, for the

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TER-RTU2 (EPA Reg. No. 88760-6) Sublabel A: Commercial Use

Kills bed bugs and their eggs, fleas, dust mites, moisture ants[†], pavement ants[†], field ants[†], cockroaches and their eggs, 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.

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EPA Reg. No. 88760-6 EPA Est. No. XXXXX-A

NET CONTENTS: 3, 3.4, 12, 16, 22, 24, 32 or, 64 fl. oz. 1 or 5 Gallons

Batch No.

PHYSICAL AND CHEMICAL HAZARDS

Do not apply this product around electrical equipment due to the possibility of shock hazard.

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.

IUSER SAFETY RECOMMENDATIONS

User should wash hands thoroughly after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.]

[Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: www.npic.orst.edu).] [For emergencies, call the poison control center 1-800-222-1222.]

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-RTU2 is a [water-based] [plant-based] Ready-to-Use spray for indoor and outdoor use, containing 5.5% pure cold-pressed neem oil. Apply **TER-RTU2** as a general surface, spot, or crack and crevice treatment in food or non-food areas. Use **TER-RTU2** for the treatment of bed bugs and their eggs, fleas, dust mites, moisture ants[†], pavement ants[†], field ants[†], cockroaches and their eggs, 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-RTU2 may cause damage or discolor certain surfaces and materials [, including paper, freshly painted surfaces, soft plastics, 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.
- Do not use on surface prone to water damage.
- 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].
- Food handling or processing establishments: Application is permitted in food and non-food areas of food handling and food processing establishments. However, do not apply when the facility is in operation or food is present. When using in livestock facilities, such as barns and poultry farms, do not spray where livestock feed is present.

Shake well prior to use.

INDOOR PESTS:

Use **TER-RTU2** to [control][kill] bed bugs and their eggs, cockroaches and their eggs, 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-RTU2** 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.

WHERE TO APPLY:

Treat areas where pests are found, or may hide, feed or breed. Use on all 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 or surface prior to treatment.

HOW TO APPLY:

- 1. Spray pests directly, and spray surfaces until moist. Use approximately one ounce of **TER-RTU2** per 1.5 to 6 sq. ft. of surface area depending on the pest or material treated. Porous surfaces such as carpets 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.). Allow treated surface to dry completely before contacting the surface.
- 2. 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.
- 3. Re-apply as needed when listed pests reappear or as instructed below.

For Bed Bug Control:

TER-RTU2 provides effective knockdown (i.e. immobilize), residual and preventative control of bed bugs, including pyrethroid-resistant bed bugs, and their eggs. [**TER-RTU2** 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.

Apply to a variety of 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.
	[When treating suitcases, remove loose clothing and other articles and treat both inside and outer surface of the suitcase, especially seams, tufts and pockets.]
	For bed bugs adults, nymphs and eggs, re-apply every 1 to 2 weeks or as needed. For ongoing control of bed bug eggs only, re-apply every 2 to 3 weeks or as needed.
Moisture, pavement, and field ants	Spray directly over and around 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. Treat entry points (e.g. doors, windows, and around pipes) and areas around them. 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. On porous surfaces, apply one ounce per 1.5~3 sq.ft.
Fleas	[TER-RTU2 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.
Cockroaches and Eggs	Apply directly over and around cockroaches 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 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	Spray directly over and around spiders for continuous exposure at the rate of one ounce
(Except black	per 1.5 sq.ft. A direct spray immobilizes spiders within 5 minutes and kills brown
widow spiders)	recluse and other spiders (except black widow spiders) within 4 hours. Black widow spiders may recover from immobility after approximately 8 hours.
OUTDOOD/DE	DIMETED DESTS.

OUTDOOR/PERIMETER PESTS:

Use **TER-RTU2** to [control] [kill] 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-RTU2** on listed pests 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 spray surfaces until moist. Use approximate one ounce of product per 1.5~6 sq.ft. of surface area depending on surface treated.
- 2. Apply outdoor perimeter treatment. If pests are flushed out from hiding sites, spray directly.
- 3. Overspray or excess drift to household plants may injure or kill. Avoid contacting residential plants.

Ants	Spray directly over and around the listed ants at the rate of one ounce per 1.5~6 sq.ft. to
(moisture,	ensure continuous exposure to treatment. Spray around the perimeter of ant aggregations
pavement,	first before applying directly to live ants. Treat entry points (e.g. doors, windows, and
field ants)	around pipes) and areas around them.
crickets [†] ,	Spray directly where possible at the rate of one ounce per 3~6 sq.ft. Treat surfaces
aphids [†] ,	where the list pests are found or may hide at the rate of one ounce per 1.5~3 sq.ft.
millipedes†,	
centipedes [†] ,	
sow bugs†, and	
bottle flies [†]	

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 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 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. 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's election, the replacement of product.

{Optional marketing claims – Specific to Sublabel A}

- 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 [including [pyrethroid] [chemical] [pesticide] resistant bed bugs]
- Effective bed bug control [for up to two weeks] [when used as directed]
- Effective treatment for fleas and dust mites [when used as directed]
- 100% effective bed bug [flea] [dust mite] protection* (*tested under laboratory conditions)
- 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]

- [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 traveling][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
- Kills bed bugs [fleas][dust mites][ants**]
 [cockroaches] [on contact] [when sprayed
 directly] ** moisture, pavement and field
- [knocks down] [disables] [immobilizes] spiders within 5 minutes by direct spray

- 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][cockroaches][ants (moisture, pavement and field)][spiders (except black widow spiders)]
- Be Bed bug Free
- Provides Protection from bed bugs
- [The] smart way to [Control] [Manage]
 [Protect] [Yourself] [Your Family]
 [From] Bed bugs
- [The] smart solution
- Ready-to-Use [spray] [formula]
- Made in [the] [USA][America] [of US and imported components]
- 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

- 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
- [For] Use as part of an Integrated Pest Management [program][strategy]

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TER-RTU2 (**EPA Reg. No. 88760-6**) Sublabel B: Residential Use on Bed Bugs – Indoor Use Only

Kills bed bugs and their eggs

TER-RTU2 Insecticide and Ovicide for Bed Bugs

[ABN: PROOF AQ]

Active Ingredient:

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

KEEP OUT OF REACH OF CHILDREN

STOP - Read the Label Before Use

EPA Reg. No. 88760-6 EPA Est. No. XXXXX-A

NET CONTENTS: 3, 3.4, 12, 16, 22, 24, 32 or, 64 fl. oz.,

1 or 5 Gallons

Batch No.

PHYSICAL AND CHEMICAL HAZARDS

Do not apply this product around electrical equipment due to the possibility of shock hazard.

IUSER SAFETY RECOMMENDATIONS

User should wash hands thoroughly after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.]

[Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: www.npic.orst.edu).] [For emergencies, call the poison control center 1-800-222-1222.]

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-RTU2 is a [water-based] [plant-based] Ready-to-Use spray for use around the home and other indoor spaces to kill bed bugs and their eggs. **TER-RTU2** kills bed bugs and their eggs on contact, and keeps on killing bed bugs for up to 2 weeks and their eggs for up to 3 weeks after initial treatment. **TER-RTU2** can be used as a preventative solution against bed bug infestations when applied every 2 weeks. Shake well prior to use.

How To Apply

Spray bed bugs and eggs directly when they are visible. Apply as a surface spray to indoor surfaces, fabrics and materials on which bed bugs may harbor, hide or lay eggs [(e.g. 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)]. Pay particular attention to 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.] Spray surfaces until it is moist. Use approximately one ounce per 1.5-3 sq.ft. on porous surfaces and one ounce per 3-6 sq.ft. on non-porous surfaces.

For optimal performance, minimize air circulation where possible and leave treated areas undisturbed for at least 4 hours after treatment. After 4 hours, ventilate the treated area well and allow re-entry.

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

General Precaution

• [TER-RTU2 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.

- Do not apply directly to electrical outlets or to other potential electrocution hazards.
- Do not spray to the point of excessive dripping or run-off to avoid potential material damage.
- Allow treated areas to dry completely before use.

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.

NOTICE: 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 B}:

- 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 [including [pyrethroid] [chemical] [pesticide] resistant bed bugs]
- Effective bed bug control [for up to two weeks] [when used as directed]
- Effective treatment for fleas and dust mites [when used as directed]
- 100% effective [bed bug protection]* (*tested under laboratory conditions)
- 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

- [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 traveling][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 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]
- Kills [pyrethroid] [chemical] [pesticide] resistant bed bugs
- All-in-one protection from bed bugs
- Provides Protection from bed bugs
- [The] smart solution to [Control] [Manage] [Protect] [Yourself] [Your Family] [From] Bed bugs
- [The] smart solution
- Ready-to-Use [spray] [formula]
- Made in [the] [USA][America] [of U.S. and imported components]
- Easy to use
- Makes bed bugs dead bugs
- Stops bed bug eggs from hatching for up to 3 weeks
- Use in and around bedroom

- weeks [when applied as directed]
- Spray your suitcases and belongings, [in and around beds] [and] [living areas] [,and] [use it on the go]
- TER-RTU2's] patent-pending technology unleashes the [botanical] power of [cold-pressed] neem [oil] to create a zone of protection [at home] [and] [while travelling].
- Kills, Protects, Prevents
- This plant-based spray is even effective against pesticide-resistant bed bugs and eggs.
- Preventative solution against bed bugs [when applied every 2 weeks]
- Bed Bug Killer
- [TER-RTU2 is a] water-based [product]
- Keeps killing [bed bugs][adults] for up to two weeks and eggs for up to three weeks.*
- *when used as directed

TER-RTU2 (EPA Reg. No. 88760-6) Sublabel C: Residential Use on Bed Bugs, Fleas and Dust Mites – Indoor Use Only

Kills bed bugs (and their eggs), fleas and dust mites

TER-RTU2

For Use as an Insecticide for All List ed Pests For Use as an Ovicide on Bed Bugs

KEEP OUT OF REACH OF CHILDREN

STOP - Read the Label Before Use

EPA Reg. No. 88760-6 EPA Est. No. XXXXX-A

Total

Batch No.

NET CONTENTS: 3, 3.4, 12, 16, 22, 24, 32 or, 64 fl. oz., 1 or 5 Gallons

100.0%

PHYSICAL AND CHEMICAL HAZARDS

Do not apply this product around electrical equipment due to the possibility of shock hazard.

[USER SAFETY RECOMMENDATIONS

User should wash hands thoroughly after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.]

[Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: www.npic.orst.edu).] [For emergencies, call the poison control center 1-800-222-1222.]

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-RTU2 is a [water-based] [plant-based] Ready-to-Use spray for use around the home and other indoor spaces to kill bed bugs (and their eggs), fleas and dust mites.

Shake well prior to use.

General Precaution

- [TER-RTU2 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.
- Do not apply directly to electrical outlets or to other potential electrocution hazards.
- Do not spray to the point of excessive dripping or run-off to avoid potential material damage.
- Allow treated areas to dry completely before use.

How To Apply

Spray pests directly, or treat surfaces and fabrics until moist. Spray approximately one ounce per 1.5 to 6 sq. ft. of surface area depending on 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, ventilate the treated area well and allow reentry.

To Kill and Prevent Bed Bugs: Spray bed bugs or eggs directly, and/or apply as a surface spray to indoor surfaces, fabrics and materials on which bed bugs may harbor, hide or lay eggs [(e.g. 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)]. Pay particular attention to tufts, folds, edges, cracks and crevices.

For ongoing control of bed bugs and eggs, re-apply every 1 to 2 weeks or as needed. For ongoing control of bed bug eggs only, 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 non-porous surfaces. Reapply if pests reappear.

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.

NOTICE: 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 C}:

- 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 [including [pyrethroid] [chemical] [pesticide] resistant bed bugs]
- Effective bed bug control [for up to two weeks] [when used as directed]
- Effective treatment for fleas and dust mites [when used as directed]
- 100% effective bed bug [flea] [dust mite] protection* (*tested under laboratory conditions)
- Stops bed bug infestations for up to 2 weeks [when used as directed]
- Patent[ed][-pending] [formula]
- Keeps on killing bed bug adults and

- [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 traveling][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][and dust mites]

- 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]
- Kills [pyrethroid] [chemical] [pesticide] resistant bed bugs
- All-in-one protection from bed bugs [fleas][dust mites]
- Provides Protection from bed bugs
- [The] smart way to [Control] [Manage] [Protect] [Yourself] [Your Family] [From] Bed bugs, fleas and dust mites
- [The] smart solution
- Ready-to-Use [spray] [formula]
- Made in [the] [USA][America] [of US and imported components]
- Easy to use

- Keeps on killing bed bugs [as a residual treatment] [on treated surfaces] for up to 2 weeks [when applied as directed]
- 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
- Ose ili aliu arounu beuroon

TER-RTU2 (EPA Reg. No. 88760-6) Sublabel D: Residential Use

Kills cockroaches (and their eggs), moisture ants[†], pavement ants[†], field ants[†], bed bugs (and their eggs), 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

TER-RTU2

For Use as an Insecticide for all Listed Pests For Use as an Ovicide on Bed Bugs and Cockroaches

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. 88760-6 EPA Est. No. XXXXX-A

NET CONTENTS: 3, 3.4, 12, 16, 22, 24, 32 or, 64 fl. oz., 1 or 5 Gallons

Batch No.

PHYSICAL AND CHEMICAL HAZARDS

Do not apply this product around electrical equipment due to the possibility of shock hazard.

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.

IUSER SAFETY RECOMMENDATIONS

User should wash hands thoroughly after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.]

[Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: www.npic.orst.edu).] [For emergencies, call the poison control center 1-800-222-1222.]

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-RTU2** to kill cockroaches (and their eggs), moisture ants[†], pavement ants[†], field ants[†], bed bugs (and their eggs), 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

Shake well before use.

General Precaution

- [TER-RTU2 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.
- Do not apply directly to electrical outlets or to other potential electrocution hazards.
- Do not spray to the point of excessive dripping or run-off to avoid potential material damage.
- Allow treated areas 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, Pavement 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 Cockroaches: 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 immobilize them. A direct spray immobilizes spiders within 5 minutes and kills them (except black widow spiders) within 4 hours. Black widow spiders may recover from immobility after approximately 8 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.

NOTICE: 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:

- 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

- [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 traveling][on the road]
- Provides Around the clock protection from

- weeks] [when used as directed]
- Effective treatment for fleas and dust mites [when used as directed]
- 100% effective bed bug [fleas] [dust mites] [cockroach] protection* (*tested under laboratory conditions)
- 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][cockroaches][ants (moisture, pavement and field)][spiders (except black widow spiders)]
- Be Bed bug Free
- Provides Protection from bed bugs
- [The] smart way to [Control] [Manage] [Protect] [Yourself] [Your Family] [From] Bed bugs
- [The] smart solution
- Ready-to-Use [spray] [formula]
- Made in [the] [USA][America] [of US and imported components]
- 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

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
- Kills bed bugs [fleas][dust mites]
 [cockroaches] [on contact] [when sprayed directly]
- [knocks down] [disables] [immobilizes] spiders within 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
- Ants** and Cockroach Killer
 - ** Moisture, pavement, field ants
- [For] Use as part of an Integrated Pest Management [program][strategy]
 - [Convenient] [Travel][personal][home] size

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