



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 30, 2022

Gabriel Lee
Director, Regulatory Affairs
Terramera, Inc.
199 West 6th Ave.
Vancouver, BC Canada

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – Acceptable Addition of Optional Marketing Claims, Directions for Use for Fruit and Nut Trees, and Use sites including Maggots and Black Spot and Brown Rot
Product Name: TNO RTU
EPA Registration Number: 88760-12
EPA Receipt Date: 02/07/2022
Action Case Number: 00338905

Dear Mr. Lee:

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

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

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

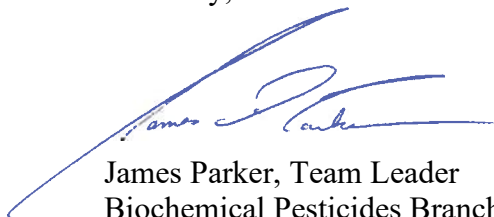
Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

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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 Alex Horansky via email at Horansky.alex@epa.gov.

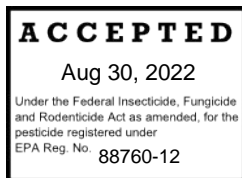
Sincerely,



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

Enclosure

TNO RTU v 1.2
(EPA Reg. No. 88760-12)
Jan. 25, 2022



Text in [] is optional language.
Text in { } is note to reviewer.

TNO RTU

Insecticide [/Fungicide] [/Nematicide] [/Miticide]

 FOR ORGANIC GARDENING

Active Ingredient:	
Cold Pressed Neem Oil.....	1.0%
Other Ingredients	99.0%
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

[See [back] label [booklet] for additional precautionary statements, directions for use, storage and disposal statements.]

NET CONTENTS: 3 FL. OZ. to 5 GALLONS

EPA Reg. No.: 88760-12
EPA Est. No. 49292-WA-001

Batch No.

Manufactured for:
Terramera, Inc.
6920 Salashan Pkwy E-100
Ferndale, WA 98248

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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 ALL DIRECTIONS BEFORE USING THIS PRODUCT

Shake Well Before Use

GENERAL INFORMATION

This product is a ready to use spray. Shake well before using.

This product controls listed insects on contact or by ingestion. The product acts on insects by way of repellence, anti-feedant action and interference with the molting process. This product controls listed diseases by inhibiting mycelial fungal growth. The efficacy of this product is dependent on weather conditions, intensity of pest population, area of application, and physical stages of pests and crops.

CROP USES: This product may be used on bulbs, cucurbits, fruiting vegetables, leafy and brassica (cole) vegetables, legumes, root and tuber vegetables, small fruit and berries, citrus and tropical fruits, pome and stone fruits, tree nuts, herbs, and spices, grass, lawn, [hemp] and ornamentals.

APPLICATION [AND DRENCH] DIRECTIONS

Apply this product as a foliar spray [or as soil drench] to control listed pests. [When applied as a soil drench, avoid excessive run off.] When using as a foliar application, ensure thorough coverage of plant surfaces, but avoid pooling or run off.

Avoid spraying under conditions of high humidity and high temperature (>90°F).

To avoid potential leaf burn, apply the product in early morning or late evening. Always test the product on a small portion of plants for compatibility before treating the entire plants.

- (1) To Control Insects or Mites:** Apply this product at the first sight of insects/mites in a 7-10 day interval. For heavy insect populations, apply in a 7 day interval. This product is most effective when applied before insects or eggs are present in large numbers.
- (2) To Control Diseases:** This product is most effective in controlling diseases when applied as a preventative before the diseases are present. Apply the product to cover all the plant tissue in a 10-14 day interval.

(3) [[To Control Nematodes and] For Soil Use: Apply to achieve a complete coverage of the soil with a 10-14 day interval.]

{Optional} [Fruit & Nut Trees

This product can be applied to fruit trees including, but not limited to: Apples, Avacados, Crabapples, Loquat, Mayhaw, Oriental Pear, Pear, Quince, Apricot, Cherry (sweet & Tart), Citrus, Oranges, Grapefruit, Limes, lemons, Nectarine, Peach, Plum, Plumcot, Prune, Almond, Beechnut, Brazil Nut, Butternut, Cashew, Chinquapin, Filbert (Hazelnut), Hickory, Macadamia nut, Pecan, and Walnut (Black & English).

Fruit Tree Stages and Spray Schedule	
Dormant: Absence of growth in late fall, winter and early spring.	Ideal time to apply as a Dormant spray for control of over-wintering insects.
Green Tip Stage: When branch tips show new, green tissue. Pre-Bloom/Pink Bud Stage: When blossom buds show full color before opening.	Second application can be made anytime in this period of growth
Bloom Stage: When blossoms are open.	To protect pollinating insects, such as bees, do not spray during this period.
Petal Fall Stage: When the last of petals have fallen from the blossoms (when bees are gone).	Third application can be made.
Fruit Set: Fruit is established and clearly visible	Fourth and subsequent applications can be made every 7 to – 14 days

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PESTS:

This product may be used to control a variety of insects and diseases listed below.

Aphids such as: Cotton Aphid Cowpea Aphid Pea Aphid Green Peach Aphid	Grasshoppers such as: Carolina Grasshopper Rice Grasshopper	Scales such as: California Red Scale Coffee Green Scale San Jose Scale Soft Scale
Beetles such as: Cucumber Beetle Japanese Beetle Spotted Cucumber Beetle	Leafhoppers such as: Grape Leafhopper Potato leafhopper	Thrips such as: Flower Thrip Grape Thrip Onion Thrip Western Flower Thrip
Borers such as: Peachtree Borers	Leafminer such as: Citrus Leafminer Tomato Leafminer Vegetable Leafminer	True Plant Bugs such as:

Peach Twig Borers	Maggots/Grubs such as: Onion Maggots Apple Maggots	Lygus Bug Phylloxera
Caterpillars/Moths/Worms such as: Armyworms Budworms Cutworms Diamondback Moth Gypsy Moth Leafrollers Loopers Navel Orange Worm	Mealy Bugs such as: Citrus Mealy Bug	Spittle Bug Sting Bug Tomato Stink Bug
	Mites such as: Pacific Spider Mites Red Spider Mite Spider Mites Two Spotted Spider Mite	Weevils such as: Black Vine Weevil Boll weevil Pepper Weevil
Flies/Gnats such as: Fruit Fly Fungus Gnat Walnut Husk Fly	Psyllids such as: Asian Citrus Psyllid Pear Psyllid Potato Psyllid	Wireworms such as: Field/Wheat Wireworm
		Whiteflies such as: Cotton Whitefly Silverleaf Whiefly Greenhouse Whitefly

Foliar Fungal Diseases Alternaria Anthracnose Blight (early, late, leaf) Botrytis Black Spot Brown rot or fruit rot	Downey Mildew Molds Powdery Mildew Rust	Scab Stem Mildew Southern Blight Sour Rot Grapes
Soil Fungal Diseases Fusarium Oxysporum Pythium Rhizoctonia Solani		

Nematodes such as Dagger Nematode Lance Nematode Lesion Nematode	Reniform Nematode Root Knot Nematode	Soybean Cyst Nematode Sting Nematode
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STORAGE AND DISPOSAL

Store in room temperature (>72 °F) where possible. Do not store this product above 104°F for extended periods of time. Avoid storing below 35°F to prevent freezing. Store out of reach of children and pets and away from direct sunlight, windows, flames and other sources of heat or ignitions. Nonrefillable 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: {Default Notice statement to be used unless the optional warranty statement below is used for a supplemental distributor product}

Terramera, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. To the extent permitted by applicable law: (1) this warranty does not extend to the use of the product contrary to label instructions or under conditions not reasonably foreseeable to or beyond the control of Terramera, Inc., and, (2) buyer and user assume the risk of any such use. TO THE EXTENT PERMITTED BY APPLICABLE LAW, TERRAMERA, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS WARRANTED BY THIS LABEL.

{Optional warranty statement – for use by a subregistrant for a supplemental distributor product}

[WARRANTY

Seller warrants that this product complies with the specifications expressed in this label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, Seller's liability or default, breach or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

For information on pesticide products (including health concerns, medical emergencies, or pesticide incidents) call National Pesticide Information Center at 1-800-858-7378.]

[Optional Marketing Claims]

- For Residential Use on Listed Crops including vegetables, fruits, citrus, nuts, [and] ornamental plants, lawns and other listed plants
- [Use] The Power of Neem
- [Cold Pressed]] Neem Oil
- Derived From Neem
- Cold-pressed from seeds of the Neem Tree [(*Azadirachta indica*)]
- Derived from seed of the Neem Tree [(*Azadirachta indica*)]
- [TNO RTU] contains Cold-Pressed Neem Oil that [provides] [contains] [keeps] the full spectrum of limonoids
- [TNO RTU] contains the full spectrum of bioactive[s] [compounds] of Neem [Oil]
- The process of cold-pressing neem does not remove the bioactive compounds from the neem seed
- Contains Azadirachtin [a bioactive compound]
- Contains limonoids [including Azadirachtin]
- Limonoids stop the insect lifecycle
- More than just Neem oil
- [Cold pressed neem oil] [a] plant-based [biopesticide]
- Contains a plant-based [biopesticide]
- [Cold pressed neem oil] [a] botanical [based] [biopesticide] active ingredient
- [Cold pressed neem oil is] [a] botanical
- [Cold pressed neem oil is] [a] plant-based
- Protect your plants from insects and diseases
- [Provides] Broad Spectrum [control] [action]
- Multiple Modes of Action
- Insect Growth Regulator
- [TNO RTU is a] broad-spectrum bioinsecticide
- [TNO RTU is a] broad-spectrum biofungicide
- [4-in-1,] [multi-purpose product –] fungicide, insecticide, miticide and nematocide*
[*for use on listed pest and crops]
- fungicide, insecticide, miticide and nematocide
- 4-in-1 [multipurpose product]
- Multi-purpose biopesticide [- 3 in 1] [product]
- One product, triple control [quadrouple control]
- Insecticide
- Miticide
- Nematicide
- Fungicide
- Botanical Insect Growth Regulator (IGR)
- Kills eggs, larvae and adult insects
- Kills insect eggs [before they hatch]
- Controls insects and their eggs
- Affects insects at all stages of growth
- [Excellent] for control of spider mites, aphids, whiteflies, leafhoppers, caterpillars
- Controls chewing and sucking insects

- [Also] controls aphids, [beetles,] [stink bugs,] [caterpillars,] [leafhoppers,] [leafminers,] [whiteflies,] [mealy bugs,] [midges,] [spider mites,] [nematodes,] [weevils,] [scales,] [and] [&] [thrips] [other listed insects and nematodes]
- Prevents and controls listed [major] diseases
- Prevents fungal attack of plant tissues
- Tool for prevention and control of powdery mildew and botrytis
- Controls [powdery mildew,] [botrytis,] [stem mildew,] [and] [&] [sour rot]
- Use for the prevention and control of powdery mildew, botrytis, stem mildew and others as listed on label.
- [For] Use as part of an Integrated Pest Management [program] [strategy]
- Complement for IPM programs
- Alternative within conventional programs
- Peel Here [for Directions & Precautions]
- Pull Here to Open
- Ready to Use [product] [spray]
- Spray right up to the time of harvest
- Zero-day Pre-Harvest interval
- Can be used up to day of harvest [as a [4 in 1,] multi-purpose product [– fungicide, insecticide, miticide and nematocidic *]] [*for use on listed pest and crops]
- Can be used up to the day of harvest
- For indoor and outdoor use
- For use on houseplants
- For use on plants in hydroponic systems
- For use on hemp
- Can be used on hemp
- Keep plants healthy; keep insects away
- TNO RTU is an effective fungicide, insecticide, miticide and nematocidic.
- For use on [roses] [flowers] [trees] [shrubs][vegetables], [fruits,] [nuts,] [vines,] [citrus,] [ornamental plants,] [grass lawns,] [and] [houseplants]
- [For] use in and around home and home garden
- [Can be used] for organic gardening
- For greenhouses, shadehouses, interiorscapes and home garden
- For indoor and outdoor vegetables, ornamentals, flowers, trees, shrubs, and houseplants,
- Controls root rot [nematodes]
- For use as a soil drench
- Mix in watering can to apply as a drench
- Kills fungus gnats [in the soil]
- Kills spider mites
- Kills borers
- Stops blight [on tomatoes] [before it starts]
- [free] Battery powered sprayer included
- Includes Power sprayer
- Power Sprayer included
- No mixing, no mess
- No need to mix
- Ready to Use

- Bag on valve technology
- Sprays every direction [even upside down]
- Sprays all directions [to make it easy to spray hard to reach areas, such as undersides of leaves]
- Controls [aphids] [grasshoppers] [scales] [beetles] [leafhoppers] [thrips] [leafminers] [borers] [maggots] [grubs] [true plant bugs] [caterpillars] [moths] [[army][worms]] [mealy bugs] [weevils] [flies] [gnats] [psyllids] [wireworms] [&] [and] [whiteflies]
- Controls soil fungal diseases [such as fusarium oxyporum, Pythium & Rhizoctonia Solani]
- Controls paracitil nematodes [such as dagger nematode, lance nematode, lesion nematode, Reniform nematode, Root Knot Nematode, Soybean Cyst Nematode and sting nematode]
- Controls XX different insects
- Controls XX different diseases
- Controls insects & diseases on fruit trees
- Use on fruit, citrus and nut trees
- Dormant and growing season applications
- Kills over-wintering insect eggs
- Help prevent disease on fruit trees
- Controls black spot [and insects] on roses

{Optional images}



[Aphid]



[Borer]



[Whitefly]



[Spider mite]



[Rust]



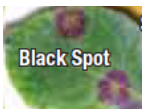
[Gypsy moth]



[Powdery mildew]



{Captain Jacks logo}



[Black spot]