UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

August 19, 2020

Micah T. Reynolds Senior Regulatory Consultant Oregon Global Distribution, Inc. (d/b/a NPK Industries) 1600 Skypark Drive, Suite 212 Medford, Oregon 97504

Subject: Label Amendment –Sublabels for Residential and Commercial Agriculture; Revising Resistance Management and Other Text Product Name: Synergy Brand EPA Registration Number: 89819-1 Application Date: August 25, 2016 Resubmission Date: August 19, 2020 Decision Number: 521354

Dear Mr. Reynolds:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is attached for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the 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 the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements 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 Agency 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.

SEE NEXT PAGE

Page 2 of 2 EPA Reg. No. 89819-1 Decision No. 521354

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Debra Rate by phone at (703) 306-0309, or via email at <u>rate.debra@epa.gov</u>.

Sincerely,

Michael Walsh Product Manager 11 Invertebrate & Vertebrate Branch 2 Registration Division Office of Pesticide Programs

Attachment

SUBLABEL A: RESIDENTIAL/HOME & GARDEN USE

(MASTER LABEL) Synergy Brand

[<u>Alternate Brand Names</u>: Synergy Brand – Flower, Fruit & Vegetable Insect Killer; Synergy Brand Spider Mite Killer; Spider Mite Killer, PROMIS Spider Mite Killer, Mighty]

For use in home gardens, indoor houseplants, and greenhouses. **Active Ingredients**

Pyrethrins	0.0075%
Čanola Oil	1.3500%
Other Ingredients	<u>98.6425%</u>
Total	100.0000%

ACCEPTED 08/19/2020 Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 89819-1

{Note to Reviewer: One of the following statements will appear on the label.} [This product contains 0.1112 lbs. of canola oil and 0.0006 lbs. of pyrethrins per gallon.] [This product contains 0.45 oz. of canola oil and 0.0024 oz. of pyrethrins per quart.]

CAUTION KEEP OUT OF REACH OF CHILDREN

FIRST AID	
IF	Call a poison control center or doctor immediately for treatment
SWALLOWED	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 by mouth to an unconscious person.
IF ON SKIN OR	Take off contaminated clothing. Rinse skin immediately with plenty of
CLOTHING:	water for 15-20 minutes. Call a poison control center or doctor for
	treatment advice.
Have the product container or label with you when calling a poison control center or	
doctor, or going for treatment. For emergency information on this product (including	
health concerns, medical emergencies or pesticide incidents), call the poison control	
center 1-800-222-1222.	

See [back] [other] [side] [panel] [and fold out label] for additional precautionary statements and directions for use.

See [back] [other] [side] [panel] [and fold out label] for additional precautionary statements. See [attached] [accompanying] booklet for directions for use. {Note to Reviewer: label presentation for some retail packaging may be accordion or peel-back style or may include a separate booklet. One of the two above iterations will be used.}

Manufactured for:	EPA Reg. No. 89819-1
NPK Industries	EPA Est. No
1600 Sky Park Drive, Suite 212	
Medford, OR 97504	Net Contents:
Batch No. {Note to reviewer: the lot or batch	ch number may also be stamped directly on
the product container.}	

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Harmful if absorbed through skin. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

User Safety Recommendations

- Users should wash hands with plenty of soap and water before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing immediately if pesticide gets inside, then wash thoroughly and put on clean clothing.

Environmental Hazards

This product is toxic to aquatic organisms including fish and invertebrates. 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. Rinsing application equipment over the treated area will help avoid runoff to water bodies or drainage systems.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.

DIRECTIONS FOR USE

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

For use in home gardens, indoor houseplants, and home greenhouses. Read entire label. Use only as directed.

Shake well before each use. Thoroughly wet all parts of the plants.

USE RESTRICTIONS

- Do not allow adults, children, or pets to enter the treated area until sprays have dried.
- Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift.
- Remove pets, birds, and cover fish aquariums before spraying.
- Do not wet plants to the point of runoff or drip.
- Do not use [Synergy Brand] spray when temperatures are above 90°F.
- Do not apply more than 1 time per day.
- Do not reapply within 3 days except under extreme pest pressure.
- In case of extreme pest pressure, do not reapply within 24 hours.

- Do not apply within 21 days of a sulfur application.
- Do not apply more than 10 times per season.
- Do not harvest until spray has dried.
- Not for use in outdoor residential misting systems.
- Do not apply directly to or near water, storm drains, or drainage ditches. Do not apply when windy. To prevent product run-off, do not over water treated area(s) or apply prior to heavy rainfall.
- Rinse applicator over lawn or garden area only.

Phytotoxicity: Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Apply carefully to blooms and buds and on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar, and Smoke Tree. If concerned about sensitivity of plants, test by spraying a portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

PESTS/SITES AND APPLICATION INSTRUCTIONS

{Note to reviewer: The following list of pests are optional. When two or more items appear next to each other in brackets, at least one of the items in brackets will be used when appropriate in order for this list of pests to be clear to product users.}

[Synergy Brand will kill] [Kills] [adelgids], [ants (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants)], [exposed aphids], [apple red bugs], [beetles (blister beetle, Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle, Mexican bean beetle, spotted cucumber beetle)], [cabbage loopers], [caterpillars (gypsy moth caterpillars, tent caterpillar, diamondback moth larvae, leafrollers)], [centipedes], [earwigs], [fruittree leafrollers], [fungus gnats], [grape phylloxera], [grubs], [harlequin bugs], [lace bugs], [leafhoppers], [leafminers], [Lygus bugs], [mealybugs], [non-biting midges], [millipedes], [moths], [pear psylla], [pillbugs], [phylloxera], [psyllids], [plant bugs], [scale], [sawfly larvae], [silverfish], [sowbugs], [spider mites]; [spittlebugs], [springtails], [stinkbugs], [thrips], [whitefly adelgids], [whiteflies], [weevils], [worms (cankerworms, cabbage worms, webworms)], [and eggs of listed insects]

HOME GARDEN USE

For use outdoors on [fruit and nut trees (apples, cherries, peaches, pears, nuts)]; [flowering, foliage, plants]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes)]; [figs]; [small fruits (grapes, strawberry, raspberry)]; [citrus]; [ornamental plants and shade trees (birch, evergreens, holly, oak)]. Do not apply more than 25 oz. per 100 square feet per application.

HOME GREENHOUSE USE

For use in home greenhouses on [flowering, foliage, plants]; [corn]; [melons]; [tomatoes]; [vegetables (beans, cabbage, cucurbits, peas, potatoes)]; [small fruits (grapes, strawberry, raspberry)]; [ornamental plants and shade trees (birch, evergreens, holly, oak)]. Do not apply more than 25 oz. per 100 square feet of plant surface area per application.

INDOOR USE

For use indoors on houseplants.

DORMANT USE

Kills exposed egg stages of listed pests present in dormant season and scale insects, spider mites and mealybugs on dormant shrubs (roses), evergreens, fruit trees, and shade trees. Thoroughly wet the dormant plants or trees. Do not apply more than 25 oz. per 100 square feet of plant surface area per application.

STORAGE AND DISPOSAL

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

{Note to reviewer: The following statements are for all residential use containers.} STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

DISPOSAL: 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 to Buyer: To the extent consistent with applicable law, it is company's intention that the buyer assumes all responsibility for safety and use not in accordance with label directions.]

Active Ingradiants

(MASTER LABEL) Synergy Brand

[<u>Alternate Brand Names</u>: Synergy Brand – Flower, Fruit & Vegetable Insect Killer; Synergy Brand Spider Mite Killer; Spider Mite Killer, PROMIS Spider Mite Killer, Mighty]

For use in commercial agriculture

Active ingredients	
Pyrethrins	0.0075%
Canola Oil	
Other Ingredients	<u>98.6425%</u>
Total	100.0000%

{Note to Reviewer: One of the following statements will appear on the label.} [This product contains 0.1112 lbs. of canola oil and 0.0006 lbs. of pyrethrins per gallon.] [This product contains 0.45 oz. of canola oil and 0.0024 oz. of pyrethrins per quart.]

CAUTION KEEP OUT OF REACH OF CHILDREN

FIRST AID	
IF	Call a poison control center or doctor immediately for treatment
SWALLOWED	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 by mouth to an unconscious person.
IF ON SKIN OR	Take off contaminated clothing. Rinse skin immediately with plenty of
CLOTHING:	water for 15-20 minutes. Call a poison control center or doctor for
	treatment advice.
Have the product	container or label with you when calling a poison control center or
doctor, or going for treatment. For emergency information on this product (including	
health concerns, medical emergencies or pesticide incidents), call the poison control	
center 1-800-222-1222.	

See [back] [other] [side] [panel] [and fold out label] for additional precautionary statements and directions for use.

See [back] [other] [side] [panel] [and fold out label] for additional precautionary statements. See [attached] [accompanying] booklet for directions for use.

{Note to Reviewer: label presentation for some retail packaging may be accordion or peel-back style or may include a separate booklet. One of the two above iterations will be used.}

EPA Reg. No. 89819-1
EPA Est. No
Net Contents:
t or batch number may also be stamped directly on
t

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals: CAUTION: Harmful if absorbed through skin. Harmful if swallowed. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Personal Protective Equipment (PPE) Requirements:

Mixers, loaders, applicators ad other handlers must wear the following:

- Long pants
- Long-sleeved shirt
- Shoes plus socks
- Chemical resistant gloves (made of any waterproof material)

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product. Do not reuse them.

User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic organisms, including fish and invertebrates. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. This product may contaminate water through runoff. This product has a potential for runoff for several weeks after application. Poorly draining soils and soils with shallow water tables are more prone to product runoff that contains this product.

This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.

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

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard, 40 CFR Part 170. This Standard contains requirements for the protection of agricultural workers on farms, forests, nurseries and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE), and restricted entry intervals (REI). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

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

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is: coveralls, chemical resistant gloves (made of any waterproof material) and shoes plus socks.

APPLICATION INSTRUCTIONS

For use in commercial greenhouses on flowers, ornamental trees, fruits, vegetables, flowering plants, and fruit and nut trees. Read entire label. Use only as directed. Shake well or agitate before each use. Apply when insects or first signs of their damage appear. Thoroughly wet all parts of the plants. Apply via conventional spray equipment including hand-held and backpack sprayers. Hold sprayer 12-18 inches from the surface to be sprayed. Spray evenly, completely coating plant surfaces where insects are feeding or resting.

{Note to reviewer: The following list of pests are optional. When two or more items appear next to each other in brackets, at least one of the items in brackets will be used when appropriate in order for this list of pests to be clear to product users.}

[Synergy Brand will kill] [Kills] [adelgids], [ants (except Fire Ants, Harvester Ants, Carpenter Ants, and Pharaoh Ants)], [exposed aphids], [apple red bugs], [beetles (blister beetle, Colorado potato beetle, flea beetle, Japanese beetle, asparagus beetle, Mexican bean beetle, spotted cucumber beetle)], [cabbage loopers], [caterpillars (gypsy moth caterpillars, tent caterpillar, diamondback moth larvae, leafrollers)], [centipedes], [earwigs], [fruittree leafrollers], [fungus gnats], [grape phylloxera], [grubs], [harlequin bugs], [lace bugs], [leafhoppers], [leafminers], [Lygus bugs], [mealybugs], [non-biting midges], [millipedes], [moths], [pear psylla], [pillbugs], [phylloxera], [psyllids], [plant bugs], [scale], [sawfly larvae], [silverfish], [sowbugs], [spider mites]; [spittlebugs],

[springtails], [stinkbugs], [thrips], [whitefly adelgids], [whiteflies], [weevils], [worms (cankerworms, cabbage worms, webworms)], [and eggs of listed insects]

USE RESTRICTIONS

- Do not use [Synergy Brand] spray when temperatures are above 90°F.
- Do not apply within 21 days of a sulfur application.
- Do not wet plants to the point of runoff or drip.
- Do not apply more than 10 times per season.
- Do not reapply within 3 days except under extreme pest pressure.
- In case of extreme pest pressure, do not reapply within 24 hours.
- Do not harvest until spray has dried.
- Do not apply more than 1 time per day.
- Do not apply product by aerial application.
- Do not apply product via hand-held fogger.
- Not for use in outdoor residential misting systems.
- Do not apply directly to or near water, storm drains, or drainage ditches. Do not apply when windy. To prevent product run-off, do not apply over water treated area(s) or apply prior to heavy rainfall.

SPRAY DRIFT MANAGEMENT FOR AGRICULTURAL CROPS

Avoiding spray drift at the application site is the responsibility of the applicator and the grower. The interactions of many equipment and weather-related factors determine the potential for spray drift. The applicator and the grower are responsible for considering all these factors when making decisions. Do not apply at wind speeds greater than 10 mph at the application site. Do not make any type of application into temperature inversions. Apply as a medium or coarser spray (ASABE standard 572).

Additional requirements for ground applications:

Do not release spray at a height greater than 4 feet above the ground or crop canopy.

Phytotoxicity: Oil removes the glaucous (blue) bloom from such evergreens as Colorado blue spruce and Koster spruce. Apply carefully to blooms and buds and on oil sensitive plants such as: Chamaecyparis, Cryptomeria, Japanese Holly, Red Cedar, and Smoke Tree. If concerned about sensitivity of plants, test by spraying a portion of the plant and wait several days to determine if burn occurs before spraying larger areas.

Application Sites	Application Timing	Application Rates
Fruits, Vegetables, and Nuts (Greenhouse, Indoor and Outdoor sites): Apples, Cherries, Peaches, Nectarines,	At the first signs of insect eggs or larvae or at any sign of pest presence.	1 gallon of [product] [Synergy Brand] per 500 sq ft of plant surface area 25 ounces of [product] [Synergy Brand] per 100 sq ft of plant surface area 80 gallons [product] [Synergy Brand] per acre
Plums, Pears, Almonds, Pecans, Walnuts, Melons, Tomatoes, Beans,		

Cabbage, Cucurbits, Peas, Potatoes, Lettuce, Lima Beans, Grapes, Strawberries, Raspberries, Blackberries, Grapefruit, Lemons, Oranges, Tangerines, Limes		
Greenhouse trees and flowering plants: Flowering, Foliage, Bedding Plants and Shade Trees (Birch, Evergreens, Holly, Oak)	At the first signs of insect eggs or larvae or at any sign of pest presence.	3 gallon of [product] [Synergy Brand] per 500 sq ft of plant surface area 76 ounces of [product] [Synergy Brand] per 100 sq ft of plant surface area
Outdoor Trees and Flowering Plants: Flowering, Foliage, Bedding Plants and Shade Trees (Birch, Evergreens, Holly, Oak)	At the first signs of insect eggs or larvae or at any sign of pest presence.	6 gallon of [product] [Synergy Brand] per 500 sq ft of plant surface area 1.2 gallons of [product] [Synergy Brand] per 100 sq ft of plant surface area
Dormant Use On Apples, Cherries, Peaches, Nectarines, Plums, Pears, Almonds, Pecans, Walnuts, Melons, Tomatoes, Beans, Cabbage, Cucurbits, Peas, Potatoes, Lettuce, Lima Beans, Grapes, Strawberries, Raspberries, Blackberries, Grapefruit, Lemons, Oranges, Tangerines, Limes, Flowering, Foliage, Bedding Plants and Shade Trees (Birch, Evergreens, Holly, Oak)	At any sign of eggs or before for preventative treatment during dormant season.	For Fruit Trees and Nut Trees: 1 gallon of [product] [Synergy Brand] per 500 sq ft of plant surface area 25 ounces of [product] [Synergy Brand] per 100 sq ft of plant surface area 80 gallons [product] [Synergy Brand] per acre Greenhouse Trees and Flowering Plants: 3 gallon of [product] [Synergy Brand] per 500 sq ft of plant surface area 76 ounces of [product] [Synergy Brand] per 100 sq ft of plant surface area Outdoor Trees, and Flowering Plants: 6 gallon of [product] [Synergy Brand] per 500 sq ft of plant surface area 1.2 gallons of [product] [Synergy Brand] per 100 sq ft of plant surface area 1.2 gallons of [product] [Synergy Brand] per 100 sq ft of plant surface area

{Note to reviewer: The instructions in the table above provide flexibility for generating the container label depending on the commercial size of the container offering. All instructions in the above table will have consistent units and will make sense to the user.}

APPLICATIONS TO FRUITS, VEGETABLES, AND NUTS

For use on indoor, outdoor, and greenhouse grown fruit and nut trees (apples, cherries, peaches, nectarines, plums, pears, almonds, pecans, walnuts), melons, tomatoes, vegetables (beans, cabbage, cucurbits, peas, potatoes, lettuce, lima beans), small fruits and berries (grapes, strawberries, raspberries, blackberries), citrus (grapefruit, lemons, oranges, tangerines, limes) against listed pests, apply up to 1 gallon of [product] [Synergy Brand] per 500 square feet of plant surface area [25 ounces per 100 square feet of plant surface area] [80 gallons per acre]. **RESTRICTIONS:** Do not apply more than 10 times per season. Do not reapply within 3 days except under extreme pest pressure. In case of extreme pest pressure, do not reapply within 24 hours. May be used on edible fruits and vegetables up to day of harvest. Do not harvest until spray has dried.

APPLICATIONS TO GREENHOUSE TREES AND FLOWERING PLANTS

For use indoors and in greenhouses on flowering, foliage, and bedding plants and shade trees (birch, evergreens, holly, oak) against listed pests, apply up to 3 gallons of [product] [Synergy Brand] per 500 square feet of plant surface area [76 ounces per 100 square feet of plant surface area]. **RESTRICTIONS:** Do not apply more than 1 time per day.

APPLICATIONS TO OUTDOOR TREES AND FLOWERING PLANTS

For use outdoors on flowering, foliage, and bedding plants and shade trees (birch, evergreens, holly, oak), against listed pests, apply up to 6 gallons of [product] [Synergy Brand] per 500 square feet of plant surface area [1.2 gallons per 100 square feet of plant surface area]. **RESTRICTIONS:** Do not apply more than 1 time per day

DORMANT USE

Kills exposed egg stages of listed pests present in dormant season and scale insects, spider mites and mealybugs on dormant shrubs (roses), evergreens, fruit trees, and shade trees. Thoroughly wet the dormant plants or trees. For vegetables, fruit trees, and nut trees including apples, cherries, peaches, nectarines, plums, pears, almonds, pecans, walnuts, melons, tomatoes, beans, cabbage, cucurbits, peas, potatoes, lettuce, lima beans, grapes, strawberries, raspberries, blackberries, grapefruit, lemons, oranges, tangerines, limes, apply product at a rate of up to 1 gallon of [product] [Synergy Brand] per 500 square feet of plant surface area [25 ounces per 100 square feet of plant surface area] [80 gallons per acre]. For greenhouse trees and plants including flowering, foliage, bedding plants and shade trees (birch, evergreens, holly, oak), apply product at a rate of up to 3 gallons of [product] [Synergy Brand] per 500 square feet of plant surface area [76 ounces per 100 square feet of plant surface area]. For outdoor trees and plants including flowering, foliage, bedding plants and shade trees (birch, evergreens, holly, oak), apply product at a rate of up to 6 gallons of [product] [Synergy Brand] per 500 square feet of plant surface area [1.2 gallons per 100 square feet of plant surface area].

STORAGE AND DISPOSAL

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

{Note to reviewer: The following statements for any commercial container. This product is non-dilutable.} STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

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

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Then offer for recycling if available or reconditioning if appropriate or puncture and dispose of in a sanitary landfill or by other procedures approved by state and local authorities.

[Notice to Buyer: To the extent consistent with applicable law, it is company's intention that the buyer assumes all responsibility for safety and use not in accordance with label directions.]

Optional Marketing claims and product information

(Note to Reviewer: The following marketing claims are optional. When two or more items appear in brackets, at least one of the items in brackets will be used when appropriate in order for the claim to be clear to product users. Optional claims and statements may be presented on the container or collateral labeling}

- For Homeowner use {Note to Reviewer: this statement only for Sublabel A: Residential/Home & Garden Use}
- Dormant and growing season insect spray to kill exposed adelgids, aphids, armored scale, beetle larvae, cankerworms, caterpillars, fungus gnats, lace bugs, leafhoppers, leafminers, leafrollers, mealybugs, plant bugs, psyllids, scale insects, spider mites, thrips, webworms and whiteflies.
- Kills Japanese Beetles
- Kills all accessible stages of listed [crawling] [and] [flying] insects [including eggs].
- Kills all accessible stages of listed insects [including eggs].
- Kills all accessible stages of spider mites [including eggs].
- Kills by contact insecticide, ovicide.
- Kills spider mites, whiteflies, aphids, and all accessible stages of listed insects and eggs
- For flowers and vegetables
- Contains pyrethrins and canola oil
- May be used up to day of harvest
- Can be used right up until day of harvest
- For use on listed plants indoors and outdoors
- Can use on [flowers], [vegetables], [fruits], and [roses]
- Easy to use
- Insecticide/Miticide
- Insect spray
- [May be Used on] [Use on] flowers
- [May be Used on] [Use on] Houseplants and gardens {Note to Reviewer: this statement only for Sublabel A: Residential/Home & Garden Use}
- [May be Used on] [Use on] Fruits and vegetables
- [Synergy Brand] kills listed [insect] pests by contact.
- Kills by contact
- For best results, pests must be contacted directly with spray
- Kills listed insects by contact
- Kills listed bugs by contact
- Read entire container label before using this product
- Made in [the] USA
- Some floors may be slippery after spraying
- Ready to Use
- Do Not Dilute
- Shake Well

• NPK Industries presents {Note to reviewer: This optional marketing statement intended for use as a callout on the label front panel to serve to "debut" the product in the marketplace}



