OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

August 12, 2025

Kara James
kjames@exponent.com
ATTUNE AGRICULTURE LLC

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment - Revision to add Pests and Crop Groups; Minor Administrative Revisions IS-39 (EPA Reg. No. 92988-2)
Product Name: IS-39
Admin Number: 92988-2
EPA Receipt Date: 05/13/2025
Action Case Number: 00657248

Dear Kara James:

The amended labeling 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 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 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.

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 questions, please contact Brad Miller via email at miller.brad@epa.gov.

Sincerely,

James Parker, Team Leader
BPB, BPPD
Office of Pesticide Programs

[Note: Text in square brackets is a note to the reviewer.]
{Note: Text in curly brackets indicates optional text.}

ACCEPTED
Aug 12, 2025
Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 92988-2

IS-39

{Alternate Brand Name(s):
Entrapment AO, AO Entrapment, Entrapment FV, FV Entrapment, Entrapment HS, HS Entrapment, Entrapment HV, HV Entrapment, Entrapment LV, LV Entrapment, Entrapment LS, LS Entrapment, Entrapment PLC, PLC Entrapment, Entrapment PGM, PGM Entrapment, Entrapment SP, SP Entrapment, Entrapment GC, GC Entrapment, Entrapment GH, GH Entrapment, Entrapment PCO, PCO Entrapment, Entrapment G&H, G&H Entrapment, Entrapment ULV, ULV Entrapment, Entrapment MBL, MBL Entrapment}[Note to reviewer: Optional product identifiers corresponding to the alternate brand names may be used in addition to the full alternate brand names. Optional product identifiers may include**:** AO, FV, HS, HV, LV, LS, PLC, PGM, SP, GC, GH, PCO, G&H, ULV, MBL]

Insecticide

Active Ingredient:

Xanthan Gum	0.15%
Other Ingredients	99.85%
Total	100.00%

KEEP OUT OF REACH OF CHILDREN

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

{See back panel for mixing and application instructions.}{See {side} {back} {panel} {label}{booklet} for {complete} {additional} {First Aid}{,}{and} {Precautionary Statements,}{Directions For Use}{,}{.}{and}{Storage and Disposal{.}}{and}{warranty disclaimers}{.}}

EPA Reg. No. 92988-2
Net Contents: {1 gal (3.79 L)}{2.5 gal (9.46 L)}{1 qt. (32 oz.)}

EPA Est. No._____
{Batch No._____}

Manufactured {by} {for}:

Attune Agriculture LLC
751 Park of Commerce Drive {Dr.}{,}{#106}{Ste. 106}{Suite 106}
Boca Raton, FL 33487
{1-}561-570-1792

[Note: Text in square brackets is a note to the reviewer.]
{Note: Text in curly brackets indicates optional text.}

PRECAUTIONARY STATEMENTS

Wear appropriate personal protective equipment (PPE). Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

Personal Protective Equipment (PPE)

Applicators and other handlers must wear:

- Long-sleeved shirt and long pants
- Socks and Shoes

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations

Users should:

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

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 cleaning equipment or disposing of equipment wash water 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 State or Tribal agency responsible for pesticide regulation.

[Note: Text in square brackets is a note to the reviewer.]
{Note: Text in curly brackets indicates optional text.}

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 the label about personal protective equipment, restricted-entry interval, and notification to workers.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 4 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
- Shoes plus socks
- Chemical resistant gloves (made of any waterproof material)

NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

Keep unprotected persons and children and pets out of the treated area until sprays have dried.

General Product Information and Mode of Action

IS-39 is an insecticide that has a physical mode of action and adheres the pest to the leaf, and/or engulfs the pest causing suffocation. IS-39 must contact the target pest, and thorough spray coverage is essential for effective control.

IS-39 controls many small, soft bodied pests including aphids, mites, psyllids, scales, thrips, leafhoppers and whiteflies. IS-39 has been shown as effective against soft bodied insects and pests that are 4 mm and smaller in length.

IS-39 controls the early stages (1st and 2nd instar) of certain small foliage feeding caterpillars. When treating caterpillar populations that have a mix of early and late stages, add an insecticide that is registered for use for control of the pest on the target plant.

[Note: Text in square brackets is a note to the reviewer.]
{Note: Text in curly brackets indicates optional text.}

{For {indoor} {and} {outdoor} {usage} {use} on {ornamental plants} {turf} {and} {agricultural crops}}.

IS-39 can be applied using standard application equipment that includes ground, airblast, backpack, and aerial (including ultra-low volume and drone) spray.

Mixing Instructions

IS-39 requires hydration to activate the active ingredient. Consequently, the sequence of product mixing is extremely important. Water must be the first ingredient added to the spray tank. Use half the total amount of water per the Application Directions below for initial mixing. IS-39 must be the first product after water to be added to the spray tank and agitated. If needed, water conditioners can be added before the addition of IS-39 if water quality necessitates the use of such products. After thoroughly mixing IS-39 and water, additional products may be added with agitation as per their label recommendations. After the additional products have been thoroughly mixed, the remaining quantity of water must be added and agitated. Follow the most restrictive of the labeling limitations and precautions of all products used in mixtures.

IS-39 may thicken at product temperatures below 50^0 F. For best results, tank mix when product temperature is at or above 50^0 F. When product temperatures are at or below 50^0 F, additional mixing of up to 5 minutes may be required to reach a uniform consistency. In the event that IS-39 is being stored at temperatures below 50^0 F, place in an environment that will allow the product temperature to reach at least 50^0 F prior to mixing for shorter mixing times.

Tank Mix Compatibility

Insecticides/Miticides and Fungicides: IS-39 is compatible with a wide range of insecticides, miticides and fungicides provided they are added to the tank after IS-39 has been added and thoroughly agitated. Follow label requirements for any tank mix partner.

Horticultural Oils (such as mineral and petroleum oils): IS-39 is compatible with most oils provided that: 1) the oils are being applied at concentrations of 2% or less in accordance with their label, and 2) IS-39 is added to the tank mix and thoroughly agitated before the addition of the oil.

Deposition Aids: With the exception of horticultural oils noted above, for best results, tank mix IS-39 with deposition aids that do not contain surfactants and whose primary active ingredient is a hydrocolloid. Consult with Attune Agriculture LLC for compatible deposition aids.

Surfactants, Spreaders, Spreader/Stickers: IS-39 ’s mode of action is physical. When surfactants or spreaders are tank mixed with IS-39, they alter the physical properties of the spray, which reduces the insecticidal properties of the spray. Therefore, <u>do not mix IS-39 with any adjuvant that contains ingredients that promote drop spreading.</u>

[Note: Text in square brackets is a note to the reviewer.]
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Insect Resistance Management

Some insect and mite pests may develop resistance to products after repeated use. IS-39 can be used in Insect Resistance Management (IRM) programs to reduce the likelihood of resistance development.

IRM Practices include:

- Incorporating IPM techniques into your insect and mite control program.
- Monitoring treated insect populations for loss of field efficacy.
- Avoiding use of insecticides with the same target site of action group for season long control of pests that have multiple generations, instead, rotate sprays with insecticides having different target site of action group.
- Using tank-mixtures with insecticides from a different target site of action group.

IS-39 has a physical mode of action and can be used with insecticides with any mode of action. IS-39 can be used in rotation or tank-mixture strategies.

Application Directions

Application Rate: Apply {1/2 pint} {0.5 pint}{0.25 quarts}{8 fl oz} to {2 quarts}{4 pints}{64 fl oz} IS-39 per 100 gallons of spray to achieve a spray concentration ranging from 0.0625% to 0.5% (% volume : volume). {Refer to conversion chart below for guidance on amount of product to use per 100 gallons to achieve various application rates.} Effective insect control with IS-39 requires the correct concentration in the spray and thorough coverage of the target plant. {Refer to table below for use rate ranges per pest.} {It is recommended that the product should be used at >50°F as it is easier to mix, load and apply. The product can be used below 50°F; however, it tends to be more viscous and could be harder to handle.}

{Conversion Chart} [Note to reviewer: the following table will be considered optional text on the final printed label]

Amount of product per 100 gallons (quarts)	Amount of product per 100 gallons (pints)	Amount of product per 100 gallons (fl. oz.)	% v/v
0.25	0.5	8	0.0625
0.5	1	16	0.125
1	2	32	0.25
2	4	64	0.50

{Use Rate Ranges per pest:} [Note to reviewer: the following table will be considered optional text on the final printed label]

[Note: Text in square brackets is a note to the reviewer.]
{Note: Text in curly brackets indicates optional text.}

Pest	Use rate range (v/v)
Aphid	0.0625% - 0.25%
Thrips	0.0625% - 0.25%
Leafhoppers	0.125% - 0.5%
Whiteflies	0.0625% - 0.5%
Mites	0.0625% - 0.5%
Psyllids	0.0625% - 0.25%
Scales	0.0625% - 0.5%
1st and 2nd instar caterpillars	0.125%
Hemipterans	0.0625% - 0.5%
Beetles	0.125% – 0.5%

Spray Volume: Apply 2 – 1,000 gallons of spray per acre.

The amount of spray applied per acre is dependent on the surface area of the use site that is being treated. Early growth stages of plants will generally require less spray volume than later growth stages. Plants with less foliage, such as bulb vegetables and legumes, will require less spray volume than higher foliage plants, such as citrus and pome fruits as well as tree nuts.

The application rates and spray volumes of IS-39 applications must be sufficient to provide thorough coverage of the target use site as the spray must contact the insect pest to be effective.

Application Timing: For optimum results, apply IS-39 at the first sign of infestation and apply every 7 to 10 days as needed.

Spray Drift Management

The applicator is responsible for not allowing spray to drift from the application site.

For ground boom applications, apply with nozzle height no more than 4 feet above the crop canopy and when wind speed is 15 mph or less at the application site.

For orchard/vineyard airblast applications, do not direct spray above trees/vines and turn off outward pointing nozzles at row ends and outer rows. Apply only when wind speed is 3-10 mph at the application site as circumstances allow. Do not apply above 15 mph wind speed.

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For aerial applications, the boom width must not exceed 75% of the wingspan or 90% of the rotary blade. Use upwind swath displacement and apply when wind speed is 3-10 mph as circumstances allow. Do not apply above 15 mph wind speed. If the application area includes a no-spray zone, do not release spray at a height greater than 10 feet above the crop canopy unless there are pilot safety concerns.

Droplet Size

IS-39 has a physical mode of action that requires the target pest to come into direct contact with a droplet while it is in a liquid state. The droplet must adhere to the leaf and must be of sufficient size to entrap the target pest. Drops that are less than 105 microns in diameter are prone to drift and may not be of sufficient size to entrap the target pest. Therefore, IS-39 must be applied using nozzles and spray pressures that minimize the production of spray drops that are less than 105 microns in diameter.

Restrictions for Tank Mixing with Surfactants and Spreaders

Viscosity and surface tension play an important role in determining drop diameter as the spray moves through the nozzle orifice. Drop diameters increase with increases in spray viscosity. Xanthan gum increases spray viscosity. Surfactants and spreaders limit viscosity and reduce surface tension, increasing the potential for production of small drift prone drops. IS-39 must not be tank mixed with adjuvants containing surfactants, spreaders, wetting agents or organosilicones but can be tank mixed with hydrocolloid based adjuvants. Consult with Attune Agriculture LLC for compatible adjuvants.

Drift Reduction Agents

IS-39 exhibits a level of drift control. If conditions merit an additional drift reduction agent, the only DRAs that should be tank mixed with IS-39 are hydrocolloid based products. Consult with Attune Agriculture LLC for compatible drift reduction agents.

[Note: Text in square brackets is a note to the reviewer.]
{Note: Text in curly brackets indicates optional text.}

IS-39 is Effective Against the Following Pests

Aphids including:

Apple aphid
Blackmargined Aphid
Cabbage Aphid
Cotton Aphid
Filbert Aphid
Foxglove Aphid
Green Peach Aphid
Lettuce Aphid
Pea Aphid
Potato Aphid
Red Aphid
Rose Aphid
Rosy Apple Aphid
Woolly Apple Aphid
Sugarcane Aphid

1st and 2nd Instar Caterpillars including:

Beet Armyworm
Corn Earworm
Cabbage Looper
Codling moth
Diamondback Moth
Imported Cabbageworm
Navel Orangeworm
Soybean Looper
Soybean Podworm
Tobacco Budworm
Tomato Hornworm
Tomato Fruitworm
Velvetbean Caterpillar

Leafhoppers including:

Grape Leafhopper
Potato Leafhopper
Rose Leafhopper
Virginia Creeper Leafhopper
Western Grape Leafhopper
White Apple Leafhopper

Psyllids including:

Asian Citrus Psyllid
Pear Psylla
Potato Psyllid
Tomato Psyllid

[Note: Text in square brackets is a note to the reviewer.]
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Scales including:

Black Scale
Brown Soft Scale
California Red Scale
Citricola Scale
Cottony Cushion Scale
European Fruit Lecanium
San Jose Scale

Thrips including:

Citrus Thrip
Florida Flower Thrip
Gladiolus Thrip
Grape Thrip
Chili Thrip
Melon Thrip
Onion Thrip
Pear Thrip
Western Flower Thrip

Whiteflies including:

Ash Whitefly
Banded-wing Whitefly
Bayberry Whitefly
Citrus Whitefly
Cloudy-winged Whitefly
Greenhouse Whitefly
Silverleaf Whitefly
Sweet potato Whitefly
Variegated Whitefly
Woolly Whitefly

Mites including:

Broad Mites
Cyclamen Mites
Pacific Spider Mite
Hemp Russet Mites
Two-spotted Spider Mite
Citrus Rust Mite

Hemipterans including:

Chinch bug
Plant bugs
Fleahopper
Tarnished plant bugs (*Lygus* spp.)

Beetles including:

Flea Beetle

{*Not for use in California} [Note to reviewer: Any of the pests above may be qualified with * as appropriate.]

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{Note: Text in curly brackets indicates optional text.}

IS-39 can be used on{indoor} {and} {outdoor} {vegetable} {fruit} {and} {other}{food} crops, including:

<table>
<tr>
<td rowspan="2">Stalk, Stem and Leaf Petiole Vegetables {Crop Group 22}, Including

Agave
Aloe vera
Asparagus
Bamboo shoots
Celtuce
Fennel
Florence
Fern
Kohlrabi
Palm hearts
Prickly pear</td>
<td>Cucurbit Vegetables {Crop Group 9}, Including

Bitter Melon
Cantaloupe
Casaba
Chinese Waxgourd
Citron melon
Crenshaw
Cucumber
Gherkin
Gourds
Honey balls
Honeydew
Mango Melon
Muskmelon
Pumpkin
Squash
Watermelon</td>
</tr>
<tr>
<td>Cereal Grains {Crop Group 15, 15-22}, Including
Barley
Buckwheat
Corn
Millet
Triticale
Rye
Oats
Popcorn
Rice
Sorghum
Wheat</td>
</tr>
<tr>
<td>Berries {Crop Group 13}, Including

Blackberry
Blueberry
Boysenberry
Currant
Dew Berry
Elderberry
Kiwi
Grapes
Huckleberry
Loganberry
Olallieberry
Raspberry
Strawberry

Berry and Small Fruit {Crop Group 13-07}, Including

Buffaloberry
Cranberry
Mulberry</td>
<td>Hops</td>
</tr>
</table>

[Note: Text in square brackets is a note to the reviewer.]
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Brassica (Cole) Crops {Crop Group 5}, Including Bok Choy {Cavolo} {Cavalo} Broccolo Broccoli Collards Broccoli {Rabe} {Raab} Kale Brussels Sprouts Kohlrabi Cabbage Mustard Greens Cauliflower Chinese Cabbage **Brassica Head and Stem Vegetable {Crop Group 5-16}, Including** Broccoli Cauliflower	**Leafy Vegetables {Crop Group 4, 4-16}, Including** Arugula Dandelions Cardoon Dock (Sorrel) Celery Fennel Celtuce Lettuce Chervil Orach Chinese Celery Parsley Chinese Spinach Purslane Corn Salad (Mache) Radicchio Chrysanthemum Rhubarb Cress Spinach Swiss Chard Turnip Greens
Sugarcane	**Legumes {Crop Group 6, 6-22}, Including** Beans Lentil Chickpeas Peas Guar Soybeans
Bulb Vegetables {Crop Group 3, 3-07}, Including Garlic Onion Leek Shallot	**Pome Fruits {Crop Group 11, 11-10}, Including** Apple Mayhaw Crabapple Pear Quince Loquat
Citrus Fruits {Crop Group 10, 10-10}, Including Calamondin Mandarin Grapefruit Orange Kumquat Pummelo Lemon Satsuma Lime Tangerine	**Stone Fruits {Crop Group 12, 12-12}, Including** Apricot Plum Aprium Plumcot Cherry Pluot Nectarine Prune Peach Jujube

[Note: Text in square brackets is a note to the reviewer.]
{Note: Text in curly brackets indicates optional text.}

<table>
<tr>
<td>Corn (all types)
Sweet corn
Popcorn
Field corn</td>
<td>Tree Nuts {Crop Group 14, 14-12}, Including

Almond
Beech Nut
Brazil Nut
Butternut
Cashew
Chinquapin
Filbert
Hickory
Macadamia
Pecan
Pistachio
Walnut</td>
</tr>
<tr>
<td>Cotton</td>
<td rowspan="2">Tropical and Subtropical Fruit, Edible Peel {Crop Group 23}, Including

Fig
Palm Fruit
Persimmon</td>
</tr>
<tr>
<td>Tropical and Subtropical Fruit, Inedible Peel {Crop Group 24}, Including

Pawpaw
Pomegranate</td>
</tr>
<tr>
<td rowspan="2">Root and Tuber Crops {Crop Group 1}, Including

Artichoke
Beet
Carrot
Cassava
Celeriac
Chervil
Daikon
Ginger
Ginseng
Horseradish
Japanese Radish
Jicama
Parsnip
Potato
Radish
Rutabaga
Salsify
Sweet Potato
Turmeric
Turnip
Yam
Yam Bean</td>
<td>Water chestnut</td>
</tr>
<tr>
<td>Fruiting Vegetables {Crop Group 8, 8-10}, Including

Eggplant
Pepper
Tomato
Hibiscus</td>
</tr>
</table>

[Note: Text in square brackets is a note to the reviewer.]
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<table>
<tr>
<td rowspan="2">Leaves of Root and Tuber Vegetables (Human Food or Animal Feed) Group {Crop Group 2}, Including

Beet, sugar
Carrot
Celeriac (celery root)
Radish
Rutabaga
Sweet potato
Yam, true</td>
<td>Foliage of Legume Vegetables {Crop Group 7}, Including

Any parts of any legume vegetable included in the legume vegetables that will be used as animal feed, including cultivars of bean (Phaseolus spp.) and field pea (Pisum spp.), and soybean (Glycine max)

Forage and Hay Legume Vegetables {Crop Group 7-22}, Including

Any cultivar of bean (Phaseolus spp. or cowpea (Vigna unguiculata (L.) Walp))
Field pea (Pisum sativum L. subsp. sativum var. arvense (L.) Poir.)
Soybean (Glycine max (L.) Merr.)</td>
</tr>
<tr>
<td>Forage, Fodder and Straw of Cereal Grains {Crop Group 16}, Including

Forage, fodder, stover, and straw of all commodities in the cereal grains group (e.g., corn, wheat, and cereal grains)

Forage, Hay, Stover, and Straw of Cereal Grains {Crop Group 16-22}, Including

Forage, hay, stover and straw of the commodities in Crop Group 15-22, including cultivars, varieties and/or hybrids of barley, corn, millet, etc.</td>
</tr>
</table>

[Note: Text in square brackets is a note to the reviewer.]
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Grass Forage, Fodder, and Hay {Crop Group 17}, Including	**Nongrass Animal Feeds (Forage, Fodder, Straw, and Hay) {Crop Group 18}, Including**
Forage, fodder, stover, and hay of any grass, *Gramineae/Poaceae* family (either green or cured) except sugarcane and those included in the cereal grains group, that will be fed to or grazed by livestock, all pasture and range grasses and grasses grown for hay or silage	Alfalfa Clover Kudzu Vetch Vetch, milk
Oilseed {Crop Group 20}, Including	**Edible Fungi {Crop Group 21}, Including**
Castor oil plant Cottonseed Evening primrose Flax seed Jojoba Milkweed Mustard seed Rapeseed Rose hip Safflower Sesame Tea oil plant	Chinese mushroom Enoki Morel Oyster mushroom Shiitake mushroom Truffle White button mushroom

[Note: Text in square brackets is a note to the reviewer.]
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Herbs {Crop Group 25}, Including	**Spices {Crop Group 26}, Including**
Angelica Basil Camomile {Chamomile} Cilantro Fennel Indian tobacco Lavender Mint Oregano Patchouli Rosemary Spearmint Tarragon	Allspice Anise pepper Ashwagandha Caper buds Caraway Cardamom Cinnamon Cumin Frankincense Kaffir lime Milk thistle Mustard Peppercorn Sandalwood Sesame, seed Vanilla Witch hazel
Tobacco {all varieties}	**Hemp {all varieties}**

[Note to reviewer: common name for all crops noted above may be used alone or in combination with scientific name on product labeling.]
[Note to reviewer: The EPA label lists examples of crops in the crop group only, but the final printed label may list any crop found in the EPA crop group even if not listed on the EPA label.]

[Note: Text in square brackets is a note to the reviewer.]
{Note: Text in curly brackets indicates optional text.}

IS-39 can be used on Turf Grasses, Including:

Annual Bluegrass	Perennial Ryegrass
Annual Ryegrass	St. Augustine Grass
Bentgrass	Seashore Paspalum
Bermuda Grass	Wheatgrass
Centipede Grass	Zoysia Grass
Fescue	

IS-39 can be used on {indoor} {and} {outdoor} Ornamental Plants, Including:

Flowering Plants, including:

Amaryllis	Daisy	Peony
Anemone	Hydrangea	Petunia
Aster	Impatiens	Poinsettia
Begonia	Iris	Poppy
Caladium	Lilac	Primrose
Carnation	Lilies	Rose
Chrysanthemum	Marigold	Sweet Pea
Dahlia	Orchid	Tulips
Dianthus	Pansy	Violets
Daffodil	Phlox	Zinnia
Hosta	Fuchsia	

Trees, including:

Ash	Fir
Beech	Elm
Birch	Juniper
Cedar	Maple
Chestnut	Mulberry
Crape Myrtle	Oak
Cyprus	Palm
Dogwood	Pine
Ficus	Spruce
Willow	

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Shrubs, including:

Arborvitae	Euonymus	Nandina
Azalea	Gardenia	Privet
Aucuba	Holly	Rhododendron
Bayberry	Jasmine	Rose of Sharon
Boxwood	Juniper	Viburnum
Butterfly Bush	Laurel	Yew
Camelia	Ligustrum	Yucca
Distylium	Loropetalum	

Groundcovers, including:

Ajuga	Mondo Grass
Astilbe	Pachysandra
Aztec Grass	Phlox
Calamintha	Sedum
Carex	Spurge
Ivy	Trillium
Liriope	Virginia Creeper
Mazus	

House Plants, including:

Aglaonema	Dracaena	Rubber Plant
Aloe Vera	Dragon Tree	Snake Plant
Anthurium		Spider Plant
Bamboo	Ficus	Swiss Cheese Plant
Bird of Paradise	Fiddle Leaf Fig	Wandering Jew
Bromeliad	Mass Cane	Yucca Cane
Cactus	Monstera	ZZ Plant
Chinese Money Plant	Peace Lily	
Coffee Plant	Philodendron	
Croton	Pothos	
Dieffenbachia	Prayer Plant	

{FOLIAR APPLICATIONS: ORNAMENTAL TREES, FRUIT AND NUT TREES, SHRUBS, EVERGREENS, FLOWERS, FOLIAGE PLANTS, GROUNDCOVERS, VEGETABLE AND FRUITING PLANTS in field-grown nursery, outdoor containers, indoor potted plants, flats, beds, benches, including greenhouse and interior plantscapes.}

{*Not for use in California} [Note to reviewer: Any of the above use sites may be qualified with * as appropriate.]

[Note: Text in square brackets is a note to the reviewer.]
{Note: Text in curly brackets indicates optional text.}

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool dry place in the original container. It is recommended to store the product above 50^{o}F. Do not store near heat or open flame. Keep the container tightly sealed.

PESTICIDE DISPOSAL: To avoid waste, use all material in this container by application according to label directions. If wastes cannot be avoided, offer remaining product to a waste disposal facility or pesticide disposal program (often such programs are run by state or local governments or by industry).

CONTAINER HANDLING: 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.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use and the following Conditions of Sale, Disclaimer of Warranties, and Limitation of Liability. If the terms are not acceptable, return the product unopened and the full purchase price will be refunded.

By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

Conditions: The directions on this label are believed to be reliable and should be carefully followed. Attune Agriculture LLC warrants that this product conforms to the ingredients description on the label and is reasonably fit for the stated Directions for Use, when the product is used according to the Directions for Use and under normal condition of use. Insufficient control of pests and/or injury to the plant to which the product is applied may result from the occurrence of extraordinary or unusual weather conditions or the failure to follow label directions or good application practices, all of which are beyond the control of Attune Agriculture LLC.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Attune Agriculture LLC makes no other warranties, 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 Attune Agriculture LLC is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Attune Agriculture LLC disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

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

[Note: Text in square brackets is a note to the reviewer.]
{Note: Text in curly brackets indicates optional text.}

Optional label text [Note to reviewer: these phrases can be found anywhere on the label in appropriate locations. An EPA approved alternate brand name can be used in place of {this product} in the phrases below]:

{Patent Pending}[Note to reviewer: The phrase "Patent Pending" will be replaced with the patent numbers at the next printing of the labels once the pending applications are approved.]

{Attune Agriculture} {Proven Science. Precise Performance. Smarter Agriculture.®}

{For organic production.}

{Shake well before use}

{Organic Materials Review Institute {(OMRI)}{OMRI} Listed}

{For use on [insert crops/plants from label]{crops} {turf}{and}{ornamentals}}

{For lawncare, professional ground maintenance, golf courses, and recreational ground maintenance}

{For {outdoor} {and} {indoor} {and} {greenhouse} use}

{For use against [insert pests from pest lists below]}

{Insect {and mite} Control powered by Rhexalloid™ Technology†}

{Powered by Rhexalloid™ Technology†}

{Insect {and mite} Control with the Active Ingredient, Xanthan Gum found in Rhexalloid™†}

{Insecticide powered by Rhexalloid™ Technology†}

{†Rhexalloid™ is Attune's proprietary technology for the active ingredient Xanthan Gum, which is a non-systemic, contact insecticide that utilizes a physical mode of action to control specific insect and mite pests.} [Note to reviewer: This is the qualifying statement to be used when the qualifier † is used after Rhexalloid™ Technology†]

{Powered by Rhexalloid™† {insecticide†}}

{With Rhexalloid™† {active}{ingredient†}}

{Contains Rhexalloid™† {active}{ingredient†}}

{Insect {and mite}Control using Rhexalloid™ Technology†}

[Note: Text in square brackets is a note to the reviewer.]
{Note: Text in curly brackets indicates optional text.}

{Insect {and mite} Control Formulated with Rhexalloid™ Technology†}

{Formulated with Rhexalloid™ Technology†}{{IS-39}{this product} is a non-systemic, contact insecticide that utilizes a physical mode of action to control specific insect and mite pests. }

{{IS-39}{this product}insecticide has 3 physical modes of action: Engulf, Trap, Immobilize.}

{Powered by Rhexalloid® technology†, {IS-39}{this product} harnesses the power of hydrocolloids to transform every water droplet in your tank mix into adhesive traps on the target for the control of insect and mite pests.}

{{IS-39's}{this product's} unique technology creates a complex molecular structure within every spray droplet that physically controls pests upon contact in three ways.}

{Engulf: Very small sized insects and mites (< 1 mm; 1st and 2nd instar) are engulfed by the droplets and suffocated.}

{Trap: Slightly larger insects (1 – 3 mm; 3rd to 5th instar) are trapped by the droplets. Once an arm or leg makes contact with a droplet, the insect is stuck to the droplet and unable to break free.}

{Immobilize: Insects large enough (3 – 4 mm) to overcome a droplet's adhesion become coated with the drop's contents. The coating on the pest picks up debris as it moves about the leaf surface. Once the coating dries, the insect becomes immobilized.}

{Pests are trapped in droplets with {IS-39}{this product} upon contact and unable to break free.}

{Pests are engulfed in droplets with {IS-39}{this product} and suffocated.}

{Pests are covered in droplets with {IS-39}{this product} and immobilized.}

{A true disruptive technology for managing insect and mite pests[1].} {[1] This product works through a physical mode of action to disrupt the insect lifecycle.}

{Hundreds of traps on every leaf surface.}

{Get off the pesticide treadmill with a disruptive technology not prone to resistance.}

{This product is formulated specifically for the intended uses.}{Specific use rates intended for insecticidal purpose.}

{A novel insecticide engineered to combat resistance.}

[Note: Text in square brackets is a note to the reviewer.]
{Note: Text in curly brackets indicates optional text.}

{{IS-39}{this product} {is} {formulated for insect and mite control on fruits, vegetables, and nuts.}}

{{IS-39}{this product} {is} {formulated for insect and mite control on row crops.}}

{{IS-39}{this product} {is} {formulated for the control of navel orangeworm, codling moth, whiteflies, and mites.}}

{{IS-39}{this product}{is} {formulated for insect and mite control on crops, turf/ornamentals, golf courses, and greenhouses.}}

{{IS-39}{this product}{is}{formulated for insect and mite control on crops, greenhouses, turf & ornamentals, and golf courses}

{Mode of action compatible with rotation and mixture approaches}

{Valuable resistance management tool}

{Zero-day Pre Harvest Interval (PHI)}

{Does not harm bees and lady bugs}

{Biochemical active ingredient}

{Biopesticide active ingredient}

{Biochemical pesticide}

{Biopesticide insecticide}

{Biopesticide}

{Biochemical insecticide}

{Broad spectrum of activity controls aphids, whiteflies, psyllids, leafhoppers, thrips, neonate caterpillars, and mites.}

{Attune's development of {IS-39}{this product}{insecticide} comes from our intimate knowledge of hydrocolloids and the physics of rheology.}

{Droplets with {IS-39}{this product} have an outer membrane that is permeable to insect limbs and an internal structure that is strong enough to hold on to the insect so that it cannot break free.}

[Note: Text in square brackets is a note to the reviewer.]
{Note: Text in curly brackets indicates optional text.}

{Recommended storage above 50°F.}

{Store above 50°F.}

{Free Sample}

{Not for resale}

{For testing purposes only.}

[Note: Text in square brackets is a note to the reviewer.]
{Note: Text in curly brackets indicates optional text.}

Optional Graphics [can be found anywhere on the label]:

attune

Entrapment® insecticide

[Note to reviewer: On the final printed labels the text "Entrapment Insecticide" in the logo above may be replaced with an EPA approved brand name. An example alternative is provided below:]

Formulated for insect and mite control on fruits, vegetables, and nuts

Entrapment® FV

{OMRI logo}[representative logo below]

OMRI LISTED
For Organic Use · OMRI.org