



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

July 02, 2025

Emily Saad
esaad@exponent.com
Ecospray Limited

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment - Revision to add voluntary protective language and update the EPA Reg. number
Product Name: NEMGUARD GRANULE
Admin Number: 102981-2
EPA Receipt Date: 05/14/2025
Action Case Number: 00658915

Dear Emily Saad:

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.

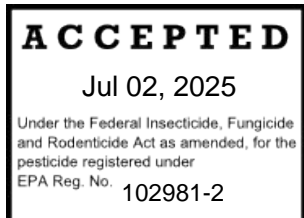
Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have questions, please contact Shanda Bennett via email at bennett.shanda@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "James Parker". The script is elegant and cursive, with a large, flowing "J" and "P".

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



NEMguard Granule

{Alternate Brand Names: NEMguard GR, NEMguard PCN GR, BERRYguard GR, EGC GR}

Bionematicide

[] [ FOR ORGANIC PRODUCTION] [For use in Organic Production]

[For control of nematodes in [agricultural food use crops] [ornamentals] [and] [turf] [{insert from list of use sites below}].]

Active Ingredient:

Garlic Extract45%
Other Ingredients:55%
Total.....100%

Keep Out of Reach of Children

CAUTION

[See [booklet][pamphlet][back panel][side panel] for [Precautionary Statements][First Aid][and][Directions for Use]]

FIRST AID	
If in eyes	<ul style="list-style-type: none">· Hold eye open and rinse slowly and gently with water for 15-20 minutes.· Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.· Call a poison control center or doctor for treatment advice.
If swallowed	<ul style="list-style-type: none">· Call poison control center or doctor immediately for treatment advice.· Have person sip a glass of water if able to swallow.· Do not induce vomiting unless told to do so by the poison control center or doctor.· Do not give anything by mouth to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none">· Take off contaminated clothing.· Rinse skin immediately with plenty of water for 15 – 20 minutes.· Call a poison control center or doctor for treatment advice.
HOTLINE NUMBER Have the product container or label with you when calling a Poison Control Center, or doctor, or going for treatment. For general information on product use, etc., call the National Pesticides Information Center at 1-800-858- 7378. For emergencies, call the poison control center (1-800-222-1222).	

Manufactured [for][by]: Ecospray Limited
6C Park Farm Business Centre
Fornham St. Geneieve
Bury St. Edmunds, IP28 6TS
United Kingdom

EPA Reg. No. 102981-2
EPA Est. No.
Net Contents:
Version Code:

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed, absorbed through skin, or inhaled. Causes moderate eye irritation. Wear protective eyewear. Avoid contact with skin, eyes or clothing. Avoid breathing dust. Wash with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before use. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Personal Protective Equipment

Applicators and other handlers must wear:

- Long sleeved shirt and long pants
- Shoes plus socks
- Waterproof gloves

Follow the manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE and contaminated clothing 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 this product. As soon as possible, wash thoroughly and change into clean clothing.

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 washwater 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 requirement specific to your State or Tribe, consult the State or Tribal 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 green houses, 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), notification to workers, and restricted-entry interval (REI). The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

- There is a restricted-entry interval of 4 hours for this product.

For early entry into 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, wear:

- Coveralls
- Shoes plus socks
- Waterproof gloves

Exception: if the product is soil-injected or soil incorporated, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

Product Information

For control of nematodes in [agricultural food and forage crops,] [ornamentals,] [and] [turf].

Application Instructions

Apply via soil incorporation, granule spreading, or in furrow. Soil conditions should be moist enough to sustain plant growth at time of application. Within 4-7 days post application, irrigation to a depth equivalent of ½ inch should be applied to ensure mobilization and dispersal of the active ingredient.

Rate of application is dependent on pest pressures. Use a higher rate with higher pest pressures. Consult with an extension specialist, a pest control advisor (PCA), or with the product manufacturer prior to use.

This product has been evaluated for phytotoxicity on a variety of crops grown under normal conditions. However, not all plant species, varieties, and cultivars have been tested for tolerance to this product. Before making widespread applications of this product, treat a limited number of plants and observe for phytotoxicity and crop sensitivity.

For use on the following use sites for control of free-living stages of plant parasitic nematodes including: root knot, citrus, stubby-root, needle, lesion, dagger, golden, and cyst.

Use Site	Application Rates and Timing
Root and Tuber Vegetables [(Crop Group 1)], including Arracacha; Arrowroot; Artichoke, Chinese; Artichoke, Jerusalem; Beet, garden; Beet, sugar; Burdock, edible; Canna, edible; Carrot; Cassava, bitter and sweet; Celeriac (celery root); Chayote (root); Chervil, turnip-rooted; Chicory; Chufa; Dasheen (taro); Ginger; Ginseng; Horseradish; Leren; Parsley, turnip-rooted; Parsnip; Potato; Radish; Radish, oriental (daikon); Rutabaga; Salsify (oyster plant); Salsify, black; Salsify, Spanish; Skirret; Sweet potato; Tanier (cocoyam); Turmeric; Turnip; Yam bean (jicama, manioc pea); Yam, true	Apply 10 – 55 lbs/acre before or at planting.
Bulb Vegetables [(Crop Group 3)], including Garlic, bulb; Garlic, great headed, (elephant); Leek; Onion, dry bulb and green; Onion, Welsh, Shallot	Apply 18 lbs/acre at planting.
Leafy Vegetables [(Crop Group 4-16)], including amaranth, Chinese; amaranth, leafy; arugula; aster, Indian; blackjack; broccoli, Chinese; broccoli raab; cabbage, abyssinian; cabbage, Chinese, bok choy; cabbage, seakale; cat's whiskers; cham-chwi; cham-na-mul; chervil, fresh leaves; chipilin; chrysanthemum, garland; cilantro, fresh leaves; collards; corn salad; cosmos; cress, garden; cress, upland; dandelion, leaves; dang-gwi, leaves; dillweed; dock; dol-nammul; ebolo; endive; escarole; fameflower; feather cockscomb; Good King Henry; hanover salad; huauzontle; jute, leaves; kale; lettuce, bitter; lettuce, head; lettuce, leaf; maca, leaves; mizuna; mustard greens; orach; parsley, fresh leaves; plantain, buckhorn; primrose, English; purslane, garden; purslane, winter; radicchio; radish, leaves; rape greens; rocket, wild; shepherd's purse; spinach; spinach, Malabar; spinach, New Zealand; spinach, tanier; Swiss chard; turnip greens; violet, Chinese, leaves; watercress; cultivars, varieties, and hybrids of these commodities	Apply 20 – 55 lbs/acre at planting.
Legume Vegetables [(Crop Group 6)] and Foliage of Legume Vegetables [(Crop Group 7)] including bean (Lupinus) (includes grain lupin, sweet lupin, white lupin, and white sweet lupin); bean (Phaseolus) (includes field bean, kidney bean, lima bean, navy bean, pinto bean, runner bean, snap, bean, tepary bean, wax bean); bean (Vigna) (includes adzuki bean, asparagus bean, blackeyed pea, catjang, Chinese longbean, cowpea, C rowder pea, moth bean, mung bean, rice bean, southern pea, urd bean, yardlong bean); broad bean (fava); chickpea (garbanzo bean); guar; jackbean; lablab bean; lentil; pea (Pisum) (including dwarf pea, edible-pod pea, English pea, field pea, garden pea, green pea, snow pea, sugar snap 10 pea); pigeon pea; soybean; soybean (immature seed); swordbean	Apply 20 – 55 lbs/acre before or at planting.

[Note: Text in square brackets indicates optional text.]

{Note: Text in curly brackets indicates a note to the reviewer. }

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Use Site	Application Rates and Timing
Fruiting Vegetables [(Crop Group 8)], including African eggplant; bush tomato; bell pepper; cocona; currant tomato; eggplant; garden huckleberry; goji berry; groundcherry; martynia; naranjilla; okra; pea eggplant; pepino; pepper, bell; pepper, nonbell; roselle; scarlet eggplant; sunberry; tomatillo; tomato; tree tomato; cultivars, varieties, and/or hybrids of these	Apply 20 – 50 lbs/acre before or at planting.
Cucurbit Vegetables [(Crop Group 9)], including Chayote (fruit); Chinese waxgourd (Chinese preserving melon); citron melon; cucumber; gherkin; gourd, edible (includes hyotan, cucuzza, hechima, Chinese okra); Momordica spp (includes balsam apple, balsam pear, bittermelon, Chinese cucumber); muskmelon (includes true cantelope, cantaloupe, casaba, crenshaw melon, golden pershaw melon, honeydew melon, honey balls, mango melon, Persian melon, pineapple melon, Santa Claus melon and snake melon); pumpkin; squash, summer (includes crookneck squash, scallop squash, straightneck squash, vegetable marrow, zucchini); squash, winter (includes butternut squash, calabaza, hubbard squash, acorn squash, spaghetti squash); watermelon; cultivars, varieties and/or hybrids of these.	Apply 20 – 50 lbs/acre before or at planting.
Berries and Small Fruits [(Crop Group 13-07)], including Amur river grape; Aronia berry; Bayberry; Bearberry; Bilberry; Blackberry (including Andean blackberry; arctic blackberry; bingleberry; black satin berry; boysenberry; brombeere; California blackberry; Chesterberry; Cherokee blackberry; Cheyenne blackberry; common blackberry; coryberry; darrowberry; dewberry; Dirksen thornless berry; evergreen blackberry; Himalayaberry; hullberry; lavacaberry; loganberry; lowberry; Lucretiaberry; mammoth blackberry; marionberry; mora; mures deronce; nectarberry; Northern dewberry; olallieberry; Oregon evergreen berry; phenomenalberry; rangeberry; ravenberry; rossberry; Shawnee blackberry; Southern dewberry; tayberry; youngberry; zarzamora; and cultivars; varieties and/or hybrids of these); Blueberry; Buffalo currant; Buffaloberry; Che; Chilean guava; Chokecherry; Cloudberry; Cranberry; Currant; Elderberry; European barberry; Gooseberry; Grape; Highbush cranberry; Honeysuckle; edible; Huckleberry; Jostaberry; Juneberry (Saskatoon berry); Kiwifruit; Lingonberry; Maypop; Mountain pepper berry; Mulberry; Muntries; Native currant; Partridgeberry; Phalsa; Pincherry; Raspberry; Riberry; Salal; Schisandra berry; Sea buckthorn; Serviceberry; Strawberry; Wild raspberry; cultivars, varieties, and/or hybrids of these	Apply 20 – 50 lbs/acre before or at planting.
Cereal Grains [(Crop Group 15)], including Barley; Buckwheat; Corn; Millet (pearl); Millet (proso); Oats; Popcorn; Rice; Rye; Sorghum (milo); Teosinte; Triticale; Wheat; Wild rice	Apply 20 – 55 lbs/acre before or at planting. If applying by broadcast equipment, the maximum rate must be used.

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Use Site	Application Rates and Timing
Herbs and Spices [(Crop Group 19)], including angelica; allspice; anise, seed; anise, star; annatto, seed; balm; basil; borage; burnet; chamomile; caper, buds; caraway; caraway, black; cardamom, cassia bark; cassia, buds; catnip; celery, seed; chervil, dried; chive; chive, Chinese; clary; cinnamon; clove, buds; coriander, leaf and seed (cilantro, 12 Chinese parsley); costmary; culantro (leaf and seed); cumin; curry, leaf; dill, seed; dillweed; fennel, common; fennel, Florence (seed); fenugreek; grains of paradise; horehound; hyssop; juniper, berry; lavender; lemongrass; lovage (leaf and seed); mace; marigold; marjoram; mustard (seed); nasturtium; nutmeg; parsley, dried; pennyroyal; pepper, black; pepper, white; poppy, seed; rosemary; rue; saffron; sage; savory; summer and winter; sweet bay; tansy; tarragon; thyme; vanilla; wintergreen; woodruff and wormwood	Apply 20 – 55 lbs/acre via soil incorporation before or at planting. If applying by broadcast equipment, the maximum rate must be used.
Oilseed [(Crop Group 20)], including borage; calendula; castor oil plant; Chinese tallowtree; cottonseed; crambe; cuphea; echium; euphorbia; evening primrose; flax seed; gold of pleasure; hare's ear mustard; jojoba; lesquerella; lunaria; meadowfoam; milkweed; mustard seed; niger seed; oil radish; poppyseed; rapeseed; rose hips; safflower; sesame; stokes aster; sunflower; sweet rocket; tallowwood; tea oil plant; veronica; cultivars, varieties and/or hybrids of these	Apply 20 – 55 lbs/acre before or at planting. If applying by broadcast equipment, the maximum rate must be used.
Stalk, Stem, and Leaf Petiole Vegetables [(Crop Group 22)], including Agave; Aloe vera; Asparagus; Bamboo, shoots; Cardoon; Celery; Celery, Chinese; Celtuce; Fennel, Florence, fresh leaves and stalk; Fern, edible, fiddlehead; Fuki; Kale, sea; Kohlrabi; Palm hearts; Prickly pear, pads; Prickly pear, Texas, pads; Rhubarb; Udo; Zuiki; cultivars, varieties, and hybrids of these commodities	Apply 18 lbs/acre via soil incorporation at planting.
Turf	Apply 50 lbs/acre at planting. If the turf is infected by root knot nematodes, a second application may be needed.
Ornamentals	Apply 50 lbs/acre before or at planting.

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

STORAGE AND DISPOSAL

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

Pesticide Storage

Store unopened original container in a cool, dry area away from light.

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

{ One or both of the following will be used on the container label as appropriate based on container type. }

For nonrefillable containers: Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container $\frac{1}{4}$ full with water.

Replace and tighten enclosures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill or by incineration.

For refillable containers: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose. Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or mix tank. Fill the container about 10% full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure 2 more times. Offer for recycling if available. If recycling is not available, puncture and dispose of in a sanitary landfill, or by incineration.

IMPORTANT: READ BEFORE USE

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

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

Conditions

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 associated with the use of this product. Crop injury, ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Ecospray Limited. All such risks shall be assumed by the user or buyer.

Disclaimer Of Warranties

To the extent consistent with applicable law, Ecospray Limited 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 Ecospray Limited is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Ecospray Limited 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 Ecospray Limited's election, the replacement of product.