



**REGION 6**  
DALLAS, TX 75270

March 28, 2025

**Via Electronic Mail:**

gcharillon@neosanlabs.com

Gregoire Charillon, CEO  
NeoSan Labs, Inc.  
609 Broadway Boulevard, Northeast  
Albuquerque, New Mexico 87102

Re: Advisory Letter – NeoSan Labs, Inc.

Dear Mr. Charillon:

The United States Environmental Protection Agency (EPA) is issuing this Advisory Letter to Neosan Labs, Inc. ("Neosan Labs") concerning potential violations of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). On March 28 – 29, 2023, an EPA inspector observed the following potential violations of FIFRA during an inspection of the Neosan Labs facility located at 609 Broadway Boulevard, Northeast, Albuquerque, New Mexico 87102:

- Distribution or sale of an unregistered pesticide, "DF-200HF+ Part A - Manufactured by Neosan Labs, Inc."

This product, which remains unregistered with EPA and was observed being held in inventory at the Neosan Labs facility at the time of inspection, appears to satisfy one or more of the criteria of a pesticide product required to be registered according to 40 C.F.R. 152.15. Neosan Labs contends that the product is not a pesticide requiring registration, stating that it is not distributed or sold in the United States and is intended for export only. FIFRA Section 17(a), 7 U.S.C. § 136o(a), and related regulations at 40 C.F.R. 168.70, 168.75, and 168.85, describe the conditions in which an unregistered pesticide may be lawfully exported. These conditions include, among other things, the submission of a foreign purchaser acknowledgement statement (FPAS) to EPA prior to the pesticide's export. You are hereby advised that the export of an unregistered pesticide in a manner inconsistent with the above-mentioned laws and regulations is a violation of FIFRA Section 12(a)(1)(A), 7 U.S.C. § 136j(a)(1)(A).

- Production of a pesticide in an unregistered establishment.

According to the inspector, production of pesticides may have occurred at the Neosan Labs facility ("establishment") via the repackaging and relabeling of product samples which were then distributed by Neosan Labs to its clients. As defined under 40 CFR 167.3, "produce" means to manufacture,

prepare, propagate, compound, or process any pesticide, including any pesticide produced pursuant to FIFRA Section 5, any active ingredient or device, or to package, repack, label, relabel, or otherwise change the container of any pesticide or device. Pursuant to FIFRA Section 7(a), 7 U.S.C. § 136e(a), no person shall produce any pesticide subject to FIFRA in any State unless the establishment in which it was produced is registered with EPA. You are hereby advised that production in an unregistered establishment is a violation of FIFRA Section 12(a)(2)(L), 7 U.S.C. § 136j(a)(2)(L).

Thank you for your company's immediate attention to these matters should they constitute noncompliance with FIFRA and the regulations thereunder. Please note that this Advisory Letter does not limit or preclude EPA's ability to take additional enforcement action authorized pursuant to FIFRA, including penalties of up to \$23,494 per violation.

If you have any questions concerning this Advisory Letter, please contact Elizabeth George with the Office of Regional Counsel, at (214) 665-6751, or [george.elizabeth.a@epa.gov](mailto:george.elizabeth.a@epa.gov), or Justin Mullenix at (214) 665-7173, or [mullenix.justin@epa.gov](mailto:mullenix.justin@epa.gov).

Sincerely,

**JEFFREY  
YURK**

Jeff Yurk, Manager

Waste and Chemical Enforcement Branch

Digitally signed by  
JEFFREY YURK  
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