



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 12, 2016

Mr. Walter G. Talarek, Agent
W. Neudorff GmbH KG
c/o Walter G. Talarek PC
1008 Riva Ridge Drive
Great Falls, VA 22066-1620

Subject: Label Amendment – Adding Field Ants, a Non-Agricultural Use Requirements Box
and Other Revisions

Product Name: Neudorff Bug Bait
EPA Registration Number: 67702-25
Application Date: July 13, 2015
Resubmission Date: March 4, 2016
Decision Number: 507135

Dear Mr. Talarek:

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 enclosed 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

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 Eric Bohnenblust by phone at (703) 347-0426, or via email at Bohnenblust.eric@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Walsh', written in a cursive style.

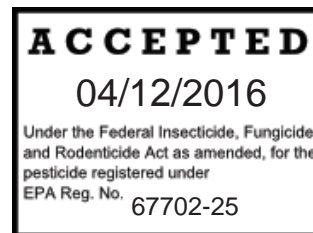
Michael Walsh
Product Manager 11
Invertebrate & Vertebrate Branch 2
Registration Division
Office of Pesticide Programs

Enclosure

NEUDORFF BUG BAIT

ABN: ANTIXX ANT AND CRAWLING INSECT BAIT

Active Ingredient: By weight
Spinosad (a mixture of spinosyn A
and spinosyn D) 0.07%
Other Ingredients: 99.93%
Total 100.00%



KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID
If in eyes: 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 eye. Call a poison control center or doctor for treatment advice.
Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For emergency information concerning this product, call the poison control center 1-800-222-1222.[Alternately insert subregistrants hotline number]

NET WEIGHT 10 lbs, 20 lbs, 25 lbs, 40 lbs, 45 lbs, 50 lbs, 55 lbs (25 kg), 1984 lbs (900 kg), 2000 lbs, 2011 lbs (912 kg) and 2116 lbs (960kg)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: CAUTION. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

PERSONAL PROTECTIVE EQUIPMENT (PPE) REQUIREMENTS: Applicators and other handlers must wear: long-sleeved shirts and long pants; and shoes plus socks. Follow manufacturer's instructions for 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 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.

ENVIRONMENTAL HAZARDS: This product is toxic to aquatic invertebrates. 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 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 manner that will contact workers or other persons, either directly or through drift. Only protected workers may be in the area during application. For any requirements specific to your State or Tribe, consult the State or Tribal agency representative responsible for pesticide regulation.

AGRICULTURAL USE REQUIREMENTS

Use this product 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 the restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard (WPS).

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
- Waterproof gloves
- Shoes plus socks

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 out of treated area until after product is applied.

APPLICATION DIRECTIONS

HOW TO APPLY: Spread the bait on the soil around or near the plants to be protected or as a perimeter treatment. The bait may also be applied to fallow fields, areas prior to planting, and areas prior to plant emergence. Apply using a hand or power operated broadcast, granular or drop spreader (gravity or rotary). Apply at the higher rate if the infestation is severe. Reapply after heavy rain or watering. Reapply as the bait is consumed or at least every 2 to 4 weeks. Do not apply more than 3 times in any 30 day period.

Do not place in piles. If the ground is dry, wet it before applying bait. The product works best when soil is moist but with little or no standing water. See specific directions for different use sites.

Neudorff Bug Bait contains 0.0007lbs of spinosad per lb. Use the following table to assist in calculating applied a.i. per acre.

APPLICATION RATE REFERENCE TABLE:

Application Rate of Neudorff Bug Bait	Active Ingredient Equivalent (lb ai/acre)
20 lbs/acre	0.014
25 lbs/acre	0.0175
30 lbs/acre	0.021
35lbs/acre	0.0245
40lbs/acre	0.028
44lbs/acre	0.0308

BERRIES: Spread the bait around the perimeter of the plot to intercept pests migrating towards the berries. If pests are already in the plots, then carefully spread bait between the furrows near the base of the plants. For small plots, treat around the base of the plants to be protected. Do not spread over the entire area but apply selectively. Use the higher rate for heavy infestations.

Application Rate: 20-44 lbs/acre (0.5-1 lb/1000 sq ft).

PESTS CONTROLLED: Earwigs, cutworms

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Bushberries (blueberry, currant, elderberry, gooseberry, huckleberry, juneberry, ligonberry, salal)	Do not make more than 6 applications per calendar year or more than 3 applications per crop.	Do not make applications less than 6 days apart.	Do not apply within 3 days of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.
Caneberries (blackberry, loganberry, red and black raspberry)	Do not make more than 6 applications per calendar year.	Do not make applications less than 5 days apart.	Do not apply within one day of harvest.	Do not apply more than a total 0.45 lb ai spinosad (including foliar uses) per acre per crop.
Cranberry	Do not make more than 6 applications per calendar year.	Do not make applications less than 7 days apart.	Do not apply within 21 days of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.
Strawberry	Do not make more than 5 applications per calendar year.	Do not make applications less than 5 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.

FRUITS INCLUDING CITRUS: For seedlings, spread the bait around the base of the stem. Apply at 0.15 oz., or 1 level teaspoon, per square yard, in a 6 inch circular band around the base of the plants to be protected. For older trees, spread the bait around the base of the trees to intercept pests traveling to the trunk. Use the higher rates for heavy infestations. Application Rate: 20-44 lbs/acre (0.5-1 lb/1000 sq ft). PESTS CONTROLLED: Ants [optional list of ant species: including foraging ants, sweet-feeding ants, pavement ants, moisture ants, little black ants, argentine ants, crazy ants, acrobat ants, bigheaded ants, cornfield ants, ghost ants, odorous house ants, thief ants, Texas leafcutting ants, field ants, and other common ants] (excluding fire ants, harvester ants, Pharaoh ants and carpenter ants), earwigs, cutworms

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Banana and plantain	Do not make more than 6 applications per calendar year or more than 4 applications per crop.	Do not make applications less than 7 days apart.	Do not apply within 8 weeks of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.
Citrus (grapefruit, lemons, limes, oranges, tangerines)	Do not make more than 3 applications per calendar year.	Do not make applications less than 6 days apart	Do not apply within one day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.
Fig	Do not make more than 4 applications per calendar year.	Do not make applications less than 7 days apart.	Do not apply within 7 days of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.

Grape	Do not make more than 5 applications per calendar year.	Do not make applications less than 5 days apart.	Do not apply within 7 days of harvest.	Do not apply more than a total of 0.45 lb ai spinosad per acre per season west of the Rocky Mountains, and no more than 0.36 lb ai spinosad per acre per season east of the Rocky Mountains.
Pome fruits (apples, crabapple, loquat, mayhaw, pears, quince)	Do not make more than 4 applications per calendar year.	Do not make applications less than 10 days apart.	Do not apply within 7 days of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.
Stone fruits – cherries, plums, prunes		Do not make applications less than 7 days apart.	Do not apply within 7 days of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Stone fruits – peaches, nectarines, apricots		Do not make applications less than 7 days apart.	Do not apply within 14 days of harvest for apricots or within 1 days of harvest for nectarines and peaches.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Tropical Tree fruits (avocado, guava, mango, papaya, passionfruit)	Do not make more than 2 applications per calendar year.	Do not make applications less than 7 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.

VEGETABLES: Scatter the bait around the perimeter of the vegetable plantings to intercept pests entering the vegetable plantings. If pests are inside the rows, then scatter the bait on the soil around the plants and between the rows. Application Rate: 20-44 lbs/acre (0.5-1 lb/1000 sq ft).

PESTS CONTROLLED: Earwigs, cutworms

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Artichoke	Do not make more than 4 applications per crop.	Do not make applications less than 7 days apart.	Do not apply within 2 days of harvest.	Do not apply more than a total of 0.33 lb ai spinosad (including foliar uses) per crop.

Asparagus (For post harvest protection of ferns only)	Do not make more than 3 applications per crop.	Do not make applications less than 4 days apart.	Do not apply within 60 days of spear harvest.	Do not apply more than a total of 0.28 lb ai spinosad (including foliar uses) per crop. Do not feed treated ferns to meat or dairy animals.
Legume vegetables (succulent and dried beans and peas)	Do not make more than 6 applications per crop.	Do not make applications less than 5 days apart.	Succulent beans and peas: Do not apply within 3 days of harvest. Dried beans and peas: Do not apply within 28 days of harvest.	Succulent beans and peas: Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per season. Dried beans and peas: Do not apply more than a total of 0.188 lb ai spinosad per acre per season.
Bulb vegetables (dry bulb onion, garlic, great-headed (elephant) garlic, green onion, leek, shallot, welch onion)	Do not make more than 5 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar and seed uses) per acre per crop.
Cole crops (broccoli, broccoli raab, Brussels sprouts, cabbage, cauliflower, cavalo, Chinese broccoli, Chinese cabbage (bok choy), Chinese cabbage (napa), Chinese mustard cabbage (gai choy), collards, kale, kohlrabi, izuna, mustard greens, mustard spinach, rape greens)	Do not make more than 6 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop. Do not apply to seedling cole crops grown for transplant.
Corn – field corn	Do not make more than 3 applications per calendar year.		Do not apply within 28 days of harvest for grain or fodder; 7 days for forage.	Do not apply more than a total of 0.188 lb ai spinosad (including foliar uses) per acre per year.
Corn – sweet corn	Do not make more than 6 applications per calendar year.		Do not apply within one day of harvest for grains; 7 days for forage, 28 days for fodder.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.

Cucurbits (cucumber, edible gourds, melons, muskmelons, cantaloupe, honeydew, pumpkin, summer squash, watermelon, winter squash)	Do not make more than 6 applications per crop.	Do not make applications less than 5 days apart.	Do not apply within one day of harvest for cucumber; 3 days for other cucurbits.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar and seed uses) per acre per season.
Fruiting vegetables (eggplant, groundcherry, pepino, pepper (except black), tomatillo, tomato) and okra	Do not make more than 6 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop. Do not apply to seedling fruiting vegetables and okra grown for transplant within a greenhouse, shade house, or field plot.
Leafy vegetables (except Brassica) and leaves of root and tuber and legume vegetables (arugula, beets, celery, peas, lettuce, rhubarb, spinach, swiss chard), turnip greens, and watercress	Do not make more than 6 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within one day of harvest for leafy vegetables and watercress; 3 days for leaves of root, tuber and legume vegetables.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar and seed uses) per acre per crop. Do not apply to seedling leafy crops grown for transplant within a greenhouse or shade house.
Potatoes, ginger, sweet potatoes, yams	Do not make more than 4 applications per crop.	Do not make applications less than 7 days apart.	Do not apply within 7 days of harvest.	Do not apply more than a total of 0.33 lb ai spinosad (including foliar uses) per crop.
Root vegetables – Carrot, parsnip	Do not make more than 4 applications per calendar year.	Do not make applications less than 5 days apart.	Do not apply within 3 days of harvest.	Do not apply more than a total of 0.3 lb ai spinosad (including foliar uses) per acre per crop.
Root vegetables – Radish, rutabaga, turnip	Do not make more than 3 applications per calendar year.	Do not make applications less than 5 days apart.	Do not apply within 3 days of harvest.	Do not apply more than a total of 0.28 lb ai spinosad (including foliar uses) per acre per crop.
Root and Tuber Vegetables (beets, sugarbeets)	Do not make more than 4 applications per crop.	Do not make applications less than 7 days apart.	Do not apply within 3 days of harvest.	Do not apply more than a total of 0.33 lb ai spinosad (including foliar uses) per acre per crop.

Soybean	Do not make more than 4 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within 28 days of harvest.	Do not apply more than a total of 0.186 lb ai spinosad (including foliar uses) per acre per year. Do not feed treated forage or hay to meat or dairy animals.
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TREE NUTS, PEANUTS AND PISTACHIOS: For seedlings spread the bait around the base of the stem. For older trees, spread around the base of the trees to intercept pests traveling to the trunk. Use the higher rates for heavy infestations. Application Rate: 20-44 lbs/acre (0.5-1 lb/1000 sq ft).

PESTS CONTROLLED: Ants [optional list of ant species: including foraging ants, sweet-feeding ants, pavement ants, moisture ants, little black ants, argentine ants, crazy ants, acrobat ants, bigheaded ants, cornfield ants, ghost ants, odorous house ants, thief ants, Texas leafcutting ants, field ants, and other common ants] (excluding fire ants, harvester ants, Pharaoh ants and carpenter ants), earwigs, cutworms

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Peanut (not for use in California)	Do not make more than 3 applications per calendar year.	Do not make applications less than 7 days apart.	Do not apply within 3 days of nut harvest or 14 days of forage.	Do not apply more than a total of 0.28 lb ai spinosad (including foliar uses) per acre per crop. Do not allow grazing of crop residue or harvest of crop residue for hay until 14 days after the last application.
Tree nuts (almond, cashew, chestnut, filbert (hazelnut), macadamia nut, pecan, walnut); Pistachios		Do not make applications less than 7 days apart	Do not apply within 1 day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.

HERBS: At the seedling and later stages, apply the bait between the rows and around the perimeter of the field. Use the higher dosage for heavy infestations. Application Rate: 20-44 lbs/acre (0.5-1 lb/1000 sq ft).

PESTS CONTROLLED: Earwigs, cutworms

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Herbs (angelica, balm, basil, borage, burnet, chamomile, catnip, chervil (dried), chive, chive (Chinese), cilantro (leaf), clary, coriander (leaf), costmary, cilantro, curry (leaf), dillweed, horehound, hyssop, lavender, lemongrass, lovage (leaf), marigold, marjoram, nasturtium, parsley (dried), pennyroyal, rosemary, rue, sage, savory (summer and winter), sweet bay, tansy, tarragon, thyme, wintergreen, woodruff and wormwood)	Do not make more than 5 applications per calendar year or more than 3 applications per crop.	Do not make applications less than 5 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.47 lb ai spinosad (including foliar uses) per acre per crop.

Peppermint and spearmint	Do not make more than 4 applications per calendar year or more than 3 applications per crop.	Do not make applications less than 4 days apart.	Do not apply within 7 days of harvest	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per crop.
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GRASS GROWN FOR SEED PRODUCTION AND CEREAL GRAINS: Application Rate: 20-44 lbs/acre (0.5-1 lb/1000 sq ft). Use the higher rate for heavy infestations.

PESTS CONTROLLED: Earwigs, cutworms

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Small cereal grains (barley, buckwheat, grain amaranth, milo, oats, pearl millet, proso millet, rye, sorghum, triticale, wheat).	Do not make more than 3 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within 3 days of harvest for forage, fodder or hay. Do not apply within 21 days of harvest for grain or straw.	Do not apply more than a total of 0.28 lb ai spinosad (including foliar uses) per acre per year.
Grass crops, grass grown for seed, pastures and rangeland	Do not make more than 6 applications per season.	No preharvest interval for forage.	Do not use within 3 days of harvest for hay or fodder.	Do not apply more than a total of 0.186 lb ai spinosad (including foliar uses) per acre per season.

TURF AND ORNAMENTALS:

PESTS CONTROLLED: Ants [optional list of ant species: including foraging ants, sweet-feeding ants, pavement ants, moisture ants, little black ants, argentine ants, crazy ants, acrobat ants, bigheaded ants, cornfield ants, ghost ants, odorous house ants, thief ants, Texas leafcutting ants, field ants, and other common ants] (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), earwigs, cutworms.

Application Rate: 20-44 lbs/acre (0.5-1 lb/1000 sq ft). Alternatively, in or around plant pots on greenhouse benches, or in or around container-grown plants apply at 0.15 oz., or 1 level teaspoon, per square yard, in a 6 inch circular band around the base of the plants to be protected.

Use the higher rate for heavy infestations.

CROP	Maximum number of applications	Application Interval	Additional Restrictions
Turf (lawns, athletic field and recreational areas, commercial turf, sod, golf courses, and grass buffers around gardens, crop areas and ornamentals)		Do not make applications less than 7 days apart.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Outdoor Ornamentals (herbaceous and woody plants)		Do not make applications less than 7 days apart.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Greenhouse Ornamentals	Do not make	Do not make	Do not apply more than a

	more than 10 applications per calendar year.	applications less than 7 days apart.	total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Outdoor container-grown nursery plants		Do not make applications less than 7 days apart.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Tree Farms and Plantations (Conifers, including Christmas trees, and deciduous trees)	Do not make more than 6 applications per calendar year.	Do not make applications less than 7 days apart.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Other agricultural areas (fallow land, barrier strips and buffer zones, areas prior to planting, planted areas prior to crop emergence)			
Non-crop areas (pastures, rangeland, forests, parks, playgrounds, cemeteries, picnic areas, roadsides, campgrounds, industrial sites, fallow land, and barrier strips)			

STORAGE AND DISPOSAL

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

PESTICIDE 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 may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Completely empty bag, box or tote into application equipment by shaking and trapping sides and bottom to loosen clinging particles. Then offer for recycling, if available, or dispose of in a sanitary landfill, or by other procedures allowed by state and local authorities.

BATCH CODE

[The registrant may use one or both of these two optional statements, either:

"WARRANTY



To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated on this label only when used in accordance with directions under normal use conditions. To the extent consistent with applicable law, this warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to seller. To the extent consistent with applicable law, seller makes no other warranties, either expressed or implied."

or

"OUR COMMITMENT TO YOUR SATISFACTION: If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product or refund your money. Simply send your name, address and proof of purchase to [insert name and address of supplemental registrant]."

]

[The following claims and product information may or may not be presented on the product's label and labeling:

- Quick Facts
- Product Facts
 - What it does: Kills listed insects
 - Where to Use: For use around vegetables, fruit trees, citrus, berries, ornamentals, shrubs, flowers, trees, gardens and in greenhouses
- Read the Label First!
- **NOTE:** This package is sold by weight. Contents may have settled during shipment.
-  For Organic Gardening
-  For Organic Production
- Neudorff Bug Bait may be used as part of an Integrated Pest Management (IPM) program or for organic production.
- Patent Pending
- Patent # xxxxxx
- This container is made from XX% recycled materials.
- The highly compressed granules (pellets) are easy to use, clean to handle and economical.
- Patented (technology)(formula).
- Patented insect killer
- Easy-to-use (ready-to-use) (RTU) granular (pellet) formulation.
- Easy to apply granules (pellets).
- (Mound) (ant hill) control for listed ants
- (Controls)(kills) (foraging ants), (sweet-feeding ants), (pavement ants), (moisture ants), (little black ants), (argentine ants), (crazy ants), (acrobat ants), (bigheaded ants), (cornfield ants), (ghost ants), (odorouse house ants), (thief ants), (Texas leafcutting ants), (field ants), and other common ants (excluding fire ants, harvester ants, Pharaoh ants and carpenter ants)
- When used as a perimeter treatment, (1lb covers up to 4000 linear ft) (xx lbs covers up to xx linear feet)
- Pellets
- Kills listed insects.
- INSECT (BAIT) (PELLETS)
- (Kills)(for control of)(for suppression of) (ants, excluding fire ants, harvester ants, Pharaoh ants and carpenter ants,) (earwigs,) (cutworm)
- Spinosad is derived from the fermentation of a naturally occurring soil dwelling organism.
- Treats (will treat) x,xxx sq. ft.
- 1 lb treats 2000 ft²
- (Remains)(Effective for)(Lasts) up to 4 weeks.
- The highly compressed easy-to-apply granules can be effective up to four (4) weeks
- Neudorff Bug Bait contains spinosad derived from naturally occurring soil dwelling bacterium in a patented granular formulation that requires no mixing, spraying , or special applicators.
- Proven insect (killer) (kill) (control).
- Convenient. Easy-to-use. Requires no mixing, spraying, or special applicators.
- SATISFACTION GUARANTEED.
- Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.
- (Can be used in)(ideal for) vegetable gardens.
- For use around listed (vegetables), (fruit trees), (citrus), (berries), (ornamentals), (shrubs), (flowers), (trees), (gardens), and (in greenhouses).
- For use on (lawns), (commercial turf), (recreational areas), and (golf courses)
- (Can be used around)(Use around) (flowers), (gardens), (fruit trees), (turf), (ornamentals), (non-crop areas).

- Read Entire Container Label Before Using This Product.
- Unconditionally guaranteed by [insert name of supplemental registrant].
- Baits and Kills
- Effective against a wide variety of listed insects.
- Lures listed insects from hiding places and plants.
- Attracts and kills listed insects
- Contains Spinosad
- www.neudorffpro.com
- Manufactured under a license of W. Neudorff GmbH KG, Germany.



- **NEUDORFF**
- Evening is the best time to apply the bait as pests travel and feed mostly by night or early morning.
- Ant (Bait)(Killer) (excluding fire ants, harvester ants, Pharaoh ants and carpenter ants)
- Controls (foraging ants)(common ants) (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)
- Can be used on listed ants (Listed Ant), (Earwig) and (Cutworm) (Bait)(Killer)
- Neudorff Bug Bait is a soil-applied granular insecticidal bait containing the active ingredient spinosad that attracts and kills listed insects, including ants (excluding fire ants, harvester ants, Pharaoh ants and carpenter ants), earwigs and cutworms in commercial agricultural crops, ornamentals, herbs, seed crops and lawns .
- Listed by the Organic Materials Review Institute (OMRI) for use in organic production.
- OMRI Listed
- See inside (booklet)(panel) for (additional) (precautionary statements) and (complete) (directions for use)



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EPA Registration #67702-25

EPA Establishment #67702-DEU-2

Registrant: W. Neudorff GmbH KG, Postfach 1209, An der Mühle 3,
31860 Emmerthal, Germany
011-49-5155-624-100
[www.neudorff\[pro\].com](http://www.neudorff[pro].com)

[in the alternative, the distributor's telephone number and website address may be used]