



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

January 7, 2021

Walter G. Talarek, Agent  
W. Neudorff GmbH KG  
c/o Law Office of Walter G. Talarek  
5153 Allison Marshall Drive  
Warrenton, VA 20187-8980

Subject: Label Amendment – Adding OMRI Organic Claim, Revising Format for Numerous Claims, and Other Label Updates  
Product Name: Neudorff Bug Bait - Residential  
EPA Registration Number: 67702-28  
Application Date: 11/15/2019  
Resubmission Date: 1/7/2021  
Decision Number: 565767

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**

Page 2 of 2  
EPA Reg. No. 67702-28  
Decision No. 565767

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 David Drawbaugh by phone at 703-731-8818, or via email at [Drawbaugh.David@epa.gov](mailto:Drawbaugh.David@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Walsh", with a stylized flourish at the end.

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

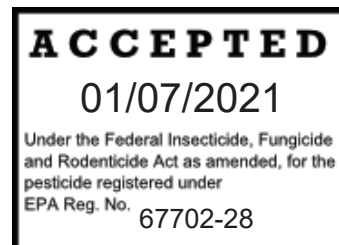
Attachment

{Note to reviewer: Text in brackets “[ ]” is optional and may or may not appear on the final label. Text in parentheses “( )” will appear on the final label. Text in braces “{ }” will not appear on the final labels.}

# NEUDORFF BUG BAIT – RESIDENTIAL ABN: ANTIXX RESIDENTIAL ANT AND CRAWLING INSECT BAIT

Only for outdoor use around residential sites and non-commercial greenhouses

Active Ingredient:	By weight
Spinosad (a mixture of spinosyn A and spinosyn D).....	0.07%
Other Ingredients: .....	99.93%
<b>Total</b> .....	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 or doctor, or going for treatment. [For emergency information concerning this product, call the National Pesticide Information Center (NPIC) at 1-800-858-7378 seven days a week., 6:30 am to 4:30 pm Pacific Time (NPIC Web site: [www.npic.orst.edu](http://www.npic.orst.edu)) [alternately insert subregistrant's toll free number and hours of operation]. During other times, call the poison control center 1-800-222-1222.]

NET WEIGHT: 1 oz, 13 oz, 26 oz, 0.5 lb, 1 lb, 1.25 lbs (20 oz), 1.5 lbs, 30 oz, 2 lbs, 2.25 lbs, 2.5 lbs (40 oz), 3 lbs, 3.2 lbs, 4 lbs, 5 lbs, 5.25 lbs, 5.5 lbs, 6 lbs, 7 lbs, 8 lbs, 10 lbs, 20 lbs, 25 lbs, 40 lbs, 50 lbs, 2116 lbs

### 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.

**Environmental Hazards:** This product is toxic to aquatic invertebrates. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help reduce potential risk to aquatic invertebrates by reducing pesticide runoff from the treatment area into water bodies. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems.

{Note to reviewer: Text in brackets “[ ]” is optional and may or may not appear on the final label. Text in parentheses “( )” will appear on the final label. Text in braces “{ }” will not appear on the final labels.}

## **DIRECTIONS FOR USE**

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

## **APPLICATION DIRECTIONS**

Apply bait at 0.5 to 1 lb per 1000 square feet, or for smaller areas, 0.075 to 0.15 oz, or 0.5 to 1 teaspoon, per square yard. Scatter the bait on the soil around or near the plants to be protected. Bait can be placed in a ring around the base of individual plants, seedlings and trees. For homes, structures, gardens, and landscaped areas, scatter the bait in a perimeter around the area to be protected. In greenhouses or in outdoor containers, scatter the bait in the pots of plants being damaged or around pots. On lawns, broadcast bait over area where pests occur.

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.

## **USE RESTRICTIONS**

- Do not place in piles.
- Do not use food utensils such as tablespoons, cups, etc. for food purposes after pesticide use.

## **Application Tips:**

- A hand or power operated spreader (gravity or rotary) can be used to ensure uniform coverage.
- The product works best when soil is moist but with little or no standing water.
- Bait may be placed directly on ant hills and trails.

**PESTS CONTROLLED:** earwigs, cutworms, sowbugs, pillbugs, crickets, 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)

## **USE SITES:**

**Vegetables**, including: artichokes (globe), asparagus, beans, beets, broccoli, Brussels sprouts, cabbage, cantaloupe, carrots, cauliflower, corn, cucumbers, eggplants, garlic, lettuce, onions, peas, peppers, potatoes, radishes, rutabagas, spinach, squash, Swiss chard, tomatoes and turnips; **Fruits**, including: apples, avocados, apricots, cherries, fig, grapes, melons, nectarines, peaches, plums, citrus, pears; **Berries**, including: , blackberries, blueberries, boysenberries,

{Note to reviewer: Text in brackets “[ ]” is optional and may or may not appear on the final label. Text in parentheses “( )” will appear on the final label. Text in braces “{ }” will not appear on the final labels.}

cranberry, loganberries, raspberries strawberries; **Herbs**, including: angelica, balm, basil, borage, burnet, chamomile, catnip, chervil (dried), chive, clary, coriander, costmary, cilantro, curry, dillweed, horehound, hyssop, lavender, lemongrass, lovage, marigold, marjoram, mint, nasturtium, parsley, pennyroyal, peppermint, rosemary, rue, sage, savory, spearmint, sweet bay, tansy, tarragon, thyme, wintergreen, woodruff and wormwood; **Peanuts, pistachios, Tree nuts**, including almond, cashew, chestnut, filbert, macadamia nut, pecan, walnut; **Outdoor Ornamentals; Greenhouses (Non-Commercial); Outdoor Container Grown Plants; Perimeter of Homes, Structures, Gardens and Landscaped Areas; Lawns; Turf.**

**USE RESTRICTIONS**

**PHI** -Do not apply within this many days of harvest.

**Timing** – Do not make applications less than this many days apart

**Max # of Appln.** – Do not make more than the specified number of applications for the given time period.

**BERRIES**

<b>PHI</b>	<b>Crop</b>	<b>Timing</b>	<b>Max # of Appln.</b>
1 day	Caneberries (blackberry, loganberry, raspberry)	5 days	6/year*
	Strawberry	5 days	5/year*
3 days	Bushberries (blueberry, currant, gooseberry, huckleberry, juneberry, ligonberry, salal)	6 days	6/year*
21 days	Cranberries	7 days	6/year*

\* year = calendar year

{Note to reviewer: Text in brackets “[ ]” is optional and may or may not appear on the final label. Text in parentheses “( )” will appear on the final label. Text in braces “{ }” will not appear on the final labels.}

**FRUITS**

<b>PHI</b>	<b>Crop</b>	<b>Timing</b>	<b>Max # of Appln.</b>
1 day	Citrus (grapefruit, lemons, limes, oranges, tangerines), Tree fruits (avocado, guava, mango, papaya, passion fruit)	6 days	3/year*
7 days	Fig, ,	7 days	4/year*
	Pome fruits (apples, crabapple, mayhaw, pears, quince)	10 days	4/year*
	Grape	5 days	5/year*
	Stone fruits (cherries, plums, prunes)	7 days	3 /year*
14 days	Stone fruits - apricots	7 days	6 /year*
1 day	Stone fruits - nectarines and peaches	7 days	6 /year*
	Tropical Tree fruits (avocado, guava, mango, papaya, passionfruit)	7 days	2/year*
8 weeks	Banana and plantain	7 days	6/year*

\* year = calendar year

**VEGETABLES**

<b>PHI</b>	<b>Crop</b>	<b>Timing</b>	<b>Max # of Appln.</b>
1 day	Bulb vegetables (onion, garlic, green onion, leek, shallot)	4 days	5/year*
	Cole crops (broccoli, Brussels sprouts, cabbage, cauliflower, kale)	4 days	6/year*
	Corn – sweet corn	N/A	6/year*
	Cucumber	5 days	6/crop
	Fruiting vegetables (eggplant, pepper, tomato) and okra	4 days	6/year*
	Leafy vegetables (arugula, celery, lettuce, rhubarb, spinach, swiss chard)	4 days	6/year*
2 Days	Artichoke	7 days	4/crop
3 days	Beans, peas, blackeyed peas	5 days	6/crop
	Cucurbits (melons, cantaloupe, pumpkin, squash)	5 days	6/crop
	Leaves of root, tuber and legume vegetables (beets, peas)	4 days	6/year*
	Root vegetables – Carrot, parsnip	5 days	4/year*
	Root vegetables – Radish, rutabaga, turnip	5 days	3/year*
	Tuberous and Corn Vegetables (beets, sugarbeets)	7 days	4/crop

{Note to reviewer: Text in brackets “[ ]” is optional and may or may not appear on the final label. Text in parentheses “( )” will appear on the final label. Text in braces “{ }” will not appear on the final labels.}

7 days	Potatoes, ginger, sweet potatoes, yams	7 days	4/crop
60 days	Asparagus**	4 days	3/crop

\* year = calendar year

\*\* For post harvest protection of ferns only. Do not apply within 60 days of spear harvest.

### **TREE NUTS, PEANUTS AND PISTACHIOS**

PHI	Crop	Timing	Max # of Appln.
3 days	Peanut (not for use in California)	7 days	3/year*
1 day	Tree nuts (almond, cashew, chestnut, filbert, macadamia nut, pecan, walnut); Pistachios	7 days	5/year*

\* year = calendar year

### **HERBS**

PHI	Crop	Timing	Max # of Appln.
1 day	Herbs (angelica, balm, basil, borage, burnet, chamomile, catnip, chervil (dried), chive, clary, coriander, costmary, cilantro, curry, dillweed, horehound, hyssop, lavender, lemongrass, lovage, marigold, marjoram, nasturtium, parsley, pennyroyal, rosemary, rue, sage, savory, sweet bay, tansy, tarragon, thyme, wintergreen, woodruff and wormwood)	5 days	5/year* 3/crop
7 days	Mint, (peppermint and spearmint)	4 days	4/year*

\* year = calendar year

### **Outdoor Ornamentals**

Scatter bait in a 6 inch circular band around the base of the plants to be protected at 0.15 oz., or 1 level teaspoon, per square yard.

### **Outdoor Container-Grown Plants**

Scatter the bait in the plant containers at the rate of 1 tablespoon per container of plants being damaged, or scatter around the soil near the containers at the rate of 1 teaspoon per square yard (24-44 lbs. per acre).

### **Greenhouses (Non-Commercial)**

Scatter the bait in the plant pots of plants being damaged or around pots on greenhouse benches. Apply about ½ teaspoon per 9 inch pot.

{Note to reviewer: Text in brackets “[ ]” is optional and may or may not appear on the final label. Text in parentheses “( )” will appear on the final label. Text in braces “{ }” will not appear on the final labels.}

### **Lawns (Turf)**

Spread the bait at a rate of 0.5 to 1 lb. per 1000 square feet (20-44 lbs. per acre). Use the higher rate for heavy infestations.

### **Perimeter Treatment**

Scatter bait in a 6 inch band around the perimeter of area to be protected.

### **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 AND 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.

### **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



{Note to reviewer: Text in brackets “[ ]” is optional and may or may not appear on the final label. Text in parentheses “( )” will appear on the final label. Text in braces “{ }” will not appear on the final labels.}

-What it does: Kills [earwigs], [cutworms], [sowbugs], [pillbugs], [crickets], [ants (excluding fire ants, harvester ants, Pharaoh’s ants and carpenter ants)]

-Where to Use: For use around [vegetables], [fruit trees], [citrus], [berries], [ornamentals], [shrubs], [flowers], [trees], [lawns], [gardens] [the perimeter of homes, structures, gardens, and landscaped areas] and [in greenhouses]

- Treats xxx linear ft

-Read the Label First!

**-NOTE:** This package is sold by weight. Contents may have settled during shipment.



-For Organic Gardening

-Listed by the Organic Materials Review Institute (OMRI) for organic gardening {placeholder}

-OMRI Listed {placeholder}

-OMRI logo {placeholder}

-US Patent number x,xxx,xxx.

-Patent Pending

-This container is made from XX% recycled materials.

-The highly compressed granules [pellets] are easy to use, clean to handle and economical.

-Patented technology.

-Patented insect killer

-Patented formula.

-Easy-to-use [ready-to-use] [RTU] granular [pellet] formulation.

-Easy to apply granules [pellets]

-Pellets

-Kills insects.

- INSECT BAIT

-INSECT [BAIT] [PELLETS]

-Kills [earwigs,] [cutworm,] [sowbugs,] [pillbugs,] [crickets,] [ants (excluding fire ants, harvester ants, Pharaoh’s ants and carpenter ants)]

-Spinosad is derived from the fermentation of a naturally occurring soil dwelling bacterium.

-Spinosad is biologically derived from the fermentation of *Saccharopolyspora spinosa*, a naturally occurring soil organism.

- Spinosad is derived from a soil dwelling bacterium

-Treats (will treat) (covers) x,xxx sq. ft.

-1 lb treats up to 2000 ft<sup>2</sup>

-Effective for up to 4 weeks.

-Lasts up to 4 weeks.

-Remains effective for up to 4 weeks.

-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 vegetable gardens.

{Note to reviewer: Text in brackets “[ ]” is optional and may or may not appear on the final label. Text in parentheses “( )” will appear on the final label. Text in braces “{ }” will not appear on the final labels.}

- Ideal for vegetable gardens.
- For use around [the Perimeter of Homes], [Structures], [Gardens], [Landscaped areas], [listed vegetables], [listed fruit trees], [listed citrus], [listed berries], [ornamentals], [shrubs], [flowers], [trees], [lawns], [gardens], and [in greenhouses].
- Lawn insecticide
- [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], [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)]
- Keep listed [ants] [insects] and [bugs] out of the house [by using Neudorff Bug Bait Residential].
- Use as perimeter treatment to stop listed [ants (excluding fire ants, harvester ants, Pharaoh’s ants and carpenter ants)] [and] [insects] before they enter the home -When used as a perimeter treatment, [1lb covers 2000 linear ft] [xx oz covers xx linear feet]
- Prevents listed insects from entering the home
- Kills insects outside so they don’t come inside
- [Kills] [stops] [barricades] listed [pests] [ants (excluding fire ants, harvester ants, Pharaoh’s ants and carpenter ants)] [insects] before they enter [invade] the home
- Stop [barricade] listed ants before they enter [invade]
- Shields the home from listed pests
- [Mound] [ant hill] control for listed ants
- Home perimeter treatment
- Can be used on lawns
- Home and Garden
- Read Entire Container Label Before Using This Product.
- Unconditionally guaranteed by [insert name of supplemental registrant].
- Baits and Kills
- For household home garden use.
- Effective against a wide variety of insects.
- Lures insects from hiding places and plants.
- Attracts and kills insects
- Attracts and kills
- For control [or suppression] of [earwigs], [cutworm], [sowbugs], [pillbugs], [crickets], [ants (excluding fire ants, harvester ants, Pharaoh’s ants and carpenter ants)]
- Contains Spinosad
- www.neudorff.com
- Manufactured under a license of W. Neudorff GmbH KG, Germany.



- Evening is the best time to apply the bait as pests travel and feed mostly by night or early morning.
- Cutworm Bait

{Note to reviewer: Text in brackets “[ ]” is optional and may or may not appear on the final label. Text in parentheses “( )” will appear on the final label. Text in braces “{ }” will not appear on the final labels.}

-Cutworm Killer

-Earwig Bait

-Earwig Killer

-Earwig and Cutworm Killer

-Earwig and Cutworm Bait

-Ant Bait

-Ant Killer

-See [attached booklet] [inside panels] for [additional] [Directions for Use]  
[precautionary statements]

-People and pets can enter treated area after bait is applied

]

EPA Registration #67702-28

EPA Establishment #

Registrant: W. Neudorff GmbH KG, An der Mühle 3,

31860 Emmerthal, Germany

011-49-5155-624-100

[www.neudorff.com](http://www.neudorff.com)

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