



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

**OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION**

July 18, 2022

Walter G. Talarek
Authorized Agent to W. NEUDORFF GMBH KG
Law Offices of Walter G. Talarek, PC
5153 Allison Marshall Drive
Warrenton, VA 20187

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – Add OMRI
logo to the label
Product Name: NEU1701I
EPA Registration Number: 67702-61
EPA Receipt Date: 04/15/2022
Action Case Number: 00355489

Dear Mr. Talarek:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), 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 the U.S. Environmental Protection Agency (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.

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EPA Reg. No. 67702-61
Action Case No. 00355489

If you have any questions, please contact please contact Andrew Queen by phone at 202-566-1539 or via email at queen.andrew@epa.gov.

Sincerely,

DANIEL
SCHOEFF

Digitally signed by
DANIEL SCHOEFF
Date: 2022.07.18
09:19:29 -04'00'

Daniel Schoeff, Risk Manager
Microbial Pesticides Branch
Biopesticides and Pollution Prevention Division (7511M)
Office of Pesticide Programs

Enclosure (Label_67702-61_00355488_4-19-2022)

Text in braces { } is for information only and will not appear on label. Text in brackets [] is optional or a 'place holder' for graphics and may or may not appear on the label. Text in parentheses () will appear on the label.

{MASTER LABEL

NEU1701I

[ABN: BTK Bioinsecticide Bait]
[ABN: BtON Biological Insecticide Bait]
[ABN: BtON Bioinsecticide Bait]

ACCEPTED

Jul 18, 2022

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 67702-61

ACTIVE INGREDIENT:

Bacillus thuringiensis

subspecies *kurstaki* strain SA-11

solids, spores, and insecticidal toxins*1.0%

OTHER INGREDIENTS:99.0%

Total:100.0%

*Contains a minimum of 441 IU per mg of product. The percent active ingredient does not indicate product performance and potency measurements are not federally standardized.

SUBLABEL A: Home and Garden Use

SUBLABEL B: Commercial Agricultural Use

SUBLABEL C: Commercial Non-Agriculture Use

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA File Symbol: 67702-AR EPA Est No.

NET WEIGHT:

[Manufactured by:] {or}

[Manufactured for:] W. Neudorff

GmbH KG An der Muhle 3

31860 Emmerthal, Germany

Home and Garden Use: NET WEIGHT: 1 lb, 1.5 lbs, 2 lbs, 2.5 lbs, 5 lbs, 6 lbs, 10 lbs, 20 lbs, 25 lbs, 50 lbs, 1984 lbs (900 kg), 2011 lbs (912 kg), 2116 lbs (960 kg)

Commercial Agriculture Use: NET WEIGHT: 1 lb, 1.5 lbs, 2 lbs, 2.5 lbs, 5 lbs, 6 lbs, 10 lbs, 20 lbs, 25 lbs, 40 lbs, 45 lbs, 50 lbs, 55 lbs (25 kg), 1984 lbs (900 kg), 2011 lbs (912 kg), 2116 lbs (960 kg)

Commercial Non-Agriculture Use: NET WEIGHT: 1 lb, 1.5 lbs, 2 lbs, 2.5 lbs, 5 lbs, 6 lbs, 10 lbs, 20 lbs, 25 lbs, 40 lbs, 45 lbs, 50 lbs, 55 lbs (25 kg), 1984 lbs (900 kg), 2011 lbs (912 kg), 2116 lbs (960 kg)}

Not for sale or use after [Insert date 6 months after manufacture].

{SUBLABEL A: Home and Garden Use}

NEU1701I

[ABN: BTK Bioinsecticide Bait]
 [ABN: BtON Biological Insecticide Bait]
 [ABN: BtON Bioinsecticide Bait]

[Graphic-Brand logo]

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

[ For Organic Gardening]

[OMRI Listed]



ACTIVE INGREDIENT:

Bacillus thuringiensis

subspecies *kurstaki* strain SA-11

solids, spores, and insecticidal toxins*1.0%

OTHER INGREDIENTS:.....99.0%

Total:100.0%

*Contains a minimum of 441 IU per mg of product. The percent active ingredient does not indicate product performance and potency measurements are not federally standardized.

EPA Reg. No. 67702-61

EPA Est No.

NET WEIGHT: 1 lb, 1.5 lbs, 2 lbs, 2.5 lbs, 5 lbs, 6 lbs, 10 lbs, 20 lbs, 25 lbs, 50 lbs, 1984 lbs (900 kg), 2011 lbs (912 kg), 2116 lbs (960 kg)

Not for sale or use after [Insert date 6 months after manufacture].

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID [First Aid Icon]

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.

HOTLINE NUMBER: 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] {or} [insert subregistrant's hotline number].

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

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 to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

This product must not be applied within 300 feet of any habitats of threatened or endangered Lepidoptera (i.e., moths or butterflies) or Coleoptera (i.e., beetles).

DIRECTIONS FOR USE

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

Apply at first sign of newly hatched sod webworms, cutworms or true armyworms. Product must be eaten by pest to be effective. After ingesting this product, the pest stops feeding and dies within days. It may be applied up to and on the day of harvest.

PESTS CONTROLLED: Cutworms, true armyworms and sod webworms

APPLICATION DIRECTIONS

Apply bait at 0.25 to 1 pound per 1000 square feet, or for smaller areas, 0.25 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. In greenhouses or in outdoor containers, scatter the bait in or around the pots of plants being damaged. On lawns, broadcast bait over area where pests occur.

A hand- or power-operated spreader (gravity or rotary) can be used to ensure uniform coverage. Apply at the higher labeled application rate if the infestation is severe. Reapply after heavy rain or watering. Reapply as the bait is consumed or at least every 1 to 2 weeks.

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, turnips;

Fruits, including: apples, avocados, apricots, cherries, fig, grapes, melons, nectarines,

peaches, plums, citrus, pears; **Berries**, including: blackberries, blueberries, boysenberries,

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.**

*Do not apply to flooded fields.

Only for application to soils and growing media around plants. Do not apply to any hardscapes, such as patios or walkways.

STORAGE AND DISPOSAL [Trash Can Icon] Do not contaminate water, food, or feed by storage or disposal.
<p>PESTICIDE STORAGE: Store in a cool, dry place. Activity may be impaired by storage at temperatures above 90°F.</p> <p>PESTICIDE DISPOSAL and CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container.</p> <p>If empty: Place in trash or offer for recycling, if available.</p> <p>If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.</p>

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}







[To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.]

{Note to reviewer: Spanish labeling text may also be included in addition to English label text.}

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

[

- Biological insecticide
- [Btk] [*Bacillus thuringiensis* subsp. *Kurstaki*] is a soil-dwelling bacterium
- Ready-to-use bait
- Kills the following pests:
 - Army cutworm [*Euxoa auxiliaris*]
 - Barnes' climbing cutworm [*Abagrotis orbis*]
 - Black army cutworm [*Actebia fennica*]
 - Black cutworm [*Agrotis ipsilon*]
 - Bristly cutworm [*Lacinipolia renigera*]
 - Bronzed cutworm [*Nephelodes minians*]
 - Claybacked cutworm [*Agrotis gladiaria*]
 - Clover cutworm [*Anarta trifolii*]
 - Dark-sided cutworm [*Euxoa messoria*]
 - Dingy cutworm [*Feltia jaculifera*]
 - Dusky cutworm [*Agrotis venerabilis*]
 - Glassy cutworm [*Apamea devastator*]
 - Large yellow underwing cutworm [*Noctua pronuba*]
 - Lesser yellow underwing cutworm [*Noctua comes*]
 - Pale western cutworm [*Agrotis orthogonia*]
 - Red-backed cutworm [*Euxoa ochrogaster*]
 - Spotted cutworm [*Xestia c-nigrum*]
 - Strawberry cutworm [*Amphipoea interoceanica*]
 - True armyworm [*Mythimna unipuncta*]
 - Variegated cutworm [*Peridroma saucia*]
 - White cutworm [*Euxoa scandens*]
 - Yellow-headed cutworm [*Apamea amputatrix*]
 - Sod webworm [*Crambus* spp.]
- Controls [cutworms][sod webworms][true armyworms] on fruits, vegetables, ornamentals and shade trees
- What it does: Kills [cutworms][sod webworms][true armyworms]
- Where to Use: For use around [vegetables], [nut trees], [fruit trees], [citrus], [berries], [herbs], [ornamentals], [shrubs], [flowers], [trees], [lawns], [gardens] and [in greenhouses]
- 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
- **NOTE:** This package is sold by weight. Contents may have settled during shipment.
- This container is made from XX% recycled materials.
- Resealable waterproof package.
- The highly compressed granules [pellets] are easy to use, clean to handle and economical [graphic of granule].
- Easy-to-use [ready-to-use] [RTU] granular [pellet] formulation.

- Easy to apply granules.
- Treats [will treat] x,xxx sq. ft.
- 1 lb treats [will treat] 4000 sq. ft.
- Remains effective after light rain or sprinkling.
- 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.
- For use around [vegetables], [fruit trees], [nut trees], [citrus], [berries], [ornamentals], [shrubs], [flowers], [trees], [lawns], [gardens], and [in greenhouses].
- For use on [lawns], and around [ornamentals], [vegetables] and [fruit]
- Read Entire Container Label Before Using This Product.
- For household home garden use.
- People and pets can enter the treated area after product is applied.
- Protecting your garden and landscapes from [cutworm][sod webworm][true armyworm] damage has never been easier!
- Easy [to use] Shaker Applicator [graphic of shaker application]
- Easy [to use] [Pour] Spout [graphic of spout]
- www.neudorff.com
- Manufactured under [a] license of W. Neudorff GmbH KG, [Germany].
- For information on this pesticide product [including general health concerns, or pesticide incidents], call the National Pesticide Information Center at 1-800-858-7378, Monday through Friday, 8:00 AM to 12:00 PM Pacific Standard Time. In the event of a medical emergency, call your poison control center at 1-800-222-1222. All other inquiries: [insert subregistrant's email and/or phone number]
- Questions or comments? Call 1-XXX-XXX-XXXX or visit our website at [www.neudorff.com] [subregistrant's website]
- For questions or comments, call toll free 1-XXX-XXX-XXXX [], [, [phone icon]
- [or visit us online at www.neudorff.com [][computer icon]]
- For emergency medical information, you may call toll free 1-XXX-XXX-XXXX. [, [, [phone icon]] [or visit us online at www.neudorff.com [] [computer icon]]
- Unconsumed bait will degrade and become part of soil
- Made in/Produced in: _____ [from US and imported products/parts][graphic of country flag]
- See back [label][panel] [booklet] for additional first aid
- This container is made with a minimum X% recycled material
- May be used up to and including day of harvest.
- Do not over-apply product
- [When used as directed] People and pets can enter the area once product is applied
- Final knockout for [cutworms][sod webworms][true armyworms]

- Final meal for [cutworms][sod webworms] [true armyworms]
- After consuming NEU1701I larvae stop eating but may be visible on the foliage until they die, usually within days.
- See [inside] [booklet] [back panel] [pamphlet] [side panel] for [additional] [directions for use], [precautionary statements], [first aid], [storage and disposal]
- [See][refer to] [inside][side][back][panel][attached booklet][container label] for [additional] [complete] [precautionary statements], [directions for use], [application instructions], [first aid statements], [storage and disposal], [use precautions] {Note to reviewer - When the first aid statement will appear on the side or back panel, either the claim "See side panel for First Aid" or "See back panel for First Aid" will appear on the front panel}
- [Manufactured by:] {or} [Manufactured for:] W. Neudorff GmbH KG
An der Mühle 3
31860 Emmerthal, Germany

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

]



{Note to reviewer: Each item below represents a graphic depicting the corresponding area of use and/or pest. The graphics will only represent individual objects or outsides or insides of buildings as described below. No people or animals will be depicted in graphics}

- Vegetables: 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, turnips
- Fruits: apples, avocados, apricots, cherries, fig, grapes, melons, nectarines, peaches, plums, citrus, pears
- Berries: blackberries, blueberries, boysenberries, cranberry, loganberries, raspberries, strawberries
- Herbs: 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, wormwood
- Peanuts, Pistachios, Tree nuts: 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
- Cutworm


- True armyworm
- Sod Webworm

{SUBLABEL B: Commercial Agricultural Use}

NEU1701I

[ABN: BTK Bioinsecticide Bait]
[ABN: BtON Biological Insecticide Bait]
[ABN: BtON Bioinsecticide Bait]

[Graphic-Brand logo]

[ For Organic Production]
[OMRI Listed]



ACTIVE INGREDIENT:

Bacillus thuringiensis

subspecies *kurstaki* strain SA-11

solids, spores, and insecticidal toxins*1.0%

OTHER INGREDIENTS:99.0%

Total:100.0%

*Contains a minimum of 441 IU per mg of product. The percent active ingredient does not indicate product performance and potency measurements are not federally standardized.

EPA Reg. No. 67702-61

EPA Est No.

NET WEIGHT: 1 lb, 1.5 lbs, 2 lbs, 2.5 lbs, 5 lbs, 6 lbs, 10 lbs, 20 lbs, 25 lbs, 40 lbs, 45 lbs, 50 lbs, 55 lbs (25 kg), 1984 lbs (900 kg), 2011 lbs (912 kg), 2116 lbs (960 kg)

Not for sale or use after [Insert date 6 months after manufacture].

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID [First Aid Icon]

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.

HOTLINE NUMBER: 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] {or} [insert subregistrant's hotline number].

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 shirt and long pants
- Waterproof gloves
- Shoes plus socks
- Protective eyewear

Mixers/loaders and applicators must wear a minimum of a NIOSH-approved particulate filtering facepiece respirator with any R or P filter; OR a NIOSH-approved elastomeric particulate respirator with any R or P filter; OR a NIOSH-approved powered air-purifying respirator with an HE filter. (Repeated exposures to high concentrations of microbial proteins can cause allergic sensitization.)

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, 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 this product. Wash the outside of gloves before removing. 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 disposing of equipment washwater or rinsate.

This product must not be applied within 300 feet of any habitats of threatened or endangered Lepidoptera (i.e., moths or butterflies) or Coleoptera (i.e., beetles).

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 workers 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.

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 this label about personal protective equipment (PPE) and restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of four (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
- Protective eyewear

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.

PESTS CONTROLLED

This product controls only larval stages (caterpillars) of the following pests:

Army cutworm (*Euxoa auxiliaris*)
 Barnes' climbing cutworm (*Abagrotis orbis*)
 Black army cutworm (*Actebia fennica*)
 Black cutworm (*Agrotis ipsilon*)
 Bristly cutworm (*Lacinipolia renigera*)
 Bronzed cutworm (*Nephelodes minians*)
 Claybacked cutworm (*Agrotis gladiaria*)
 Clover cutworm (*Anarta trifolii*)
 Dark-sided cutworm (*Euxoa messoria*)
 Dingy cutworm (*Feltia jaculifera*)

Dusky cutworm (*Agrotis venerabilis*)
 Glassy cutworm (*Apamea devastator*)
 Large yellow underwing cutworm (*Noctua pronuba*)
 Lesser yellow underwing cutworm (*Noctua comes*)
 Pale western cutworm (*Agrotis orthogonia*)
 Red-backed cutworm (*Euxoa ochrogaster*)
 Spotted cutworm (*Xestia c-nigrum*)
 Strawberry cutworm (*Amphipoea interoceanica*)
 True armyworm (*Mythimna unipuncta*)
 Variegated cutworm (*Peridroma saucia*)
 White cutworm (*Euxoa scandens*)
 Yellow-headed cutworm (*Apamea amputatrix*)
 Sod webworm (*Crambus* spp.)

For most consistent control, apply at the first sign of newly hatched larvae (1st and 2nd instar). For dense foliage or during periods of rapid growth, shorter labeled application intervals and higher labeled application rates will provide better crop coverage and improve performance. Use a lower application rate when pest pressure is low and for preventative treatment. The product must be ingested by the pest larvae to be effective. After ingesting this product, pest larvae stop feeding and die within days. It may be applied up to and on the day of harvest.

APPLICATION RATE: 10 - 45 lbs/acre (0.25 to 1 lb per 1000 square feet)

HOW TO APPLY: Apply directly to the soil area beneath plants as a broadcast treatment, perimeter treatment, or band treatment between rows. Reapply as necessary to maintain control. Apply using a hand- or power-operated broadcast, granular or drop spreader (gravity or rotary). Do not apply when weather conditions favor drift from treated areas. Do not place in piles. Reapply after heavy rain or watering.

Use a contact insecticide in combination with this product if 4th and 5th instars of multiple worm species are present in the crop and continuous egg laying occurs.

USE SITES:

Agricultural or Non-Agricultural Food and Feed Crops:

Vegetables	
Root and Tuber Vegetables:	Arracacha; arrowroot; artichoke; beet; burdock; canna; carrot; cassava; celeriac; chayote; turnip-rooted chervil; chicory; chufa; dasheen (taro); ginger; ginseng; horseradish; leren; turnip rooted parsley; parsnip; potato; radish; rutabaga; salsify; skirret; sweet potato; tanier (cocoyam); turmeric; turnip; yam bean; yam
Bulb Vegetables:	Chive; Chinese chive; daylily bulb; elegans hosta; fritillaria; garlic (bulb, great headed, serpent); kurrat; lady's leek; leek; lily; onion (including Beltsville, bulb, Chinese, green, macrostem, pearl, potato, tree, Welch); shallot
Leafy Vegetables and Leaves of Root and Tuber and Legume	Amaranth, Chinese amaranth; arugula; Indian aster; blackjack; cat's whiskers; cham-chwi; cham-na-mul; chervils; chipilin; chrysanthemum; cilantro; collards; corn salad; cosmos; celery cress; cress; dandelion; dang-gwi; dillweed; dock; dol-nam-mul; ebolo; endive; escarole; fameflower; feather cockscomb; Good King Henry; hanover salad; huauzontle; jute; kale; lettuce (bitter, head, leaf); maca; mizuna; mustard greens; orach; parsley; plantain; English primrose;

Vegetables:	purslane; radicchio; radish; rape greens; rocket; shepherd's purse; spinach; Swiss chard; turnip greens; Chinese violet; watercress*
Cole Crops and <i>Brassica</i> Leafy Vegetables:	Broccoli; Chinese broccoli; broccoli raab (rapini); Brussels sprouts; cabbage; Chinese cabbage (bok choy, napa, gai choy); cauliflower; cavalo broccolo; collards; kale; kohlrabi; mizuna; mustard greens; mustard spinach; rape greens
Legume and Foliage of Legumes:	Beans (including lupin, field bean, kidney bean, lima bean, navy bean, pinto bean, runner bean, snap bean, tepary bean, wax bean, adzuki bean, asparagus bean, blackeyed pea, catjang, Chinese longbean, cowpea, Crowder pea, moth bean, mung bean, rice bean, southern pea, urd bean, yardlong bean, broad bean (fava bean); chickpea); guar; jackbean; lablab bean (hyacinth bean); lentil; pea (includes dwarf pea, edible-podded pea, English pea, field pea, garden pea, green pea, snow pea, sugar snap pea); pigeon pea; soybean; sword bean
Cucurbit Vegetables:	Chayote; Chinese waxgourd; citron melon; cucumber; gherkin; gourd; Momordica spp (includes balsam apple, balsam pear, bittermelon, Chinese cucumber); muskmelon (includes true cantaloupe, cantaloupe, casaba, crenshaw melon, golden pershaw melon, honeydew melon, honey balls, mango melon, Persian melon, pineapple melon, Santa Claus melon and snake melon); pumpkin; summer squash (includes crookneck squash, scallop squash, straightneck squash, vegetable marrow, zucchini); winter squash (includes butternut squash, calabaza, hubbard squash, acorn squash, spaghetti squash); watermelon
Fruiting Vegetables:	African eggplant; bush tomato; bell pepper; cocona; currant tomato; eggplant; garden huckleberry; goji berry; groundcherry; martynia; naranjilla; okra; pea eggplant; pepino; non-bell pepper; roselle; scarlet eggplant; sunberry; tomatillo; tomato; tree tomato

Fruits (Including Citrus) and Nuts	
Tropical and Subtropical Fruits (Edible Peel):	Acai; acerola; achachairu; African plum; agritos; almondetta; ambarella; apak palm; appleberry; araza; arbutus berry; babaco; bacaba palm; bacaba-de-leque; bayberry, red; bignay; bilimbi; borojo; breadnut; cabeluda; cajou, fruit; cambuca; carandas-plum; carob; cashew apple; Ceylon iron wood; Ceylon olive; cherry-of-the-Rio-Grande; Chinese olive, black; Chinese olive, white; chirauli-nut; ciruela verde; cocoplum; date; Davidson's plum; desert-date; doum palm coconut; false sandalwood; feijoa; fig; fragrant manjack; gooseberry; governor's plum; grumichama; guabiroba; guava; guayabillo; illawarra plum; imbe; imbu; Indian-plum; jaboticaba; Jamaica-cherry; jambolan; jelly palm; Indian jujube; kaffir-plum; kakadu plum; kapundung; karanda; kwai muk; lemon aspen; mangaba; Marian plum; mombin (Malayan, purple, yellow); monkeyfruit; monos plum; mountain cherry; nance; natal plum; noni; olive; papaya, mountain; pataua; peach palm, fruit; persimmon; pitomba; plum-of-Martinique; pomerac; rambai; rose apple; rukam; rumberry; sea grape; sentul; sete-capotes; silver aspen; starfruit; Surinam cherry; tamarind; uvalha; water apple; water pear; water berry; wax jambu
Tropical and Subtropical Fruits (Inedible Peel):	Abiu; aisen; akee apple; atemoya; avocado (including Guatemalan; Mexican; West Indian); bacury; bael fruit; banana; binjai; biriba; breadfruit; Burmese grape; canistel; cat's-eyes; champedak; cherimoya; cupuacu; custard apple; dragon fruit; durian; elephant-apple; etambe; granadilla; ilama; inga; jackfruit; jatoba; karuka; kei apple; langsai; lanjui; longan; lucuma; lychee; mabolo; madras-thorn; mammy-apple; manduro; mango; mangosteen; marang;

	marmaladebox; matisia; mesquite; mongongo, fruit; monkey-bread-tree; monstera; nicobar-breadfruit; paho; pandanus; papaya; passionflower;; passionfruit (including banana, purple, yellow); pawpaw; pelipisan; pequi; pequia; persimmon, American; pineapple; pitahaya; pitaya; pitaya, amarillo; pitaya, roja; pitaya; plantain; pomegranate; poshte; prickly pear; pulasan; quandong; rambutan; saguaro; sapodilla; sapote (black, green, mamey, white); sataw; satinleaf; screw-pine; Sierra Leone-tamarind; soncoya; soursop; Spanish lime; star apple; sugar apple; sun sapote; tamarind-of-the-Indies; velvet tamarind; wampi; white star apple; wild loquat
Citrus Fruits:	Calamondin; citron; citrus hybrids; grapefruit; Japanese summer grapefruit; kumquat; lemon; lime; Mediterranean mandarin; orange (sour, sweet); pummelo; satsuma mandarin; tangelo; tangerine (mandarin); tangor; trifoliolate orange; unqi fruit
Pome Fruits:	Apple; azarole; crab apple; loquat; mayhaw; medlar; pear; Asian pear; quince; tejocote
Stone Fruits:	Apricot; capulin; cherry (black, Nanking; sweet; tart); Chinese Jujube; nectarine; peach; plum (American, beach, Canada, cherry, Chickasaw, Damson, Japanese, Klamath, prune); plumcot; sloe
Berries and Small Fruits:	Aronia berry; bayberry; bearberry; bilberry; blackberry; blueberry (highbush, lowbush); buffalo currant; buffaloberry; che; Chilean guava; chokecherry; cloudberry; cranberry*;; currant, black; currant, red; elderberry; European barberry; gooseberry; grape; honeysuckle, edible; huckleberry; jostaberry; Juneberry (Saskatoon berry); kiwifruit; lingonberry; maypop; mountain pepper berries; mulberry; muntries; native currant; partridgeberry; phalsa; pincherry; raspberry, black and red; riberry; salal; schisandra berry; sea buckthorn; serviceberry; strawberry; wild raspberry
Tree Nuts and Other Nuts:	African nut-tree; almond; beechnut; Brazil nut; Brazilian pine; bunya; bur oak; butternut; Cajou nut; candlenut; cashew; chestnut; chinquapin; coconut; coquito nut; dika nut; ginkgo; Guiana chestnut; hazelnut (filbert); heartnut; hickory nut; Japanese horse-chestnut; macadamia nut; mongongo nut; monkey-pot; monkey puzzle nut; Okari nut; Pachira nut; peach palm nut; pecan; pequi; Pili nut; pine nut; pistachio; Sapucaia nut; tropical almond; walnut, black; walnut, English; yellowhorn; peanut, pistachio
Stock, Stem and Leaf Petiole:	Agave; aloe vera; asparagus; bamboo shoots; cardoon; celery; Chinese celery; celtuce; fennel; edible fern; fiddlehead; fuki; Sea kale; kohlrabi; palm hearts; prickly pear; rhubarb; udo; zuiki

Herbs and Spices	
Herbs:	Angelica; balm (lemon balm); basil; borage; burnet; camomile; catnip; chervil (dried); chive; clary; coriander leaf (cilantro or Chinese parsley); costmary; culantro (leaf); curry (leaf); dillweed; horehound; hyssop; lavender; lemongrass; lovage (leaf); marigold; marjoram (includes sweet or annual marjoram, wild marjoram or oregano, and pot marjoram); mint; spearmint; peppermint; parsley (dried); pennyroyal; rosemary; rue; sage; savory; sweet bay; tansy; tarragon; thyme; wintergreen; woodruff; wormwood
Spices:	Allspice; anise; annatto (seed); caper buds; caraway; cardamom; cassia bark; cassia buds; celery seed; cinnamon; clove (buds); coriander seed (cilantro); culantro (seed); cumin; dill (seed); fennel; fenugreek; grains of paradise; juniper (berry); lovage (seed); mace; mustard (seed); nutmeg; pepper (black, white);

	poppy (seed); saffron; vanilla
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Other Crops	
Cereal Grains (and Forage, Fodder and Straw of):	Barley; buckwheat; corn (field and sweet); millet, pearl; millet, proso; oats; popcorn; rice*; rye; sorghum (milo); teosinte; triticale; wheat; wild rice*
Grass and Non-Grass Forage, Fodder, Hay, Seed:	Bermuda grass; bluegrass; brome grass; fescue; alfalfa; velvet bean; clover (<i>Trifolium spp.</i> , <i>Melilotus spp.</i>); kudzu; lespedeza; lupin; sainfoin; trefoil; vetch
Oilseed:	Borage; calendula; canola; castor oil plant; Chinese tallowtree; cotton; 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; poppy seed; rapeseed; rose hip; safflower; sesame; stokes aster; sunflower; sweet rocket; tallowwood; tea oil plant; vernonia
Misc Crops:	Sugarcane, hops, tobacco, hemp, coffee
Greenhouses:	Greenhouse benches, floors, and in or around the pots and containers

Turf, Ornamental and Non-Crop Areas	
Commercial Turf, Sod, Golf Courses and Grass Buffers around Gardens and Ornamentals, Industrial, and Commercial Landscaping:	Schools and parks, commercial turf, sod, golf courses, grass buffers in and around gardens, ornamentals, and greenhouses
Shade Trees and Ornamentals:	Herbaceous and woody plants, greenhouse ornamentals, outdoor container-grown nursery plants, tree farms and plantations (conifers, including Christmas trees, and deciduous trees)
Non-Crop Areas:	Pastures, rangeland, forests, parks, playgrounds, cemeteries, picnic areas, roadsides, campgrounds, industrial sites, fallow land, barrier strips, and farmsteads, corrals and around animal housing facilities

Only for application to soils and growing media around plants. Do not apply to any hardscapes, such as patios or walkways.

<p align="center">STORAGE AND DISPOSAL [Trash Can Icon]</p> <p>Do not contaminate water, food or feed by storage or disposal.</p>
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PESTICIDE STORAGE: Store in original container in a cool dry place inaccessible to children and pets and away from heat and direct sunlight. Protect from freezing. Storage at temperatures above 90°F may impair effectiveness.

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, jug or tote into application equipment by shaking and tapping sides and bottom to loosen clinging particles. Then offer for recycling, if available, or dispose of in a sanitary landfill, or by incineration. In most states, burning is not allowed.

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}

[To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.]

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

[

- The active ingredient in this product is exempt from the requirement for a tolerance when used as an insecticide in or on all food commodities.
- Biological insecticide
- [Btk] [*Bacillus thuringiensis* subsp. *kurstaki*] is a soil dwelling bacterium
- Ready-to-use bait
- Controls [cutworms][true armyworms][sod webworms] on fruits, vegetables, ornamentals and shade trees
- Kills [cutworms], [true armyworms] and [sod webworms]

- For use around [vegetables], [nut trees], [fruit trees], [citrus], [berries], [herbs], [ornamentals], [shrubs], [flowers], [trees], [lawns], [gardens] and [in greenhouses]
- **NOTE:** This package is sold by weight. Contents may have settled during shipment.
- This container is made from XX% recycled materials.
- Resealable waterproof package.
- The highly compressed granules [pellets] are easy to use, clean to handle and economical.
- Easy-to-use [ready-to-use] [RTU] granular [pellet] formulation [graphic of granule].
- Easy to apply granules.
- Treats [will treat] x,xxx sq. ft.
- 1 lb treats [will treat] xxxx sq. ft.
- Remains effective after rain or sprinkling.
- SATISFACTION GUARANTEED.
- Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.
- For use around [vegetables], [fruit trees], [nut trees], [citrus], [berries], [ornamentals], [shrubs], [flowers], [trees], [lawns], [gardens], and [in greenhouses].
- For control of [cutworms], [true armyworms] and [sod webworms] in fruits, nuts, vegetables, herbs, spices, turf, and other crops
- For use on [lawns], and around [ornamentals], [vegetables] and [fruit]
- Read Entire Container Label Before Using This Product.
- Easy [to use] Shaker Applicator [Graphic of shaker applicator]
- Easy [to use] [Pour] Spout [graphic of spout]
- www.neudorff.com
- Manufactured under [a] license of W. Neudorff GmbH KG, [Germany].
- For information on this pesticide product [including general health concerns, or pesticide incidents], call the National Pesticide Information Center at 1-800-858-7378, Monday through Friday, 8:00 AM to 12:00 PM Pacific Standard Time. In the event of a medical emergency, call your poison control center at 1-800-222-1222. Questions or comments? Call 1-XXX-XXX-XXXX or visit our website at [www.neudorff.com] [insert subregistrant's website]
- For questions or comments, call toll free 1-XXX-XXX-XXXX [], [, [phone icon] [or visit us online at www.neudorff.com [][computer icon]]
- For emergency medical information, you may call toll free 1-XXX-XXX-XXXX. [, [, [phone icon] [or visit us online at www.neudorff.com [] [computer icon]]
-
- Unconsumed bait will degrade and become part of soil
- Made in/Produced in: _____ [from US and imported products/parts] [graphic of country flag]
- See back [booklet] label for additional first aid
- This container is made with a minimum X% recycled material
- May be used up to and including day of harvest.

- Do not over-apply product
- Final knockout for [cutworms][sod webworms][true armyworms]
- Final meal for [cutworms][sod webworms][true armyworms]
- NEU1701I is most effective against small, newly hatched larvae.
- For best control, perform an early scouting program to identify early infestations
- After consuming NEU1701I larvae stop eating but may be visible on the foliage until they die, usually within days.
- 4 hour restricted-entry interval (REI)
- 0 day pre-harvest interval (PHI)
- Ideal for use as part of an Integrated Pest Management [IPM] program
- See inside [booklet][panel] for [additional] [precautionary statements] and [complete] [directions for use]
- [See][refer to] [inside][side][back][panel][attached booklet][container label] for [additional] [complete] [precautionary statements], [directions for use], [application instructions], [first aid statements], [storage and disposal], [use precautions] {Note to reviewer - When the first aid statement will appear on the side or back panel, either the claim "See side panel for First Aid" or "See back panel for First Aid" will appear on the front panel}
- [Manufactured by:] {or} [Manufactured for:] W. Neudorff GmbH KG
An der Mühle 3
31860 Emmerthal, Germany

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



{Note to reviewer: Each item below represents a graphic depicting the corresponding area of use and/or pest. The graphics will only represent individual objects or outsides or insides of buildings as described below. No people or animals will be depicted in graphics}

- Vegetables
- Fruits (Including Citrus) and Nuts
- Herbs and spices
- Commercial Turf, Sod, Golf Courses and Grass Buffers around Gardens and Ornamentals, Residential, Industrial, and Commercial Landscaping
- Shade Trees and Ornamentals
- Cereal Grains (and Forage, Fodder and Straw of), Grass and Non-Grass Forage, Fodder, Hay, Seed, Oilseed
- Pastures, rangeland, forests, parks, playgrounds, cemeteries, picnic areas, roadsides, campgrounds, industrial sites, fallow land, barrier strips, and farmsteads, corrals and around animal housing facilities
- Greenhouses
- Cutworm
- True armyworm
- Sod Webworm

]

{SUBLABEL C: Commercial Non-Agriculture Use}

NEU1701I

[ABN: BTK Bioinsecticide Bait]
 [ABN: BtON Biological Insecticide Bait]
 [ABN: BtON Bioinsecticide Bait]

[Graphic- Brand logo]

[ For Organic Gardening]

[OMRI Listed]

**ACTIVE INGREDIENT:**

Bacillus thuringiensis

subspecies *kurstaki* strain SA-11

solids, spores, and insecticidal toxins*.....1.0%

OTHER INGREDIENTS:.....99.0%

Total:.....100.0%

*Contains a minimum of 441 IU per mg of product. The percent active ingredient does not indicate product performance and potency measurements are not federally standardized.

EPA Reg. No. 67702-AR EPA Est No.

NET WEIGHT: 1lb, 1.5lbs, 2 lbs, 2.5 lbs, 5 lbs, 6 lbs, 10 lbs, 20 lbs, 25 lbs, 40 lbs, 45 lbs, 50 lbs, 55 lbs (25 kg), 1984 lbs (900 kg), 2011 lbs (912 kg), 2116 lbs (960 kg)

Not for sale or use after [Insert date 6 months after manufacture].

KEEP OUT OF REACH OF CHILDREN
CAUTION

FIRST AID [First Aid Icon]

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.

HOTLINE NUMBER: 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] {or} [insert subregistrant's hotline number.]

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 shirt and long pants
- Waterproof gloves
- Shoes plus socks
- Protective eyewear

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, 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 this product. Wash the outside of gloves before removing. 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 disposing of equipment washwater or rinsate.

This product must not be applied within 300 feet of any habitats of threatened or endangered Lepidoptera (i.e., moths or butterflies) or Coleoptera (i.e., beetles).

DIRECTIONS FOR USE

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

PESTS CONTROLLED

This product controls only larval stages (caterpillars) of the following pests:

Army cutworm (*Euxoa auxiliaris*)
 Barnes' climbing cutworm (*Abagrotis orbis*)
 Black army cutworm (*Actebia fennica*)
 Black cutworm (*Agrotis ipsilon*)
 Bristly cutworm (*Lacinipolia renigera*)
 Bronzed cutworm (*Nephelodes minians*)
 Claybacked cutworm (*Agrotis gladiaria*)
 Clover cutworm (*Anarta trifolii*)
 Dark-sided cutworm (*Euxoa messoria*)

Dingy cutworm (*Feltia jaculifera*)
 Dusky cutworm (*Agrotis venerabilis*)
 Glassy cutworm (*Apamea devastator*)
 Large yellow underwing cutworm (*Noctua pronuba*)
 Lesser yellow underwing cutworm (*Noctua comes*)
 Pale western cutworm (*Agrotis orthogonia*)
 Red-backed cutworm (*Euxoa ochrogaster*)
 Spotted cutworm (*Xestia c-nigrum*)
 Strawberry cutworm (*Amphipoea interoceana*)
 True armyworm (*Mythimna unipuncta*)
 Variegated cutworm (*Peridroma saucia*)
 White cutworm (*Euxoa scandens*)
 Yellow-headed cutworm (*Apamea amputatrix*)
 Sod webworm (*Crambus* spp.)

For most consistent control, apply at the first sign of newly hatched larvae (1st and 2nd instar). For dense foliage or during periods of rapid growth, shorter labeled application intervals and higher labeled application rates will provide better crop coverage and improve performance. Use a lower application rate when pest pressure is low and for preventative treatment. The product must be ingested by the pest larvae to be effective. After ingesting this product, pest larvae stop feeding and die within days. It may be applied up to and on the day of harvest.

APPLICATION RATE: 10 - 45 lbs/acre (0.25 to 1 lb per 1000 square feet)

HOW TO APPLY: Apply directly to the soil area beneath plants as a broadcast treatment, perimeter treatment, or band treatment between rows. Reapply as necessary to maintain control. Apply using a hand- or power-operated broadcast, granular or drop spreader (gravity or rotary). Do not apply when weather conditions favor drift from treated areas. Do not place in piles. Reapply after heavy rain or watering.

Use a contact insecticide in combination with this product if 4th and 5th instars of multiple worm species are present in the crop and continuous egg laying occurs.

USE SITES

- Lawns and other turfgrass areas
- Shade trees and ornamentals (herbaceous and woody), greenhouse ornamentals, outdoor container-grown nursery plants, tree farms and plantations (conifers, including Christmas trees, and deciduous trees)
- Non-crop areas such as pastures, rangeland, forests, roadsides, industrial sites, fallow land, barrier strips, buffer zones, farmsteads, corrals and around animal housing facilities
- Recreational areas such as parks, schools, golf courses, playgrounds, cemeteries, picnic areas, campgrounds, grass buffers around gardens and ornamentals
- Home greenhouses and home gardens including:

{One of the following two crop lists may be used}

[around vegetables, nut trees, fruits including citrus, berries, herbs]

{OR}

[

Vegetables	
Root and Tuber Vegetables:	Arracacha; arrowroot; artichoke; beet; burdock; canna; carrot; cassava; celeriac; chayote; turnip-rooted chervil; chicory; chufa; dasheen (taro); ginger; ginseng; horseradish; leren; turnip rooted parsley; parsnip; potato; radish; rutabaga; salsify; skirret; sweet potato; tanier (cocoyam); turmeric; turnip; yam bean; yam
Bulb Vegetables:	Chive; Chinese chive; daylily bulb; elegans hosta; fritillaria; garlic (bulb, great headed, serpent); kurrat; lady's leek; leek; lily; onion (including Beltsville, bulb, Chinese, green, macrostem, pearl, potato, tree, Welch); shallot
Leafy Vegetables and Leaves of Root and Tuber and Legume Vegetables:	Amaranth, Chinese amaranth; arugula; Indian aster; blackjack; cat's whiskers; cham-chwi; cham-na-mul; chervils; chipilin; chrysanthemum; cilantro; collards; corn salad; cosmos; celery cress; cress; dandelion; dang-gwi; dillweed; dock; dol-nam-mul; ebolo; endive; escarole; fameflower; feather cockscomb; Good King Henry; hanover salad; huauzontle; jute; kale; lettuce (bitter, head, leaf); maca; mizuna; mustard greens; orach; parsley; plantain; English primrose; purslane; radicchio; radish; rape greens; rocket; shepherd's purse; spinach; Swiss chard; turnip greens; Chinese violet; watercress*
Cole Crops and Brassica Leafy Vegetables:	Broccoli; Chinese broccoli; broccoli raab (rapini); Brussels sprouts; cabbage; Chinese cabbage (bok choy, napa, gai choy); cauliflower; cavalo broccolo; collards; kale; kohlrabi; mizuna; mustard greens; mustard spinach; rape greens
Legume and Foliage of Legumes:	Beans (including lupin, field bean, kidney bean, lima bean, navy bean, pinto bean, runner bean, snap bean, tepary bean, wax bean, adzuki bean, asparagus bean, blackeyed pea, catjang, Chinese longbean, cowpea, Crowder pea, moth bean, mung bean, rice bean, southern pea, urd bean, yardlong bean, broad bean (fava bean); chickpea); guar; jackbean; lablab bean (hyacinth bean); lentil; pea (includes dwarf pea, edible-podded pea, English pea, field pea, garden pea, green pea, snow pea, sugar snap pea); pigeon pea; soybean; sword bean
Cucurbit Vegetables:	Chayote; Chinese waxgourd; citron melon; cucumber; gherkin; gourd; Momordica spp (includes balsam apple, balsam pear, bittermelon, Chinese cucumber); muskmelon (includes true cantaloupe, cantaloupe, casaba, crenshaw melon, golden pershaw melon, honeydew melon, honey balls, mango melon, Persian melon, pineapple melon, Santa Claus melon and snake melon); pumpkin; summer squash (includes crookneck squash, scallop squash, straightneck squash, vegetable marrow, zucchini); winter squash (includes butternut squash, calabaza, hubbard squash, acorn squash, spaghetti squash); watermelon
Fruiting Vegetables:	African eggplant; bush tomato; bell pepper; cocona; currant tomato; eggplant; garden huckleberry; goji berry; groundcherry; martynia; naranjilla; okra; pea eggplant; pepino; non-bell pepper; roselle; scarlet eggplant; sunberry; tomatillo; tomato; tree tomato

Fruits (Including Citrus) and Nuts

Tropical and Subtropical Fruits (Edible Peel):	Acai; acerola; achachairu; African plum; agritos; almondetta; ambarella; apak palm; appleberry; araza; arbutus berry; babaco; bacaba palm; bacaba-de-leque; bayberry, red; bignay; bilimbi; borojo; breadnut; cabeluda; cajou, fruit; cambuca; carandas-plum; carob; cashew apple; Ceylon iron wood; Ceylon olive; cherry-of-the-Rio-Grande; Chinese olive, black; Chinese olive, white; chirauli-nut; ciruela verde; cocoplum; date; Davidson's plum; desert-date; doum palm coconut; false sandalwood; feijoa; fig; fragrant manjack; gooseberry; governor's plum; grumichama; guabiroba; guava; guayabillo; illawarra plum; imbe; imbu; Indian-plum; jaboticaba; Jamaica-cherry; jambolan; jelly palm; Indian jujube; kaffir-plum; kakadu plum; kapundung; karanda; kwai muk; lemon aspen; mangaba; Marian plum; mombin (Malayan, purple, yellow); monkeyfruit; monos plum; mountain cherry; nance; natal plum; noni; olive; papaya, mountain; pataua; peach palm, fruit; persimmon; pitomba; plum-of-Martinique; pomerac; rambai; rose apple; rukam; rumberry; sea grape; sentul; sete-capotes; silver aspen; starfruit; Surinam cherry; tamarind; uvalha; water apple; water pear; water berry; wax jambu
Tropical and Subtropical Fruits (Inedible Peel):	Abiu; aisen; akee apple; atemoya; avocado (including Guatemalan; Mexican; West Indian); bacury; bael fruit; banana; binjai; biriba; breadfruit; Burmese grape; canistel; cat's-eyes; champedak; cherimoya; cupuacu; custard apple; dragon fruit; durian; elephant-apple; etambe; granadilla; ilama; inga; jackfruit; jatoba; karuka; kei apple; langsung; lanjut; longan; lucuma; lychee; mabolo; madras-thorn; mammy-apple; manduro; mango; mangosteen; marang; marmaladebox; matisia; mesquite; mongongo, fruit; monkey-bread-tree; monstera; nicobar-breadfruit; paho; pandanus; papaya; passionflower; passionfruit (including banana, purple, yellow); pawpaw; pelipisan; pequi; pequia; persimmon, American; pineapple; pitahaya; pitaya; pitaya, amarillo; pitaya, roja; pitaya; plantain; pomegranate; poshte; prickly pear; pulasan; quandong; rambutan; saguaro; sapodilla; sapote (black, green, mamey, white); sataw; satinleaf; screw-pine; Sierra Leone-tamarind; soncoya; soursop; Spanish lime; star apple; sugar apple; sun sapote; tamarind-of-the-Indies; velvet tamarind; wampi; white star apple; wild loquat
Citrus Fruits:	Calamondin; citron; citrus hybrids; grapefruit; Japanese summer grapefruit; kumquat; lemon; lime; Mediterranean mandarin; orange (sour, sweet); pummelo; satsuma mandarin; tangelo; tangerine (mandarin); tangor; trifoliate orange; unqi fruit
Pome Fruits:	Apple; azarole; crab apple; loquat; mayhaw; medlar; pear; Asian pear; quince; tejocote
Stone Fruits:	Apricot; capulin; cherry (black, Nanking; sweet; tart); Chinese Jujube; nectarine; peach; plum (American, beach, Canada, cherry, Chickasaw, Damson, Japanese, Klamath, prune); plumcot; sloe
Berries and Small Fruits:	Aronia berry; bayberry; bearberry; bilberry; blackberry; blueberry (highbush, lowbush); buffalo currant; buffaloberry; che; Chilean guava; chokecherry; cloudberry; cranberry*; currant, black; currant, red; elderberry; European barberry; gooseberry; grape; honeysuckle, edible; huckleberry; jostaberry; Juneberry (Saskatoon berry); kiwifruit; lingonberry; maypop; mountain pepper berries; mulberry; muntries; native currant; partridgeberry; phalsa; pincherry; raspberry, black and red; riberry; salal; schisandra berry; sea buckthorn; serviceberry; strawberry; wild raspberry

Tree Nuts and Other Nuts:	African nut-tree; almond; beechnut; Brazil nut; Brazilian pine; bunya; bur oak; butternut; Cajou nut; candlenut; cashew; chestnut; chinquapin; coconut; coquito nut; dika nut; ginkgo; Guiana chestnut; hazelnut (filbert); heartnut; hickory nut; Japanese horse-chestnut; macadamia nut; mongongo nut; monkey-pot; monkey puzzle nut; Okari nut; Pachira nut; peach palm nut; pecan; pequi; Pili nut; pine nut; pistachio; Sapucaia nut; tropical almond; walnut, black; walnut, English; yellowhorn; peanut, pistachio
Stock, Stem and Leaf Petiole:	Agave; aloe vera; asparagus; bamboo shoots; cardoon; celery; Chinese celery; celtuce; fennel; edible fern; fiddlehead; fuki; Sea kale; kohlrabi; palm hearts; prickly pear; rhubarb; udo; zuiki

Herbs and Spices	
Herbs:	Angelica; balm (lemon balm); basil; borage; burnet; camomile; catnip; chervil (dried); chive; clary; coriander leaf (cilantro or Chinese parsley); costmary; culantro (leaf); curry (leaf); dillweed; horehound; hyssop; lavender; lemongrass; lovage (leaf); marigold; marjoram (includes sweet or annual marjoram, wild marjoram or oregano, and pot marjoram); mint; spearmint; peppermint; parsley (dried); pennyroyal; rosemary; rue; sage; savory; sweet bay; tansy; tarragon; thyme; wintergreen; woodruff; wormwood
Spices:	Allspice; anise; annatto (seed); caper buds; caraway; cardamom; cassia bark; cassia buds; celery seed; cinnamon; clove (buds); coriander seed (cilantro); culantro (seed); cumin; dill (seed); fennel; fenugreek; grains of paradise; juniper (berry); lovage (seed); mace; mustard (seed); nutmeg; pepper (black, white); poppy (seed); saffron; vanilla

Other Crops	
Cereal Grains (and Forage, Fodder and Straw of):	Barley; buckwheat; corn (field and sweet); millet, pearl; millet, proso; oats; popcorn; rice*; rye; sorghum (milo); teosinte; triticale; wheat; wild rice*
Grass and Non-Grass Forage, Fodder, Hay, Seed:	Bermuda grass; bluegrass; brome grass; fescue; Alfalfa; velvet bean; clover (<i>Trifolium spp.</i> , <i>Melilotus spp.</i>); kudzu; lespedeza; lupin; sainfoin; trefoil; vetch
Oilseed:	Borage; calendula; canola; castor oil plant; Chinese tallowtree; cotton; 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; poppy seed; rapeseed; rose hip; safflower; sesame; stokes aster; sunflower; sweet rocket; tallowwood; tea oil plant; vernonia;
Misc. Crops:	Sugarcane, hops, tobacco, hemp, coffee

*Do not apply to flooded fields.

]

Only for application to soils and growing media around plants. Do not apply to any hardscapes, such as patios or walkways.

STORAGE AND DISPOSAL [Trash can icon]

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

PESTICIDE STORAGE: Store in original container in a cool, dry place inaccessible to children and pets and away from heat and direct sunlight. Protect from freezing. Storage at temperatures above 90°F may impair effectiveness.

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, jug or tote into application equipment by shaking and tapping sides and bottom to loosen clinging particles. Then offer for recycling, if available, or dispose of in a sanitary landfill, or by incineration. In most states, burning is not allowed.

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}

[To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. To the extent consistent with applicable law, buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.]

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

[

- The active ingredient in this product is exempt from the requirement for a tolerance when used as an insecticide or on all food commodities.
- Biological insecticide
- Btk [*Bacillus thuringiensis* subsp. *kurstaki*] is a soil dwelling bacterium [found in soil and other insect habitats].
- Ready-to-use bait

- Controls [cutworms][true armyworms][sod webworms] on fruits, vegetables, ornamentals and shade trees
- Kills [cutworms], [true armyworms] and [sod webworms]
- For use around [vegetables], [nut trees], [fruit trees], [citrus], [berries], [herbs], [ornamentals], [shrubs], [flowers], [trees], [lawns], [gardens] and [in greenhouses]
- **NOTE:** This package is sold by weight. Contents may have settled during shipment.
- This container is made from XX% recycled materials.
- Resealable waterproof package.
- The highly compressed granules [pellets] are easy to use, clean to handle and economical [graphic of granules].
- Easy-to-use [ready-to-use] [RTU] granular [pellet] formulation.
- Easy to apply granules.
- Treats [will treat] x,xxx sq. ft.
- 1 lb treats [will treat] xxxx sq. ft.
- Remains effective after rain or sprinkling.
- 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.
- For use around [vegetables], [fruit trees], [nut trees], [citrus], [berries], [ornamentals], [shrubs], [flowers], [trees], [lawns], [gardens], and [in greenhouses].
- For control of [cutworms], [true armyworms] and [webworms] in fruits, nuts, vegetables, herbs, spices, turf, and other crops
- For use on [lawns], and around [ornamentals], [vegetables] and [fruit]
- Read Entire Container Label Before Using This Product.
- Easy [to use] Shaker Applicator
- Easy [to use] [Pour] Spout
- www.neudorff.com
- Manufactured under [a] license of W. Neudorff GmbH KG, [Germany].
- For information on this pesticide product [including general health concerns, or pesticide incidents], call the National Pesticide Information Center at 1-800-858-7378, Monday through Friday, 8:00 AM to 12:00 PM Pacific Standard Time. In the event of a medical emergency, call your poison control center at 1-800-222-1222. Questions or comments? Call 1-XXX-XXX-XXXX or visit our website at [www.neudorff.com] [subregistrant's website]
- For questions or comments, call toll free 1-XXX-XXX-XXXX [], [, [phone icon] [or visit us online at www.neudorff.com] [][computer icon]]
- For emergency medical information, you may call toll free 1-XXX-XXX-XXXX. [, [, [phone icon] [or visit us online at www.neudorff.com] [] [computer icon]]
-
- Unconsumed bait will degrade and become part of soil

- Made in/Produced in: _____ [from US and imported products/parts] [Graphic of country flag]
- See back [booklet] label for additional first aid
- This container is made with a minimum X% recycled material
- May be used up to and including day of harvest.
- Do not over-apply product
- [When used as directed] People and pets can enter the area once product is applied
- Final knockout for [cutworms][sod webworms][true armyworms]
- Final meal for [cutworms][sod webworms][true armyworms]
- NEU1701I is most effective against small, newly hatched larvae.
- For best control, perform an early scouting program to identify early infestations
- After consuming NEU1701I larvae stop eating but may be visible on the foliage until they die, usually within days.
- Residue exempt
- Ideal for use as part of an Integrated Pest Management [IPM] program
- See inside [booklet][panel] for [additional] [precautionary statements] and [complete] [directions for use]
- [See][refer to] [inside][side][back][panel][attached booklet][container label] for [additional] [complete] [precautionary statements], [directions for use], [application instructions], [first aid statements], [storage and disposal], [use precautions] {Note to reviewer - When the first aid statement will appear on the side or back panel, either the claim "See side panel for First Aid" or "See back panel for First Aid" will appear on the front panel}
- [Manufactured by:] {or} [Manufactured for:] W. Neudorff GmbH KG
An der Mühle 3
31860 Emmerthal, Germany

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



{Note to reviewer: Each item below represents a graphic depicting the corresponding area of use and/or pest. The graphics will only represent individual objects or outsides or insides of buildings as described below. No people or animals will be depicted in graphics}

- Lawns and other turfgrass areas
- Shade trees and ornamentals (herbaceous and woody), greenhouse ornamentals, outdoor container-grown nursery plants, tree farms and plantations (conifers, including Christmas trees, and deciduous trees)
- Non-crop areas such as pastures, rangeland, forests, roadsides, industrial sites, fallow land, barrier strips, buffer zones, farmsteads, corrals and around animal housing facilities
- Recreational areas such as parks, schools, golf courses, playgrounds, cemeteries, picnic areas, campgrounds, grass buffers around gardens and ornamentals
- Home greenhouses and home gardens
- vegetables,
- Fruits (Including Citrus) and Nuts

- herbs and spices
 - Cereal Grains (and Forage, Fodder and Straw of), Grass and Non-Grass Forage, Fodder, Hay, Seed, Oilseed
 - Greenhouses
 - Outdoor Container Grown Plants
 - Cutworm
 - True armyworm
 - Sod Webworm
-]