



U.S. ENVIRONMENTAL PROTECTION AGENCY  
 Office of Pesticide Programs  
 Registration Division (7505P)  
 1200 Pennsylvania Ave., N.W.  
 Washington, D.C. 20460

EPA Reg. Number:

91234-202

Date of Issuance:

9/3/20

NOTICE OF PESTICIDE:

Registration  
 Reregistration  
 (under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

A171.02

Name and Address of Registrant (include ZIP Code):

Kristen Cianni  
 Atticus, LLC  
 5000 CentreGreen Way  
 Cary, NC 27513

**Note:** Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:

Venus Eagle, Product Manager 01  
 Invertebrate & Vertebrate Branch 3, Registration Division (7505P)

Date:

9/3/20

2. You are required to comply with the data requirements described in the DCI identified below:
  - a. Imidacloprid GDCI-129099-951
  - b. Imidacloprid GDCI-129099-1516

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division: <http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1>

3. Make the following label changes before you release the product for shipment:
  - Revise the EPA Registration Number to read, “EPA Reg. No. 91234-202.”
4. Submit one copy of the final printed label for the record before you release the product for shipment.

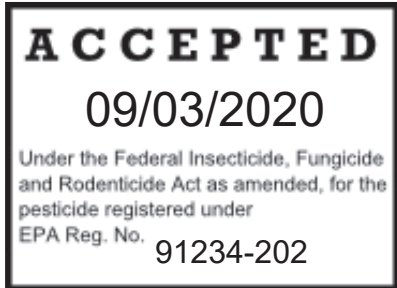
Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded 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.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 2/13/2020
- Alternate CSF 1 dated 2/13/2020

If you have any questions, please contact Scott Campbell at [Campbell.scott@epa.gov](mailto:Campbell.scott@epa.gov)

Enclosure: Stamped label



{Note to reviewer: [Text] in brackets denotes optional or explanatory language}  
 {Note to reviewer: {Text} in braces denotes where in the final label text will appear}  
**{BOOKLET FRONT PANEL LANGUAGE}**

IMIDACLOPRID	GROUP 4A	INSECTICIDE
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# A171.02<sup>[TM]</sup>

[Alternate Brand Name: Mineiro 75 WSP]

Contains imidacloprid, the active ingredient used in [Merit® 75 WSP].

**[For foliar and systemic insect control of listed pests in turfgrass (including sod farms), landscape ornamentals, fruit and nut trees, and interior plantscapes]**

**ACTIVE INGREDIENT:** (% by weight)

Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine..... 75.0%

**OTHER INGREDIENTS:** ..... 25.0%

**TOTAL** ..... 100.0%

Keep water-soluble packets in this container and store in a cool dry place but not below freezing (32° F).

Do Not Remove Packets from Container Except For Immediate Use.

## STOP – READ THE LABEL BEFORE USE KEEP OUT OF REACH OF CHILDREN CAUTION

**Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)**

See inside label booklet for [additional] [First Aid,] [Precautionary Statements] [and] Directions for Use.

FIRST AID	
<b>If swallowed:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall at <b>1-844-685-9173</b> for emergency medical treatment information.	

**For Chemical Emergency:  
Spill, Leak, Fire, Exposure, or Accident,  
Call CHEMTREC Day or Night  
Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)**

**[A171.02]** is not manufactured, or distributed by Bayer Environmental Science, seller of [Merit® 75 WSP].

**EPA Reg. No.: 91234-XXX**

**EPA Est. No.:**

**Net Weight:**

**Batch No.:**

Manufactured for:  
**Atticus, LLC**  
5000 CentreGreen Way, Suite 100  
Cary, NC 27513

## {LANGUAGE INSIDE BOOKLET}

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### CAUTION

Harmful if swallowed, inhaled, or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children or pets off treated area until spray is dry.

#### PERSONAL PROTECTIVE EQUIPMENT (PPE)

**WPS USES:** Applicators and Other Handlers who handle this product for any use covered by the Worker Protection Standard (40 CFR Part 170) – in general, agricultural plant uses e.g., use in sod farms, must wear:

- Long-sleeved shirt and long pants
- Chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton. If you want more options, follow the instructions for category A on an EPA chemical-resistance category selection chart.
- Shoes plus socks

Follow manufacturer's instructions for cleaning/maintaining personal protective equipment, PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

**NON-WPS USES:** Applicators and other handlers who handle this product for any use NOT covered by the Worker Protection Standard (40 CFR Part 170) – in general, only agricultural plant uses are covered by the WPS, must wear:

- Shirt and pants
- Gloves
- Shoes plus socks

#### Instructions for Using Water Soluble Packages Directly into Spray tanks:

Water Soluble Packages (WSPs) are designed to dissolve in water. Agitation may be used, if necessary, to help dissolve the WSP. Failure to follow handling and mixing instructions can increase your exposure to the pesticide products in WSPs. WSPs, when used properly, qualify as a closed mixing/loading system under the Agricultural Worker Protection Standard [40 CFR 170.607(d)].

#### Handling Instructions

Follow these steps when handling pesticide products in WSPs.

1. Mix in spray tank only.
2. Handle WSP(s) in a manner that protects package from breakage and/or unintended release of contents. If package is broken, put on PPE required for clean-up and then continue with mixing instructions.
3. Keep the WSP(s) in outer packaging until just before use.
4. Keep the WSP dry prior to adding to the spray tank.
5. Handle with dry gloves and according to the label instructions for PPE.
6. Keep WSP intact. Do not cut or puncture WSP.
7. Reseal the WSP outer packaging to protect any unused WSP(s).

#### Mixing Instructions

Follow the steps below when mixing this product, including if tank mixed with other pesticide products. If being tank mixed, the mixing directions 1 through 9 below take precedence over the mixing directions of the other tank mix products. WSPs may, in some cases, be mixed with other pesticide products so long as the directions for use of all mixed products do not conflict. Do not tank mix this product with products that prohibit tank mixing or have conflicting mixing directions.

1. If a basket or strainer is present in the tank hatch, remove prior to adding the WSP to the tank.
2. Fill tank with water to approximately one-third to one-half of the desired final volume of spray.
3. Stop adding water and stop any agitation.
4. Place intact/unopened WSP(s) into the tank.
5. Do not spray water from a hose or fill pipe to break or dissolve the WSP(s).
6. Start mechanical and recirculation agitation from the bottom of tank without using any overhead recirculation, if possible. If overhead recirculation cannot be turned off, close the hatch before starting agitation.
7. Dissolving the WSP(s) may take up to 5 minutes or longer, depending on water temperature, water hardness and intensity of agitation.
8. Stop agitation before tank lid is opened.
9. Open the lid to the tank, exercising caution to avoid contact with dusts or spray mix, to verify that the WSPs have fully dissolved and the contents have been thoroughly mixed into the solution.
10. Do not add other allowed products or complete filling the tank until the bags have fully dissolved and pesticide is thoroughly mixed.
11. Once the WSP have fully dissolved and any other products have been added to the tank, resume filling the tank with water to the desired level, close the tank lid, and resume agitation.
12. Use the spray solution when mixing is complete.
13. Maintain agitation of the diluted pesticide mix during transport and application.
14. It is unlawful to use any registered pesticide, including WSPs, in a manner inconsistent with its label.

#### **Engineering controls statements:**

Water soluble packets, when used correctly, qualify as a closed mixing/loading system under the Worker Protection Standard [40 CFR 170.607(d)]. Mixers and loaders handling this product while it is enclosed in intact water soluble packets may elect to wear reduced PPE of long-sleeved shirt, long pants, shoes, socks, a chemical-resistant apron, and chemical-resistant gloves. When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for “applicators and other handlers” and have such PPE immediately available for use in an emergency, such as a spill or equipment break-down.”

#### **USER SAFETY RECOMMENDATIONS**

##### **Users should:**

- Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Remove clothing 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**

This product is highly 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 washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops/plants or weeds. Do not apply this product or allow it to drift to blooming crops/plants or weeds if bees are foraging the treatment area. This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

## PHYSICAL AND CHEMICAL HAZARDS

Do not mix or allow contact with oxidizing agents, as a hazardous chemical reaction may occur.

## PROTECTION OF POLLINATORS



**APPLICATION RESTRICTIONS** EXIST FOR THIS PRODUCT BECAUSE OF RISK TO BEES AND OTHER INSECT POLLINATORS. FOLLOW APPLICATION RESTRICTIONS FOUND IN THE DIRECTIONS FOR USE TO PROTECT POLLINATORS.



Look for the bee hazard icon in the Directions for Use for each application site for specific use restrictions and instructions to protect bees and other insect pollinators.

**This product can kill bees and other insect pollinators.**

Bees and other insect pollinators will forage on plants when they flower, shed pollen, or produce nectar. Bees and other insect pollinators can be exposed to this pesticide from:

- Direct contact during foliar applications, or contact with residues on plant surfaces after foliar applications
- Ingestion of residues in nectar and pollen when the pesticide is applied as a seed treatment, soil, tree injection, as well as foliar applications.

When Using This Product Take Steps To:

- Minimize exposure of this product to bees and other insect pollinators when they are foraging on pollinator attractive plants around the application site.
- Minimize drift of this product on to beehives or to off-site pollinator attractive habitat. Drift of this product onto beehives or off-site to pollinator attractive habitat can result in bee kills.

Information on protecting bees and other insect pollinators may be found at the Pesticide Environmental Stewardship website at: <http://pesticidestewardship.org/PollinatorProtection/Pages/default.aspx>.

Pesticide incidents (for example, bee kills) should immediately be reported to the state/tribal lead agency. For contact information for your state, go to: [www.aapco.org/officials.html](http://www.aapco.org/officials.html). Pesticide incidents should also be reported to the National Pesticide Information Center at: [www.npic.orst.edu](http://www.npic.orst.edu) or directly to EPA at: [beekill@epa.gov](mailto:beekill@epa.gov)

## DIRECTIONS FOR USE

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

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

**SEE INDIVIDUAL SITES FOR SPECIFIC POLLINATOR PROTECTION APPLICATION RESTRICTIONS. IF NONE EXIST UNDER THE SPECIFIC SITE, FOR OUTDOOR FOLIAR APPLICATIONS, FOLLOW THESE APPLICATION DIRECTIONS.**



#### **NON-AGRICULTURAL USES**

**Do not apply A171.02 while bees are foraging. Do not apply A171.02 to plants that are flowering. Only apply after all flower petals have fallen off.**

Use **A171.02** as directed for sod farm production and on turfgrass and ornamentals on: residential home lawns, business and office complexes, shopping complexes, multi-family residential complexes, golf courses, airports, cemeteries, parks, playgrounds, and athletic fields.

**A171.02** can be used by soil application as directed on trees, shrubs, flowers and groundcovers in sites: in and around the perimeter of industrial and commercial buildings; residential areas; interior plantscapes; municipal, city, state and national forested areas, and private wooded areas.

**RESTRICTION:** Not for use in commercial greenhouses, nurseries, or on grasses grown for seed, or on commercial fruit and nut trees.

#### **RESISTANCE MANAGEMENT RECOMMENDATIONS**

Some insects are known to develop resistance to insecticides after repeated use. As with any insecticide, the use of this product should conform to resistance management strategies established for the use area.

**A171.02** contains a Group 4A insecticide. Insect biotypes with acquired or inherent resistance to Group 4A insecticides may eventually dominate the insect population if Group 4A insecticides are used repeatedly as the predominant method of control for targeted species.



### 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 12 hours.

**Exception:** If the product is applied by drenching, the Worker Protection Standard, under certain circumstances, allows workers to enter the treated area if there will be no contact with anything that has been treated.

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
- Chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.
- 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, and sod farm production.

Keep children and pets off treated area until dry.

### APPLICATION TO TURFGRASS

Use **A171.02** for the control of soil inhabiting pests of turfgrass, Northern & Southern masked chafers, *Cyclocephala borealis*, *C. immaculata*, and/or *C. lurida*; Asiatic garden beetle, *Maladera castanea*; European chafer, *Rhizotroqus majalis*; Green June beetle, *Cotinis nitida*; May or June beetle, *Phyllophaga* spp.; Japanese beetle, *Popillia japonica*; Oriental beetle, *Anomala orientalis*; Billbugs, *Spherophorus* spp.; Annual bluegrass weevil, *Hyperodes* spp.; Black turfgrass atenius, *Ataenius spretulus* and *Aphodius* spp.; European Crane Fly *Tipula paludosa*; and mole crickets, *Scapteriscus* spp. **A171.02** can also be used for the suppression of cutworms and chinchbugs.

The active ingredient in **A171.02** has sufficient residual activity so that applications can be made preceding the egg laying activity of the target pests. High levels of control are achieved when applications are made preceding or during the egg laying period. The need for an application can be based on historical monitoring of the site, previous records or experiences, current season adult trapping or other methods. Optimum control will be achieved when applications are made prior to egg hatch of the target pests, followed by sufficient irrigation or rainfall to move the active ingredient through the thatch.

Do not apply when turfgrass areas are waterlogged or the soil is saturated with water. Adequate distribution of the active ingredient cannot be achieved when these conditions exist. The treated turf area must be in such a condition that the rainfall or irrigation will penetrate vertically in the soil profile.

**RESTRICTION:** Do not apply more than a total of 8.53 oz (0.4 lb of active ingredient) per acre per year.

### APPLICATION EQUIPMENT FOR USE ON TURFGRASS

Apply **A171.02** in sufficient water to provide adequate distribution in the treated area. The use of accurately calibrated equipment normally used for the application of turfgrass insecticides is required. Use equipment which will produce a uniform, coarse droplet spray, using a low-pressure setting to eliminate off target drift. Check calibration periodically to ensure that equipment is working properly.

### **APPLICATION TO ORNAMENTALS**

**A171.02** is for use on ornamentals in commercial and residential landscapes and interior plantscapes. **A171.02** is a systemic product and will be translocated upward into the plant system from root uptake. To assure optimum effectiveness, the product must be placed where the growing portion of the target plant can absorb the active ingredient. The addition of a nitrogen containing fertilizer, where applicable, into the solution may enhance the uptake of the active ingredient. Application can be made by foliar application or soil applications; including soil injection, drenches, and broadcast sprays. Foliar applications offer locally systemic activity against insect pests.

When making soil applications to plants with woody stems, systemic activity will be delayed until the active ingredient is translocated throughout the plant. In some cases, this translocation delay could take 60 days or longer. For this reason, make application prior to anticipated pest infestation to achieve optimum levels of control.

**RESTRICTION:** Outdoor applications cannot exceed a total of 8.53 oz (0.4 lb of active ingredient) per acre per year.

### **ANT MANAGEMENT PROGRAMS**

Use **A171.02** to control aphids, scale insects, mealybugs and other listed sucking pests on ornamentals to limit the honeydew available as a food source for ant populations. **A171.02** applications can be supplemented with residual sprays, bait placements or other ant control tactics to further reduce the pest population.

### **APPLICATION EQUIPMENT FOR FOLIAR APPLICATIONS**

**A171.02** mixes readily with water and may be used in many types of application equipment. Mix product with the required amount of water and apply as desired dependent upon the selected use pattern.

When making foliar applications on hard to wet foliage such as holly, pine, or ivy, the addition of a spreader/sticker is recommended. If concentrate or mist type spray equipment is used, apply an equivalent amount of product on the area sprayed, as would be used in a dilute application.

**MIXING:** Within each container are clear inner packets containing **A171.02**. The clear inner packet is water-soluble. Do not allow packets to become wet prior to adding to the spray tank. Do not handle the clear inner packets with wet hands or wet gloves. Rough handling may cause breakage. Reseal container to protect remaining packets.

To prepare the spray mixture, drop the required number of unopened clear water-soluble packets, as determined in the application rate chart, into the spray tank while filling with water to the desired level. Operate the agitator while mixing. Depending on the water temperature and the degree of agitation, the packets should be completely dissolved within a few minutes from the time they are added to the water. Cooler water temperatures increase the time needed for the inner packet to dissolve completely.

**RESTRICTION:** Do not use **A171.02** packets in a tank-mix with products that contain Boron or release free chlorine. The resultant reaction of PVA and boron or free chlorine is a plastic, which is not soluble in water or solvents such as diesel oils, kerosene, gasoline, or alcohol. Do not attempt to use the WSP packets directly in diesel oils or summer spray type oils as in ULV or LV uses. PVA packets are water-soluble not oil soluble. Use of chlorinated water is acceptable.

**A171.02** has been found to be compatible with commonly used fungicides, miticides, liquid fertilizers, and other

commonly used insecticides. Check physical compatibility using the correct proportion of products in a small jar test if local experience is unavailable.

**RESTRICTION:** Do not apply through any irrigation system.

DIRECTIONS FOR USE ON TURFGRASSES IN RESIDENTIAL, COMMERCIAL, AND INDUSTRIAL AREAS			
SITE	PEST	APPLICATION RATE	
<b>TURFGRASSES</b> (Residential home lawns, business and office complexes, shopping complexes, multi-family residential complexes, golf courses, airports, cemeteries, parks, playgrounds, athletic fields)	<b>Larvae of:</b> Annual bluegrass weevil Asiatic garden beetle Billbug Black turfgrass ataenius Cutworm (suppression) European chafer	European Crane Fly Green June beetle Japanese beetle Northern masked chafer Oriental beetle <i>Phyllophaga</i> spp. Southern masked chafer	
	For optimum control of grubs, billbugs, annual bluegrass weevil, and European crane fly larvae, make application prior to egg hatch of the target pest. Be sure to read "Application Equipment for Use on Turfgrass" Section of this label.		
	Chinchbug (suppression)	Mole cricket	1.6 oz (1 packet) per 8,250 sq ft
	For suppression of chinchbugs, make application prior to hatching of the first instar nymphs. For control of mole crickets, make application prior to or during the peak egg hatch period. If application is not made prior to egg hatch or when adults or large nymphs are present and actively tunneling, apply <b>A171.02</b> in combination with a remedial insecticide to minimize damage to turf. Follow label instructions for other insecticides when tank mixing.		
Consult your local State Agricultural Experiment Station or State Extension Turf Specialists for more specific information regarding timing of application. For optimum control, if rainfall does not occur within 24 hours after application, irrigate to move the active ingredient through the thatch.			
<b>RESTRICTIONS:</b> <ul style="list-style-type: none"> <li>• Do not apply more than 8.53 oz (0.4 lb of active ingredient) per acre per year.</li> <li>• Do not mow turf or lawn area until after sufficient irrigation or rainfall has occurred so that uniformity of application will not be affected.</li> <li>• Do not allow this product to contact plants in bloom while bees are foraging the treatment area.</li> <li>• Do not graze treated areas or use clippings from treated areas for feed or forage.</li> <li>• Do not allow runoff or puddling of irrigation water following application.</li> <li>• Keep children and pets off treated area until dry.</li> <li>• Do not apply <b>A171.02</b> to areas which are waterlogged or saturated, which will not allow penetration into the root zone of the plant.</li> </ul>			

DIRECTIONS FOR USE ON SOD FARMS			
CROP	PEST	APPLICATION RATE	
TURFGRASSES (Sod Farms)	<b>Larvae of:</b> Annual bluegrass weevil Asiatic garden beetle Billbug Black turfgrass ataenius Cutworm (suppression) European chafer	European Crane Fly Green June beetle Japanese beetle Northern masked chafer Oriental beetle <i>Phyllophaga</i> spp. Southern masked chafer	1.6 oz (1 Packet) per 8,250 to 11,000 sq ft
	For optimum control of grubs, billbugs, annual bluegrass weevil, and European crane fly larvae, make application prior to egg hatch of the target pest. Be sure to read "Application Equipment for Use on Turfgrass" Section of this label.		
	Chinchbug (suppression)	Mole cricket	1.6 oz (1 packet) per 8,250 sq ft
	For suppression of chinchbugs, make application prior to hatching of the first instar nymphs. For control of mole crickets, make application prior to or during the peak egg hatch period. If application is not made prior to egg hatch or when adults or large nymphs are present and actively tunneling, apply <b>A171.02</b> in combination with a remedial insecticide to minimize damage to turf. Follow label instructions for other insecticides when tank mixing.		
Consult your local State Agricultural Experiment Station or State Extension Turf Specialists for more specific information regarding timing of application. For optimum control, if rainfall does not occur within 24 hours after application, irrigate to move the active ingredient through the thatch.			
<b>RESTRICTIONS:</b> <ul style="list-style-type: none"> <li>Do not apply more than 8.53 oz (0.4 lb of active ingredient) per acre per year.</li> <li>Do not allow this product to contact plants in bloom while bees are foraging the treatment area.</li> <li>Do not use for seed production.</li> <li>Do not allow runoff or puddling of irrigation water following application.</li> <li>Do not apply <b>A171.02</b> to areas which are waterlogged or saturated, which will not allow penetration into the root zone of the plant.</li> </ul>			

**DIRECTIONS FOR APPLICATION TO OUTDOOR ORNAMENTALS IN RESIDENTIAL, COMMERCIAL, AND INDUSTRIAL LANDSCAPE AREAS**

SITE	PEST		APPLICATION RATE
Trees Shrubs Evergreens Flowers Foliage plants Groundcovers	Adelgids (including hemlock woolly adelgid) Aphids Leaf-feeding beetles (Japanese beetle, emerald ash borer and vine weevil adults) Leaf-feeding bugs (including lace bugs, leaf bugs, and plant bugs) Leafhoppers, planthoppers, sharpshooters (including glassy-winged sharpshooter) and spittle bugs	Mealybugs Psyllids Sawfly larvae Thrips (foliage only) Whiteflies	1.6 oz (1 packet) per 300 gallons of water
<b>Foliar Applications:</b> Start treatments prior to establishment of high pest populations and reapply on an as needed basis.			
	White grub larvae (such as Japanese beetle larvae, Chafers, <i>Phyllophaga</i> spp. Asiatic garden beetle, Oriental beetle)		1.6 oz (1 packet) per 8,250 to 11,000 sq ft
<b>Broadcast Applications:</b> Mix required amount of product in sufficient water to uniformly and accurately cover the area being treated. Do not use less than 2 gallons of water per 1,000 sq ft. For optimum control, irrigate thoroughly to incorporate <b>A171.02</b> into the upper soil profile.			

**RESTRICTIONS:**

- Follow application restrictions for Non-Agricultural Uses on page [X] to protect bees and other insect pollinators
- Do not apply more than 8.53 oz (0.4 lb of active ingredient) per acre per year.
- Keep children and pets off treated area until dry.
- Do not apply this product, by any application method, to linden, basswood, or other *Tilia* species.

**DIRECTIONS FOR APPLICATION TO PLANTS GROWN INDOORS**

SITE	PEST		APPLICATION RATE
Interior plantscapes	Adelgids (including hemlock woolly adelgid) Aphids Leaf-feeding beetles (Japanese beetle, emerald ash borer and vine weevil adults) Leaf-feeding bugs (including lace bugs, leaf bugs, and plant bugs) Leafhoppers, planthoppers, sharpshooters (including glassy-winged sharpshooter) and spittle bugs	Mealybugs Psyllids Sawfly larvae Thrips (foliage only) Whiteflies	1.6 oz (1 packet) per 300 gallons of water
	<b>Foliar Applications:</b> Start treatments prior to establishment of high pest populations and reapply on an as-needed basis.		
	White grub larvae (such as Japanese beetle larvae, Chafers, <i>Phyllophaga</i> spp. Asiatic garden beetle, Oriental beetle)	1.6 oz (1 packet) per 8,250 to 11,000 sq ft	
	<b>Broadcast Applications:</b> Mix required amount of product in sufficient water to uniformly and accurately cover the area being treated. Do not use less than 2 gallons of water per 1,000 sq ft. For optimum control, irrigate thoroughly to incorporate <b>A171.02</b> into the upper soil profile.		
<b>RESTRICTIONS:</b> <ul style="list-style-type: none"> <li>• Not for use in commercial greenhouse</li> </ul>			

**DIRECTIONS FOR APPLICATION TO TREES AND SHRUBS BY SOIL DRENCH AND SOIL INJECTION**

For use in and around the perimeter of industrial and commercial buildings, in residential and recreational areas, and in municipal, city, state, national, and private wooded and forested areas.

<b>Trees and Shrubs</b>	1.6 oz (1 packet) <b>A171.02</b> per 24 to 48 inches of cumulative trunk diameter or 24 - 48 feet of cumulative shrub height		
Adelgids (including hemlock woolly adelgid)	Leaf-feeding bugs (including lace bugs, leaf bugs, and plant bugs)	Leafminers	Sawfly larvae
Aphids		Mealybugs	Soft scales
Leaf-feeding beetles (including Japanese beetle and vine weevil adults)	Leafhoppers, planthoppers, sharpshooters (including glassy-winged sharpshooter) and spittle bugs	Pine tip moth larvae	Whiteflies
		Psyllids	
		Royal palm bug	

<b>Trees and Shrubs</b>	1.6 oz (1 packet) <b>A171.02</b> per 24 inches of cumulative trunk diameter or 24 feet of cumulative shrub height		
Armored scales (including: camellia, false oleander, Florida red, oystershell, tea, and white peach scales)	Roundheaded borers (including Asian longhorned beetle)		
Flatheaded borers (including emerald ash borer)	Thrips (foliage only)		
	White grub, billbug, and root weevil larvae		

Example equation:  $[x \text{ (total DBH inches of a tree)} / y \text{ (cumulative trunk diameter rate to be applied)}] \times 1.6 \text{ oz (1 packet)} = \text{total oz of product per tree.}$

**Examples of single tree calculations:**

To calculate the rate range with a 12 inch DBH tree:

$(12/48) \times 1.6 \text{ oz (1 packet)} = 0.4 \text{ oz per tree}$

$(12/24) \times 1.6 \text{ oz (1 packet)} = 0.8 \text{ oz per tree}$

If treating multiple trees at a similar rate, add the DBH of the trees together and divide by rate to be applied.

Example of multiple trees using similar rate of 48 (y): 3 trees with DBH of 8, 10, & 9 inches. Total cumulative inches of DBH are 27 (x).  $(27/48) \times 1.6 \text{ oz (1 packet)} = 0.9 \text{ oz total for all three trees.}$

**Soil Injection:** GRID SYSTEM: Space holes on 2.5 foot centers, in a grid pattern, extending to the drip line of the tree. CIRCLE SYSTEM: Apply in holes evenly spaced in circles, (use more than one circle dependent upon the size of the tree) beneath the drip line of the tree extending in from that line. BASAL SYSTEM: Space injection holes evenly around the base of the tree trunk no more than 6 to 12 inches out from the base.

Mix required dosage in sufficient water to inject an equal amount of solution in each hole. Maintain a low pressure and use sufficient solution for distribution of the liquid into the treatment zone. For optimum control, keep the treated area moist for 7 to 10 days. Do not use less than 4 holes per tree or shrub.

**Soil Drench:** Uniformly apply the dosage in no less than 10 gallons of water per 1000 square feet as a drench around the base of the tree, directed to the root zone. Remove plastic or any other barrier that will stop solution from reaching the root zone.

**For Control of Specified Borers:** Application to trees already heavily infested may not prevent the eventual loss of the trees due to existing pest damage and tree stress.

**RESTRICTIONS:**

- No Soil Injection Applications Allowed in Nassau or Suffolk Counties of New York.
- Do not apply more than 8.53 oz (0.4 lb active ingredient) per acre per year.
- Keep children and pets off treated area until dry.
- Do not apply **A171.02** to areas which are waterlogged or saturated, which will not allow penetration into the root zone of the plant.
- Do not apply this product, by any application method, to linden, basswood, or other *Tilia* species.

**TREES: DIRECTIONS FOR SOIL APPLICATIONS FOR TREES WITH A 15 INCH OF TRUNK DIAMETER AT BREAST HEIGHT (D.B.H.) OR GREATER TO TREAT THE PESTS LISTED BELOW**

Use the following rates as a function of tree DBH. Apply 1.6 oz (1 packet) of **A171.02** per 12 to 48 inches of cumulative trunk diameter for tree(s) intended to be treated. You may use the higher rate of 1.6 oz (1 packet) of **A171.02** per cumulative trunk diameter (12 inches to less than 24 inches) only to control the pests listed below.

**RESTRICTION:** Do not apply more than 8.53 oz (0.4 lb active ingredient) per acre per year

DBH = is measured 4.5 feet from the ground

Emerald Ash Borer  
Bronze birch borer

Asian Longhorned Beetle  
Eucalyptus Longhorned Borer

Alder Borer

**Example equation:**  $[x \text{ (total DBH inches of a tree)} / y \text{ (cumulative trunk diameter rate to be applied)}] \times 1.6 \text{ oz (1 packet)} = \text{total oz of product per tree.}$

**Calculation examples for a single tree with a DBH greater than 15 inches:**

To calculate the higher rate range with a 30 inch DBH tree:  
 $(30/12) \times 1.6 \text{ oz (1 packet)} = 4 \text{ oz per tree}$

To calculate the lower rate range with a 30 inch DBH tree:  
 $(30/48) \times 1.6 \text{ oz (1 packet)} = 1 \text{ oz per tree}$

**Calculation examples for multiple trees with a DBH greater than 15 inches:**

To calculate the higher rate range for multiple trees, add the DBH of the trees together and divide by rate to be applied. Example of multiple trees using similar rate of 12 (y): 3 trees with DBH of 15, 20, & 25 inches.

Total cumulative inches of DBH are 60 (x).  $(60/12) \times 1.6 \text{ oz (1 packet)} = 8 \text{ oz for all three trees.}$

To calculate the lower rate range for multiple trees, add the DBH of the trees together and divide by rate to be applied. Example of multiple trees using similar rate of 48 (y): 3 trees with DBH of 15, 20, & 25 inches.

Total cumulative inches of DBH are 60 (x).  $(60/48) \times 1.6 \text{ oz (1 packet)} = 2 \text{ oz for all three trees.}$

**Soil Injection:** GRID SYSTEM: Space holes on 2.5 foot centers, in a grid pattern, extending to the drip line of the tree. CIRCLE SYSTEM: Apply in holes evenly spaced in circles, (use more than one circle dependent upon the size of the tree) beneath the drip line of the tree extending in from that line. BASAL SYSTEM: Space injection holes evenly around the base of the tree trunk no more than 6 to 12 inches out from the base.

Mix required dosage in sufficient water to inject an equal amount of solution in each hole. Maintain a low pressure and use sufficient solution for distribution of the liquid into the treatment zone. For optimum control, keep the treated area moist for 7 to 10 days. Do not use less than 4 holes per tree or shrub.

**Soil Drench:** Uniformly apply the dosage in no less than 10 gallons of water per 1000 square feet as a drench around the base of the tree, directed to the root zone. Remove plastic or any other barrier that will stop solution from reaching the root zone.

**For Control of Specified Borers:** Application to trees already heavily infested may not prevent the eventual loss of the trees due to existing pest damage and tree stress.

**RESTRICTIONS:**

- No Soil Injection Applications Allowed in Nassau or Suffolk Counties of New York.
- Do not apply more than 8.53 oz (0.4 lb active ingredient) per acre per year.
- Keep children and pets off treated area until dry.
- Do not apply **A171.02** to areas which are waterlogged or saturated, which will not allow penetration into the root zone of the plant.
- Do not apply this product, by any application method, to linden, basswood, or other *Tilia* species.



DIRECTIONS FOR GROUND TREATMENT PRE-PLANTING	
GROUND TREATMENT PRE-PLANTING	1.6 oz (1 packet) <b>A171.02</b> per 8,250 to 11,000 sq ft
Apply as a broadcast treatment and incorporate into the soil before planting.	
<b>RESTRICTION:</b> <ul style="list-style-type: none"> <li>Do not apply more than 8.53 oz (0.4 lb active ingredient) per acre per year.</li> <li>Keep children and pets off treated area until dry.</li> <li>Do not apply <b>A171.02</b> to areas which are waterlogged or saturated, which will not allow penetration into the root zone of the plant.</li> </ul>	

DIRECTIONS FOR FOLIAR APPLICATION TO POME FRUITS, PECANS, AND GRAPES GROWN IN RESIDENTIAL AREAS				
SITE	PEST		APPLICATION RATE	
<b>Pome Fruits</b>	Aphids (except Woolly apple aphid)	Mealybugs*	1.6 oz (1 packet) per 300 gallons of water	2.1 oz per acre <sup>1</sup>
Apple		San Jose Scale*		
Crabapple	Leafhoppers (including glassy-winged sharpshooter)			
Loquat				
Mayhaw	Leafminer			
Pear				
Pear (oriental)				
Quince				
<p>Apply specified dosage as foliar spray as needed after petal-fall is complete. For control of rosy apple aphid, apply prior to leafrolling caused by the pest.</p> <p>For first generation leafminer control, make first application as soon as petal-fall is complete. Greatest leafminer control will result from the earliest possible application. For second and succeeding generations of leafminer, optimal control is obtained from applications made early in the adult flight against egg and early instar larvae. A second application may be required 10 days later if severe pressure continues or if generations are overlapping. A single application may result in suppression only. <b>A171.02</b> will not control late stage larvae.</p> <p>For San Jose Scale, time applications to the crawler stage. Treat each generation.</p> <p>For late season (preharvest) control of leafhopper species, apply <b>A171.02</b> while most leafhoppers are in the nymphal stage.</p>				
<b>RESTRICTIONS:</b> <ul style="list-style-type: none"> <li><b>Follow application restrictions for Non-Agricultural Uses on page [X] to protect bees and other insect pollinators.</b></li> <li>For optimal control of mealybug, ensure good spray coverage of the trunk and scaffolding limbs or other resting sites of the mealybug.</li> <li>Do not apply more than 2.1 oz per acre in a single application.</li> <li>Do not apply more than 8.53 oz (0.4 lb active ingredient) per acre per year</li> <li>Allow 10 or more days between applications.</li> <li>Allow at least 7 days between last application and harvest.</li> <li>Keep children and pets off treated area until dry.</li> </ul>				
*Not for use in California for control on pears.				

<b>Pecans*</b>	Yellow pecan aphid	Pecan spittlebug	1.6 oz	2.1 oz
	Black margined aphid	Pecan stem phylloxera	(1 packet) per 300	per acre <sup>1</sup>
	Pecan leaf phylloxera		gallons of water	

Make foliar applications as pests begin to build before populations become extreme. Two applications at a 10 to 14 day interval may be required to achieve control. Scout and retreat if needed.

Thorough uniform coverage of foliage is necessary for optimal control. Addition of an organosilicone-based spray adjuvant at a rate not to exceed the adjuvant manufacturer's use rate may improve coverage.

**RESTRICTIONS:**

- Follow application restrictions for Non-Agricultural Uses on page [X] to protect bees and other insect pollinators.
- Do not apply more than a total of 6.3 oz of **A171.02** per acre per year.
- Do not make more than 3 applications.
- Allow 10 or more days between applications.
- Allow at least 7 days between last application and harvest.
- Keep children and pets off treated area until dry.

<sup>1</sup>The amount of **A171.02** required per acre will depend on tree size and volume of foliage present. The rate per acre is based on a standard of 400 gallons of dilute spray solution per acre for large trees.

\*Use on pecans not permitted in California unless directed by state-specific 24(c) supplemental labeling.

SITE	PEST	APPLICATION RATE	
Grapes	Leafhoppers (including glassy-winged sharpshooter) Mealybugs	1.6 oz (1 packet) per 300 gallons of water	1.0 oz per acre

Apply specified dosage as a foliar spray using 200 gallons of water per acre.

**RESTRICTIONS:**

- Follow application restrictions for Non-Agricultural Uses on page [X] to protect bees and other insect pollinators.
- Do not apply more than a total of 2.0 oz of **A171.02** per acre per year.
- Allow at least 14 days between applications.
- Applications may be applied up to and including day of harvest.
- Keep children and pets off treated area until dry.

## STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Store in a tightly closed container in a cool, dry place. Store in original container and out of reach of children, preferably in a locked storage area.

**PESTICIDE DISPOSAL:** Pesticide spray mixture or rinsate that cannot be used should be disposed of in a landfill approved for pesticides. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by the use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

### CONTAINER HANDLING:

Nonrefillable container. Do not reuse or refill this container. Empty residue into application equipment. Offer container and foil bag for recycling, if available, or dispose of container and/or foil bag in a sanitary landfill or by incineration, if allowed by State and local authorities.

## LIMITATION OF WARRANTY AND LIABILITY

**IMPORTANT: READ BEFORE USE.** Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability. **CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of ATTICUS, LLC. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

**DISCLAIMER OF WARRANTIES:** To the extent consistent with applicable law, ATTICUS, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label. **LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, neither ATTICUS, LLC the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

[A171.02] is a trademark of Atticus, LLC

[Merit® 75 WSP] is a registered trademark of Bayer.

**{LANGUAGE ON LABEL AFFIXED TO CONTAINER}**

IMIDACLOPRID	GROUP	4A	INSECTICIDE
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**A171.02<sup>[TM]</sup>**

[Alternate Brand Name: Mineiro 75 WSP]

Contains imidacloprid, the active ingredient used in [Merit® 75 WSP].

[For foliar and systemic insect control of listed pests in turfgrass (including sod farms), landscape ornamentals, fruit and nut trees, and interior plantscapes]

<b>ACTIVE INGREDIENT:</b>	(% by weight)
Imidacloprid, 1-[(6-Chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine.....	75.0%
<b>OTHER INGREDIENTS:</b> .....	<u>25.0%</u>
<b>TOTAL</b> .....	100.0%

Keep water-soluble packets in this container and store in a cool dry place but not below freezing (32° F).

Do Not Remove Packets from Container Except For Immediate Use.

**STOP – READ THE LABEL BEFORE USE  
KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail.)

FIRST AID	
<b>If swallowed:</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If on skin or clothing:</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes:</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
HOT LINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall at <b>1-844-685-9173</b> for emergency medical treatment information.	

**For Chemical Emergency:**  
**Spill, Leak, Fire, Exposure, or Accident, Call CHEMTREC Day or Night**  
**Within USA and Canada: 1-800-424-9300 or +1 703-527-3887 (collect calls accepted)**

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
CAUTION**

Harmful if swallowed, inhaled, or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Keep children or pets off treated area until spray is dry.

**ENVIRONMENTAL HAZARDS:** This product is highly 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 washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops/plants or weeds. Do not apply this product or allow it to drift to blooming crops/plants or weeds if bees are foraging the treatment area. This chemical demonstrates the properties and characteristics associated with chemicals detected in groundwater. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in groundwater contamination.

**PHYSICAL AND CHEMICAL HAZARDS**

Do not mix or allow contact with oxidizing agents, as a hazardous chemical reaction may occur.

STORAGE AND DISPOSAL
Do not contaminate water, food or feed by storage or disposal.
<b>PESTICIDE STORAGE:</b> Store in a tightly closed container in a cool, dry place. Store in original container and out of reach of children, preferably in a locked storage area.
<b>PESTICIDE DISPOSAL:</b> Pesticide spray mixture or rinsate that cannot be used should be disposed of in a landfill approved for pesticides. Improper disposal of excess pesticide spray mixture or rinsate is a violation of Federal law. If these wastes cannot be disposed of by the use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.
<b>CONTAINER HANDLING:</b> Nonrefillable container. Do not reuse or refill this container. Empty residue into application equipment. Offer container and foil bag for recycling, if available, or dispose of container and/or foil bag in a sanitary landfill or by incineration, if allowed by State and local authorities.

See inside label booklet for additional Precautionary Statements and Directions for Use.

[A171.02] is not manufactured, or distributed by Bayer Environmental Science, seller of [Merit® 75 WSP].

Manufactured for:  
**Atticus, LLC**  
 5000 CentreGreen Way, Suite 100  
 Cary, NC 27513

**EPA Reg. No.: 91234-XXX**  
**EPA Est. No.:** \_\_\_\_\_  
**NET WEIGHT:** \_\_\_\_\_