

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

October 7, 2024

Georgia Anastasiou Agent Senoret Chemical Company, Inc 69 North Locust Street Lititz, PA 17543

Subject: Notification per PRN 98-10 – Adding optional marketing claims, optional graphics

and optional language for directions for use.

Product Name: Terro® MSLAB EPA Registration Number: 149-22 Application Date: 8/19/2024

Case Number: 626378

Dear Georgia Anastasiou

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "NOTIFICATION" and placed in our records.

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 (FIFRA) 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) lists 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 have any questions, please contact David Drawbaugh at Drawbaugh.David@epa.gov.

Page 2 of 2 EPA Reg. No. 149-22 Case No. 626378

Sincerely,

Kable Bo Davis

Senior Regulatory Specialist Office of Pesticide Programs

Registration Division, Immediate Office

Enclosure

EPA Reg. No. 149-22 Notification of Label Action –Pre-Applied Adhesive/ Marketing Language/ Graphics August 15, 2024 Page 1 of 7

[MASTER LABEL - FRONT PANEL]

TERRO® MSLAB

[Kills Sweet-Eating Ants*]

NOTIFICATION

149-22

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

10/07/2024

[Alternate Brand Names]

TERRO® Multi-Surface Liquid Ant Baits
TERRO® Multi-Surface Liquid Ant Bait Stations
TERRO® Discreet Liquid Ant Baits
TERRO® Discreet Liquid Ant Bait Stations

ACTIVE INGREDIENT:

Sodium Tetraborate Decahydrate (Borax)	5.40%
OTHER INGREDIENTS:	
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

NET CONTENT	S:	
[Bait Stations	fl. oz. (ml) each

^{*} except fire ants, pharaoh ants, carpenter ants, and harvester ants

[MASTER LABEL - BACK PANEL PAGE 1 OF 3]

[PRODUCT INFORMATION: TERRO® MSLAB is [a] [an] [ready] [easy]-to-use, pre-filled, liquid ant bait station. Ants (except fire ants, pharaoh ants, carpenter ants, and harvester ants) will enter the station, feed and return to the nest where they will pass on the bait to the rest of the colony. Included [removable] adhesive [strips] [tape] allow(s) for [discreet], multi-surface application. Bait stations may be applied to indoor vertical surfaces, [[including cabinet sides and interiors, cabinet toe kicks, baseboards, walls] cabinet overhangs or placed directly on floors or counters.]

DIRECTIONS FOR USE

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

FOR USE IN: Homes, Hospitals, Restaurants, Apartments, Grocery Stores, Institutional Buildings, Schools, Cafeterias, Warehouses, Storage Areas, Food Processing Plants, Mobile Homes, Boats, Military Bases, Theaters, Nursing Homes, and on Military, Commercial, and Cruise Ships.

ATTRACTS AND KILLS ALL COMMON HOUSEHOLD ANTS INCLUDING: Argentine ants, Ghost ants, Cornfield ants, Pavement ants, Acrobat ants, White footed ants, Little black ants, Odorous house ants, Crazy ants, Big headed ants, and other sweet-eating ants (except fire ants, pharaoh ants, carpenter ants, and harvester ants).

USE INSTRUCTIONS:

{Note to reviewer: Instructions will be listed in appropriate sequential order based on whether adhesive strips are preapplied or applied by consumer}

Product Application:

1. For [adhesive] [discreet] [placement] [applications], apply [remove] [included] [removable] adhesive [strip] [tape] [liner] [paper backing] [to either side of station between adhesive [strip] [tape] placement guides [with (labeled) (printed) (removable) (removable labeled) (wall) side of adhesive facing out]. [Press and hold [adhesive] [strip] [tape] firmly to station for 10 seconds [to ensure proper adhesion]. [For non-adhesive application, skip to step [2] 3.]

[Note: Only (side) (printed) (labeled) (side of adhesive) (as removable) (side of adhesive) (strip) (tape) is removable.]

- 2. Remove [remaining] [labeled] [printed] [removable side] [wall side] [adhesive] strip [liner] [paper backing].
- 3. Hold bait station firmly in one hand with bait pack tab facing up. [Break][Twist][Snap][Cut] off the bait pack tab being careful not to spill bait.
- 4. Apply/place bait stations close to where ants are [traveling] [present]. For adhesive [applications] [placements], [carefully] press and hold station firmly against surface for 10 seconds [to ensure proper adhesion]. Ants will enter the bait station through the hole created by removing the bait pack tab.
- 5. Place additional bait stations anywhere ants [may enter] [are present in] your home. [For best results, use (all) (number) bait stations to ensure sufficient supply for the ants.]
- 6. Monitor [placements] [bait stations] regularly for activity but do not interfere with the ants or baits.
- 7. Replace bait stations [with new baits] when bait is depleted [until ants are controlled].
- [Once ants are controlled, replace bait stations every month to keep ants from returning].

Product Removal (for adhesive applications):

- 1. Grasp bait station and [twist] [turn] [gently] [slowly] to remove [station] from adhesive [strip] [tape] [application surface] [being careful not to spill any remaining bait.]
- 2. [Pull [free] [loose] adhesive strip tab [in direction of tab] [to stretch strip] until strip is freed from [application] surface.]

EPA Reg. No. 149-22 Notification of Label Action –Pre-Applied Adhesive/ Marketing Language/ Graphics August 15, 2024 Page 3 of 7

[MASTER LABEL - BACK PANEL PAGE 2 OF 3]

CONTROLLING AND ELIMINATING ANTS (except fire ants, pharaoh ants, carpenter ants, and harvester ants): Ants may first come in large numbers but will soon disappear. This product is specifically formulated to allow worker ants to consume the product and survive long enough to carry the liquid back to the [nest and deliver a dose to the] rest of the colony. The key to obtaining effective control is to monitor the placements regularly and ensure there is always a fresh supply of bait at each placement. Complete control may take up to two weeks.

DO NOT use adhesive application [strips] [tape] on delicate surfaces such as unpainted walls, wallpaper or wood furniture finishes. Do not use insect killing sprays on or near bait stations as they may repel ants from feeding. Do not use bait stations in edible product areas of food handling establishments, restaurants or other areas where food is commercially prepared or processed. Do not use bait stations in serving areas while food is exposed. Do not contaminate feed and foodstuffs. Place bait stations in areas inaccessible to children and pets.

For further information on successful ant control using the TERRO® brand of ant control products, visit our web site (www.Terro.com).

[MASTER LABEL - BACK PANEL PAGE 3 OF 3]

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. **PESTICIDE STORAGE:** Store in a cool dry place. Do not store where children or animals may gain access. **PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Nonrefillable Container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

SENORET CHEMICAL CO., INC. 69 NORTH LOCUST STREET LITITZ, PA 17543

Phone: (24-hour emergency): 1-800-800-1819 www.Terro.com Terro® is a registered trademark of Senoret Chemical Company, Inc.

EPA Reg. No. 149-22 EPA Est. No. 47629-PA-001

[MASTER LABEL - OPTIONAL CLAIMS PAGE 1 OF 4]

[Optional Marketing Claims]

- Liquid [ant] bait contains both a food and water source
- Contains Borax
- Use Indoors
- Liquid Ant Killer
- Liquid Ant Bait Solution
- 5.4% Concentrate saves time and money
- Kills the ants* you see and the ants you don't
- Attracts and kills all common household ants*
- Attracts Ants*
- Worker Ants* carry the bait back to the colony
 [Qualifier for above * claims] *except fire ants, pharaoh ants, carpenter ants, and harvester ants
- Do it yourself liquid bait system
- No unpleasant odors
- Hate em Bait em
- Indoor [Protection]
- Twist [Break] [off bait pack tab] to activate [open]
- Pre-filled
- Ready-to-use
- Easy to use
- Easy to open [simply twist [break] [off bait pack tab]].
- Twist Tab keeps liquid ant bait fresh until you are ready to use
- Sealed bait stays fresh until opened
- Stay-Fresh twist tab
- Liquid bait technology offers ants* both a food and water source
- An ant's anatomy allows for effective transport and consumption of liquids
- This product is specifically formulated to allow worker ants* to consume the product and survive long
 enough to carry the liquid back to the nest and deliver a dose to the rest of the colony.
- Ants cannot live without water. TERRO MSLAB contains both a food and water source for ants. TERRO
 MSLAB is formulated to allow worker ants* to consume the product and survive long enough to carry the
 liquid back to the nest and deliver a dose to the rest of the colony.
- [Bait(s)] [stations(s)] not for individual sale
- Small size for discreet placement
- [Small] Liquid] bait station design for discreet placement
- Includes [removable] adhesive [strips] [tape] for [multi-surface] [discreet] [flexible] [hidden] [inconspicuous] [secure] [application] [placement].
- Multi-surface [discreet] [adhesive] application.
- [Convenient] [adhesive] [strips] [tape] included
- Adhesive application for [discreet] [flexible] [hidden] [inconspicuous] [secure] placement
- [Discreet] [flexible] placement
- Discreet, place anywhere
- Discreet adhesive design
- Discreet design sticks anywhere
- Small, adhesive-backed for discreet placement
- 4 adhesive-backed bait stations
- Sticks to multiple surfaces
- Place anywhere in your home
- Use anywhere in your home
- Easy removal [adhesive-backed stations]
- Adhesive-backed for [secure], [discreet] placement
- Small and discreet
- Small, discreet, ant solution
- Adhesive removes cleanly

[MASTER LABEL - OPTIONAL CLAIMS PAGE 2 OF 4]

- Out-of-the way placement
- Out-of-sight placement
- Dual color station
- Discreet [two-color] [design] [colors]
- Choice of color
- Color choice
- Dual color station provides [color] [choice of visible color]
- Dual color
- Two [2] [tone] color [options]

[Optional Marketing Claims - For stations with pre-applied adhesive strips]

- Improved design [so more ants can enter]
- New design [so more ants can enter]
- New design, now with 2-way feeding steps so more ants can enter
- [Now] [with] 2-way feeding steps so more ants can enter
- 2 way feeding steps
- New design, same results!
- New & improved design
- New style, same results
- 50% smaller design
- Same amount of ant bait, 50% smaller design
- Improved design, less plastic
- Improved design, less waste
- Less plastic than previous design
- Now 75% less plastic [than previous design]

[MASTER LABEL - OPTIONAL CLAIMS PAGE 3 OF 4]

[Optional Graphics]



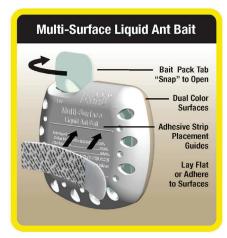












[MASTER LABEL - OPTIONAL CLAIMS PAGE 4 OF 4]

[Optional Graphics - Cont'd]



















