

United States Environmental Protection Agency

Jean M. Fugate Registration Specialist  
S.C. Johnson & Son, Inc.  
525 Howe Street  
Racine, WI 53403

Subject: Label amendment submitted by notification. Submission dated March 28, 2000  
Registration Number: 4822-38  
Date of Submission: March 28, 2000  
Product Name: Raid House & Garden Bug Killer JUN 13 2000  
Agency Bar Code # S578802

Dear Ms. Fugate;

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. On the front panel of the label the terms "Many More Listed on Back" and "Many More" as trailer descriptions of target pests, are considered non-descriptive for purposes of adequately identifying pests to be controlled with this product. This terminology should be removed and all the pests listed, or not added to the label.
2. The Term "New!" is allowed to be used on any Agency approved labels for a period of 6 consecutive months. After that time, the language must be removed. Your current formulation and label language has exceeded that time frame, therefore the language should be removed.
3. On page 2 of the proposed label the statement "Made with Natural Pyrethrin" may be considered a false and misleading claim as outlined below:

CFR 40 156.10 (a),(5) Labeling requirements states the following:

"False or misleading statements. Pursuant to section 2(q)(1)(A) of the Act, a pesticide or a device declared subject to the Act pursuant to § 153.240, is misbranded if its labeling is false or misleading in any particular including both pesticidal and non-pesticidal claims. Examples of statements or representations in the labeling which constitute misbranding include:

- (i) A false or misleading statement concerning the composition of the product;
- (ii) A false or misleading statement concerning the effectiveness of the product as a pesticide or device;
- (iii) A false or misleading statement about the value of the product for purposes other than as a pesticide or device;
- (iv) A false or misleading comparison with other pesticides or devices;
- (v) Any statement directly or indirectly implying that the pesticide or device is recommended or endorsed by any agency of the Federal Government;

CONCURRENCES

SYMBOL ▶	H7505C							
SURNAME ▶	RGBKBN							
DATE ▶	Jun 13, 2000							

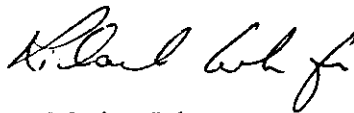
- (vi) The name of a pesticide which contains two or more principal active ingredients if the name suggests one or more but not all such principal active ingredients even though the names of the other ingredients are stated elsewhere in the labeling;
- (vii) A true statement used in such a way as to give a false or misleading impression to the purchaser;
- (viii) Label disclaimers which negate or detract from labeling statements required under the Act and these regulations;
- (ix) Claims as to the safety of the pesticide or its ingredients, including statements such as "safe," "nonpoisonous," "noninjurious," "harmless" or "nontoxic to humans and pets" with or without such a qualifying phrase as "when used as directed"; and
- (x) Non-numerical and/or comparative statements on the safety of the product, including but not limited to:
  - (A) "Contains all natural ingredients";
  - (B) "Among the least toxic chemicals known"
  - (C) "Pollution approved" "

3. The language within the Environmental Hazards section "This product is highly toxic to fish. Do not apply directly to water. Drift and Runoff from treated sites may be hazardous to aquatic organisms in adjacent waters." may be modified to state the following" This product is toxic to fish. Do not apply directly to water."

4. The statement "Product is for use on ornamental garden plants only. It is not for use on edible crops." Should remain on the front display panel in order to adequately inform the purchaser about product usage limitations at point of purchase. This language also qualifies the terms on the label such as the trade name "Raid House and Garden Bug Killer", "Lawn and Garden Size", and "Garden Center Size."

A stamped copy is enclosed for your records. If you have any questions, you may contact Richard J. Gebken, at (703) 305-6701.

Sincerely,



Marion Johnson  
 Product Manager 10  
 Insecticide Branch  
 Registration Division (7505C)

Enclosure  
 004822-00038 S578802.wpd



**KILLS WITH PYRETHRIN INSECTICIDE  
PYRETHRIN INSECTICIDE IS MADE FROM FLOWERS  
MADE WITH NATURAL PYRETHRIN  
CONTAINS BOTANICAL INSECTICIDES**

Kills the following insects: Ants, Aphids, Army Worms, Boxelder Bugs, Carpet Beetles, Caterpillars, Centipedes, Climbing Cut Worms, Crickets, Earwigs, Fleas, Flies, Gnats, Gypsy Moth, Gypsy Moth Larvae, Hornets, Japanese Beetles, Leafhoppers, Millipedes, Mosquitoes, Moths (Small Flying), Red Spidermites, Roaches, Silverfish, Sow Bugs, Spiders, Thrips (Exposed), Ticks, Wasps, Waterbugs, Webworms, Whiteflies

**DIRECTIONS FOR USE:**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **SHAKE CAN BEFORE USING.** Hold container upright. **SPRAY** away from face.

**CRAWLING BUGS:** To kill Roaches, Waterbugs, Crickets, Silverfish, Centipedes, Ticks, Boxelder Bugs, Earwigs, Caterpillars, Millipedes, Spiders, Sow Bugs: Hold dispenser about 12 inches from surface being sprayed. Spray thoroughly into hiding places such as cracks, moist areas, openings around pipes and sinks, under refrigerators, baseboards and storage areas.

**ANTS:** Spray trails, nests, doors and window frames where ants enter.

**FLEAS:** Spray floors, floor coverings and sleeping quarters of pets. Repeat as necessary.

**CARPET BEETLES:** Spray top and underside of rug. Repeat as necessary.

**FLYING BUGS:** To kill Flies and Mosquitoes: Close all doors and windows. Direct the spray mist to all parts of the room especially windows and other light sources which attract these insects, staying about 3 feet from walls, fabrics and furniture. Fill room with mist then leave the treated areas. Keep room closed for at least 15 minutes. Ventilate the room when treatment is completed. Spray directly on stray Wasps, Hornets, Gnats and small Flying Moths that enter buildings.

**GARDEN BUGS:** Product is for use on ornamental garden plants only. It is not for use on edible crops. To kill Aphids, Climbing Cut Worms, Gypsy Moth Larvae, Army Worms, Japanese Beetles, Leafhoppers, Red Spider Mites, exposed Thrips, Webworms and Whiteflies on ornamental garden plants: Salvias, Roses, Gladiolas, Azaleas, Dahlias, Chrysanthemums, Asters, Marigolds, Delphiniums, Petunias, Begonias, Shrub, Butterfly Plants, Dieffenbachia, Dracaenas, Ferns, Ficus, Palms, Pepperonia, Philodendrons, Piggyback Plants, Pines, Pothos, Spider Plants, Succulents, Evergreens, Fushia, Geraniums, Irises, Wandering Jews, Zinnias, Peonies, Impatiens, Alyssum, African Violets and English Ivy. Spray when air is still and temperature is not above 90°F. Spray with slow sweeping motion 36 inches from all plants. Avoid wetting - a light spray kills pests effectively. Spray in short bursts. Repeat application from time to time as long as insects are present. Use with caution on tender foliage, young plants and new growth. For adult Whiteflies, Red Spider Mites, Gypsy Moths and Japanese Beetles be sure to direct spray to contact these pests. Thoroughly cover the infested area. Repeat as necessary.

**STORAGE AND DISPOSAL**

**STORAGE:** Store in an area away from heat or flame and inaccessible to children.

**DISPOSAL:** Wrap empty container and put in trash. Do not puncture or incinerate. Do not reuse empty container.

[Per PR Notice 94-2, the following Disposal statement may be used:

**DISPOSAL:** This container may be recycled in the few but growing number of communities where aerosol can recycling is available. Before offering for recycling, empty the can by using the product according to the label. (DO NOT PUNCTURE!) If recycling is not available, wrap in several layers of newspaper and discard in trash.]

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

**CAUTION:** Harmful if absorbed through the skin. Keep out of reach of children. Avoid contact with skin, eyes and clothing. Do not remain in enclosed areas after use. Ventilate enclosed areas before returning. Avoid contamination of food and foodstuffs. Remove pets and birds before using. Cover fish aquariums before spraying. Wash hands thoroughly with soap and water after handling.

**STATEMENT OF PRACTICAL TREATMENT:**

**IF ON SKIN:** Remove with soap and water. If irritation persists, seek medical attention.

**IF IN EYES:** Flush with plenty of water. If irritation persists, seek medical attention.

**PHYSICAL OR CHEMICAL HAZARDS:** Contents under pressure. Do not use or store near heat or flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

**ENVIRONMENTAL HAZARDS:** This product is highly toxic to fish. Do not apply directly to water. Drift and runoff from treated sites may be hazardous to aquatic organisms in adjacent waters.

Questions? Comments?

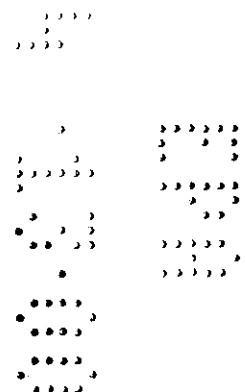
Call 800-558-5252

or Write Helen Johnson

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EPA Est. No. 4822-WI-1

