

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

May 4, 2012

Ms. Rachel M. Callies Registration Specialist S.C. Johnson & Son, Inc. 1525 Howe Street Racine, WI 53403-2236

Subject:

Amended Labeling; Addition of New Pyrethrins-Related Marketing Claims

RAID HOUSE & GARDEN BUG KILLER, EPA Reg. No. 4822-38

Your Submission Dated March 14, 2012

Dear Ms. Callies:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following label revision provision(s):

Optional Marketing Statements section comments, page 1 of 4:

- 1. Delete the 1st, 2nd, 3rd, and 4th optional marketing statements. As per Chapter 12, Section III of the Agency's Label Review Manual, it is unacceptable to make label statements or claims that express the absence of certain ingredients that were never a part of this formulation in the first place. These optional marketing statements are considered implied safety claims that are false and misleading to the consumer, and are prohibited by 40 CFR §156.10(a)(5).
- 2. Revise the 5th optional marketing statement to read "Contains pyrethrins, a botanical insecticide derived from Chrysanthemum flowers."
- 3. Delete the 6th, 7th, and 9th optional marketing statements. These optional marketing claims are considered false and misleading to the consumer. A revised version of the 5th optional marketing statement above will have to suffice for these deleted statements.

Should S.C. Johnson & Son, Inc. wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under 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 section 12(a)(1)(E) of FIFRA. 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 be 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 EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, S.C. Johnson & Son, Inc. may refer consumers to the company's phone number or e-mail address.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Per 40 CFR §156.10(a)(6), submit one (1) copy of your final printed labeling, incorporating the above changes, before you release the product for shipment. As defined in 40 CFR §152.3, "final printed labeling" means the "label or labeling of the product when distributed or sold." Clearly legible reproductions or photo reductions will be accepted for unusual labels. Note that a clean copy of the master label in most cases does not meet the definition of final printed labeling. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely yours,

Richard J. Gebken Product Manager (10)

Insecticide Branch

Registration Division (7504P)

Enclosure: Label stamped "Accepted with Comments" 004822-00038 D462519 & D463893

RAID HOUSE & GARDEN BUG KILLER

Alternate Brand Names:

Raid Earth Options House & Garden Bug Killer (4-21-06)

Raid Earth Options Flying Insect Killer I (4-21-06)

Raid Flying Insect Killer (4-21-06)

Raid Earth Options Home Insect Killer (4-21-06)

Raid Home Insect Killer (4-21-06)

Raid Earth Options Multi-Bug Killer (4-21-06)

Raid Multi-Bug Killer I (4-21-06)

ACCEPTED
With COMMENTS
In EPA Letter Dated:
May 4, 2012
Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:

4822 - 38

- Contains no chlorinated pesticides
- Contains no organophosphates
- Contains no chlorine-based ingredients -
- Made without dyes or phosphates

Contains pyrethrins, a biological insecticide derived from Chrysanthemum flowers

- Contains a plant based (active ingredient) (insect killer) (insecticide)
- Contain pyrethrins derived from a Chrysanthemum flower

Non-staining (non-porous surfaces)

Pyrethrin insecticide is made from flowers

Saves buying several single purpose insecticides. Its formula is specially designed to kill crawling, flying and garden insects. Feel confident to use it indoors or outdoors around carpets, draperies, no-wax floors, houseplants and garden plants.

Kills on contact

Kills common household insects listed on label

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

For use throughout the house including (kitchens), (bathrooms), (bedrooms), (laundry rooms), and (basements)

Treated surfaces may be slippery when wet. Wipe surface until dry.

Bad news for bugs, good news for you.

Kills bugs Indoors & Outdoors

Indoor(s) - Outdoor(s)

For use Indoors & Outdoors

Indoor/Outdoor

Indoor and Outdoor Use

Raid Kills Bugs Dead (!)

Kills with pyrethrin insecticide

Made with pyrethrins and piperonly butoxide

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

Multi-Bug House & Yard Line Lawn & Garden Size Garden Center Size (Pleasant)(clean)(fresh)(scent)(smell)(odor)(fragrance)
Country Garden Scent
Forest Fresh Scent
Fresh Garden Scent
Outdoor Fresh Scent
Garden Fresh Scent
Country Fresh Scent
Herbal Garden Scent
Mountain Fresh Scent
Spring Fresh Scent
Country Scent
Country Scent

SC Johnson, A Family Company (since 1886) Fisk Johnson [signature]

ACTIVE INGREDIENTS:

NET WEIGHT 9-17.5oz OZ. KEEP OUT OF REACH OF CHILDREN CAUTION: SEE ADDITIONAL PRECAUTIONARY STATEMENTS ON BACK

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Use Restrictions: Do not make applications during rain. Do not remain in treated area. Exit area immediately and remain outside the treated area until aerosols, vapors, and/or mists have dispersed. Do not allow adults, children, or pets to enter until vapors, mists, and aerosols have dispersed, and the treated area has been thorousghly ventilated and until sprays have dried. Do not wet plants to point of runoff or drip. Remove and cover exposed food and drinking water before application. Remove or cover dishes, utensils, food processing equipment and food preparation surfaces, or wash them before use. Do not wet treated areas or articles to the point of run-off or drip. Do not use the treated article until spray has dried. All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses: - Treatment to soil or vegetation around structures; - Application to lawns, turf and other vegetation; -Applications for building foundations up to a mximum height of 3 feet. Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches and structural surfaces (such as windows, doors and eaves) are limited to spot and crack-and-crevice applications only.

SHAKE CAN BEFORE USING. Hold container upright. SPRAY away from face. Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift. Remove pets, birds, and cover fish aquariums before spraying.

To Kill CRAWLING BUGS Indoors: 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.

To Kill ANTS (in the yard) (and) (around)(the house)(and)(structures): Spray trails, nests, doors and window frames where ants enter.

To Kill FLEAS (indoors)(and)(in pet areas): Spray floors, floor coverings and sleeping quarters of pets. Allow treated surfaces to dry prior to allowing pets to return. Apply once a day if necessary.

To Kill CARPET BEETLES in (your) rug(s): Spray top and underside of rug. Apply once a day if necessary.

To Kill FLYING BUGS (in) indoor(s) (spaces): 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. Thoroughly ventilate the room when treatment is completed. Spray directly on stray Wasps, Hornets, Gnats and small Flying Moths that enter buildings.

To Kill (Outdoor) (and) (GARDEN) BUGS (on ornamental plants): 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, Shrubs, 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. Apply once a day if necessary.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store in a cool, dry place away from heat or open flame and inaccessible to children.

PESTICIDE DISPOSAL AND CONTAINER HANDLING:

Do Not Puncture or Incinerate!

If empty: This container may be recycled in the few but growing number of communities where (steel) aerosol can recycling is available. Before offering for recycling, empty the container (can) by using the product according to the label. If recycling is not available, place in trash. If partially filled: Call your local solid waste agency or 1-800-558-5252 for disposal instructions.



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. Wash hands thoroughly with soap and water after handling.

FIRST AID:

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor immediately for treatment advice.

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 immediately for treatment advice.

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

ENVIRONMENTAL HAZARDS: This pesticide is toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to or near water. Drift or run-off may be hazardous to fish in water adjacent to treated area. Do not contaminate water when disposing of equipment, washwater, or rinsate. See Directions for Use for additional precautions and requirements. This product is highly toxic to bees exposed to direct treatment on blooming crops or weeks. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.



Contains no CFCs or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.

Questions? Comments? Call 800-558-5252 or Write Helen Johnson © 2012 S.C. Johnson & Son, Inc., Racine WI 53403-2236 U.S.A. All Rights Reserved. www.killsbugsdead.com EPA Reg. No. 4822-38 EPA Est. No. 4822-WI-1