



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 4, 2020

Dan Pederson
Associate Manager – Global Regulatory Affairs & Registration
S.C. Johnson & Son, Inc.
1525 Howe St.
Racine, WI 53403

Subject: Label Amendment – Adding residual claims for cockroaches and adding alternate brand names
Product Name: BUGTRON
EPA Registration Number: 4822-561
Application Date: 14 June 2019
Decision Number: 552311

Dear Mr. Pederson:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing 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 copy of the final printed labeling before you release the 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.

The following alternate brand names have been added to the product record:

- Raid Ant & Roach Barrier
- Raid Max Perimeter Protection
- Raid Bug Defense
- Raid Ant & Roach Kitchen Defense
- Raid Max Defend Perimeter Protection

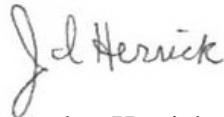
Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded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

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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.

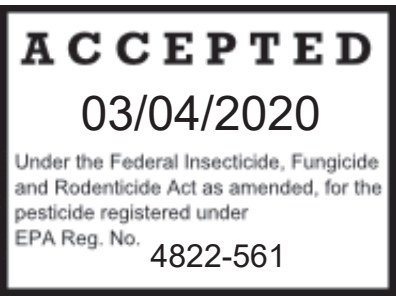
Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Dr. Helen Hull-Sanders by phone at 703-347-0243, or via email at hull-sanders.helen@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "J. Herrick".

Jacquelyn Herrick, Product Manager 03
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

Enclosure



[Information in brackets is notes to Reviewer]
(Information in parentheses is optional language)
Information in {} means one option must be selected

BUGTRON

Alternate Brand Names:

- Raid Max Bug Barrier
- Raid Max Home Insect Killer
- Raid Ant & Roach Barrier
- Raid Max Perimeter Protection [*Alternate Brand Name Proposed 6-20-19*]
- Raid Bug Defense [*Alternate Brand Name Proposed 6-20-19*]
- Raid Ant & Roach Kitchen Defense [*Alternate Brand Name Proposed 6-20-19*]
- Raid Max Defend Perimeter Protection [*Alternate Brand Name Proposed 6-20-19*]

Active Ingredient:

Deltamethrin.....	0.03%
Other Ingredients.....	<u>99.97%</u>
Total.....	100.00%

KEEP OUT OF REACH OF CHILDREN
CAUTION

See (back) (inside) (bottom) (side) panel for additional precautionary statements (and complete use instructions)

Net Contents:

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION

Contact with product may result in transient tingling and reddening of the skin. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and aquatic invertebrates. 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. This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area. Do not contaminate fish ponds or apply directly to water.

PHYSICAL OR CHEMICAL HAZARDS

Do not apply this product in or on electrical equipment due to possibility of shock hazard. Some hard surfaces may become damp if sprayed. Avoid slips or falls.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
Read entire label before use. Apply this product only as directed.

Restrictions

- Do not allow children or pets to touch the treated surface until it has dried.
- Do not use in commercial food handling establishments, restaurants or other places where food is commercially prepared or processed.
- Do not spray more than once per week.
- Do not use on edible crops.
- DO NOT apply to vegetable plants or other plants used for food.
- Not for use on plants grown for sale or other commercial use.
- Do not spray animals directly.
- Do not apply to clothing

[Option 1 Trigger with Hose]

Assembly Instructions

Remove cap and auto trigger {{(sprayer) (hanger) (holster).}
Remove band holding auto trigger {{(sprayer) (to) (hanger) (holster).}
Replace {{(hanger) (holster)}} on bottle for future auto trigger (sprayer) storage.
Uncoil hose and drop (flexible) dip tube into container and tighten cap.
{{(Slide) (set)}} the reusable auto trigger sprayer to the {{(on) (unlocked)}} position.

[Option 2 Direct Mount]

Assembly Instructions

(When using a refill, remove sprayer from the bottle by turning the nut.)
(Remove the cap from the refill bottle, place the auto trigger (sprayer) on the bottle, and tighten the nut.)
Keep the {{(reusable auto) (automatic)}} trigger sprayer, hose, dip tube and {{(hanger) (holster)}} for use on compatible refills.

[Optional usage instructions by form]

(Manual Trigger)

Turn (set) the nozzle to the fan (spray) or stream position. Squeeze trigger to apply (spray) product.
Return nozzle to off (stop) position after use.

(Auto Trigger)(Sprayer)

{{(Slide) (set)}} the {{(reusable auto) (automatic)}} {{(trigger) (sprayer)}} to the {{(on) (unlocked)}} position.
{{(Turn) (set)}} the nozzle to the fan or stream position.
{{(Squeeze) (press)}} and hold the {{(reusable auto) (automatic)}} {{(trigger) (sprayer)}} to apply product.

[Information in brackets is notes to Reviewer]
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(Lift the jug above the height of the {{(trigger) (sprayer)}} while spraying initially, if it does not {{(spray)(dispense)}} immediately.)
After use, {{(slide) (set)}} the {{(reusable auto) (automatic)}} {{(trigger) (sprayer)}} to the off (locked) position {and {{(hang) (place)}} upside down on the {{(hanger) (holster)}} for storage.}
{{{Turn) (set)}} the nozzle to {{(off) (stop)}} position after use.}

Product Information

Remove or cover exposed food and utensils. Cover exposed countertops and other food related surfaces. Do not spray into the air. Test in an inconspicuous area before applying. Wash thoroughly after spraying.

{{(Turn) (set)}} the nozzle to the fan or stream position.)

Spray until surface is moist but not dripping.

(Approximately [insert number(s)] pulls (seconds) per square foot.)

(Approximately [insert number(s)] pulls (seconds) per square foot for the fan spray and [insert number(s)] pulls (seconds) per square foot for the stream spray.)

[Number(s) will vary depending on trigger chosen.]

Over application may cause damage.

(Keep the Reusable {{(Auto Trigger) (Sprayer)}} for use on compatible refills.)

Indoors

Hold container upright and spray away from face.

[Note to reviewer: One of these options must be used on the final printed label.]

{{(Slide) (set)}} the reusable auto trigger to the on (unlocked) position.

{{(Slide) (set)}} the automatic trigger to the on (unlocked) position.

{{(Slide) (set)}} the reusable auto sprayer to the on (unlocked) position.

{{(Slide) (set)}} the automatic sprayer to the on (unlocked) position.

{{(Turn) (set)}} the nozzle to the fan or stream position.)

(Spray (one to two) (one to three) (one to four) (two to three) (two to four) (three to four) feet from the surface.)

(Return trigger (sprayer) to off (locked) position after use.)

(Return nozzle to off (stop) position after use.)

[Note to Reviewer: Listed (Pests)(Bugs)(Insects) bugs must appear on final printed label.]

Ants, Boxelder Bugs, Cockroaches Firebrats, Ground Beetles, Palmetto Bugs, Pillbugs, Roaches, Silverfish, Sowbugs, and Waterbugs: Apply as a spot and crack and crevice treatment to areas where these pests crawl and hide, paying special attention to ant trails, hidden areas around sinks and storage areas, behind baseboards, around doors and windows, behind and under refrigerators, cabinets, sinks and stoves, the underside of shelves, drawers, bookcases, and similar areas. Can also be used in basements.

Centipedes, Crickets, Scorpions, Spiders and Stink Bugs: Spray directly.

Carpenter Ants: For effective control, locate and treat nests and surrounding areas. Apply around doors and windows and other places where ants enter premises and where they crawl and hide. Spray into infested wood through existing openings.

Ticks (Including Deer Ticks which May Transmit Lyme Disease) and Fleas on Pet Surfaces: Remove pet bedding

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and destroy or clean thoroughly. Spray pet resting quarters. Adult Fleas and Larvae contacted by spray will be killed. Put fresh bedding down once spray has dried. Do not spray animals directly. For best results, pets should be treated with an appropriate flea and/or tick control product registered for use on pets before allowing them to return to the treated area. Spray rugs and carpets where infestations are bad. Delicate fabrics should be tested for staining in an inconspicuous area prior to use.

Gnats, Houseflies, Mosquitoes and Small Flying Moths: Spray resting areas. Insects coming to rest on treated surfaces will be killed.

Chocolate Moths, Cigarette Beetles, Clover Mites, Cluster Flies, Drugstore Beetles, Flour Beetles (Red and Confused), Grain Beetles (Rusty, Merchant and Saw-Toothed), Lesser Grain Borer, Rice Weevils, Spider Beetles and Tobacco Moths: Spray insects directly. Remove all food-stuffs, utensils and shelf paper from area to be treated. Discard used shelf paper and any infested foodstuffs. Apply spray to shelves and in cracks and crevices behind and under cupboards and cabinets. Allow to dry prior to replacement with new shelf paper, food and utensils. Wash any exposed food handling surfaces and utensils before use.

Webbing Clothes Moths: Use this product as a crack and crevice treatment in closets and other storage areas where these pests are found. This treatment will not control moth larvae already on clothes. Do not apply to clothing.

To control Aphids, Elmleaf Beetles, Japanese Beetles, Lace Bugs, Leafminers, Mealy Bugs, Mites and Spider Mites on house plants: (Use (fan) setting.) Prior to spraying, remove plants from living and eating areas. Put in an area not likely to come in contact with pets, children or food. Plants can be returned to original location when leaves are dry. If plants cannot be moved, cover or remove exposed food and food handling surfaces. Apply spray to upper and lower surfaces of foliage. Avoid wetting blossoms if possible. Avoid spraying surrounding areas.

Outdoors

Hold container upright and spray away from face.

Spray with wind if breeze is blowing.

(Slide {(move) (set)} the {(reusable auto) (automatic)} trigger (sprayer) to the {(on) (unlocked)} position.)

(Turn {(move) (set)} the nozzle to the fan or stream position.)

(Spray (one to two) (one to three) (one to four) (two to three) (two to four) (three to four) feet from the surface.)

(Return trigger (sprayer) to {(off) (locked)} position after use.)

(Return nozzle to {(off) (stop)} position after use.)

All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses: (1) Applications to soil or vegetation around structures; (2) Applications to lawns, turf and other vegetation; (3) Applications to building foundations up to a maximum 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. Application is prohibited directly into sewers or drains or to any area like a gutter where drainage to sewers, storm drains, water bodies or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.

[Note to Reviewer: Listed (Pests)(Bugs)(Insects) bugs must appear on final printed label.]

Ants, Clover Mites, Cockroaches (roaches) (including (Asian) (and) (German) Cockroaches), Crickets, (Mole Crickets,) (Pillbugs,) Silverfish, Sowbugs, (and) (Waterbugs): Spray foundation of building up to a height of 2 to 3 feet where insects are active and may find entrance. Apply to outside surfaces of buildings where insects tend to congregate.

Ants on lawns and turf: Spray around ant trails and hills. Spot treat around nests hidden under steps, brickwork, concrete.

Crickets, Fleas, Dog Ticks and Lone Star Ticks: Apply to infestation in bushes, grass or weeds.

Gnats, Houseflies, Mosquitoes and Small Flying Moths: Spot treat resting areas. Insects coming to rest on treated surfaces will be killed.

For control of ornamental garden insects: For use on asters, dahlias, roses, and other ornamentals. Spray directly to kill Aphids, Armyworms, Clover Mites, Japanese Beetles, Lace Bugs, Leafminers, Mealy Bugs, Pavement Ants, Spiders, Spider and Red Mites, Exposed Thrips and Whiteflies.

Also for use as a multi-purpose spray in small ornamental gardens without edible crops and for spot treatments to prevent insects from spreading into large garden areas.

May be used on other plants: African violets, asters, azaleas, begonias, camellias, carnations, chrysanthemums, delphiniums, dogwood, English ivy, euonymus, fuschia, geraniums, crassula, grape vine, Kentia palm, laurel, marigolds, rhododendrons, rubber plants, snapdragons, stocks, wandering Jews and zinnias.

When spraying plants, use a sweeping motion. Spray insects directly whenever possible. Be cautious about wetting tender foliage, young plants and new growth. Do not spray plants when temperatures exceed 90°F. Over application may cause damage. Repeat treatment as necessary but not more than once per week.

STORAGE AND DISPOSAL

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

Storage: Store in a cool, dry area (away from) (inaccessible to) children and pets and away from heat, sparks and open flame. (Protect from freezing.) (Store above 32°F.) (Do not transport or store below 32°F (0°C).) If freezing occurs, allow product to thaw and shake well before (using) (use). (Some product separation may occur on freezing which is reversible on shaking.) Freezing does not adversely affect (the performance of) this product.

Pesticide Disposal: ((Battery Powered) (Reusable) (Auto) (Automatic) (Trigger) (Sprayer): Do not discard. (Keep) (Save) the (Battery Powered) (Reusable) (Auto) (Automatic) (Trigger) (Sprayer) for use (on) (with) (Bugtron) refills of equal size.)

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 or 800-529-3394 for disposal instructions. Never place unused product down any indoor or outdoor drain.

[Raidkillsbugs.com]

[Killsbugsdead.com]

[raid.com]

Questions? Comments?

Call 800-558-5252 or write Helen Johnson

Sold by: © [year] S.C. Johnson & Son, Inc., Racine, WI 53403-2236

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EPA Reg. No.: 4822-561

EPA Est. No.

[Optional Marketing Claims]

- (Spanish directions (inside) (on back))
- For Indoor and Outdoor Use
- Indoor/Outdoor



- Ready-To-Use
- Easy-To-Use
- Water-Based
- Kills on Contact
- Long-Lasting up to 18 months**
- Kills Bugs Dead!
- With up to 18 months**, it's the Longest Lasting Raid (Ever!)
- (Also) (Kills) (Controls) (Brown Marmorated) Stink Bug(s)
- Keeps Killing Carpenter Ants For Up To (1 Month) (4 Weeks) When Applied To Non-Porous Surfaces

[Information in brackets is notes to Reviewer]
(Information in parentheses is optional language)
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- Keeps Killing Pharaoh Ants, Crazy Ants and Fire Ants For Up To 1 Week
- {{Keeps Killing} (Kills)} German Cockroaches for up to {(12 months) (1 Year) (52 Weeks)} on non-porous surfaces
- Keeps Killing for up to 18 months** ** American Cockroaches and Argentine Ants on non-porous surfaces
- Up to (12) months {(control) (protection)} from German and American Cockroaches, and Argentine Ants on non-porous surfaces
- Season Long Protection from German Cockroaches on non-porous surfaces
- Keeps Killing Flies For Up To (5 Months) (20 Weeks)
- Keeps listed* {(Insects) (Bugs)} Out!
*[Note to Reviewer: when used, * will be used to direct to the list on the final printed label]*
- The {(easy way) (effortless way) (quick way)} to apply year-long (season-long) protection from German (& American) Cockroaches (and Argentine Ants) on non-porous surfaces
- Leaves No Odor
- No Oily (Greasy) Residue
- For Use on House Plants
- Can be used on House Plants
- For Use on Ornamental Plants
- Kills listed* Home Invading Pests
*[Note to Reviewer: when used, * will be used to direct to the list on the final printed label]*
- Kills {(listed* Insects) (listed* Bugs)}
*[Note to Reviewer: when used, * will be used to direct to the list on the final printed label]*
- Kills (Ants) (Aphids) (Boxelder Bugs) (Carpenter Ants) (Centipedes) (Cockroaches) (Crazy Ants) (Crickets)(Fire Ants) (Fleas) (Flies) (Firebrats) (German Cockroaches) (Gnats) (Ground Beetles) (House flies) (Japanese Beetles) (Lace Bugs) (Leafminers) (Mealy Bugs) (Mites) (Mosquitoes) (Palmetto Bugs) (Pharaoh Ants) (Pillbugs) (Roaches) (Scorpions) (Silverfish) (Small Flying Moths) (Sowbugs) (Spider Mites) (Spiders) ((Brown Marmorated)Stink Bugs) (Thrips) (Ticks) (Waterbugs) (on contact)
[Note to Reviewer: Listed (Pests)(Bugs)(Insects) bugs must appear on final printed label.]
- Kills Plant Pests
- Also Controls Carpenter Ants
- Controls Ticks That May Transmit Lyme Disease
- Does Not Stain Most Surfaces* (* Test in an inconspicuous area before applying)
- Does Not Stain Most Fabrics* (* Test in an inconspicuous area before applying)
- Non-staining* (* Test in an inconspicuous area before applying)
- Refills Available
- Refill
- Refill for reusable (auto) {(trigger) (sprayer)}
- Starter {(Unit) (Pack)}
- With reusable (auto) {(trigger) (sprayer)}
- (Includes)(2)(3)(4) (AA) Batteries (Included)
- Reusable (Auto) (Battery Powered) (Electronic) (Automatic) (Power) {(trigger) (sprayer)}
- The reusable auto (Battery Powered) (Electronic) (Power) (Automatic) trigger (sprayer) helps reduce (reduces) (prevents) trigger (sprayer) (hand) fatigue
- Reduces Hand Fatigue
- The reusable auto (Battery Powered) (Electronic) (Power) (Automatic) trigger (sprayer) creates (forms) a consistent bug barrier (layer of coverage)

[Information in brackets is notes to Reviewer]
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- (The)(Reusable) Auto (Battery Powered) (Automatic) (Power) (Electronic) trigger (sprayer) is reusable with bottles (refills) of equal size.
- Use only (on) with bottles (refills) of equal size.
- Use (reusable auto) (automatic) trigger (sprayer) for (a) continuous line of protection
- Press & Hold (power(ful)) (auto(matic)) (reusable) trigger (sprayer)
- Pulsating (Pulsing) (auto) (reusable) (powerful) trigger (sprayer) for (a) continuous (line of) protection
- Powerful (auto) (reusable) {(trigger) (sprayer)}
- Create(s) a continuous line of protection
- Reusable (auto) (automatic) {(trigger) (sprayer)}
- Spray & {(Go (leave))}
- Ready to use
- {(Precise) (precision)} application (spray)
- Controlled application (spray)
- Squeeze (trigger) (sprayer) and protect (prevent)
- Easy Squeeze (trigger) (sprayer) (application)
- Puts you in control (of) (spray) (application)
- Dual Spray (patterns)
- Sprays 2 (two) ways
- Multiple spray(s) (patterns)
- Wide (broad) and precise (precision) (controlled) (targeted) spray(s) (patterns)
- Fan and stream spray(s) (patterns)
- Gets (sprays) (reaches) tight (narrow) (small) spots (cracks) (crevices) and wide (big) (large) areas
- Extends (your) reach
- Easy application (of) (spray)
- Precise (Precision) control (of) (application) (spray)
- Precision applicator (trigger) (sprayer)
- (Helps) Get(s) hard to reach spots (cracks) (crevices)
- Spray(s) from a distance
- Peel (remove) (tear) label (sticker) (coupon) (here) for complete use directions (and precautionary statements) (before use)
- Visit [(raid.com) (raidkillsbugs.com)] to identify your bug and best treatment plan.
- Spot treat outdoors around doors, windows, and along your home's foundation
- Spray indoors along floorboards, door and window frames.
- Use this product ([brand name]) to help keep German roaches out of your home for up to (12) months on non-porous surfaces.
- Use this product ([brand name]) to help keep {(American roaches) (Argentine Ants)} out of your home for up to 18 months on non-porous surfaces.
- Use to help keep German roaches out (of your home) for up to (12) months on non-porous surfaces
- Use to help keep {(American roaches) (Argentine ants)} out (of your home) for up to 18 months on non-porous surfaces
- Use this product ([brand name]) in hard-to-reach places where long-term control is needed.
- Use in hard-to-reach places where long-term control is needed.
- Read the label to find the right product for your bug problem.
- S.C. Johnson A Family Company (At work for a better world)(!)
- Money-Back Guarantee*** ***If you are not satisfied with this product, S.C. Johnson will refund the purchase price within one year after the date of purchase reflected on an original receipt. Offer limited to 1

refund per household. For more details, contact us at (the phone or address below) [insert phone number or website](.)

- (New)(Improved) Continuous spray (trigger)
- Bottle contains XXX% {(post-consumer recycled) (PCR)} content(,)(excluding XX% colorant)
- Defend your home from (listed) pests
- Continuous home protection[†] [†] Up to (12 months against German Cockroaches) (18 months against American Cockroaches and Argentine Ants) on non-porous surfaces
- Feel the security of a protected home with Raid {(pest control products)(insecticides)(pesticides)}

(Additional) Tips (Non-chemical Control Options) [one or more to be chosen from the following list]:

Remove food spills and exposed food.

Store food in sealed containers.

Avoid leaving (accumulating) dirty dishes in sinks.

Keep food out of bedroom(s) and living room(s).

Caulk cracks and crevices where bugs enter (enter or escape) into walls, including entry points from outside or neighboring units.

Caulk hiding spots and points of entry (from outside or neighboring units).

[Segmentation language, if used, to be used in its entirety]

Raid Defense System (Defense System)

Attack(s) Bugs*

Control(s) Bugs[†]

Prevent(s) Bugs[‡]

Raid Defense System (Raid Guided Support) helps you work smarter, not harder, to fight bugs. Visit raidkillsbugs.com to identify your bug and best treatment plan.

Use this product to:

Prevent Bugs

Help keep bugs out (Keep bugs out)

[‡] Use (this product) to (help) keep listed bugs out (of your home). Spray outdoors, around doors, windows, and along your home's foundation. Spray indoors along floor boards, door and window frames. Use in hard-to-reach places where long term control is needed.

Use other Raid products to:

Attack Bugs

Kill bugs on contact (Kill the bugs you see)

*Use a Raid Ant or Roach Killer spray product to kill listed bugs on contact. Read the label to find the right product for your bug problem.

Control Bugs

Kill bugs at the source (Kill the bugs you don't see)

[†] Use a Raid Ant or Roach Bait product to kill ants or roaches where they hide. For heavy infestations, first use a Raid Fogger or Fumigator product and then place baits to provide ongoing control. Read the label to find the right product for your bug problem.