

4822-595

08/27/2013

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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Dan Hollas  
S.C. Johnson & Son, Inc.  
1525 Howe Street  
Racine, WI 53403-2236

AUG 27 2013

Subject: Label amendment to Revise Marketing Claims  
Product Name: RRG RAM  
EPA Registration No. 4822-595  
Submission Date: June 4, 2013  
Decision Number: # 479953

Dear Mr. Hollas,

The labeling referred to above, submitted under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

Should you wish to add a reference to the company's website on your label, 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 Assurance.

Submit two copies of your final printed labeling before you release the product for shipment. A stamped copy is enclosed for your records. If you have any questions, please contact me at (703) 347-0263 or [rogala.jessica@epa.gov](mailto:rogala.jessica@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "John Hebert".

John Hebert  
Product Manager 07  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

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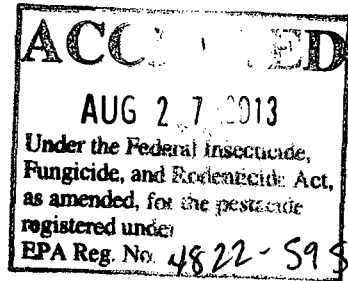
[Information in brackets is notes to Reviewer]  
(Information in parentheses is optional language)

**RRG RAM**

[Alternate Brand Names:]  
Raid Roach Gel [12/06/2012]

Ready-To-Use Gel Formulation

<i>Active Ingredient</i>	<i>[By Weight]</i>
INDOXACARB (CASN 173584-44-6)	0.3%
<i>Other ingredients</i>	99.7%
TOTAL	100.0%



(Nonrefillable Container)  
(Refillable Container)  
(Net Wt.)  
(Net Contents):  
(Total Weight: xx oz/xx g) (xx oz/xx g per dispenser)  
(Contains) (#) (tube(s)) (syringe(s)) (cartridge(s))

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**  
**ONLY TREAT IN AREAS THAT ARE NOT EASILY ACCESSIBLE TO CHILDREN AND PETS**

Refer to (back)(*inside*)(bottom)(side) panel(s) for additional precautionary statements (*and*)(*complete use instructions*)(and First Aid).

**FIRST AID**  
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.  
You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**  
CAUTION: Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

**ENVIRONMENTAL HAZARDS**  
Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high watermark.

**PHYSICAL AND CHEMICAL HAZARDS**  
Do not use this product in or on electrical equipment where a possibility of shock hazard exists.

**[OPTIONAL CLAIMS]**  
[List of Optional Marketing Claims-]

1. For Hard to Reach Places
2. For Hard to Reach Places Such as Cracks and Crevices
3. (Works) (Starts Working) (Kills) (Starts Killing) (within) (in) hours
4. The Gel Attracts Roaches in Search of Food and Water

[Information in brackets is notes to Reviewer]  
 (Information in parentheses is optional language)

5. Ready To Use
6. Convenient Syringe Applicator
7. Convenient (tube) Applicator
8. Precision Syringe Applicator
9. Precision (tube) Applicator
10. Gets Bait where (cock)roaches live
11. Makes Multiple Bait Placements Quick and Easy
12. Makes Baiting Quick and Easy
13. Easy Way to Apply Bait
14. Easy to Apply Multiple Bait Placements
15. (Formulated) (Specifically Formulated) (to Kill) (for) (Cock)Roaches
16. Quickly (Readily) Consumed by (Cock)Roaches
17. Use Indoors and Outdoors
18. Can be Used Indoors and Outdoors
19. Kills Roaches Indoors or Outdoors
20. **Kills (Common)(All Common)(Household) Roaches**
21. **Effective Against (Common)(All Common)(Household) Roaches**
22. **Easy application (for cracks and crevices)(for hard to reach places)**
23. **Precision placement (for cracks and crevices)(for hard to reach places)**
24. Works in Areas (Not Reachable by) (Inaccessible to) (Children) (Kids) (and) (or) (Pets)
25. No (Embarrassing) (Visible) Bait Stations
26. No Messy Spray(s)
27. Fast-acting (roach control) (bait)
28. Easy to Use
29. **Kills roaches and the eggs they carry**
30. **Kills roaches that may carry germs**
31. **Kills (Roaches) at their source**
32. **Kills (Roaches) at the source**
33. **Kills (Roaches) where they hide**
34. **(Kills the Roaches You See)**, Kills the Roaches You Don't (See)
35. **Roaches eat the bait and (take it back to the nest) (take it back to the colony) (crawl away to die)**
36. **Roaches (take it back to the nest) (take it back to the colony) (crawl away to die)**
37. **Roaches eat the bait, take it back to the (nest)(colony)**
38. **Roaches eat the bait, crawl away to die**
39. (Kills) (Destroys) the (Entire) (Nest) (Colony)
40. (For) (Treats) (Controls) Even Heavy Infestations
41. **Precision Applicator (for easy placement)**
42. **Precision (placement)(tube)(syringe)**
43. **Stands upright (for easy storage)**
44. Re-sealable Tube Keeps Bait Fresh
45. Use in Areas (You) (See) (Find) Roaches (and) (Where Roaches Nest)
46. [insert trademark] Kills Bugs Dead!®.

[Information in brackets is notes to Reviewer]  
(Information in parentheses is optional language)

- 47. Peel (remove) (tear) (outer) label (sticker) (coupon) (here) for complete use directions
- 48. Peel (remove) (tear) (outer) label (sticker) (coupon) (here) for complete use directions and precautionary statements
- 49. Peel (remove) (tear) (outer) label (sticker) (coupon) (here) before use
- 50. Read entire label before use.
- 51. Apply this product only as specified.
- 52. Visit [website] to identify your bug and best treatment plan.
- 53. [website may be listed]
- 54. This product [brand name] provides precise application in sensitive areas such as kitchens and bathrooms.)
- 55. Re-apply more frequently (and in multiple locations) for heavy infestations.
- 56. Use this product [brand name] to kill hidden bugs at the source.
- 57. (Make sure you) inspect gel baits periodically and apply fresh baits as needed.
- 58. The Raid online reminder will help you remember to replace gel, which is key to controlling the problem.

[Optional Non-Chemical Control Claims][one or more of the non-chemical control claims below will be used]

- 59. (Additional) Tips (Non-chemical Control Options):
  - 60. Remove food spills and exposed food.
  - 61. Store food in sealed containers.
  - 62. Avoid accumulating (leaving) dirty dishes in sinks.
  - 63. Keep food out of bedrooms and living rooms.
  - 64. Do not store items like firewood near the home, which provides areas for outdoor roaches to live and breed.
  - 65. Caulk cracks and crevices or any points where roaches enter or escape into walls, including entry points from outside or neighboring units.

[Information in brackets is notes to Reviewer]  
(Information in parentheses is optional language)

**READ THE LABEL FIRST!**  
**PRODUCT FACTS**

Kills	Cockroaches (including German and Americans)
Where to use	In and around homes and other buildings/structures where cockroaches have infested or where they travel to seek food, water or shelter
When to use	When cockroaches are observed or there is evidence of an infestation in/around a home, building or structure
[Telephone icon]	For information or comments call 1-xxx -xxx -xxxx

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.  
READ THIS LABEL: Read this entire label and follow all use directions and use precautions. Use only for the sites, pests, and application methods described on this label. (Test in an inconspicuous area before applying gel) (Test in an inconspicuous area for possible (staining) (or) (discoloration). (Evaluate test area after drying))

**BACKGROUND INFORMATION:**

RRG RAM is a ready-to-use highly attractive gel bait formulation that is very effective in controlling German and American cockroaches.

**BEFORE YOU START**

- Apply to areas not easily accessible to children and pets.
- Do not apply RRG RAM (Cockroach) (Gel) bait to surfaces recently treated with residual insecticide sprays.
- Surfaces treated with RRG RAM (Cockroach) (Gel) bait must not be treated with insecticidal sprays, as the bait will be rendered ineffective.
- Do not apply in or on electrical equipment due to the possibility of shock.
- Do not apply to surfaces that food contacts.
- Do not allow open foods to contact gel material.
- Do not apply in locations of high temperature or direct sunlight.
- Gel deposits may be cleaned up by using damp paper towel or rag while still wet, or if dried has dried use putty knife to scrape and discard in trash.

**(HOW (Product Name) (IT) WORKS)**

(RRG RAM (Cockroach) (Gel) bait contains the active ingredient Indoxacarb, in a formulation that is highly attractive to German and American cockroaches.)

(The (handy applicator)(tube) makes it easy to apply small placements of gel. For high cockroach densities, more placements also allow more cockroaches to eat at the same time.)

**WHERE TO USE**

**Indoors:**

- Kitchens
- Bathrooms
- Laundry rooms
- Basements

[Information in brackets is notes to Reviewer]  
(Information in parentheses is optional language)

- Garages
- May be used indoors (or outdoors) (applied) as a crack and crevice (and corner) treatment in and around single and multi-family residential buildings.
- Apply to areas (frequented by) (cock)roaches (are commonly found) such as:
  - (Under sinks and) around plumbing (and) pipes
  - (To drawers and) cabinet (corners) where (cock) roaches are known to (hide)(nest)
  - (Equipment legs and bases) (including) (and) behind and under appliances (such as) (ovens) (refrigerators) (and) (washers)
  - Openings leading into (voids)(cracks) and hollow spaces (in) (floors)(walls)(and)(ceilings)
  - Trashcans
  - Behind toilets
  - Baseboards, doors and windows
- Do not apply in locations of high temperature or direct sunlight
- Inspect bait placements periodically and apply fresh bait as needed.

[OPTIONAL GRAPHICS WITH TEXT]

**(Where To Place The Gel)**

(Main placement areas)

(Panel 1: Picture with arrows pointing under refrigerator)

(Panel 2: Picture with arrows pointing under drawers)

(Panel 3: Picture with arrows pointing behind trash receptacle in kitchen)

(Panel 4: Picture with arrows pointing to inside of storage cabinet under kitchen sink)

(Panel 5: Picture with arrows pointing behind toilet in bathroom)

(Panel 6: Picture with arrows pointing to inside edge of bathroom sink cabinet)

(Panel 7: Picture with arrows pointing behind toilet in bathroom opposite side)

(Panel 8: Picture with arrows pointing to cracks and crevices at base of bathroom cabinet)

**Outdoors:**

- A thorough inspection around a structure may reveal areas where cockroaches are gaining access. Attempts should be made to remove the access.
- Apply RRG RAM ((bait)) as a spot or thin bead (see above) to pest entry sites such as along windows, doors, sewer areas, adjacent trees which harbor cockroaches, along walls, garbage holding areas, or suitable placement sites citing as a cockroach harborage.
- Place baits in such a way as to reduce the potential of subsequent human contact.

**HOW MUCH TO APPLY**

**For spot or gel dot applications:**

- For heavy infestations of (cock)roaches, apply 3 to 5 spots of RRG RAM bait per 10 linear feet or one square yard.
- For light to moderate infestations of (cock)roaches, apply 1- 3 spots of RRG RAM bait per 10 linear feet or one square yard.
- (Each (spot) (gel dot) of RRG RAM applied should (equal about 0.5 grams) (be approximately 1/4 inch diameter) (be about the size of a pea)

**To apply a (line) (bead) of gel:**

- For all levels of (cock) roach infestations, when a (bead)(line) of RRG RAM bait is used, apply a small thin (bead)(strip) that is less than 1/8 inches wide and approximately 2 inches long. (insert 1/8x2 inch bead/line graphic)
- (Inspect bait placements periodically and reapply fresh bait as needed.)

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[Information in brackets is notes to Reviewer]  
(Information in parentheses is optional language)

**HOW TO APPLY**

1. (Twist)(and) (Remove) cap (from) (syringe) (tip) (tube) (cap) (to) (open) (position).
2. Place (syringe) (tube) tip at surface to be treated.
3. (Gently squeeze) (Apply light pressure to )(plastic) (syringe) (plunger)( tube) (to create multiple spots of) (gel)(paste)(about the size of a pea) (or apply as a line or strip) (When finished,) Lift (syringe) (tube) tip from surface, (and)(replace cap)(twist cap) (to close).
4. (Keep (the cap on) (the tube) (closed) (to prevent) (gel) (paste) (from drying out)).
5. ((For convenience,) (you can store tube standing up)).

**STORAGE AND DISPOSAL**

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

**Pesticide Storage:** Store in cool, dry place inaccessible to children and pets.

**Pesticide Disposal:** Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

**Container Handling: Nonrefillable container.** Do not reuse or refill the gel bait dispenser. Place empty bait dispensers in trash, offer for recycling, or call your local solid waste authority (or 1-800-xxx-xxxx) for disposal instructions.

[website may be used]

Questions? Comments?

Call 800-558-5252 or write Helen Johnson

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Fisk Johnson

EPA Reg. No. 4822-595

EPA Est. No. XXX-XX-XXX

(Bitrex®)

(Contains Bitrex®)

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[Information in brackets is notes to Reviewer]  
(Information in parentheses is optional language)

**[Individual Syringe/Tube Label]**  
Ready-To-Use Gel Formulation

<i>Active Ingredient</i>	<i>[By Weight]</i>
INDOXACARB (CASN 173584-44-6)	0.3%
<i>Other ingredients</i>	99.7%
TOTAL	100.0%

Net Wt: XXX oz/XX g

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

**ONLY TREAT IN AREAS THAT ARE NOT EASILY ACCESSIBLE TO CHILDREN AND PETS**

Refer to (insert) (exterior packaging) for use directions/additional precautionary statements

**READ ENTIRE LABEL FIRST!**

[Note to Reviewer: if space on individual syringe/ tube allows, the sections of First Aid and Precautionary Statements will be added to the tube.]

**(FIRST AID**

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

You may also contact 1-800-xxx-xxxx for emergency medical treatment information.)

**(PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

**ENVIRONMENTAL HAZARDS**

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high watermark.

**PHYSICAL AND CHEMICAL HAZARDS**

Do not use this product in or on electrical equipment where a possibility of shock hazard exists.)

[Note to Reviewer: tube may contain optional claims noted above for exterior packaging. It may also contain Optional Segmentation language noted below.]

Questions? Comments?

Call 800-558-5252 or write Helen Johnson

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U.S. Patent D642,932

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EPA Reg. No. 4822-595

EPA Est. No. XXX-XX-XXX



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[Information in brackets is notes to Reviewer]  
(Information in parentheses is optional language)

**Raid Defense System (Defense System)**

**Attack(s) Bugs\***

**Control(s) Bugs<sup>†</sup>**

**Prevent(s) Bugs<sup>‡</sup>**

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

**Use this product to:**

**Control Bugs**

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

**<sup>†</sup> Use (this product) in hard to reach places like cracks and crevices, in corners, along walls, and near entry points to kill roaches where they hide (and their hidden nest). Avoid placing gel directly on top of surfaces treated with a Raid Ant & Roach Killer or Raid MAX Roach Killer spray product. This will inhibit the gel bait's effectiveness.**

**Use other Raid products to:**

**Attack Bugs**

**Kill bugs on contact (Kill the bugs you see)**

**\* Use a Raid Ant & Roach Killer or Raid MAX Roach Killer spray to kill roaches on contact.**

**Read the label to find the right product for your bug problem.**

**Prevent Bugs**

**Help keep bugs out (Keep bugs out)**

**<sup>‡</sup> Use a Raid MAX Bug Barrier product to (help) keep German roaches out of your home for up to 12 months.**

**Read the label to find the right product for your bug problem.**