

PM/4

12455-76

1 of 10

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 14 1992

5423591 $\frac{346}{38}$

5418754 $\frac{300}{12}$

5419062 $\frac{345}{17}$

Ms. Victoria Dunnum
Bell Laboratories, Inc.
3699 Kinsman Boulevard
Madison, WI 53704

Dear Ms. Dunnum:

Subject: **Confrac Rodenticide Ready To Use Place Pac** 5423590 $\frac{346}{38}$
EPA Registration No. 12455-76
Your Letters Dated April 29, May 22, and
August 10 and 12, 1992

The Agency has reviewed the submission referred to above and has the following comments:

1. With your letter of April 29, 1992, you provided proposed labels for 0.88-oz placepacks, outer packages that would contain 200 0.88-g placepacks, an outer packages that would contain six 1-1/2-oz placepacks. We have concluded that these various labels and packaging arrangements are not acceptable as proposed under this registration.

The labels which pertain to 0.88-oz placepacks differ significantly from your current label in the application directions for controlling commensal rats. Although we feel that the 0.88-oz size is somewhat small for controlling rats, this size of placepack would be acceptable if it were to be the only placepack size sold under registration number 12455-76. In the same amendment application, however, you also propose to continue to sell the product in 1-1/2-oz placepacks. Depending upon whether the larger or smaller placepacks were used, applying the same numbers of packs would lead to vastly different amounts of bait being placed. Your proposed solution to this problem is to adjust the application directions for rats to the size of the pack being used. We could permit this if you had separate registrations for the two distinct package sizes, but do not allow major substantive changes in application directions under one registration number for rodenticide baits.

CONCURRENCES

SYMBOL								
SURNAME								
DATE								

For the mouse claims, the application directions proposed for the 0.88-oz placepack are identical to those already being used for the 1-1/2-oz pack. Therefore, the 0.88-oz size of pack could be used for this product if it were sold with a label from which all claims for controlling rats had been deleted. Some of the changes which would be needed for a "mouse-only" label are listed below.

a. On the front panel,

- (1) "KILLS RATS AND MICE" would have to be changed to "KILLS MICE";
- (2) "KILLS WARFARIN RESISTANT NORWAY RATS" would have to be deleted; and
- (3) "Norway rats and" would have to be deleted from, the "h" in "house" would have to be capitalized, and "rodents" would have to be changed to "mice" in the "one-feeding" claim.

b. In the "DIRECTIONS FOR USE,"

- (1) "Norway rats, roof rats, and" would have to be deleted from the phrase which immediately follows "USE RESTRICTIONS:";
- (2) "rats or" would have to be deleted from the first sentence of "SELECTION OF TREATMENT AREAS:";
- (3) "APPLICATION DIRECTIONS" for "RATS" would have to be deleted; and
- (4) The subheading "RATS/MICE:," but not the text which follows it, would have to be deleted from the "APPLICATION DIRECTIONS."

The label for the "SIX-PACK" of 1-1/2-oz placepacks is unacceptable. As you are aware, we do not knowingly accept packaging for rat and mouse baits when the amount of bait per single placement for controlling rats at the highest rate prescribed on the label unless an appropriate statement is added to the label to qualify the "KILLS RATS" claim. The label which you have proposed for the "SIX-PACK" bears the qualifying statement

"The place packs in this bag contain enough bait (9 oz.) to kill three to nine rats."

We suspect that this statement was derived by extrapolation from a comment in our letter of September 24, 1991, to the effect that the smallest quantity in which 1-1/2-oz placepacks bearing rat claims could be sold would be two and that a two-pack would have to have

an outer package which bore a statement such as

"The placepacks in this package contain enough bait to control one to three rats."

We are not sure that such extrapolation is warranted or accurate. The basis for the statement for the 3-oz amount was that if there were more than three rats present, 3 oz of bait probably would not be enough to kill them, figuring how much the rats would be likely to eat in one day's feeding and the extremes of how bait might be divided among rats.

We have no reason to believe that rodents that are not individually caged are likely to share limited amounts of bait evenly. How many rats a given amount of bait can kill depends not only upon the toxicity of the bait but also on where baits are placed, how much bait each rat that feeds leaves for the next rat, etc., and the extent to which the rats permit the bait to be shared. Placepacks often are removed from their placement locations and cached in burrows. Bait in caches may be less generally available to all rats infesting an area than baits placed in bait stations or other man-chosen locations.

If the 43-g placepacks in your "SIX-PACK" were removed and cached by rats, it would be hard to predict how many animals they would kill. One rat might cache all six packs and feed from none of them. One rat might cache all six and feed from some or all of them before dying. Other rats might or might not find and feed on the remaining bait, which could lose palatability over time. Six rats might cache one pack each. Maybe each rat would be killed. Maybe some would not eat the bait at all. Perhaps the bait in some caches would be fed upon by more than one rat. How many rats exposed to the baits cached in these ways actually would die could vary greatly from one control effort to another.

We feel is that qualifying statements on labels for packages which offer limited amounts of bait should be conservative in reflecting what one could reasonably expect to kill with 9 oz of 0.005% Bromadiolone bait. If you decide to market a "SIX-PACK" of 1-1/2-oz. placepacks, the qualifying statement should read

"The place pack in this bag contain enough bait (9 oz.) to kill two to five rats."

If you decide to produce a 0.88-oz mouse-only pack or sell 1-1/2-oz packs in a six pack, submit amended proposed labels for our review. If you propose a new label for the "SIX-PACK," we suggest that you reduce the

amount of space on the front panel that is devoted to the product name, the claim "KILLS RATS AND MICE," and the statement of contents, especially "SIX PACK." Such reductions would provide ample space on the front panel for the precautionary statements which appear on the center panels of your other labels for this product. Moving the precautionary statements to the front panel also would permit a larger type size to be used for the "DIRECTIONS FOR USE" and other text on the back panel. This change also would provide space for properly centering the heading "DIRECTIONS FOR USE" so that it is apparent to readers that everything from the "It is a violation" statement through the end of the "RATS/MICE" paragraph is part of the "DIRECTIONS FOR USE" section.

- 2. The rat and mouse efficacy studies submitted on May 22, 1992, are acceptable and, under our current criteria, would support the "single-feeding" claim that you have retained on the label submitted on May 22, 1992. The rat study was assigned the MRID# 423269-02. The mouse study was assigned the MRID# 423269-01. These efficacy data are not applicable to the formulation that was proposed for this product on August 10, 1992.
- 3. The rat and mouse efficacy studies submitted on August 10, 1992, are applicable to the formulation described in the Confidential Statement of Formula (CSF) for your product 12455-69, dated August 6, 1992. These data also appear, by reference, to be relevant to the CSF for 12455-76 dated August 7, 1992. These efficacy studies are acceptable and would support a true "single-day's-feeding" claim. The rat study was assigned the MRID# 424360-02. The mouse study was assigned the MRID# 424360-01. These efficacy data are applicable to the formulation that was proposed for this product on August 10, 1992. We assume that the formulation described by the CSF for 12455-69 dated 8/6/92 describes the only formulation that you intend to use for this product in the future. Except for certain types of dye substitutions, we do not permit "alternate formulations" for rodenticide baits.

As long as the material used in the placepacks for this product does not differ from that of the packs used in the placepack-penetration study for the current formulation (lacking Bitrex) for this product, new placepack penetration studies are not required.

We believe that data from laboratory efficacy studies involving only one day of exposure to toxic bait, which occurs in a standard choice situation, provide better support for a "single-feeding" claim than do the data that we have been accepting from 3-day tests. Even on

the one-day test, however, rodents have opportunities to feed many times. Therefore, a claim which stated that the product kills in one feeding would not be absolutely correct. What the product has been shown to do is to kill after one day's feeding.

Because rodents do not die soon after eating lethal doses of anticoagulant baits, it is misleading to permit single-feeding or one-day's-feeding claims without adding a qualifying statement which informs potential users when the first rodent deaths are likely to occur. We do not believe that any claims which imply quick results are justified for anticoagulants.

Despite these considerations, we feel that this bait's having exceeded the 90% mortality criterion in rat and mouse tests which involved only one day of bait exposure is a very significant event. Therefore, we have attempted to develop language which could be added to the label for your product to allow its single-feeding claim to be somewhat different from those made for other products for which the claims are based upon the results of tests which included three days of exposure to toxic bait. Below, we provide examples of statements that would be acceptable to us.

"This product has been shown to kill Norway rats and house mice after one day of feeding. As Bromadiolone is a slow-acting poison, rodent deaths should not be expected to occur until 3-5 days after treatment begins."

"This product can kill Norway rats and house mice as a result of one day of feeding on it. Rodent deaths should not be expected to occur until 3-5 days after treatment begins."

"Norway rats and house mice may consume a lethal dose in only one day of feeding on this bait. As Bromadiolone is a slow-acting poison, rodent deaths are not expected to occur until 3-5 days after treatment begins."

If you decide to use one of these statements, or if you elect to propose a statement of your own, you must submit proposed revised labeling which bears the statement which you would prefer to use. If we were to find the revised label to be acceptable, you would be able to use it from then on.

- 4. The text of the proposed revised labels submitted on May 22, 1992, is acceptable. The relatively small starburst in which "WITH BITREX" appears on these labels does not detract significantly from the precautionary statements

and the "DIRECTIONS FOR USE."

We concur with your assessment that the actual protective value of Bitrex in rodenticide baits is questionable. Our policy has been to permit this ingredient to be added to baits -- as long as the baits can be shown to remain sufficiently palatable to target species -- on the theory that the bittering agent might "help" and apparently is not "hurting" product performance significantly. The second part of our policy has been to require that label and advertising statements regarding the presence of Bitrex in the product be limited to relatively inconspicuous factual declarations that the ingredient is in the bait (i.e., no safety claims).

What we prefer to see on labels is an asterisk following "INERT INGREDIENTS" in the ingredients statement which refers the reader to a sentence, in relatively fine print, such as

"This product contains Bitrex."

We are aware of at least one instance in which our Bitrex policy and good faith have been abused in the advertising for a rodenticide bait. We intend to rectify this situation. In the meantime, we hope that such problematical advertising does not lead to an "everybody's-doing it" situation in which other companies abuse the policy in their promotional campaigns in order to keep pace.

A copy of the stamped labeling is enclosed for your records. Submit one copy of the final printed labeling before releasing the product for shipment bearing the amended labeling.

Sincerely yours,

Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure: Stamped label

10/14/92:ERICKSON:DISK4:12455-76.LBL

7810

ACCEPTED
with COMMENTS
in EPA Letter Dated

OCT 14 1992

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
12455-76

SELECTION OF TREATMENT AREAS: Determine areas where rats or mice feed and hide and consume the bait. Generally, these are along walls, by openings, in or behind burrows, in corners and concealed places, between floors and walls, or in locations where rodents or their signs have been seen. Protect bait from rats or mice. Remove all such alternative food as possible.

APPLICATION DIRECTIONS:
RATS: Apply 2 to 10 Place Pac per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days.
HOUSE MICE: Place 1 Place Pac at 6 to 12-foot intervals. Maintain an uninterrupted supply of fresh bait for at least 15 days.
MULTI-SPECIES: Rotate continuously in special bait receptacles. Collect and dispose of all dead animals and remove bait promptly. To prevent reinfestation, limit sources of rodent food, water, and harborage as much as possible. If reinfestation does occur, repeat treatment. Remove continuous sources of infestation to prevent establish permanent bait stations and traps, as needed.

STORAGE AND DISPOSAL:
STORAGE: Store only in original container in a dry area inaccessible to children and pets.
DISPOSAL: Do not reuse empty container. Securely wrap original container in several layers of newspaper and discard in trash.

Contrac®

RODENTICIDE



READY TO USE PLACE PAC
KILLS RATS AND MICE

KILLS WARFARIN RESISTANT NORWAY RATS
Norway rats and house mice may consume a lethal dose in one feeding with first dead rodents appearing four or five days after treatment begins.

ACTIVE INGREDIENT: Bromadiolone, 3-[3-(5-Bromo-1,1'-biphenyl-4-yl)-3-hydroxy-1-phenylpropyl]-4-hydroxy-2H-1-benzopyran-2-one.....	0.005%
INERT INGREDIENTS	99.995%
TOTAL	100.000%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**


PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Keep away from humans, domestic animals and pets. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling. If swallowed, call a physician at once.

NOTE TO PHYSICIAN: If exposed, administer Vitamin K intravenously or orally as indicated in hydroquinone/1-overdose. Repeat as necessary based on monitoring of prothrombin time.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Keep out of lakes, streams or ponds.

Mfg by  **Net Contents 1 1/2 OZ. (43 GM)**
Bell Laboratories, Inc.
Millsboro, DE 19366 U.S.A.

EPA EST NO 12455-WF-1
EPA REG NO 12455-76

DIRECTIONS FOR USE: In a container of Federal law to use the product in a manner consistent with its labeling.

READ THIS LABEL: Read the entire label and follow all use directions and label precautions.

IMPORTANT: Do not expose children, pets, or other nontarget animals to rodenticides. To help prevent accidents:

1. Store product out of reach of children and pets.
2. Apply bait in locations out of reach of children, pets, domestic animals and nontarget wildlife, or in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and by children under six years of age, and must be used in a manner that prevents such children from reaching into the compartments and consuming bait. If bait can be obtained from stations when they are closed, they must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to treated livestock, raccoons, bears, or other potentially destructive animals, or in areas prone to vandalism.
3. Dispose of product container, and treated, spoiled, and unconsumed bait as specified on the label.

USE INSTRUCTIONS: For control of Norway rats, roof rats and house mice.

USE LIMITATIONS: May be used in and on the grounds of homes, schools, commercial and public buildings. Contrac Place Pac may also be used in and around temporary, semi-permanent, mobile, and mobile food service buildings. May also be used in sheds. Do not use in forests, agricultural fields, or areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not broadcast bait.

BEST AVAILABLE COPY

ACCEPTED
with COMMENTS
in EPA Letter Dated:

OCT 14 1992

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

12455-76

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.

IMPORTANT: Do not expose children, pets, or other nontarget animals to rodenticides. To help to prevent accidents:

1. Store product not in use in a location out of reach of children and pets.
2. Apply bait in locations out of reach of children, pets, domestic animals and nontarget wildlife, or in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and by children under six years of age, and must be used in a manner that prevents such children from reaching into bait compartments and obtaining bait. If bait can be shaken from stations when they are lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hoofed livestock, raccoons, bears, or other potentially destructive animals, or in areas prone to vandalism.
3. Dispose of product container, and unused, spoiled, and unconsumed bait as specified on this label.

USE RESTRICTIONS:

For control of Norway rats, Roof rats and House mice.
URBAN AREAS: May be used in and around the periphery of homes, industrial, commercial and public buildings. CONTRAC Place Pacs may also be used in and around transport vehicles (ships, trains, aircraft) and related port or terminal buildings. May also be used in alleys. Do not use in sewers.
NON-URBAN AREAS: May be used inside of homes and agricultural buildings.

See right side panel for additional DIRECTIONS FOR USE.

Contrac®

RODENTICIDE

READY TO USE PLACE PAC

KILLS RATS AND MICE

KILLS WARFARIN RESISTANT NORWAY RATS

Norway rats and house mice may consume a lethal dose in one feeding with first dead rodents appearing four or five days after treatment begins.

ACTIVE INGREDIENT: Bromadiolone; 3-[3-(4-bromo-1,1'-biphenyl)-4-yl]-3-hydroxy-1-phenylpropyl-4-hydroxy-2H-1-benzopyran-2-one.....	0.005%
INERT INGREDIENTS	99.995%
TOTAL	100.000%

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Keep away from humans, domestic animals and pets. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling. If swallowed, call a physician at once.

NOTE TO PHYSICIAN: If ingested, administer Vitamin K, intramuscularly or orally as indicated in bishydroxycoumarin or coumatetralil. Repeat as necessary based on monitoring of prothrombin times.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Keep out of lakes, streams or ponds.

Net Contents: 40 x 1 1/2 OZ.

EPA EST. NO. 12455-WI-1

EPA REG. NO. 12455-76

Mfg. by:



Bell Laboratories, Inc.

Murphy, NJ 08874 U.S.A.

DIRECTIONS FOR USE (continued from left)

Do not place bait in areas where there is a potential for contamination of food or surfaces that come in contact with food. Do not broadcast bait.

SELECTION OF TREATMENT AREAS:

Determine areas where rats or mice will most likely consume the bait. Generally, these are stored food areas, gnawed openings, in or beside burrows, in concealed places, between floors and walls, or where rodents or their signs have been seen, from rain or snow. Remove as much alternate food as possible.

APPLICATION DIRECTIONS:

RATS: Apply 2 to 10 Place Pacs per placement area. Maintain an uninterrupted supply of fresh bait for at least 10 days.
HOUSE MICE: Place 1 Place Pac at 8 to 12 ft intervals. Maintain an uninterrupted supply of fresh bait for at least 10 days.

RATS/MICE: Replace contaminated or spoiled bait immediately. Collect and dispose of all dead animals and bait properly. To prevent reinfestation, limit rodent food, water, and harborage as much as possible. If reinfestation does occur, repeat treatment. If a continuous source of infestation is present, establish bait stations and replenish as needed.

STORAGE AND DISPOSAL

STORAGE: Store only in original container, inaccessible to children and pets.
DISPOSAL: Do not reuse empty container. Store original container in several layers of newspaper and place in trash.

BEST AVAILABLE COPY

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.

IMPORTANT: Do not expose children, pets, or other nontarget animals to rodenticides. To help to prevent accidents:

1. Store product not in use in a location out of reach of children and pets.
2. Apply bait in locations out of reach of children, pets, domestic animals and nontarget wildlife, or in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and by children under six years of age, and must be used in a manner that prevents such children from reaching into bait compartments and obtaining bait. If bait can be shaken from stations when they are lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hoofed livestock, raccoons, bears, or other potentially destructive animals, or in areas prone to vandalism.
3. Dispose of product container, and unused, spoiled, and unconsumed bait as specified on this label.

USE RESTRICTIONS:

For control of Norway rats, Roof rats and House mice.

URBAN AREAS: May be used in and around the periphery; of homes, industrial, commercial and public buildings. CONTRAC Place Pacs may also be used in and around transport vehicles (ships, trains, aircraft) and related port or terminal buildings. May also be used in alleys. Do not use in sewers.

NON-URBAN AREAS: May be used inside of homes and agricultural buildings.

See right side panel for additional DIRECTIONS FOR USE.

Contrac®

RODENTICIDE

READY TO USE PLACE PAC

KILLS RATS AND MICE



KILLS WARFARIN RESISTANT NORWAY RATS

Norway rats and house mice may consume a lethal dose in one feeding with first dead rodents appearing four or five days after treatment begins.

ACTIVE INGREDIENT: Bromadiolone, 3-[p-(4-bromo-1,1'-biphenyl)-4-yl]-3-hydroxy-1-phenylpropyl-4-hydroxy-2H-1-benzopyran-2-one.....	0.005%
INERT INGREDIENTS	99.995%
TOTAL	100.000%

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Keep away from humans, domestic animals and pets. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling. If swallowed, call a physician at once.

NOTE TO PHYSICIAN: If ingested, administer Vitamin K, intramuscularly or orally as indicated in hydroxycooumatin overdose. Repeat as necessary based on monitoring of prothrombin times.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Keep out of lakes, streams or ponds.

Net Contents: 75 x 1 1/2 OZ.

EPA EST. NO. 12455-W1-1

EPA REG. NO. 12455-76

Mfg. by:



Bell Laboratories, Inc.
Bridgewater, NJ 08804 U.S.A.

DIRECTIONS FOR USE (continued from left side panel)

Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not broadcast bait.

SELECTION OF TREATMENT AREAS:

Determine areas where rats or mice will most likely find and consume the bait. Generally, these are along walls, by gnawed openings, in or beside burrows, in corners and concealed places, between floors and walls, or in locations where rodents or their signs have been seen. Protect bait from rain or snow. Remove as much alternative food as possible.

APPLICATION DIRECTIONS:

RATS: Apply 2 to 10 Place Pacs per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days.
HOUSE MICE: Place 1 Place Pac at 8 to 12 foot intervals. Maintain an uninterrupted supply of fresh bait for at least 15 days.

RATS/MICE: Replace contaminated or spoiled bait immediately. Collect and dispose of all dead animals and leftover bait properly. To prevent reinfestation, limit sources of rodent food, water, and harborage as much as possible. If reinfestation does occur, repeat treatment. Where a continuous source of infestation is present, establish permanent bait stations and replenish as needed.

STORAGE AND DISPOSAL

STORAGE: Store only in original container, in a dry area inaccessible to children and pets.

DISPOSAL: Do not reuse empty container. Securely wrap original container in several layers of newspaper and discard in trash.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

OCT 14 1992

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.

12455-76

19810

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.

IMPORTANT: Do not expose children, pets, or other nontarget animals to rodenticides. To help to prevent accidents:

1. Store product not in use in a location out of reach of children and pets.
2. Apply bait in locations out of reach of children, pets, domestic animals and nontarget wildlife, or in tamper-resistant bait stations. These stations must be resistant to destruction by dogs and by children under six years of age, and must be used in a manner that prevents such children from reaching into bait compartments and obtaining bait. If bait can be shaken from stations when they are lifted, units must be secured or otherwise immobilized. Even stronger bait stations are needed in areas open to hoofed livestock, raccoons, bears, or other potentially destructive animals, or in areas prone to vandalism.
3. Dispose of product container, and unused, spoiled, and unconsumed bait as specified on this label.

USE RESTRICTIONS:

For control of Norway rats, Roof rats and House mice.

URBAN AREAS: May be used in and around the periphery of homes, industrial, commercial and public buildings. CONTRAC Place Pacs may also be used in and around transport vehicles (ships, trains, aircraft) and related port or terminal buildings. May also be used in alleys. Do not use in sewers.

NON-URBAN AREAS: May be used inside of homes and agricultural buildings.

See right side panel for additional DIRECTIONS FOR USE.

Contrac®

RODENTICIDE

READY TO USE PLACE PAC

KILLS RATS AND MICE

KILLS WARFARIN RESISTANT NORWAY RATS

Norway rats and house mice may consume a lethal dose in one feeding with first dead rodents appearing four or five days after treatment begins.

ACTIVE INGREDIENT: Bromadiolone; 3-D-(4-Bromo-1,1'-biphenyl)-4-yl-3-hydroxy-1-phenylpropanoate + hydroxy-2-(1-benzopyran-2-yl)-	0.005%
INERT INGREDIENTS	99.995%
TOTAL	100.000%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Keep away from humans, domestic animals and pets. If swallowed, this material may reduce the clotting ability of the blood and cause bleeding. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling. If swallowed, call a physician at once.

NOTE TO PHYSICIAN: If ingested, administer Vitamin K, intramuscularly or orally as indicated in bis(hydroxymethyl)resorcinol overdose. Repeat as necessary based on monitoring of prothrombin times.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and wildlife. Keep out of lakes, streams or ponds.

Net Contents: 120 x 1 1/2 OZ.

EPA EST NO 12455-W1-1

EPA REG NO 12455-78

Mfg. by:



Bell Laboratories, Inc.

Whitman, NJ 07891 U.S.A.

DIRECTIONS FOR USE (continued from left side panel)

Do not place bait in areas where there is a possibility of contaminating food or surfaces that come in direct contact with food. Do not broadcast bait.

SELECTION OF TREATMENT AREAS:

Determine areas where rats or mice will most likely find and consume the bait. Generally, these are along walls, by gnawed openings, in or beside burrows, in corners and concealed places, between floors and walls, or in locations where rodents or their signs have been seen. Protect bait from rain or snow. Remove as much alternative food as possible.

APPLICATION DIRECTIONS:

RATS: Apply 2 to 10 Place Pacs per placement. Maintain an uninterrupted supply of fresh bait for at least 10 days.

HOUSE MICE: Place 1 Place Pac at 8 to 12 foot intervals. Maintain an uninterrupted supply of fresh bait for at least 15 days.

RATS/MICE: Replace contaminated or spoiled bait immediately. Collect and dispose of all dead animals and leftover bait properly. To prevent reinfestation, limit sources of rodent food, water, and harborage as much as possible. If reinfestation does occur, repeat treatment. Where a continuous source of infestation is present, establish permanent bait stations and replenish as needed.

STORAGE AND DISPOSAL

STORAGE: Store only in original container, in a dry area inaccessible to children and pets.

DISPOSAL: Do not reuse empty container. Securely wrap original container in several layers of newspaper and discard in trash.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

OCT 14 1992

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, this pesticide
registered under EPA Reg. No.

12455-76

10710