



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

November 7, 2019

Ms. Leanna Bosarge  
Director, Regulatory Affairs  
Control Solutions, Inc.  
5903 Genoa-Red Bluff  
Pasadena, TX 77507-1041

Subject: PRIA Label and CSF Amendment – Addition of General Cockroach Claims, Acceptance of New Basic CSF and Acceptance of Storage Stability & Corrosion Characteristics Data  
Product Name: CSI 16-107G Indoxacarb Powder  
EPA Registration Number: 53883-438  
Application Dates: March 18, 2019 & April 26, 2019  
Decision Number: 549124

Dear Ms. Bosarge:

The amended label and CSF referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are 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.

Please note that the record for this product currently contains the following CSF:

- Basic CSF dated 04/26/2019

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, 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.

Page 2 of 2  
EPA Reg. No. 53883-438  
Decision No. 549124

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 Mr. Carmen J. Rodia, Jr. by phone at (703) 306-0327, or via email at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Johnson, Jr.", with a stylized flourish at the end.

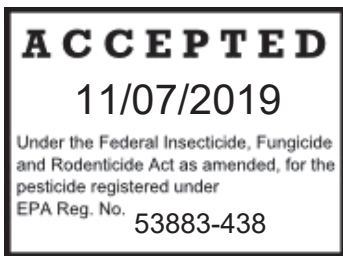
Marion J. Johnson, Jr., Acting Product Manager 10  
Invertebrate & Vertebrate Branch 2  
Registration Division (7505P)

*Enclosures: Stamped "Accepted" Master Label, dated November 7, 2019  
Efficacy Review, dated September 26, 2019  
Product Chemistry Review, dated October 24, 2019*

[Text in brackets and italics are notes to the label editor.]

[Text in brackets alone or separated by a / are optional statements or alternative statements.]

MASTER LABEL – Unless otherwise noted, all text shown prior to the start of sub-label A will be present on both sub-label A and sub-label B when printed.



# CSI 16-107G Indoxacarb Powder

[ABN: Doxem [DF]; Doxem Precise]

[Insecticide]

[Dry Flowable [Cockroach] Bait]

[Bait Solutions]

**KILLS:** Ants (excluding fire, pharaoh, harvester, and carpenter ants), Booklice, Carpet Beetles, Cockroaches (indoor use only), Crickets, Drugstore Beetles, Earwigs, Firebrats, Flour Beetles, Grain Weevils, Pillbugs, Silverfish and Sowbugs.

**FOR USE IN:** Apartments, Campgrounds, Garages, Food Storage Areas, Homes, Hospitals and Nursing Homes†, Hotels, Meat Packing and Food Processing Plants, Motels, Resorts, Restaurants and other Food Handling Establishments, Schools\*, Supermarkets, Transportation Equipment (Buses, Boats, Ships, Trains, Trucks, Planes\*\*), Utilities, Warehouses, and other Commercial and Industrial Buildings. [For use only on Sub-Label A]

**FOR USE IN:** Single Family Homes, Apartments, Attics, Kitchens, Bathrooms, Basements, Crawl Spaces, Garages, Storage Areas, Other Rooms and on Outside of Structures [For use only on Sub-Label B]

†Make applications only in unoccupied areas and patient/resident rooms when occupants are not present.

\*Do not apply to classrooms when in use.

\*\*Do not apply in cockpit.

**ACTIVE INGREDIENT:**

Indoxacarb\* ..... 0.6%

**OTHER INGREDIENTS:** ..... 99.4%

**TOTAL:** ..... 100.00%

\* (S)-methyl 7-chloro-2,5-dihydro-2-[[[methoxy-carbonyl][4(trifluoromethoxy)phenyl]amino]carbonyl]indeno[1,2-e][1,3,4]oxadiazine-4a-(3H)-carboxylate



ADAMA

Consumer & Professional Solutions

**Manufactured for:**  
Control Solutions, Inc.  
5903 Genoa Red Bluff  
Pasadena, TX 77507

EPA Reg. No: 53883-438  
EPA Est. No: \_\_\_\_\_  
Net Contents: \_\_\_\_\_

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

See inside label/insert label/side panel/back panel for First Aid, Precautionary Statements, Directions for Use and additional information

| <b>FIRST AID</b>  |   |
|---|---|
| <b>IF IN EYES:</b>  | <ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul> |
| <p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For information on this pesticide product (including health concerns or pesticide incidents), call SafetyCall® International at 1-866-897-8050, twenty-four (24) hours per day, seven (7) days per week (privacy@safetycall.com). OR [For information on this pesticide product (including health concerns or pesticide incidents), call the National Pesticide Information Center (NPIC) at 1-800-858-7378, Monday through Friday, 8:00 AM to 12:00 PM Pacific Time (NPIC Web site: www.npic.orst.edu). After 12:00 PM Pacific Time Weekdays and during the weekend, call your poison control center at 1-800-222-1222.]</p> |   |

### **PRECAUTIONARY STATEMENTS**

#### **HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

Do not apply where children (or domestic animals) are likely to come in frequent contact with treated areas. Any powder visible after application is complete should be brushed into cracks or crevices or removed by cleaning the area with a cloth and mild detergent solution. No generalized dusting should be done in household areas accessible to children or pets.

#### **PHYSICAL OR CHEMICAL HAZARDS**

Do not mix or allow coming in contact with oxidizing agent. Hazardous chemical reaction may occur.

#### **USER SAFETY RECOMMENDATIONS**

**USERS SHOULD:** Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

#### **ENVIRONMENTAL HAZARDS**

This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water. 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.

## SUB-LABEL A: Commercial Use Language

### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

- Do not apply to humans, animals, clothing or bedding.
- Do not use on or contaminate fruit, vegetables or other food or feed crops.
- Do not contaminate feed or food products or food preparation surfaces, dishes, kitchen utensils and food containers.
- [Do not dispense this product with power dusters in confined areas (i.e. attics, hot water heater closets, furnace rooms, etc.) in the presence of open flames, such as pilot lights.]
- [Do not use metal straw/tube/application injector when working around electrical equipment.]  
[For use with Precision Delivery System instructions.]

### PRODUCT INFORMATION

This product is intended for application with the supplied applicator [or other [re-fillable] applicator] intended for use with dry flowable baits to hiding and runway areas and those places where pests are found. Apply insecticide directly into cracks and crevices. Apply lightly and uniformly to infested areas. Pay particular attention to cracks and crevices, service ducts, false floors and ceilings, wall voids, around electrical and telephone fittings and equipment, around water and sewer pipes, under and behind cabinets, refrigerators, dishwashers, other installed appliances and sinks, around window and door frames, and in attics and crawl spaces. Any powder visible after application must be brushed into cracks and crevices or removed.

[To be used when packaged in puffer tubes]

[The amount to be applied will vary with the site. Concentrate treatment at insect activity sites. For light infestations, a minimum of 4 - 6 bait points is recommended per 100 ft<sup>2</sup> treatment area. For heavy infestations, a minimum of 12 -24 bait points is recommended per 100 ft<sup>2</sup> of treatment area. One bait point is equal to 0.15 grams of product. During follow-up visits, inspect the baited area and reapply when necessary.]

#### **Application Instructions:**

- Unscrew [Pull off] the cap.
- Let the hand duster lie across your finger with your palm facing upwards. Place your thumb in the middle of the tube.
- While holding the hand duster parallel to the floor and pointed away from you, begin to lightly shake the tube and push down once per desired bait point.
- Continue to shake the tube between each “puff” to keep the powder in airborne state.
- For your first application, give the tube a few shakes, then a light but firm press of the thumb.
- As the tube starts to empty, gradually begin tilting it downward, continuing the shaking technique and the parallel to gradual tilting of the tube, allowing for peak efficiency.]

[To be used when packaged in cartridges for use with the Precision Delivery System Applicator]

#### **Applicator Instructions for the Precision Delivery System™ (PDS):**

1. Insert the battery into the Precision Delivery System prior to loading dry flowable products.
2. To insert the 9V battery, unscrew the small screw on the back ledge/underside of top of the PDS unit. The top cover will lift off. Place the 9V battery into the housing as indicated

and replace the top cover. Tighten the cover back down with the screw.

3. To load bait into the Precision Delivery System (PDS), remove bait cartridge from packaging and unscrew the lid. [Remove protective film and] firmly screw the bait canister into the underside of the PDS. Be sure to keep the bait cartridge upright to prevent spillage, and do not overtighten. Retain the cartridge lid for storage after application is complete.
4. Insert the [appropriate] application straw into the opening on front of the PDS. Do not use PDS unit without an application straw.
5. Move the switch, located on the back of the PDS to "on".
6. To dispense bait, insert the [appropriate] application straw into the desired crack, crevice or void. Depress the trigger for the appropriate amount of time. The trigger can be held down to dispense a continuous flow of bait material into a large void if necessary.
7. To replace an empty bait cartridge, unscrew the used cartridge and dispose of it as directed.
8. Bait dispenses at a rate of [0.01 grams per ½ second or] 0.02 grams per 1 second of trigger activation time. Each cartridge/canister contains 5 grams of bait and will provide between 33-100 bait placements per cartridge/canister depending on the application time (See Table Below).

**Application Rates:**

The amount to be applied will vary with the site, species of cockroach and level of infestation. Concentrate treatment at insect activity sites. For light infestations, place bait in harborage areas, cracks and crevices with a minimum of 5-7 bait placements per 100 ft<sup>2</sup>. For heavy infestations, treat harborage, cracks and crevices with a minimum of 10-20 bait placements per 100 ft<sup>2</sup>. During follow-up visits, inspect the baited area and reapply when necessary.

For void applications, insert application straw into the void and dispense bait for 2 ½ to 7 ½ seconds. For smaller voids, or light infestations, use the lower end of the specified rate range. For large voids, or heavy infestations, use the upper end of the specified rate range.

| Rate   | Grams of Doxem®<br>Precise Applied | Amount of time to<br>actuate trigger | Total # placements<br>in 5 g canister |
|--------|------------------------------------|--------------------------------------|---------------------------------------|
| Low    | 0.05                               | 2.5 seconds                          | 100                                   |
| Medium | 0.075 g                            | 3.75 seconds                         | 67                                    |
| High   | 0.15 g                             | 7.5 seconds                          | 33                                    |

*[End of Precision Delivery System applicator use directions]*

**INDOOR TREATMENTS**

**COCKROACHES, ANTS (excluding fire, pharaoh, harvester, and carpenter ants) AND CRICKETS:**

Apply thoroughly to all areas where these pests crawl and hide, especially in cracks and crevices, voids and hidden surfaces around sinks and storage areas, behind baseboards, around doors and windows, cabinets, pantries, stoves, behind refrigerators and other installed appliances and in attics and crawl spaces. Check bait placements regularly and replace as needed.

**EARWIGS, PILLBUGS AND SOWBUGS:** Apply in cracks and crevices around doors and windows and other places where these pests may enter premises. Treat voids and other enclosed locations where these pests may hide or are found.

**STORED PRODUCT PESTS - Including Drugstore Beetles (exposed adult and larva stages), Flour Beetles and Grain Weevils:** Remove all food, utensils, serving ware and non-adhesive shelving paper before treatment. Treat cracks and crevices and/or voids where these insects may be harboring. Infested areas include, but are not limited to, cracks and crevices in cabinets, pantries and wall voids. During follow-up visits, inspect bait placements and reapply when necessary. Cover shelves with shelving paper after treatment. Destroy or discard infested food packages.

**SILVERFISH:** Apply in cracks and crevices where these pests are found. Treat voids and enclosed locations where these pests may hide or are found. Treatment may be made to voids in/near food pantries, kitchen and bathroom cabinets, behind baseboards, around doors, around windows, behind wall paper, in wall voids, in attics, in crawl spaces and other construction voids. During follow up visits, inspect bait placements and reapply when necessary

**CARPET BEETLES - Including Black, Furniture and Varied:** Apply to cracks and crevices where these insects are found.

**AIRCRAFT CABINS:** Apply bait in suspected and infested cockroach areas. Place a bait placement in areas between elements of construction. Use 5 - 20 bait placements/100 ft<sup>2</sup>. Do not apply any bait in cockpit area.

**FOOD AREAS OF FOOD/FEED HANDLING ESTABLISHMENTS:** Food/feed handling establishments are places other than private residences in which food/feed is held, processed, prepared or served. **APPLICATIONS OF THIS PRODUCT IN FOOD AREAS OF FOOD HANDLING ESTABLISHMENTS ARE LIMITED TO CRACK AND CREVICE TREATMENT ONLY AND MAY OCCUR WHEN FACILITY IS IN OPERATION.** Food areas include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing, edible waste storage and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas (when food is exposed and facility is in operation) would also be considered a food area. Apply product according to the level of infestation as prescribed in the General Instructions into cracks and crevices associated with wall voids, pieces of equipment, stainless steel tables, drains, storage-equipment, and dining tables. Also apply between elements of construction. During follow-up visits, inspect bait placements and reapply when necessary. Do not contaminate feed or food products or food preparation surfaces, dishes, kitchen utensils or food containers.

#### **OUTDOOR TREATMENTS**

Use for control of ants (excluding fire, pharaoh, harvester, and carpenter ants), crickets, earwigs, ground beetles, pillbugs and sowbugs. Inject into cracks and crevices around windows and doors, porches, screens, eaves, patios, garages, under stairways and in crawl spaces as well as under siding or exterior construction elements.

#### STORAGE AND DISPOSAL

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

**PESTICIDE STORAGE:** Keep this product in its tightly closed original container when not in use. Store in a cool, well-ventilated, dry (preferably locked) area that is inaccessible to children and animals. Do not store this product under wet conditions.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on-site or at an approved waste disposal facility.

**CONTAINER HANDLING: Non-refillable 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 for disposal instructions.

**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

#### LIMITATION OF WARRANTY AND LIABILITY

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Control Solutions, Inc. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Control Solutions, Inc. and Seller harmless for any claims relating to such factors.

Control Solutions, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Control Solutions, Inc., and Buyer and User assume the risk of any such use. To the extent permitted by applicable law, **CONTROL SOLUTIONS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

**IT IS CONTROL SOLUTIONS INC., AND SELLERS INTENTION THAT** in no event shall Control Solutions or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF CONTROL SOLUTIONS, INC., AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF CONTROL SOLUTIONS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Control Solutions, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Control Solutions, Inc.



## **SUB-LABEL B: Consumer Use Language**

### **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

- Do not apply to humans, animals, clothing or bedding.
- Do not use on or contaminate fruit, vegetables or other food or feed crops.
- Do not contaminate feed or food products or food preparation surfaces, dishes, kitchen utensils and food containers.
- [Do not dispense this product in confined areas (i.e. attics, hot water heater closets, furnace rooms, etc.) in the presence of open flames, such as pilot lights.]
- Do not puff bait into the air. Always apply/puff bait into a crack or crevice.

### **PRODUCT INFORMATION**

[This product] [Name of product] is applied with the supplied “Puffer” applicator to cracks, crevices, under and behind appliances, hiding and runway areas and those places where pests are found. Apply product directly into cracks and crevices. Apply lightly and uniformly to infested areas. Any powder visible after application must be brushed into cracks and crevices or removed.

*[Directions for use with the puffer tube]*

The amount to be applied will vary. Concentrate treatment at insect activity sites. For light infestations, a minimum of 4 - 6 bait points is recommended per 100 ft<sup>2</sup> of treatment area. For heavy infestations, a minimum of 5 – 20 bait points is recommended per 100 ft<sup>2</sup> of treatment area. Reapply bait when necessary. Each bait point should equal about 0.15 grams of product.

**Application Instructions:** *[graphics depicting use instructions may be used in conjunction with text]:*

- Unscrew [Pull off] the cap.
- Let the hand duster lie across your finger with your palm facing upwards. Place your thumb in the middle of the tube.
- While holding the hand duster parallel to the floor and pointed away from you, begin to lightly shake the tube and push down once per desired bait point.
- Continue to shake the tube between each “puff” to keep the powder in airborne state.
- For your first application, give the tube a few shakes, then a light but firm press of the thumb.
- As the tube starts to empty, gradually begin tilting it downward, continuing the shaking technique and the parallel to gradual tilting of the tube, allowing for peak efficiency.

*[Directions for use with the consumer puff applicator]*

The amount to be applied will vary. Concentrate treatment at insect activity sites. For light infestations, use 2 puffs in a minimum of 4 - 6 insect hiding places per 100 ft<sup>2</sup> of treatment area. For heavy infestations, use 4 - 7 puffs in a minimum of 12 – 24 insect hiding places per 100 ft<sup>2</sup> of treatment area. Reapply bait when necessary. Each puff should equal about 0.05 grams of product.

**Application Instructions:**

- [Remove cap from tip of puffer straw.]
- Twist puffer straw 180 degrees so that it is pointing upward.
- Hold puffer applicator upright so that your index finger is on the depressor.
- Turn puffer applicator so that the straw is parallel with the floor.

- While holding the puffer applicator parallel to the floor and pointed away from you, push down or puff 2 – 7 times per insect hiding place. This equals one dose.
- As the puffer applicator starts to empty, gradually begin tilting it upward during applications. Applicator may not fully empty if it remains in the horizontal position.
- [When application is complete, ensure that puffer straw is return to the original downward facing direction and that cap is placed back on puffer straw end.]

*[Instructions to be used regardless of applicator type]*

#### **INDOOR USE**

Use for control of Cockroaches, Ants (excluding fire, pharaoh, harvester, and carpenter ants), Asian ladybeetles, Booklice, Boxelder Bugs, Carpet Beetles, Crickets, Dermestids, Drugstore Beetles, Earwigs, Firebrats, Flour Beetles, Grain Weevils, Palmetto Bugs, Pillbugs, Silverfish, Sowbugs, and Stinkbugs. For home treatment in non-food areas, place bait behind and under cabinets, drawers and shelving, under and behind appliances, such as stoves and refrigerators, and in attics and crawlspaces, into cracks and crevices, holes, pipe chases, undersides of furniture, under drain plates, in or under trash containers, hidden surfaces around sinks and storage areas, behind baseboards, and around doors and windows. Inspect applied area periodically and re-apply if necessary. Care should be taken to avoid depositing the product onto exposed surfaces. If bait contacts an exposed surface, remove and wash exposed surface with a cloth and mild detergent solution.

#### **OUTDOOR USE**

Use for control of Ants (excluding fire, pharaoh, harvester, and carpenter ants), Asian ladybeetles, Booklice, Boxelder bugs, Carpet Beetles, Crickets, Drugstore Beetles, Earwigs, Firebrats, Flour Beetles, Grain Weevils, Pillbugs, Silverfish, Sowbugs, and Stinkbugs. Inject into cracks and crevices around windows and doors, porches, screens, eaves, patios, garages, under stairways, in open crawl spaces, and under siding or exterior construction elements and other areas where insects may be nesting.

#### **STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Keep this product in its tightly closed original container when not in use. Store in a cool, well-ventilated, dry (preferably locked) area that is inaccessible to children and animals. Do not store this product under wet conditions.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on-site or at an approved waste disposal facility.

**CONTAINER HANDLING: Non-refillable 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 for disposal instructions.

**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

*[EPA Reviewer – The following are alternate Warranty and Disclaimer statements that may be used for both Commercial use and Consumer use version of this label.]*

*[Option 1:]*

#### **LIMITATION OF WARRANTY AND LIABILITY**

The Directions for Use of this product should be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Control Solutions, Inc. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Control Solutions, Inc. and Seller harmless for any claims relating to such factors.

Control Solutions, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Control Solutions, Inc., and Buyer and User assume the risk of any such use. To the extent permitted by applicable law, **CONTROL SOLUTIONS, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

**IT IS CONTROL SOLUTIONS INC., AND SELLERS INTENTION THAT** in no event shall Control Solutions or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF CONTROL SOLUTIONS, INC., AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF CONTROL SOLUTIONS, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Control Solutions, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Control Solutions, Inc.

*[Option 2:]*

#### **Limited Warranty and Disclaimer**

Seller warrants that this product complies with the specifications expressed in this label. To the extent consistent with applicable law, seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, seller shall have no liability for consequential damages.

[Option 3:]

[Alternate Optional WARRANTY STATEMENT]

Satisfaction guaranteed or your money back

If not completely satisfied, please submit a refund request. Please send a copy of the receipt, the back label of the product that contains the UPC Code and a note explaining why you were dissatisfied. Send to, [insert company name and address]. [Company name] will not be liable for any damage, direct or incidental. Refund or replacement product is [Company name]'s only obligation.

Buyers Guarantee limited to label claims

**NOTICE:** Buyer assumes all risks of use, storage and handling of this product not in strict accordance with directions given herewith.

**PUFFER TUBE UNIT LABEL FOR CSI 16-107G Indoxacarb Powder**

*[Applicable to Both Commercial and Consumer Products]*

|  |   |
|--|---|
| <b>CSI 16-107G Indoxacarb Powder</b>   |   |
| NOTE: Do not remove this label.  |   |
| <b>ACTIVE INGREDIENT:</b>  |   |
| Indoxacarb* .....  | 0.6%  |
| <b>OTHER INGREDIENTS:</b> .....  | <u>99.4%</u>  |
| <b>TOTAL:</b>  | 100.00%   |
| <br>* (S)-methyl 7-chloro-2,5-dihydro-2-[[[(methoxy-carbonyl)[4(trifluoromethoxy)phenyl]amino]carbonyl]indeno[1,2-e][1,3,4]oxadiazine-4a-(3H)-carboxylate  |   |
| <b>KEEP OUT OF REACH OF CHILDREN</b>   |   |
| <b>CAUTION:</b> Do not apply where children (or domestic animals) are likely to come in frequent contact with treated areas. Any powder visible after application is complete should be brushed into cracks or crevices or removed. No generalized dusting should be done in household areas accessible to children or pets. |   |
| <b>CONTAINER HANDLING: If empty:</b> Do not reuse container. Place in trash or offer for recycling if available. <b>If partly filled:</b> Call your local solid waste agency for disposal instructions.  |   |
| Control Solutions, Inc.<br>5903 Genoa Red Bluff<br>Pasadena, TX 77507-1041   | EPA Reg. No. 53883-XXX<br>EPA Est. No. _____<br>NET WT. _____ |
| SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS   |   |

**BAIT CARTRIDGE/CANISTER UNIT LABEL FOR CSI 16-107G Indoxacarb Powder**

*[For use only on Commercial Products]*

|   |  |
|---|--|
| CSI 16-107G Indoxacarb Powder           | <b>ACTIVE INGREDIENT:</b> Indoxacarb 0.6%                |
| NOTE: Do not remove this label          | <b>NET WT. 0.18 oz. (5 g)</b>                            |
| Do not re-use or refill this container. |  |
| EPA Reg. No. 53883-438                  | <b>KEEP OUT OF REACH OF CHILDREN</b>                     |
| EPA Est. No. XXXXX-XX-X                 | See Label Insert for Complete Directions and Precautions |

*[Above label is actual size of 0.6" x 3.5" and font is 6pt. Lot number to be ink jet printed on the container.]*

**CONSUMER PUFF APPLICATOR UNIT LABEL FOR CSI 16-107G Indoxacarb Powder**

*[For use only on Consumer Products]*

|   |                           |
|---|---------------------------|
| <b>CSI 16-107G Indoxacarb Powder</b>  |                           |
| NOTE: Do not remove this label. Do not re-use or refill this container.   |                           |
| ACTIVE INGREDIENT: Indoxacarb 0.6%  | NET WT. 0.35 oz. (10g)    |
| <b>KEEP OUT OF REACH OF CHILDREN</b>  |                           |
| <b>CAUTION</b>  |                           |
| See label insert for complete directions for use and precautionary language.  |                           |
| <b>CONTAINER HANDLING: If empty:</b> Do not reuse container. Place in trash or offer for recycling if available. <b>If partly filled:</b> Call your local solid waste agency for disposal instructions. |                           |
| EPA Reg. No. 53883-438  | EPA Est. No. XXXXX-XX-XXX |

*[Above label is actual size of 1.75" x 4.0". Lot number to be ink jet printed on the container.]*

**[Optional Marketing Claims for both Sub-Labels:]**

**Use Related Claims**

- For Crack and Crevice Use
- Effective and Easy to Use
- One 10 gram tube equals 67 bait placements [for use only with puffer tubes]
- One 20 gram tube equals 133 bait placements [for use only with puffer tubes]
- One 30 gram tube equals 200 bait placements [for use only with puffer tubes]
- One 5 gram cartridge/canister contains up to 100 bait placements [for use only with the Precision Delivery System]
- [Up to] 100 applications per [5 gram] canister/cartridge [for use only with the Precision Delivery System]
- One cartridge/canister treats up to 5,000 ft<sup>2</sup> [for use only with the Precision Delivery System]
- Easy to use applicator included
- Can be used in combination with other baits/control methods
- Ideal for use in kitchens/bathrooms/living rooms
- Control Solutions, Inc. [CSI] Bait Solutions
- For Use in Commercial, Residential and Industrial Areas
- Perfect for [application into] voids, cracks and crevices
- Great kill where insects crawl and hide such as: cracks and crevices, behind baseboards and behind and under cabinets, drawers and appliances
- Bait is taken back by one roach so other roaches will feed on it as well.
- Bait is taken back by one insect and other insects will feed on it.
- Bait is carried back to where other roaches are hiding
- Bait is carried back to where other insects are hiding
- Easy to use [bait dust]/[dry bait] that kills cockroaches and controls re-infestations
- Easy to use [bait dust]/[dry bait] that kills listed insects and controls re-infestations
- Easy to use Puffer Applicator- gets bait into hard to reach cracks and crevices
- Use in cracks and crevices throughout your home
- Great for apartments, the roach takes the bait back to the nest hidden in the walls
- Great control for [cock]roaches hiding in dark [damp] places
- Great control for [cock]roaches in hidden places
- Use around drain pipes under the sink.
- Helps prevent your neighbors' roaches from taking over your apartment
- Whole House Protection {image – walls, ceilings, cabinets, cracks, crevices}



**BaitSolutions**

**Efficacy Related Claims**

- Kills Cockroaches (indoor use only)
- Keeps working on German cockroaches indoors for up to 2 years/24 months [unless bait is depleted]
- Begins/Starts killing/controlling in 24 hours
- Kills the [cock]roaches you see AND [even] the ones you don't

- Kills the [cock]roaches you can't see
- Kills [cock]roaches where they hide [and breed]
- Discretely kill[s] [your] [cock]roaches
- Smokes [cock]roaches [where they hide]
- Begins eliminating your German [cock]roach population in 24 hours
- Works even when other food is available
- Provides lethal consumption through direct feeding and Cling-n-Clean/Grab-n-Groom
- Aids in the control of Silverfish
- Kills Ants\*, cockroaches, earwigs, pantry pests and many more listed insects. {\*excluding fire, pharaoh, harvester and carpenter ants}
- Applied bait is still effective up to 2 years later on German cockroaches
- Controls the adult cockroach and the nymphs.
- Kills 15+ listed common household insects {see list at end of claims for substantiation on number of insects}

#### **Formulation Related Claims**

- Dry flowable bait for cockroaches
- Non-staining dry bait formula
- Adheres to almost any surface
- No odor, no mess
- Invisible powder bait
- Tarsal tastin' good
- Does not contain the ingredients that cause bait aversion
- Doesn't melt [or run] in hot environments/climates
- Stays in place in hot environments
- Penetrates deep into cracks, crevices and voids where gels and bait stations cannot reach
- Unique dry [bait] [formulation]
- Product flows on a cushion of air to penetrate spaces where cockroaches are harboring
- Cling-n-Clean/Grab-n-Groom: Clings [Grabs on] to [cock]roach bodies when they walk through, ensuring that the powder is later ingested when the [cock]roaches preen/clean/groom
- [Grab 'n Groom:/-] [Doxem Precise/Precise's] [Unique dry formula] grabs onto cockroaches and is ingested when they groom[.]
- [Cling & Clean:/-] [Doxem Precise/Precise's] [Unique dry formula] clings to cockroaches and is ingested when they clean [themselves][.]
- Grab 'n Groom
- Grab & Groom
- Cling 'n Clean
- Cling & Clean

#### **Precision Delivery System Applicator Claims**

- Easy to operate
- Heavy Duty Design [built for years of dependable service]
- Very reliable
- Superior [DF Bait] [Dry Flowable Bait] Delivery
- Fast[er] Application
- [More] Precise [DF Bait] [Dry Flowable Bait] Delivery
- [More] Precise bait placement
- [More] Consistent bait placement



- [More] Consistent [DF Bait] [Dry Flowable Bait] Delivery
- Ideal for applying [DF Bait]/[Dry Flowable Bait] consistently over a broad area
- Ideal for treating hard to reach areas
- Electrically non-conductive extender included
- Long-lasting battery included
- Comes complete with [insert number] bait cartridges
- Place bait directly/accurately in those hard to reach places
- Delivers proper dosage and prevents overapplication or inconsistent placements
- Designed to deliver precise and uniform applications
- To be used in conjunction with PDS
- Precision Delivery System {to be used on box containing the applicator and bait refills}
- Saves on time and labor
- For your overall baiting program
- Go-to bait for your rotational program

#### **Consumer “Puffer” Applicator Claims**

- Precision application system
- Precision application
- Precision applicator
- Puffs in all directions
- Contains up to 200 doses/bait placements [*for a 10g applicator*]
- Treats a 2,500 sq. ft home [twice][2x]
- Patented bait delivery system
- Simple to use Puffer applicator

{For informational purposes only in list format from Sub-label B}

#### List of Common Household Insects

1. Ants
2. Asian ladybeetles
3. Booklice
4. Boxelder bugs
5. Carpet beetles
6. Cockroaches
7. Crickets
8. Dermestids
9. Drugstore beetles
10. Earwigs
11. Firebrats
12. Flour beetles
13. Grain weevils
14. Palmetto Bugs
15. Pillbugs
16. Silverfish
17. Sowbugs
18. Stinkbugs