

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

August 3, 2021

Lisa Adamson Regulatory Manager Control Solutions, Inc. 5903 Genoa-Red Bluff Pasadena, TX 77507

Subject: PRIA Label Amendment – Label amendment to add cockroach claims. Product Name: CSI 16-202 Roach Gel EPA Registration Number: 53883-456 Application Date: February 5, 2021 Decision Number: 571161

Dear Lisa Adamson:

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.

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. 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

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with FIFRA section 6. If you have any questions, please contact Ralph Narain by phone at 703-347-8750, or via email at Narain.Ralph@epa.gov.

Sincerely,

her tom

Gene Benbow, Product Manager 7 Invertebrate & Vertebrate Branch 3 Registration Division (7505P) Office of Pesticide Programs



and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. \_\_\_\_\_\_

53883-456

FIPRONIL	GROUP	2B	INSECTICIDE
ABAMECTIN	GROUP	6	INSECTICIDE

## CSI 16-202 Roach Gel

## [ABN: Fuse<sup>®</sup> Roach Gel]

#### FOR USE IN COMMERCIAL, INDUSTRIAL, AND RESIDENTIAL AREAS [Sub-Label A] FOR USE IN RESIDENTIAL AREAS [Sub-Label B]

#### **ACTIVE INGREDIENTS:**

Fipronil (CAS # 120068-37-3)	0.05%
Abamectin (CAS # 71751-42-2)	0.05%
OTHER INGREDIENTS:	<u>99.90%</u>
TOTAL:	100.00%



olutions

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

EPA Reg. No: 53883-456 EPA Est. No: \_\_\_\_\_ Net Contents:

## **KEEP OUT OF REACH OF CHILDREN**

#### **PRECAUTIONARY STATEMENTS**

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail)

#### HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

#### **ENVIRONMENTAL HAZARDS**

This product is toxic to birds, 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.

#### PHYSICAL AND CHEMICAL HAZARDS

Do not use this product in or on electrical equipment where possibility of shock hazard exists. Do not mix or allow contact with oxidizing agents. Hazardous chemical reaction may occur.

#### 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.

Use CSI 16-202 Roach Gel as a spot or crack and crevice treatment for the indoor control of cockroaches in residential areas and the non-food/non-feed areas of institutional, warehousing and commercial establishments, warehouses, restaurants, food processing plants, supermarkets, hospitals, nursing homes, motels, hotels, apartment buildings, bakeries, beverage plants, breweries, bottling facilities, candy plants, canneries, cereal processing and manufacturing plants, animal housing facilities (such as but not limited to poultry houses, cattle, sheep, swine, goat and dairy facilities, horse stables, dog kennels), dairies and dairy product processing plants, frozen food plants, schools, laboratories, computer facilities, sewers, aircraft, buses, boats/ships, trains, homes, houses, industrial buildings, office buildings, kennels, kitchens, manufacturing facilities, spice plants, stores, wineries and similar structures, mausoleums, meat processing and packaging plants, meat and vegetable canneries, pet shops, and zoos. Non-food/non-feed areas include bedrooms, living rooms, bathrooms, closets, media rooms, garbage rooms, lavatories, entries, vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and storage areas (after canning or bottling). This product may also be used in food/feed areas of food/feed handling establishments as outlined below.

May stain textiles, fabrics, and or porous surfaces.

#### **RESISTANCE MANAGEMENT**

For resistance management, please note that CSI 16-202 Roach Gel contains both a Group 2B and Group 6 insecticide. Any insect population may contain individuals naturally resistant to CSI 16-202 Roach Gel and other Group 2B or Group 6 insecticides. The resistant individuals may dominate the insect population if these insecticides are used repeatedly in the same locations. Appropriate resistance-management strategies should be followed.

To delay insecticide resistance, take the following steps:

- Rotate the use of CSI 16-202 Roach Gel or other Group 2B or Group 6 insecticides within your insect control plan with different groups that control the same pests.
- Adopt an integrated pest management program for insecticide use that includes scouting, uses historical information related to pesticide use, record keeping, and which considers cultural, biological and other chemical control practices.
- Monitor after application for unexpected target pest survival. If the level of survival suggests the presence of resistance, consult with your local university specialist or certified pest control advisor.
- For further information or to report suspected resistance contact your local Control Solutions, Inc. representative or your pest control product distributor.

#### **USE RESTRICTIONS:**

- For indoor use only. **DO NOT** apply outdoors.
- **DO NOT** treat food preparation surfaces. Keep gel away from foods and food contact surfaces.
- **DO NOT** apply gel to areas which have been recently sprayed with insecticide, and **DO NOT** spray insecticide over gel as it may cause the bait to become repellent.

- **DO NOT** apply to areas that are accessible to children, domestic animals or pets.
- In pet shops and zoos, place bait out of reach of pets and zoo animals.

#### **APPLICATION DIRECTIONS**

**Application rate for all uses:** Application rate varies according to the level of infestation and species to be controlled. Apply gel as round spots or thin beads into cracks and crevices or as a spot treatment. Place bait close to cockroach harborages, foraging, and feeding areas including corners, cracks and crevices. Numerous smaller bait placements provide faster control than fewer larger placements. In cases of severe infestation and areas with excessive clutter or alternative food sources that cannot be eliminated, use the higher rate of application within the labeled range.

**Small Cockroaches: German Cockroaches, Brown Banded Cockroaches, and stored product pests:** For severe or heavy infestations, use up to 3.0 grams of bait per square yard (9 square feet). For use in maintenance programs where regular [monthly] [quarterly] applications are made for continuous control of cockroach populations, use up to 0.75 grams of bait per square yard. This rate will not provide fast control of existing infestations. For light to moderate infestations (or for retreatments), use up to 1.5 grams of bait per square yard.

Large Cockroaches: American, Australian, Smokey-Brown, Oriental, Surinam, Turkestan, and Wood Cockroaches: 1 to 2 grams of bait per square yard.

Place bait under baseboards, sinks, countertops, seats, around water pipes, water heaters, dishwasher equipment, in crack and crevices as well as voids where insects harbor.

BAIT QUANTITY REFERENCE TABLE			
Approximate weight per spot diameter	Approximate weight per bead length		
0.1 gram = 1/4 inch diameter spot	1/3 gram = 1.5 inch bead		
1.0 gram = Dime size spot	2/3 gram = 3.0 inch bead		
1.5 gram = Quarter size spot	1 1/3 gram = 6 inch bead		

**Wax Paper Application:** For gel bait applications under appliances and other similar areas, or to protect the bait from possible existing contamination, apply the bait using 2-3" wax paper squares. Fold the wax paper in half to make a triangle and apply the 1/8" wide and 2" long bait bead in the center. Place the folded wax paper containing the bait into the appropriate bait placement location. Wax paper squares can easily be inspected, removed and/or replaced as needed.

**Vertical Applications:** For applications to vertical surfaces such as walls and sides of appliances, it can be useful to use masking/painter's tape. Put the tape on first and then apply the bait to the tape surface. When it is time to replace the bait, simply peel the tape away and repeat with new tape and fresh bait.

**PANTRY PESTS:** To control exposed, adult stages of stored product beetles [.][: cadelle, cigarette beetle, confused flour beetle, dermestid, drugstore beetle, flat grain beetle, granary weevil, lesser grain borer, lesser mealworm, mealworm, merchant grain beetle, red flour beetle, rice weevil, rusty grain beetle, saw-toothed grain beetle, spider beetle, or warehouse beetle.] After removing infested foodstuffs and cleaning up spilled foodstuffs and dust, applications of this product will kill adult stages of beetles remaining in area. Apply in voids, cracks and crevices, behind and under cupboards, and other difficult

to reach areas where insects may hide. Application rate is dependent on level of infestation.

**Applications in Food/Feed Handling Establishments:** Application within food/feed areas of food/feed handling establishments is limited to crack and crevice treatment only and application can be made while the facility is in operation. If gel contacts an exposed surface where food is handled, remove gel and wash exposed surface with an effective cleaning compound followed by a potable water rinse prior to use. Apply with bait injector directly into cracks and crevices. Place applicator tip into cracks, crevices, holes and other small openings where cockroaches may be a problem. Follow labeled application rates for gel.

## Use Restrictions in Food/Feed Handling Establishments:

- **DO NOT** apply bait to areas where food/feed, utensils, or processing surfaces may become contaminated.
- **DO NOT** apply bait to areas that are routinely washed including cracks and crevices in tops of tables, food/feed preparation, and prepared food holding surfaces as bait may be removed by washing.
- **DO NOT** apply bait to surfaces where the temperature exceeds 130°F as bait may run. Examples include, but are not limited to, portions of stoves, ovens, grills, fume hoods, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers, and hot water pipes.
- **DO NOT** apply gel to exposed surfaces. If gel contacts an exposed surface, remove gel and wash exposed surface.

Food/feed 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 are also considered a food/feed area when food is exposed and facility is in operation. Apply bait in small amounts between different elements of construction, between equipment and floors, openings leading into voids and hollow spaces in floors, walls, ceilings, equipment legs and bases, around plumbing pipes, doors and windows, behind and under refrigerators, cabinets, sinks, closets, stoves, and other equipment where cockroaches hide. During follow-up visits inspect bait placements and reapply when necessary.

# Application of this product in food/feed areas of food/feed handling establishments other than as a crack and crevice treatment is not permitted.

Gel bait placements should be at or near harborages or aggregation areas, such as corners or cracks and crevices. Numerous smaller placements will provide faster control than fewer larger spots, especially for German cockroach control.

**Refillable bait stations:** CSI 16-202 Roach Gel may be placed into refillable bait stations designed for interior use; when placing bait in stations do not exceed 1 gram (1/5 teaspoon) and do not exceed the capacity of the stations. Close the station securely after application. During follow up visits inspect placements and reapply as needed.

#### STORAGE AND DISPOSAL

**DO NOT** contaminate water, food or feed by storage or disposal. **PESTICIDE STORAGE**: Store in a cool, dry area out of reach of children. **CONTAINER HANDLING**:

If Empty: DO NOT reuse container. Place in trash or offer for recycling if available. If Partly Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

#### LIMITATION OF WARRANTY AND LIABILITY

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.

The Directions for Use of this product must 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.

To the extent consistent with applicable law, 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. 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.

To the extent consistent with applicable law, 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.

To the extent consistent with applicable law, 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.

FIPRONIL	GROUP	2B	INSECTICIDE
ABAMECTIN	GROUP	6	INSECTICIDE

#### SUB-LABEL B: CONSUMER USES

#### DIRECTIONS FOR USE

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

This ready-to-use gel bait formulation controls cockroaches and pantry pests in homes and residential structures.

#### **USE RESTRICTIONS:**

- For indoor use only. **DO NOT** apply outdoors.
- **DO NOT** apply gel to exposed surfaces in food/feed handling areas. Keep gel away from foods and food contact surfaces. If gel contacts an exposed surface, remove gel and wash exposed surface.
- **DO NOT** apply bait gel to areas which have been recently sprayed with insecticide, and **DO NOT** spray insecticide over gel as it may cause the bait to become repellent.
- **DO NOT** apply to areas that are accessible to children, domestic animals, or pets.
- **DO NOT** apply bait to areas that are routinely washed such as cracks and crevices in tops of tables, food/feed preparation surfaces, and prepared food holding surfaces as bait may be removed by washing.
- **DO NOT** apply bait to surfaces where the temperature exceeds 130°F as bait may run. Examples include, but are not limited to, portions of stoves, ovens, grills, fume hoods, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers, and hot water pipes.
- **DO NOT** apply in areas exposed to direct sunlight.

If needed, gel bait deposits may be cleaned up with a damp paper towel or rag, or if dried, use a putty knife to scrape and discard in trash.

#### WHERE TO USE:

Indoors in kitchens, bathrooms, basements, garages and laundry rooms as a crack and crevice, spot treatment or bait station application. Apply to areas frequented by cockroaches such as openings leading to voids and hollow spaces in floors, walls, ceilings, equipment legs and bases, around plumbing pipes, doors and windows, and behind and under appliances and cabinets where cockroaches are typically known to hide.

Pest population reduction will be apparent within 3 days for German cockroaches and 1 day for American cockroaches.

**Wax Paper Application:** For gel bait applications under appliances and other similar areas, or to protect the bait from possible existing contamination, apply the bait using 2-3" wax paper squares. Fold the wax paper in half to make a triangle and apply the 1/8" wide and 2" long bait bead in the center. Place the folded wax paper containing the bait into the appropriate bait placement location. Wax paper squares can easily be inspected, removed and/or replaced as needed.

**Vertical Applications:** For applications to vertical surfaces such as walls and sides of appliances, it can be useful to use masking/painter's tape. Put the tape on first and then apply the bait to the tape surface.

When it is time to replace the bait, simply peel the tape away and repeat with new tape and fresh bait.

#### [TARGET PESTS:

CSI 16-202 Roach Gel is effective at controlling pantry pests and cockroaches found in home and residential structures.]

**PANTRY PESTS:** CSI 16-202 Roach Gel controls exposed, adult stages of beetles [: including cadelle beetles, cigarette beetles, confused flour beetles, dermestids, drugstore beetles, flat grain beetles, granary weevils, lesser grain borers, lesser mealworms, mealworms, merchant grain beetles, red flour beetles, rice weevils, rusty grain beetles, saw-toothed grain beetles, spider beetles, or warehouse beetles]. After removing infested foodstuffs and cleaning up spilled foodstuffs and dust, applications of this product will kill adult stages of beetles remaining in area. Apply in voids, cracks and crevices, behind and under cupboards, and other difficult to reach areas where insects may hide. Application rate is dependent on level of infestation.

**[Cockroaches:** CSI 16-202 Roach Gel controls large and small species of cockroaches, including German, American, Smokey-brown, Oriental, and Wood cockroaches. Place bait close to cockroach harborages, foraging, and feeding areas including corners, cracks and crevices.]

{Note to reviewer: only one of the below application methods will appear on the label depending on chosen applicator}

#### HOW TO APPLY (DIRECTLY FROM SYRINGE):

Cockroaches prefer pressure on three sides of their body and spend 75% of their existence living in cracks and crevices. For this reason, syringe applications directly in cracks and crevices will be most effective in eradicating the cockroach population.

For light to moderate infestations, apply 1 to 3 spots of this gel bait per 10 linear feet or one square yard. For heavy infestations, use 3 to 5 spots of gel bait per 10 linear feet or one square yard. Each bait spot should equal about 0.5 grams (1/4" diameter spot).



Figure 1: Spot of gel bait approx. 0.5 gram

For all infestations, you can also apply this gel bait in lines approximately 1/8-inch wide by 2 inches long. Inspect placements of gel bait periodically and apply fresh bait as needed.

Figure 2: Line of gel bait approximately 1/8 inch by 2 inches

For bait spots or lines:

- Remove cap from syringe tip.
- Place syringe tip at the surface to be treated.
- Apply light pressure to the plunger of the syringe.

• After dispensing gel bait, replace cap on syringe tip.

#### HOW TO APPLY (DIRECTLY from handheld dispenser):

Cockroaches prefer pressure on three sides of their body and spend 75% of their existence living in cracks and crevices. For this reason, applications directly in cracks and crevices will be most effective in eradicating the cockroach population.

For light to moderate infestations, apply 1 to 3 spots of this gel bait per 10 linear feet or one square yard. For heavy infestations, use 3 to 5 spots of gel bait per 10 linear feet or one square yard. Each bait spot should equal about 0.5 grams (1/4" diameter spot).

Figure 1: Spot of gel bait approx. 0.5 gram

For all infestations, you can also apply this gel bait in lines approximately 1/8-inch wide by 2 inches long. Inspect placements of gel bait periodically and apply fresh bait as needed.

Figure 2: Line of gel bait approximately 1/8 inch by 2 inches

[Use of one of the below use directions depending on tube]

For bait spots or lines:

- Remove cap from tube.
- Apply pressure to dispenser to dispense the gel.
- After dispensing gel bait, replace cap on tube.

#### HOW TO APPLY (USING REFILLABLE BAIT STATIONS):

#### *{Note to reviewer: This language to be used with the Syringe application}*

For [filling] refillable bait stations:

- Insert plunger into the open end of the syringe and then remove cap from syringe tip.
- Place tip of the syringe into the hole in the center of the bait station.
- Gently apply pressure to the plunger to fill the empty bait station with two grams of bait. The bait station is properly filled when the gel bait reaches the desired level.
- When bait filling is complete, firmly replace the cap on the tip of the syringe.

#### *{Note to reviewer: This language to be used with the Handheld Dispenser application}* For [filling] refillable bait stations:

- Remove cap from tube.
- Place tip of the applicator into the hole in the center of the bait station.

- Apply pressure to dispenser to fill the empty bait station with two grams of bait. The bait station is properly filled when the gel bait reaches the top of the pie-shaped fill level indicator.
- When bait filling is complete, replace cap on tube to close.

Indoors: Place 1 to 4 filled bait stations (hole side up) under sinks, behind appliances, inside cabinets, inside garbage containers, in corners of cupboards, closets, under furniture and other locations where cockroach activity has been observed.

Cockroaches will forage for food and can consume the bait within a matter of a few hours. The bait station cap allows for easy inspection of cockroach activity. When the bait station is empty (or near empty), refill the empty bait station with two more grams of bait.

**Important cockroach baiting reminder:** Whether applying bait directly [from the applicator] [with the] [syringe] [hand held dispenser] or in a bait station, keep a fresh supply of bait available for cockroaches. The clear view cap of the refillable bait station allows for easy

inspection of cockroach activity. Cockroaches can remain active year-round and prefer locations near food and water, and will gravitate to warm indoor locations. Cockroaches are primarily nocturnal feeders.

### STORAGE AND DISPOSAL

DO NOT contaminate water, food or feed by storage or disposal.
PESTICIDE STORAGE: Store in a cool, dry area out of reach of children.
CONTAINER HANDLING:
If Empty: DO NOT reuse container. Place in trash or offer for recycling if available.

If Partly Filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

Never place unused product down any indoor or outdoor drain.

{Note to 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

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.

The Directions for Use of this product must 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.

To the extent consistent with applicable law, 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.

## 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.

To the extent consistent with applicable law, 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.

To the extent consistent with applicable law, 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.

### UNIT LABEL FOR CSI 16-202 Roach Gel Syringe

[Applicable for both commercial and consumer products]

CSI 16-202 Roach Gel		
NOTE: <b>DO NOT</b> remove this label.		
ACTIVE INGREDIENTS:		
Fipronil	0.05%	
Abamectin	0.05%	
OTHER INGREDIENTS:		
TOTAL:	100.00%	
KEEP OUT OF REACH OF CHILDREN		
<b>CAUTION:</b> Keep gel away from foods and food contact surfaces. Avoid contact with eyes and clothing. Wash thoroughly with soap and water after handling.		
<b>CONTAINER HANDLING: If empty: DO NOT</b> reuse container. Place in trash or offer for recycling if available. <b>If partly filled:</b> Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.		
EPA Reg. No. 53883-456	EPA Est. No	
NET WT ounces ( grams)	May stain textiles, fabrics and/or porous surfaces.	
SEE [OUTER CARTON][PACKAGE LABEL] FOR COMPLETE DIRECTIONS AND PRECAUTIONS		

#### UNIT LABEL FOR Handheld applicator for CSI 16-202 Roach Gel

[Applicable for consumer products]

#### CSI 16-202 Roach Gel NOTE: DO NOT remove this label.

**CAUTION:** Keep gel away from foods and food contact surfaces. Avoid contact with eyes and clothing. Wash thoroughly with soap and water after handling.

ACTIVE INGREDIENTS: Fipronil 0.05% & Abamectin 0.05% NET Wt. \_\_\_\_ounces (\_\_\_\_grams) KEEP OUT OF REACH OF CHILDREN EPA Reg. No. 53883-456 EPA Est. No. XXXXX-XX-X See [outer carton] [package label] for Complete Directions and Precautions May stain textiles, fabrics and/or porous surfaces

#### [Optional Marketing Claims:]

#### [Efficacy related]

- Kills [[cock]roaches in 2 ways] by ingestion and contact
- Kills [cock]roaches through -or- by ingestion -or- contact
- Kills [cock]roaches [through] [by] ingestion or contact
- Kills two ways
- Guaranteed to kill [cock]roaches (or your money back)
- Guaranteed to work (or your money back)
- Garantizado para trabajar (o devolvemos su dinero)
- Satisfaction Guaranteed (or your money back)
- Effectively kills [German] [and] [American] cockroaches without a trace - no fumes or odor
- Kills [cock]roaches where you can't find them
- Kills [cock]roaches you don't see
- Kills [cock]roaches you see and [even] those you don't
- Mata cucarachas que ves y [incluso] aquellos que no
- Kills large [and small] [cock]roaches
- Kills [cock]roaches
- Controls [cock]roaches
- **Dual Action kills [cock]roaches two ways.** Contains Fipronil, which kills [cock]roaches by ingestion and contact. During or after foraging [cock]roaches either eat or contact the bait, return to the harborage and contaminate -or kill- other [cock]roaches.
- Kills [cock]roaches in their harborage. Inject bait into cracks and crevices or apply as a spot where [cock]roaches harbor or enter a structure.
- **This product effectively controls large [cock]roaches.** This product contains Fipronil and Abamectin, active ingredients that kill [cock]roaches.
- Begins/Starts killing/controlling in 24 hours

- Empieza/Comienza a matar/controlar en 24 horas
- Bait is effective for [90 days] [120 days] [160 days] [180 days] [6 months] against [cock]roaches
- Kills [cock]roaches for [90 days] [120 days] [160 days] [180 days] [6 months]
- Kills American [cock]roaches for [90 days] [120 days] [160 days] [180 days] [6 months]
- Mata a las cucarachas americanas durante [90 días] [120 días] [160 días] [180 días] [6 meses]
- Kills German [cock]roaches for [90 days] [120 days] [160 days] [180 days] [6 months]
- Applied bait is effective for [90 days] [120 days] [160 days] [180 days] [6 months]
- Kills [German] [and] [American] cockroaches for [90 days] [120 days] [160 days] [180 days] [6 months]
- Effective against [German] [and] [American] cockroaches for [90 days] [120 days] [160 days] [180 days] [6 months]
- Begins eliminating your [cock]roach population in 24 hours
- Comienza a eliminar su población cucaracha en 24 horas
- Up to [90-day] [120-day] [160-day] [180-day] [6 month] protection on [cock]roaches\* {\*or until bait is depleted}
- [Up to] [90-day] [120-day] [160-day] [180-day] [6 month] protection\* {\*on [cock]roaches until bait is depleted}
- Continuous action for [a]round the clock protection for up to [90 days\*] [120 days\*] [160 days\*] [180 days\*] [6 months\*] {\*on [cock]roaches until bait is depleted}
- Acción continua durante [a]20 días\*] [120 días\*] [160 días\*] [180 días\*] [6 meses\*] {en cucarachas hasta que se agote el cebo}
- Works every minute of every hour of every day for up to [90 days\*] [120 days\*] [160 days\*] [180 days\*] [6 months\*] {\*or until bait is consumed}
- Works on German [cock]roaches day and night\* {\*or until bait is consumed}
- Works day after day on German [cock]roaches for up to [90 days\*] [120 days\*] [160 days\*] [180 days\*] [6 months\*] {\*or until bait is consumed}
- Works day and night on German [cock]roaches for up to [90 days\*] [120 days\*] [160 days\*]
   [180 days\*] [6 months\*] {\*or until bait is consumed}
- [Also] kills pantry pests including: exposed, adult stages of beetles: [cadelle], [cigarette beetle], [confused flour beetle], [dermestid], [drugstore beetle], [flat grain beetle], [granary weevil], [lesser grain borer], [lesser mealworm], [mealworm], [merchant grain beetle], [red flour beetle], [rice weevil], [rusty grain beetle], [saw- toothed grain beetle], [spider beetle], [or] [warehouse beetle]
- [Also] kills pantry pests
- [Also]Kills pantry pests in kitchen[s] [cabinets]
- Kills [cock]roaches indoors for up to 6 months
- Works for 6 months Indoors against [German] [and] [American] cockroaches
- Kills German [cock]roaches for 6 months
- Kills American [cock]roaches for 6 months
- Starts killing [cock][roaches] in 24 hours
- Starts killing [German] [American] cockroaches [with]in 24 hours [and keeps killing for 6 months indoors]
- Dual action [technology] kills cockroaches by ingestion and contact

#### [Formulation related]

- No vapor or fumes
- Combination Chemistry<sup>™</sup> [from Control Solutions, Inc.]
- Bait Solutions [from Control Solutions, Inc.]
- [Gel] bait is discreet
- Discreet [[cock]roach] [gel] bait
- Contains No "Big 8" Allergens

### [Use Related]

- Easy to apply [gel] bait
- For crack and crevice [cock]roach control
- [Use] [Easily applies] in cracks and crevices
- Use in cracks and crevices against [cock]roaches
- Easy to use [apply] [; nothing to activate]
- No messy residue
- No mixing required
- [Designed] [Ideal] for use in kitchens
- Ready-to-use [bait]
- For hard to reach places [such as cracks and crevices]\* (see label for full Use Restrictions)
- Easy way to apply bait
- Gets bait where [cock]roaches live
- Where to use: In homes and other [buildings] [structures] where [cock]roaches have infested or where they travel to seek food, water or shelter.
- Use in homes [and] [other] [buildings] [structures]
- When to use: When [cock]roaches are observed or there is evidence of an infestation in homes and building.
- Use whenever [cock]roaches are present\* {\*in homes and buildings}
- Use under appliances and in cabinets in kitchens where [cock]roaches hide
- Use in kitchen cabinets
- Use under appliances and in kitchen cabinets
- Pantry pest control in kitchen cabinets
- Kills [cock]roaches in kitchen cabinets
- For use in kitchens
- Simple to apply
- Easier to use
- Precision applicator
- Dosing applicator
- Apply with one hand
- One hand[ed] application
- Use indoors to kill cockroaches
- Use indoors [to control cockroaches]
- Kills [cock]roaches for 6 months\* indoors (\*or until bait is consumed)
- Controls [cock]roaches for 6 months\* indoors (\*or until bait is consumed)

- Give [cock]roaches what they want to eat [and watch them die]
- Serving [cock]roaches a deadly dinner

{When used with syringe applicator}

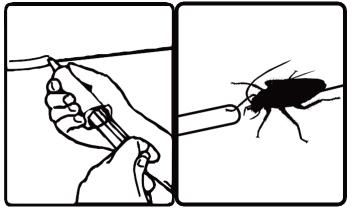
- Convenient [syringe] applicator
- Precision syringe applicator

{When used with handheld applicator}

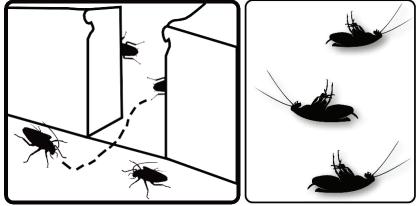
• Handy Applicator

#### How It Works

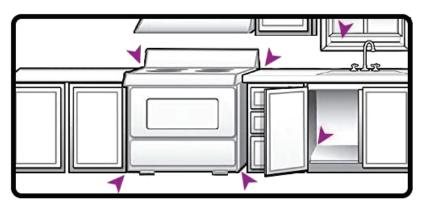
Apply to cracks
 Roaches eat the gel bait.
 and crevices.



3. Then return to the nest to die. 4. Roaches die in 24 hours.



Where It Works



{handheld applicator image}

