



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

MAR 8 2000

OFFICE OF
PREVENTION, PESTICIDES

John J. Jachetta, PhD
Regulatory Manager, Regulatory Success-Americas
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Subject: Final Printed Labels
Conserve Fire Ant Bait (A.I. SPINOSAD)
EPA Registration No. 62719-304
Your Submission Dated January 5, 2000

Dear Dr. Jachetta:

The amendment referred to above, submitted in connection with registration under section 3 (c)(5) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable, subject to the comment listed below. A stamped copy of the label is enclosed for your records.

1. Please quantify the label claims "Fast Acting" and "Fast, Effective Kill of Fire Ants" on the front panel. Fast may imply within minutes or a short period of time when in fact it may take 12-36 hours for such a response. This is misleading and may give a false sense of security to the user.
2. Please delete the word "Eliminates" from your label. This implies absolute and total removal of every pest.

Please submit two (2) copies of your final printed label for before your release the product for shipment. Please refer to the A-79 enclosure for a further description of final printed labeling. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes acceptance of these conditions.

If you have any questions regarding this action, please contact Dr. William Sproat of my team at (703) 308-8587.

Sincerely,

A handwritten signature in black ink, appearing to read "George T. LaRocca".

George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)

7505C
SPROAT
03/08/00
Enclosure

(front panel)

Conserve* Fire Ant Bait

[icon] OUTDOOR USE ONLY
READY TO USE
Easy to Use
No Mixing Required/Necessary
Use Straight from the Bag (Bottle, Container)

Mound or Broadcast Treatments
No Watering Necessary

Kills Fire Ants
Kills the Queen(s)
Kills the Mound
~~Destroys~~ Controls the Mound
Eliminates/~~Destroys~~ Controls the Colony
Plus Helps Stop New Mounds from Forming
No Mound Movement
~~Destroys~~ Controls Mounds You See *plus* Those You Don't
Fast, Effective Kill of Fire Ants

Fast Acting
Dead Ants in 24 Hours
Controls Fire Ants for up to 2 Months
Fire Ants Find/Pick Up Bait in Minutes
Long Lasting Control

~~Quickly Stops Aggressive Biting and Stinging~~
Treats (depends on package size) Mounds

No Odor
Odor-Free
Contains Conserve*

Active Ingredient	
spinosad †	0.015%
Other Ingredients	99.985%
Total	100.000%
† A mixture of Spinosyn A & Spinosyn D	

U.S. Patent No. 5,362,634 and 5,496,931

KEEP OUT OF REACH OF CHILDREN CAUTION PRECAUCION

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.)

ACCEPTED
with COMMENTS
in EPA Letter Dated
MAR 8 2000

Under the Federal Insect
Fungicide, and Rodenticide
Act, amended, for the product
registered under EPA Reg. No.
62219-304

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed.

Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Wash thoroughly with soap and water after handling.

FIRST AID

If Swallowed: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. If person is unconscious, do not give anything by mouth and do not induce vomiting.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates. Do not apply directly to any body of water. Do not put product or rinse water down any drain.

[phone icon] **Questions, Comments or Medical Information**
call 1-800-XXX-XXXX www. _____

EPA Reg. No. 62719-304

EPA Est. 00000-XX-00

*Trademark of Dow AgroSciences LLC
Dow AgroSciences LLC • Indianapolis, IN 46268 USA
[Editor's note: substitute name and address of supplemental distributor.]

Insect Control

Net Contents XXX

(back panel)

Product Facts Treats X Sq Ft [Depends on package size] Treats X Mounds [Depends on package size]	
KILLS	Fire Ants
PESTS/INSECTS/BUGS	
WHERE TO USE	<ul style="list-style-type: none"> • On Lawns • Perimeter of Home • Around Ornamental Plants (Flowers, Shrubs & Trees)
[phone icon] Questions, Comments or Medical Information call 1-800-XXX-XXXX www._____	

DIRECTIONS FOR USE

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

AMOUNT TO USE
<ul style="list-style-type: none"> • Mounds: 4 Tbs for each mound † • Broadcast Application: 1/2 - 3/4 cup for each 1,000 sq ft

Tbs = Tablespoon

† For mounds greater than 15 inches in diameter use 6 Tbs per mound.

Do not use kitchen utensils for measuring. Keep measuring utensils with pest control products and away from children.

FOR BEST RESULTS	
HOW TO APPLY [optional illustration]	<ul style="list-style-type: none"> • Mounds: Sprinkle bait evenly over and around each mound in a 4-ft diameter circle. Apply gently to avoid disturbing ants. • Broadcast Application: Use a hand held or ground driven rotary broadcast spreader. [Editor's note: subregistrant can specify spreaders and settings.]
MOW [optional illustration /mower]	<ul style="list-style-type: none"> • Avoid mowing 1 day before and after application.
WATER/RAINFALL [optional illustration /hose]	<ul style="list-style-type: none"> • Do not water-in bait. • Do not water within 6 hours of a mound or 24 hours of a broadcast application. • If rain occurs within 6 hours of mound application or 24 hours of broadcast application, adequate foraging of the bait may not occur and retreatment may be necessary.
WHEN TO APPLY [optional illustration]	<ul style="list-style-type: none"> • Apply when ants are active (usually when temperatures are greater than 60° F). • The best time to apply is in the cooler morning and late evening when fire ant foraging is at its peak. • Mounds will usually be eliminated/destroyed in 3 to 14 days. Extremely large mounds may require a repeat application. • Make a broadcast application every other month during the warm months to keep fire ants from establishing/starting/forming new mounds.

HOW IT WORKS

Conserve* fire ant bait is attractive and deadly to fire ants. Fire ants quickly find/pick up this bait, take it back to the mound, and feed it to the entire colony including the queen(s). Ants start dying in 24-36 hours with mound/colony destruction in 3 to 14 days. Broadcast applications may take longer.

Fire ant colonies are started by newly mated queen(s) that fly into an area, burrow into the ground and begin laying eggs. Several flights are common during the summer, often shortly after rain. It takes several weeks for new mounds to appear. Combining mound and broadcast applications eliminates/destroys-controls visible mounds and helps prevent new mounds from forming.

STORAGE AND DISPOSAL

STORAGE: Store in a cool dry place out of the reach of children and domestic animals. Store in original container only.

DISPOSAL: Do not reuse container. Wrap container in newspaper and put in trash.

Warranty Disclaimer

Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the label when used in strict accordance with the directions, subject to the inherent risks set forth below. SELLER MAKES NO EXPRESS NOR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR ANY OTHER EXPRESS OR IMPLIED WARRANTY.

Inherent Risks of Use

It is impossible to eliminate all risks associated with use of this product. Lack of performance, or other unintended consequences may occur due to such factors as use of the product contrary to label instructions (including adverse conditions noted on the label, such as unfavorable temperature, soil conditions, etc.), abnormal conditions (such as extreme weather conditions), presence of other materials,

the manner of application, or other factors, all of which are beyond the control of Seller. All such risks shall be assumed by Buyer.

*Trademark of Dow AgroSciences LLC
EPA Accepted: 10-28-98