

67702-3

9/1/2009

10f20



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

September 1, 2009

OFFICE OF  
PREVENTION, PESTICIDES  
AND TOXIC SUBSTANCES

Walter G. Talarek  
Authorized Agent for W. Neudorff GmbH KG  
1008 Riva Ridge Drive  
Great Falls, VA 22066-1620

RE: Product Name: NEU1165M Slug and Snail Bait  
EPA Reg. No: 67702-3  
Application for Label Notification Dated July 17, 2009 for Revision to the Label  
Disclaimer Associated with the Use of the Trade Name Ecosense

Dear Mr. Talarek:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under Pesticide Registration (PR) Notice 98-10 dated above. A preliminary screen of this request has been conducted for its applicability under PR Notice 98-10 and it has been determined that the action(s) requested falls within the scope of PR Notice 98-10. Our records have been duly noted, and the label submitted with this application has been stamped "Notification, received and reviewed" and will be placed accordingly in our records.

For any question you may have concerning this action, please contact Ms. Diana Hudson  
at  
(703) 308-8713 or email at [hudson.diana@epa.gov](mailto:hudson.diana@epa.gov).

Sincerely,

*Linda Hollis*

Linda Hollis, Chief  
Biochemical Pesticides Branch  
Biopesticides and Pollution Prevention  
Division (7511P)



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number

67702-3

2. EPA Product Manager

Linda Hollis

3. Proposed Classification

☒ None ☐ Restricted

4. Company/Product (Name)

NEU1165M Slug and Snail Bait

PM#

91

5. Name and Address of Applicant (Include ZIP Code)

W. Neudorff GmbH KG  
c/o Walter G. Talarek PC 1008 Riva Ridge Drive  
Great Falls, VA 22066-1620

☐ Check if this is a new address

6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to:

☒ EPA Reg. No. \_\_\_\_\_

Product Name \_\_\_\_\_

## Section - II

☐ Amendment - Explain below.

☐ Resubmission in response to Agency letter dated \_\_\_\_\_

☒ Notification - Explain below.

☐ Final printed labels in response to  
Agency letter dated \_\_\_\_\_

☐ "Me Too" Application. **NOTIFICATION**

☐ Other - Explain below

Date Reviewed: 9-1-09

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Reviewed By: D. Hudson

Notification of a revision to the label disclaimer associated with the use of the trade name Ecosense. For a full explanation of the notification and the certification required by PR Notices 98-10 and 2002-X, see the enclosed letter to Ms. Linda Hollis, PM 91.

## Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging

☐ Yes  
☒ No

Unit Packaging

☐ Yes  
☒ No

Water Soluble Packaging

☐ Yes  
☒ No

2. Type of Container

☐ Metal  
☒ Plastic  
☐ Glass  
☒ Paper  
☐ Other (Specify) \_\_\_\_\_

\* Certification must  
be submitted

If "Yes"  
Unit Packaging wgt. No. per  
container

If "Yes"  
Package wgt. No. per  
container

3. Location of Net Contents Information

☒ Label ☐ Container

4. Size(s) Retail Container

See label.

5. Location of Label Directions

☒ On Label  
☐ On Labeling accompanying product

6. Manner in Which Label is Affixed to Product

☒ Lithograph  
☐ Paper glued  
☐ Stenciled

☐ Other \_\_\_\_\_

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name

Walter G. Talarek

Title

Authorized Agent

Telephone No. (Include Area Code)

703-759-4837

## Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature

3. Title

Authorized Agent

4. Typed Name

Walter G. Talarek

5. Date

July 17, 2009

6. Date of Application  
Received  
(Stamped)

30420

LAW OFFICES OF  
WALTER G. TALAREK, P.C.  
1008 RIVA RIDGE DRIVE  
GREAT FALLS, VA 22066-1620

PHONE: 703-759-4837  
FAX: 703-759-5548  
E-MAIL: WTALAREK@VERIZON.NET

July 17, 2009

DELIVERED BY COURIER

Linda Hollis, Chief  
Biochemicals Branch  
Biopesticides and Pollution Prevention Division  
c/o Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S, Crystal Drive  
Arlington, VA 22202

Re: NEU1165M Slug and Snail Bait  
EPA Reg. No. 67702-3  
Notification

Dear Ms. Hollis:

Please find enclosed W. Neudorff GmbH KG's (Neudorff's) application for a notification for the registration for NEU1165M Slug and Snail Bait, EPA Reg. No. 67702-3. In essence, this notification replaces the current claim concerning a qualifying symbol and a disclaimer for the Ecosense brand name with the following claim: "[when the Scotts Company uses the brand name Ecosense when selling or distributing this product, it must place a qualifying symbol after the brand name and, in close proximity to the brand name, place the statement 'economically sensible alternative pest control']". The Ecosense brand name belongs to the Scotts Company, which is a supplemental distributor of this product.

The Scotts Company has discussed the above revisions with Mr. Dan Kenney, Branch Chief, Herbicide Branch, Registration Division. Neudorff also will make the revisions to the labels of its products that are distributed by the Scotts Company and that are handled by the Registration Division.

Two (2) copies of the revised label are enclosed. One (1) of the copies has the revisions being made by this notification highlighted in yellow.

This notification is consistent with PR Notices 98-10 and 2002-X and EPA's regulations at 40 CFR 152.46 and 156.10, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notices 98-10 and 2002-X and 40 CFR 152.46 and 156.10, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**If you have any questions about this notification, please feel free to call me.**

Sincerely yours,

W. J. Alcock

Walter G. Talarek  
Authorized Agent

## Enclosure – Application for Notification

**Cc:** Dan Kenney, RD, EPA

A collection of 15 small, stylized line drawings of various birds, including sparrows, finches, and songbirds, arranged in a grid-like fashion.

**NOTIFICATION**

Date Reviewed: 9-1-09

Reviewed By: D. Hudson

**MASTER LABEL**

**NEU1165M  
SLUG AND SNAIL BAIT**

Active Ingredient:	By weight
Iron phosphate .....	1.0%
Other Ingredients: .....	<u>99.0%</u>
<b>Total</b>	<b>100.0%</b>

SUBLABEL A: Home and Garden Use

SUBLABEL B: Commercial Agriculture Use

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

**EPA Registration #67702-3**

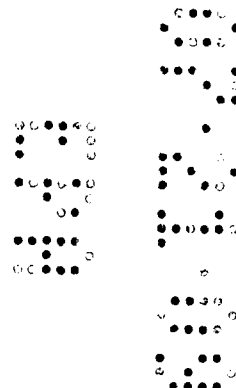
**EPA Establishment #**

Registrant: W. Neudorff GmbH KG  
An der Muhle 3, Postfach 1209  
D-31860 Emmerthal, Germany  
[www.neudorff.com](http://www.neudorff.com)

[in the alternative, the distributor's telephone number and website address may be used]

Home and Garden Use: NET WEIGHT 1oz, 13oz, 20oz, 26oz, 30oz, 0.5lb, 1 lb, 1.25lbs, 1.5 lbs, 2lbs, 2.5lbs, 3lbs, 3.2lbs, 4 lbs, 5lbs, 5.25lbs, 5.5lbs, 6lbs, 7lbs, 8lbs, 10lbs, 20lbs, 25lbs, 40 lbs, 1lb. 4oz., 1lb. 14oz., 2lb. 8oz., 2116 lbs (960kg)

Commercial Agriculture Use: NET WEIGHT 20lbs, 25lbs, 40lbs, 45lbs, 50lbs, 55lbs (25 kg), 1984lbs (900 kg), 2011lbs (912 kg), 2116 lbs (960kg)



600f20

**SUBLABEL A: Home and Garden Use**

**NEU1165M  
SLUG AND SNAIL BAIT**

Active Ingredient:	By weight
Iron phosphate .....	1.0%
Other Ingredients: .....	99.0%
<b>Total</b>	<b>100.0%</b>

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

**EPA Registration #67702-3**

**EPA Establishment #**

**NET WEIGHT** 1oz, 13oz, 20oz, 26oz, 30oz, 0.5lb, 1 lb, 1.25lbs, 1.5 lbs, 2lbs, 2.5lbs, 3lbs, 3.2lbs, 4lbs, 5lbs, 5.25lbs, 5.5lbs, 6lbs, 7lbs, 8lbs, 10lbs, 20lbs, 25lbs, 40 lbs, 1lb. 4oz., 1lb. 14oz., 2lb. 8oz., 2116 lbs (960 kg)

**FIRST AID**

**If in eyes:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**Hotline Number**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the National Pesticide Information Center at 1-800-858-7378 seven days a week, 6:30 am to 4:30 Pacific Time (NPIC Web site: [www.npic.orst.edu](http://www.npic.orst.edu))

**PRECAUTIONARY STATEMENTS**

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

**Environmental Hazards:** 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. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems.

### **DIRECTIONS FOR USE**

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

### **HOME AND GARDEN**

**HOW TO APPLY:** Scatter the slug and snail bait granules on the soil around or near the plants to be protected. For broadcast application, use standard broadcast spreaders. For row application, use standard granular spreaders. Apply bait evenly at the rate of 0.5-1 lb. per 1000 square feet, or for smaller areas, 0.15 oz., or 1 level teaspoon, per square yard, and reapply as the bait is consumed or at least every two weeks. Do not place in piles. If the ground is dry, wet it before applying bait. The product works best when soil is moist but with little or no standing water.

Reapply as the bait is consumed or at least every two weeks. Apply more heavily if the infestation is severe, if the area is heavily watered or after long periods of heavy rain. See specific directions for different plant types and for inside greenhouses.

**WHEN TO APPLY:** Apply the bait during the evening, as slugs and snails travel and feed mostly by night or early morning.

**WHERE TO APPLY:** Treat all likely areas of infestation, especially around the perimeter of garden plots because these pests travel into plant areas from daytime refuges. They favor damp places around vegetable plants such as beans, tomatoes, lettuce, cabbage, celery and squash. Other favorite areas are flower gardens, rockeries, hedges, dichondra lawns, citrus groves, ivy patches, and other ground cover where they obtain shelter by day.

### **Vegetables**

Use the bait to protect any vegetables from slug and snail damage, including (but not limited to): artichokes, asparagus, beans, beets, blackeyed peas, broccoli, Brussels sprouts, cabbage, cantaloupe, carrots, cauliflower, corn, cucumbers, eggplants, garlic, lettuce, onions, peas, peppers, potatoes, radishes, rutabagas, spinach, squash, Swiss chard, tomatoes and turnips. Scatter the bait around the perimeter of the vegetable plot at the rate of 0.5-1 lb. per 1000 square feet, or for smaller areas, 0.15 oz., or 1 level teaspoon, per square yard, to provide a protective "barrier" for slugs and snails entering the garden.

plot. If slugs or snails are inside the rows, then scatter the bait on the soil around the base of the plants and between the rows.

### **Fruits Including Citrus**

Use the bait to protect fruits from slugs and snails, including (but not limited to): apples, avocados, apricots, cherries, grapes, melons, peaches, plums, citrus, pears. For seedlings spread the bait around the base of the stem. Apply at 0.15 oz., or 1 level teaspoon, per square yard, in a 6 inch circular band around the base of the plants to be protected. For older trees, spread the bait around the base of the tree to intercept slugs and snails traveling to the trunk. Apply the bait at the rate of 0.5-1 lb. per 1000 square feet for orchards using standard fertilizer granular spreaders.

### **Berries**

Use the bait to protect berries from slugs and snails, including (but not limited to): strawberries, blackberries, blueberries, boysenberries, loganberries, raspberries. Spread the bait around the perimeter of the plot to intercept slugs and snails migrating toward the berries. Use a rate of 0.5-1 lb. per 1000 square feet, or for smaller areas, 0.15 oz., or 1 level teaspoon, per square yard, and scatter by hand or with granular spreaders. If slugs and snails are already in the plots, then carefully spread bait between the furrows near the base of the plants. For small plots, treat around the base of the plants to be protected. Do not spread over the entire area but apply selectively.

### **Outdoor Ornamentals**

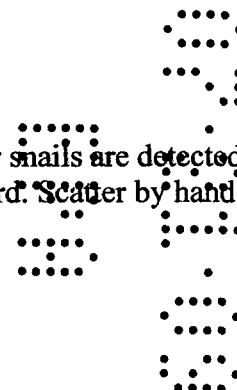
Scatter bait in a 6 inch circular band around the base of the plants to be protected at 0.15 oz., or 1 level teaspoon, per square yard. If plants are next to a grassy area, spread the bait between the ornamentals and the grass. Slugs and snails traveling to the plants will encounter the bait before reaching the plant. In these situations, scatter the bait around the perimeter of the plot at the rate of 1 lb. per 1000 square feet to intercept snails and slugs traveling to the plot.

### **Greenhouses**

Where slugs or snails are a problem in greenhouses, scatter the bait in the plant pots of plants being damaged or around pots on greenhouse benches. Apply ½ teaspoon per 9 inch pot.

### **Lawns**

Use the bait on lawns as a buffer zone around gardens. When slugs or snails are detected, scatter the bait at a rate of 0.15 oz., or 1 level teaspoon, per square yard. Scatter by hand or with a granular spreader where the slugs or snails are observed.





# **STORAGE AND DISPOSAL**

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

**PESTICIDE STORAGE:** Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

## **CONTAINER DISPOSAL:**

Nonrefillable container.

**If empty:** Do not reuse or refill this container. Offer for recycling, if available.

**If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

## **BATCH CODE**

The registrant may use one or both of these two optional statements, either:

### **"WARRANTY**

To the extent consistent with applicable law, the seller warrants that this product conforms to the chemical description on this label and is reasonably fit for purposes stated on this label only when used in accordance with directions for use. This warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to seller. To the extent consistent with applicable law, seller makes no other warranties, either expressed or implied."

OR

**OUR COMMITMENT TO YOUR SATISFACTION:** If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product or refund your money. Simply send your name, address and proof of purchase to [insert name and address of supplemental registrant]."

OR

[The] (insert company name) Guarantee- If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

[The following claims and product information, may or may not be presented on the product's label and labeling:

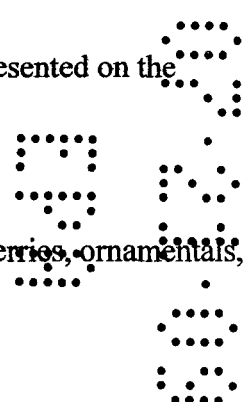
-Quick Facts

-Product Facts

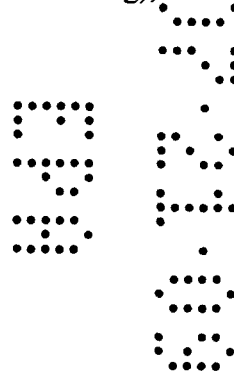
-What it does: Kills snails and slugs

-Where to Use: For use around vegetables, fruit trees, citrus, berries, ornamentals, shrubs, flowers, trees, lawns, gardens and in greenhouses

-Read the Label First!



- NOTE:** This package is sold by weight. Contents may have settled during shipment.
- US Patent number 5,437,870.
- This container is made from XX% recycled materials.
- The highly compressed granules (pellets) are easy to use, clean to handle and economical.
- Patented technology. Patented snail & (and) slug killer.
- Unique, patented formula.
- Easy-to-use (ready-to-use) (RTU) granular (pellet) formulation.
- Easy to apply granules.
- Kills snails & (and) slugs.
- Treats (will treat) x,xxx sq. ft.
- Remains effective after rain or sprinkling.
- Proven snail & (and) slug killer (kill, control).
- Convenient. Easy-to-use. Requires no mixing, spraying, or special applicators.
- SATISFACTION GUARANTEED.
- Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.
- Can be used in vegetable gardens.
- For use around vegetables, fruit trees, citrus, berries, ornamentals, shrubs, flowers, trees, lawns, gardens, and in greenhouses.
- Use around flowers, gardens, and fruit trees.
- Iron phosphate occurs naturally in soil.
- Can be used around domestic animals (pets) and wildlife.
- Read Entire Container Label Before Using This Product.
- The active ingredient in this product is exempt from the requirement for a tolerance when used as a molluscicide in or on all food commodities.
- For broadcast application standard broadcast applicators may be used, such as (but not limited to): Cyclone.
- For row application standard granular spreaders may be used, such as (but not limited to): Gandy and Clampco.
- Unconditionally guaranteed by [insert name of supplemental registrant].
- Baits and Kills
- For household home garden use.
- The slugs and snails controlled by this product include (but are not limited to): *Deroceras reticulatum* (Field slug), *Deroceras laeve* (Smooth slug), *Arion subfuscus* (Dusky slug), *Arion circumscriptus* (Gray garden slug), *Arion hortensis* (Black field slug), *Arion rufus* (Large red slug), *Arion ater* (Large black slug), *Limax flavus* (Spotted garden slug), *Limax tenellus* (Slender slug), *Ariolimax columbianus* (Banana slug), *Helix* spp., *Helicella* spp., and *Cepaea* spp.
- Kills a wide variety of slugs and snails
- Effective against a wide variety of slugs and snails.
- No slime trails
- No messy cleanup
- Dead snails, no slime trails
- Rain-Proof Formula
- Guaranteed (Results)



- Protecting your garden and landscapes from snail and slug damage has never been easier!
- Easy (to use) Shaker Applicator
- Easy (to use) (Pour) Spout
- Contains Ferramol™ Slug and Snail Bait, a trademark of W. Neudorff GmbH KG
- Made with Ferramol™ Slug and Snail Bait, a trademark of W. Neudorff GmbH KG
- Ferramol™ is a trademark of W. Neudorff GmbH KG, Germany.
- www.neudorff.com
- Manufactured under [a] license of W. Neudorff GmbH KG, [Germany].



- May be used up to and including day of harvest.
- Does not contain metaldehyde.
- Iron phosphate occurs naturally in the soil
- Unconsumed bait will degrade and become part of soil
- Exclusive smaller particle size makes it easier for pests to find
- Questions, comments (or medical information) X-XXX-XXX-XXXX
- © 20XX Licensed (insert company name). World rights reserved.
- Manufactured. Distributed by: (insert company name)
- Made in/Produced in: \_\_\_\_\_ (from US and imported products/parts)
- See back (booklet) label for additional first aid
- This container is made with a minimum X% recycled material



- For Organic Gardening



- For Organic Production



- Listed by the Organic Materials Review Institute (OMRI) for use in production of organic food and fiber
- Listed by the Organic Materials Review Institute (OMRI) for use in organic production

## GENERAL INFORMATION (WHY SLUG AND SNAIL BAIT IS EFFECTIVE)

This product is a unique blend of an iron phosphate active ingredient, originating from soil, with slug and snail bait additives. It is used as an ingredient in fertilizers. The bait, which is not ingested by snails and slugs will degrade and become a part of the soil.

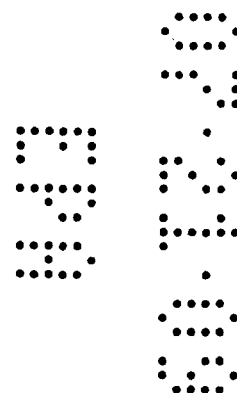
The bait is ingested by slugs and snails when they travel from their hiding places to plants. Ingestion, even in small amounts, will cause them to cease feeding. This physiological effect of the bait gives immediate protection to the plants even though the slugs and snails may remain in the area. After eating the bait, the slugs and snails cease feeding, become less mobile and begin to die within three to six days. Dead slugs and

snails may not be visible as they often crawl away to secluded places to die. Plant protection will be observed in the decrease in plant damage.

This product is effective against a wide variety of slugs and snails and will give protection to home lawns, gardens, greenhouses, outdoor ornamentals, vegetable gardens, fruits, berries, citrus and crop plants. The bait can be scattered on the lawn or on the soil around any vegetable plants, flowers or fruit trees or bushes to be protected.

[ when The Scotts Company uses the brand name Ecosense when selling or distributing this product, it must place a qualifying symbol after the brand name and, in close proximity to the brand name, place the statement “economically sensible alternative pest control”]

Registrant: W. Neudorff GmbH KG, Postfach 1209, An der Mühle 3,  
D-31860 Emmerthal, Germany  
Phone: 250-652-5888  
[www.neudorff.com](http://www.neudorff.com) [in the alternative, the distributor's telephone number and website address may be used]



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**SUBLABEL B: Commercial Agriculture Use**

**NEU1165M  
SLUG AND SNAIL BAIT**

Active Ingredient:	By weight
Iron phosphate .....	1.0%
Other Ingredients: .....	99.0%
<b>Total</b>	<b>100.0%</b>

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

**EPA Registration #67702-3**

**EPA Establishment #**

**NET WEIGHT** 20lbs, 25lbs, 40 lbs, 45lbs, 50lbs, 55lbs (25 kg), 1984lbs (900 kg),  
2011lbs (912 kg), 2116lbs (960kg)

**FIRST AID**

**If in eyes:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**Hotline Number**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the National Pesticide Information Center at 1-800-858-7378 seven days a week, 6:30 am to 4:30 Pacific Time (NPIC Web site: [www.npic.orst.edu](http://www.npic.orst.edu))

**PRECAUTIONARY STATEMENTS**

**Hazards to Humans and Domestic Animals:** Caution. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

**Personal Protective Equipment (PPE) Requirements:** Applicators and other handlers must wear: long-sleeved shirts and long pants; and shoes plus socks. Follow manufacturer's instructions for maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

#### User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

**Environmental Hazards:** For terrestrial uses. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

#### DIRECTIONS FOR USE

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

Do not apply this product in a manner that will contact workers or other persons, either directly or through drift. Only protected workers may be in the area during application. For any requirements specific to your State or Tribe, consult the State or Tribal agency representative responsible for pesticide regulation.

#### AGRICULTURAL USE REQUIREMENTS

Use this product in accordance with its labeling and with the Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about Personal Protective Equipment (PPE) and the restricted-entry interval. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard (WPS).

There is a restricted-entry interval of zero hours for this product.

#### NON-AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are not within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used to produce agricultural plants on farms, forests, nurseries, or greenhouses.

There is a restricted-entry interval of zero hours for this product.

#### COMMERCIAL AGRICULTURE

**HOW TO APPLY:** Scatter the slug and snail bait granules on the soil around or near the plants to be protected. For broadcast application, use standard broadcast spreaders. For row application, use standard granular spreaders. Apply the higher rates if the infestation is severe or if the area is heavily watered or after long periods of heavy rain. Reapply as the bait is consumed or at least every two weeks.

Do not place in piles. If the ground is dry, wet it before applying bait. The product works best when soil is moist but with little or no standing water. See specific directions for different plant types and for inside greenhouses.

**WHEN TO APPLY:** Apply the bait in the evening, as slugs and snails travel and feed mostly by night or early morning.

**WHERE TO APPLY:** Treat all likely areas of infestation, especially around the perimeter of garden plots because these pests travel into plant areas from daytime refuge sites. They favor damp places around vegetable plants such as beans, tomatoes, lettuce, cabbage, celery and squash, and in weeds or ditches around field margins. Other favorite areas are flower gardens, rockeries, hedges, dichondra lawns, citrus groves, ivy patches, and other ground cover where they obtain shelter by day.

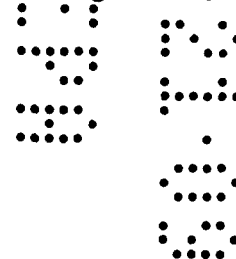
### **Vegetables**

Use the bait to protect any vegetables from slug and snail damage, including (but not limited to): asparagus, beans, beets, blackeyed peas, broccoli, Brussels sprouts, cabbage, cantaloupe, carrots, cauliflower, corn, cucumbers, eggplants, garlic, lettuce, onions, peas, peppers, potatoes, radishes, rutabagas, spinach, squash, Swiss chard, tomatoes and turnips. Scatter the bait around the perimeter of the vegetable plantings at the rate of 20-44 lbs per acre (0.5-1 lb per 1,000 square feet) to provide a protective "barrier" for slugs and snails entering the vegetable plantings. If slugs or snails are inside the rows, then scatter the bait on the soil around the plants and between the rows.

### **Fruits Including Citrus**

Use the bait to protect fruits from slugs and snails, including (but not limited to): apples, avocados, apricots, cherries, grapes, melons, peaches, plums, nectarines, citrus, pears. For seedlings spread the bait around the base of the stem. Apply at 0.15 oz., or 1 level teaspoon, per square yard, in a 6 inch circular band around the base of the plants to be protected. For older trees, spread the bait around the base of the trees to intercept slugs and snails traveling to the trunk. Apply the bait at 20-44 lbs. per acre (0.5-1 lb per 1,000 square feet) in orchards, using standard fertilizer granular spreaders. Use the higher rates for heavy infestations.

### **Berries**



Use the bait to protect berries from slugs and snails, including (but not limited to): strawberries, blackberries, blueberries, boysenberries, loganberries, raspberries. Spread the bait around the perimeter of the plot to intercept slugs and snails migrating toward the berries. Use a rate of 20-44 lbs. per acre (0.5-1 lb per 1,000 square feet) and scatter by hand or with granular spreaders. If slugs and snails are already in the plots, then carefully spread bait between the furrows near the base of the plants. For small plots, treat around the base of the plants to be protected. Do not spread over the entire area but apply selectively.

### Field Crops

Use the bait to protect field and seed crops from slugs and snails, including: beans, field corn, sweet corn, soybeans, sugarbeets, sugar cane, asparagus, beets, broccoli, Brussels sprouts, cabbage, carrots, cauliflower, cucumbers, lettuce, onions, peas, peppers, potatoes, radishes, strawberries, tomatoes, and turnips. At the seedling and later stages, apply the bait between the rows and around the perimeter of the field. Scatter pellets at a rate of 20-44 lbs. per acre (0.5-1 lb per 1,000 square feet). Use the higher dosage rate for heavy infestations.

### Artichokes

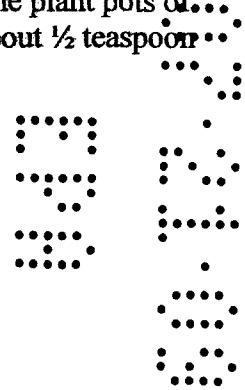
Use the bait to protect artichokes from slugs and snails. At the seedling and later stages, apply the bait within the rows and around the perimeter of the field. Scatter pellets at a rate of 10-44 lbs. per acre (0.23-1 lb per 1,000 square feet). Use the higher dosage rate for heavier infestations.

### Outdoor Ornamentals

Scatter bait in a 6 inch circular band around the base of the plants to be protected at 0.15 oz., or 1 level teaspoon, per square yard. If plants are next to a grassy area, spread the bait between the ornamentals and the grass. Slugs and snails traveling to the plants will encounter the bait before reaching the plant. In these situations, scatter the bait around the perimeter of the plot at 1 lb. per 1000 square feet to intercept snails and slugs traveling to the plot.

### Greenhouses

Where slugs or snails are a problem in greenhouses, scatter the bait in the plant pots of... plants being damaged or around pots on greenhouse benches. Apply about ½ teaspoon per 9 inch pot.





### Outdoor Container-Grown Nursery Plants

Where slugs or snails are a problem in outdoor nurseries, scatter the bait in the plant containers at the rate of 1 tablespoon per container of plants being damaged, or scatter around the soil near the containers at the rate of 1 teaspoon per square yard (24-44 lbs. per acre).

### Commercial Turf, Sod, Golf Courses and Grass Buffers around Gardens, Crop Areas and Ornamentals

Use the bait on turf and sod for resale, golf courses and on lawns as a buffer zone around gardens and agricultural crop areas. When slugs or snails are detected, scatter the bait at a rate of 0.54 to 1 lb. per 1000 square feet (24-44 lbs. per acre). Use the higher rate for heavy infestations. Scatter by hand or with a granular spreader where the slugs or snails are observed.

### Grass Grown for Seed Production, Wheat

Use the bait to protect grass grown for seed production and wheat. When slugs or snails are detected, scatter the bait at a rate of approximately 0.23 to 1 lb. per 1000 square feet (10-44 lbs. per acre). Use the higher rate for heavy infestations. Scatter by hand or with a granular spreader where the slugs or snails are observed.

### Surrounding Agricultural Areas Suffering Infestation

Use the bait to protect non-crop areas, including: fallow land, barrier strips and buffer zones around agricultural crop areas. Apply at a rate of 20-44 lbs/acre (0.5-1 lb per 1,000 square feet). Use the higher rate for heavy infestations.

#### STORAGE AND DISPOSAL

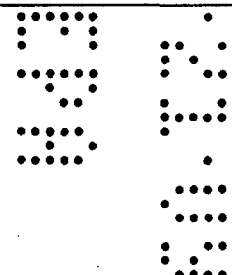
Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.

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

**CONTAINER DISPOSAL:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Completely empty metal drum, plastic bag, box or plastic tote into application equipment. Then dispose of empty metal drum, plastic bag, box or plastic tote in a sanitary landfill, or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

#### BATCH CODE



The registrant may use one or both of these two optional statements, either:

**"WARRANTY**

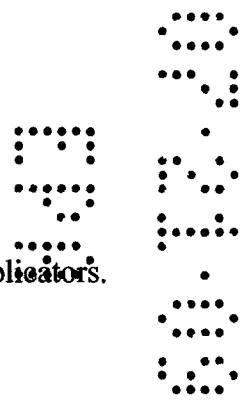
To the extent consistent with applicable law, the seller warrants that this product conforms to the chemical description on this label and is reasonably fit for purposes stated on this label only when used in accordance with the directions for use. This warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to seller. To the extent consistent with applicable law, seller makes no other warranties, either expressed or implied.."

or

**OUR COMMITMENT TO YOUR SATISFACTION:** If you are not happy with the way this product works in your garden, please let us know. We will be happy to replace the product or refund your money. Simply send your name, address and proof of purchase to [insert name and address of supplemental registrant]."

[The following claims and product information, may or may not be presented on the product's label and labeling:

- Quick Facts
- Product Facts
  - What it does: Kills snails and slugs
  - Where to Use: For use around vegetables, fruit trees, citrus, berries, ornamentals, shrubs, flowers, trees, lawns, gardens and in greenhouses
- Read the Label First!
- NOTE:** This package is sold by weight. Contents may have settled during shipment.
- US Patent number 5,437,870.
- This container is made from XX% recycled materials.
- The highly compressed granules (pellets) are easy to use, clean to handle and economical.
- Patented technology. Patented snail & (and) slug killer.
- Unique, patented formula.
- Easy-to-use (ready-to-use) (RTU) granular (pellet) formulation.
- Easy to apply granules.
- Easy to use small (short) pellets
- Small (short) pellets for even coverage.
- Shorts
- Kills snails & (and) slugs.
- Treats (will treat) x,xxx sq. ft.
- Remains effective after rain or sprinkling.
- Proven snail & (and) slug killer (kill, control).
- Convenient. Easy-to-use. Requires no mixing, spraying, or special applicators.
- SATISFACTION GUARANTEED.



- Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.
- Can be used in vegetable gardens.
- For use around vegetables, fruit trees, citrus, berries, ornamentals, shrubs, flowers, trees, lawns, gardens, and in greenhouses.
- Use around flowers, gardens, and fruit trees.
- Iron phosphate occurs naturally in soil.
- Can be used around domestic animals (pets) and wildlife.
- Read Entire Container Label Before Using This Product.
- The active ingredient in this product is exempt from the requirement for a tolerance when used as a molluscicide in or on all food commodities.
- For broadcast application standard broadcast applicators may be used, such as (but not limited to): Cyclone.
- For row application standard granular spreaders may be used, such as (but not limited to): Gandy and Clampco.
- Unconditionally guaranteed by [insert name of supplemental registrant].
- Baits and Kills
- The slugs and snails controlled by this product include (but are not limited to): *Deroceras reticulatum* (Field slug), *Deroceras laeve* (Smooth slug), *Arion subfuscus* (Dusky slug), *Arion circumscriptus* (Gray garden slug), *Arion hortensis* (Black field slug), *Arion rufus* (Large red slug), *Arion ater* (Large black slug), *Limax flavus* (Spotted garden slug), *Limax tenellus* (Slender slug), *Ariolimax columbianus* (Banana slug), *Helix* spp., *Helicella* spp., and *Cepaea* spp.
- Kills a wide variety of slugs and snails
- Effective against a wide variety of slugs and snails.
- No slime trails
- No messy cleanup
- Dead snails, no slime trails
- Contains Ferramol™ Slug and Snail Bait, a trademark of W. Neudorff GmbH KG
- Made with Ferramol™ Slug and Snail Bait, a trademark of W. Neudorff GmbH KG
- Ferramol™ is a trademark of W. Neudorff GmbH KG, Germany.
- www.neudorff.com
- Manufactured under a license of W. Neudorff GmbH KG, Germany.



- May be used up to and including day of harvest.
- Does not contain metaldehyde.



-For Organic Gardening



-For Organic Production



- Listed by the Organic Materials Review Institute (OMRI) for use in production of organic food and fiber
- Listed by the Organic Materials Review Institute (OMRI) for use in organic production



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**GENERAL INFORMATION (WHY SLUG AND SNAIL BAIT IS EFFECTIVE)**

This product is a unique blend of an iron phosphate active ingredient, originating from soil, with slug and snail bait additives. It is used as an ingredient in fertilizers. The bait which is not ingested by snails and slugs will degrade and become part of the soil.

The bait is ingested by slugs and snails when they travel from their hiding places to plants. Ingestion, even in small amounts, will cause them to cease feeding. This physiological effect of the bait gives immediate protection to the plants even though the slugs and snails may remain in the area. After eating the bait, the slugs and snails cease feeding, become less mobile and begin to die within three to six days. Dead slugs and snails may not be visible as they often crawl away to secluded places to die. Plant protection will be observed in the decrease in plant damage.

This product is effective against a wide variety of slugs and snails and will give protection to home lawns, gardens, greenhouses, outdoor ornamentals, vegetable gardens, fruits, berries, citrus, crop and seed plants. The bait can be scattered on the lawn or on the soil around any vegetable or seed crops, flowers or fruit trees or bushes to be protected.

Registrant: W. Neudorff GmbH KG, Postfach 1209, An der Mühle 3,  
D-31860 Emmerthal, Germany  
Phone: 250-652-5888  
[www.neudorff.com](http://www.neudorff.com)  
[in the alternative, the distributor's telephone number and website address  
may be used]

