
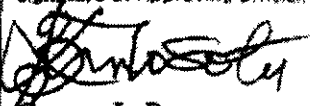


67702-24

10/30/2006

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 <b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b> Office of Pesticide Programs Registration Division (7505C) 1200 Pennsylvania Avenue NW Washington, D.C. 20460	EPA Reg. Number: <b>67702-24</b>	Date of Issuance: <b>10/30/06</b>
	Term of Issuance: <b>Conditional</b>	
	Name of Pesticide Product: <b>Bug-N-Sluggo</b> Insect, Slug and Snail Bait	
<b>NOTICE OF PESTICIDE:</b> <input checked="" type="checkbox"/> <b>Registration</b> <input type="checkbox"/> <b>Reregistration</b> (under FIFRA, as amended)		
Name and Address of Registrant (include ZIP Code): <b>W. Neudorff GmbH KG</b> <b>% Walter G. Talarek, PC</b> <b>1008 Riva Ridge Drive,</b> <b>Great Falls, VA 22066-1620</b>		
Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.		
On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.  Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.  This product is conditionally registered in accordance with FIFRA sec 3(c)(7)(A) provided that you:  <ol style="list-style-type: none"><li>1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.</li><li>2. Make the following labeling changes before you release the product for shipment:<ol style="list-style-type: none"><li>a. Revise the EPA Registration Number to read: "EPA Registration No. 67702-24"</li></ol></li></ol>		
Signature of Approving Official:  <b>George LaRocca</b> Product Manager (RM 13) Insecticide Branch Registration Division (MC 7505P)		Date:  <b>October 30, 2006</b>

- b. On the front panel beneath the product name, add "For Outdoor Use Around Residential Sites".
- c. Qualify greenhouses with non-commercial - i.e., to read "Greenhouses (non-commercial)".
- d. Since this product is for use around residential sites, under Environmental Hazards, delete "... to areas where surface water is present or to intertidal areas below the mean high water mark".
- e. Under Pests Controlled, clarify the types of ants to be controlled. Additional data are required if fire ants, harvester ants, Pharaoh's ants or carpenter ants are added to the label. If you do not wish to add these public health/structural pests, you must include a statement excluding these pests. Thus revising the statement to read "***Pests Controlled: earwig, cutworms, sowbugs, pillbugs, crickets, ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)***".
- f. Under application directions, add "Do not use food utensils such as tablespoons, cups, etc. for food purposes after pesticide use".
- g. Revise the first sentence under application directions to read "Scatter the bait granules on the soil around or near the plants with a suitable hand or power operated spreader (gravity or rotary) to ensure uniform coverage over the treatment area".
- h. If you are going to recommend the use of broadcast or granular spreader, then you must provide the users with suggested spreader settings so that they apply the correct amount of product to the area.
- i. The label claims and uses for this product must be consistent with the most restrictive of those of the two me-too products EPA Reg. Nos. 62719-282 and 67702-3. (1) Under Application Directions, revise the statement "Reapply as the bait is consumed or at least every four weeks" to read "***Do not apply more than 3 times in any 30 day period.***" (2) In the list of alternate claims on page 3 - 5, revise the statement "Can be/may be used up to and including day of harvest" to read "***Do not apply within 3 days of harvest***".
- j. Under use sites, delete "(but not limited to)".
- k. Delete "For organic gardening and For Organic production". This is presently not acceptable for this specific formulation.
- l. The word "Unique" may be used on labels produced for a period of six months following the date of registration.
- m. Delete "3 in 1 and Triple Actions", or explain what these pertain mean.
- n. Delete "Remains effective after rain or sprinkling, Rainfast, Rainfast pellets and Rainfast pellet formulation/formula". These statements contradict the statement "Reapply after heavy rain or watering".
- o. Delete "Can be used around domestic animals/pets and wildlife". Claims pertaining to the safety of a pesticide are not acceptable.
- p. Delete the safety/comparable claims "Does not contain metaldehyde, does not contain carbaryl, replacement for metaldehyde/carbaryl baits".
- q. Delete "Citrus groves" on page 6. This is a residential use product.
- r. Qualify artichokes as globe only - i.e., to read "artichokes (globe)".
- s. Delete blackberries, boysenberries, raspberries. These crops do not have tolerances for spinosad.
- t. Add the registrant's telephone number beneath the company's name.

3. Submit to the Agency, data on one year storage stability testing (830.6317), conducted concurrently with the corrosion characteristics study (830-6320) at 0, 3, 6, 9 and 12 months of warehouse storage.
4. Submit two (2) copies of the final printed label bearing the above stated revisions prior to releasing this product for sale.

If you fail to comply with the above stated conditions, this registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A copy of the stamped label is enclosed for your records. If you have any questions concerning this action, please contact Dr. B. A. Akinlosotu at (703) 605-0653.

Enclosure

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# BUG-N-SLUGGO™

Insect, Slug and Snail Bait

**ACCEPTED**  
with **COMMENTS**  
In EPA Letter Dated: **OCT 30 2006**  
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. **61102-2A**

Active Ingredient:	By weight
Iron phosphate .....	0.97%
Spinosad (a mixture of spinosyn A and spinosyn D) .....	0.07%
Other Ingredients: .....	98.96%
<b>Total</b> .....	<b>100.00%</b>

**KEEP OUT OF REACH OF CHILDREN**

## CAUTION

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.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Telecommunications Network hotline at 1-800-858-7378 for emergency medical treatment information.

## 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, or using tobacco.

**Environmental Hazards:** For terrestrial uses. This product is toxic to aquatic invertebrates. Do not apply directly to water, 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 washwaters or rinsate.

**NET WEIGHT** 1 oz, 13 oz, 26 oz, 0.5 lb, 1 lb, 1.25 lbs, 1.5 lbs, 2 lbs, 2.25 lbs, 2.5 lbs, 3 lbs, 3.2 lbs, 4 lbs, 5 lbs, 5.25 lbs, 5.5 lbs, 6 lbs, 7 lbs, 8 lbs, 10 lbs, 20 lbs, 25 lbs

## DIRECTIONS FOR USE

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

**PESTS CONTROLLED:** earwigs, cutworms, sowbugs, pillbugs, crickets, ants, slugs, snails

#### **APPLICATION DIRECTIONS:**

Scatter the 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 approximately 0.5 to 1 lb per 1000 square feet, or for smaller areas, 0.075 to 0.15 oz, or 0.5 to 1 teaspoon, per square yard. Do not place in piles. For slugs and snails also scatter the bait around the perimeter of the area to provide a protective "barrier" for slugs and snails entering the area. 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 four weeks. Apply at the higher rate if the infestation is severe. Re-apply after heavy rain or watering.

For seedlings spread the bait around the base of the stem. For trees or shrubs, spread the bait around the base of the tree. For small plots, treat around the base of the plants to be protected. In greenhouses, scatter the bait in the pots of plants being damaged or around pots on greenhouse benches.

#### **USE SITES:**

**Vegetables**, including (but not limited to): artichokes, asparagus, beans, beets, broccoli, Brussels sprouts, cabbage, cantaloupe, carrots, cauliflower, corn, cucumbers, eggplants, garlic, lettuce, onions, peas, peppers, potatoes, radishes, rutabagas, spinach, soybeans, squash, Swiss chard, tomatoes and turnips; **Fruits**, including (but not limited to): apples, avocados, apricots, cherries, grapes, melons, peaches, plums, citrus, pears; **Berries**, including (but not limited to): strawberries, blackberries, blueberries, boysenberries, loganberries, raspberries; **Outdoor Ornamentals**; **Greenhouses**; **Lawns**; **Turf**.

#### **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:**

**If empty:** Do not reuse this container. Place in trash or offer for recycling if available.

**If partly filled:** Call your local solid waste agency or 1-800-CLEAN-UP for disposal instructions. Never place unused product down any indoor or outdoor drain.

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



### **"WARRANTY**

Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for the purposes stated on this label only when used in accordance with directions under normal use conditions. 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. 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 insects, 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.
-  -For Organic Gardening
-  -For Organic Production
- US Patent number x,xxx,xxx.
- Patent Pending
- 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.
- Patented snail, slug and insect killer
- Patented insect, snail and slug killer
- Unique, patented formula.
- Easy-to-use (ready-to-use) (RTU) granular (pellet) formulation.
- Easy to apply granules (pellets).

- Kills snails & (and) slugs.
- Pellets
- Kills slugs, snails and insects.
- SLUG, SNAIL AND INSECT BAIT
- SLUGGO plus insect killer
- Slug and bug control
- Slug and bug killer
- INSECT, SLUG AND SNAIL (BAIT) (PELLETS)
- bug and slug control
- bug and slug killer
- 3 in 1
- Triple Action
- Kills (earwigs,) (cutworm,) (sowbugs,) (pillbugs,) (crickets,) (ants,) (slugs,) (snails,)
- Spinosad is derived from a naturally occurring soil dwelling bacterium.
- Spinosad is biologically derived from *Saccharopolyspora spinosa*, a naturally occurring soil organism.
- Spinosad is derived from a soil dwelling bacterium.
- Treats (will treat) x,xxx sq. ft.
- 1 lb treats 2000 ft<sup>2</sup>
- Remains effective after rain or sprinkling.
- Rainfast
- Rainfast pellet formulation (formula)
- Rainfast pellets
- Effective for up to 4 weeks.
- Lasts up to 4 weeks.
- Remains effective for up to 4 weeks.
- Proven snail & (and) slug & (and) insect (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.
- Can be used up to and including day of harvest.
- Ideal for 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.
- Lawn insecticide
- Can be used on lawns
- Home and Garden
- Iron phosphate occurs naturally in soil.
- Can be used around domestic animals (pets) and wildlife.
- Read Entire Container Label Before Using This Product.
- 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, snails and insects.
- Effective against a wide variety of insects, slugs and snails
- Lures slugs, snails and insects from hiding places and plants.
- Lures insects, slugs and snails from hiding places and plants.
- No slime trails
- No messy cleanup
- Dead snails, no slime trails
- Attracts and kills slugs, snails and insects
- Attracts and kills insects, slugs and snails
- Attracts and kills
- For control (or suppression) of (earwigs), (cutworm), (sowbugs), (pillbugs), (crickets), (ants), (slugs), (snails)
- Contains Spinosad
- Contains Ferramol<sup>TM</sup> Slug and Snail Bait, a trademark of W. Neudorff GmbH KG
- Made with Ferramol<sup>TM</sup> Slug and Snail Bait, a trademark of W. Neudorff GmbH KG
- Ferramol<sup>TM</sup> is a trademark of W. Neudorff GmbH KG, Germany.
- Sluggo<sup>®</sup> is a registered trademark of W. Neudorff GmbH KG, Germany.
- www.neudorff.de
- Manufactured under a license of W. Neudorff GmbH KG, Germany.

**NEUDORFF**

- May be used up to and including day of harvest
- Does not contain metaldehyde
- Does not contain carbaryl
- replacement for metaldehyde/carbaryl baits
- easy to see blue bait
- distinct color
- special blue formulation
- blue bait
- Evening is the best time to apply the bait as pests travel and feed mostly by night or early morning.
- Treat all likely areas of infestation, especially around the perimeter of garden plots, for slugs and snails because these pests travel into plant areas from

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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.

Registrant: W. Neudorff GmbH KG, Postfach 1209, An der Mühle 3,  
D-31860 Emmerthal, Germany

EPA Registration #67702-XX

EPA Establishment #67702-WG-1