



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

September 26, 2008

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

Subject: Notification- Withdrawal of Confidential Statement of Formula dated
December 21, 2006 due to unable dye an all reference to that color on the label;
New Establishment Number
Bug-N-Sluggo Insect, Slug and Snail Bait
EPA Reg. No. 67702-24
Your Application Dated June 6, 2008

Dear Mr. Talarek:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated June 6, 2008 for the above mentioned product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

Our files have been updated to reflect that you have withdrawn the Confidential Statement of Formula dated December 21, 2006.

If you have any questions, please call me directly at 703-305-6249.

Sincerely,



Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

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

PHONE: (703) 759-4837
FAX: (703) 759-5548

June 6, 2008

DELIVERED BY COURIER

George LaRocca, PM 13
Registration 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: Notification for Bug-N-Sluggo Insect, Slug and Snail Bait
EPA Reg. No. 67702-24

Dear Mr. LaRocca:

Please find enclosed W. Neudorff GmbH KG's ("Neudorff's") application for a notification regarding the registration for Bug-N-Sluggo Insect, Slug and Snail Bait, EPA Reg. No. 67702-24. This notification withdraws the alternate formulation for the product, which is dated December 21, 2006 (copy enclosed), because this formulation contains FD & C Blue #1, which no longer is considered an acceptable inert ingredient for products for which the National Organic Program logo is used and claims are made, and Neudorff wishes to retain the logo and claims on the label for this product. Further, this notification also makes the following changes to the product's label:

1. Deletes the four optional marketing claims that state the product has a blue color or a distinct color; and
2. Changes the EPA establishment number from 67702-WG-1 to 67702-DEU-1.

The notification also incorporates the label revision made by the notification dated November 19, 2007, which was the addition of a container size.

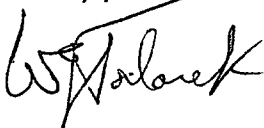
One copy of the revised label is enclosed for your review. Also, one copy of the revised label with the proposed change under item 2 above highlighted in yellow is enclosed for your convenience in reviewing this application.

Notification of revisions to the product's confidential statements of formula and label per PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA

regulations at 40 CFR 152.46, 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 PR Notice 98-10 and 40 CFR 152.46, 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,



Walter G. Talarek
Authorized Agent

Enclosures

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BUG-N-SLUGGO® INSECT, SLUG AND SNAIL BAIT

For Outdoor Use Around Residential Sites

Active Ingredient:	By weight
Iron phosphate.....	0.97%
Spinosad (a mixture of spinosyn A and spinosyn D).....	0.07%
Other Ingredients:	98.96%
Total	100.0%

NOTIFICATION

SEP 26 2008

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. 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, 2.25lbs, 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, 21.16 lbs (960 kg)

DIRECTIONS FOR USE

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

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PESTS CONTROLLED: earwigs, cutworms, sowbugs, pillbugs, crickets, ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), slugs, snails

APPLICATION DIRECTIONS:

Scatter the bait granules on the soil around or near the plants to be protected with a suitable hand or power operated spreader (gravity or rotary) to ensure uniform coverage over the treatment area. 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. Do not use food utensils such as tablespoons, cups, etc. for food purposes after pesticide use.

Do not apply more than 3 times in any 30 day period. 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: artichokes (globe), 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: apples, avocados, apricots, cherries, grapes, melons, peaches, plums, citrus, pears; **Berries**, including: strawberries, blueberries, loganberries; **Outdoor Ornamentals; Greenhouses (Non-Commercial); 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-CLEANUP 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 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
- 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.

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- 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
- 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 ft²
- 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 (non-commercial).
- Use around flowers, gardens, and fruit trees.
- Lawn insecticide
- Can be used on lawns
- Home and Garden
- Iron phosphate occurs naturally in soil.
- Read Entire Container Label Before Using This Product.
- 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* (Banded 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.

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- 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™ 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.
- Sluggo® is a registered trademark of W. Neudorff GmbH KG, Germany
- www.neudorff.de
- Manufactured under a license of W. Neudorff GmbH KG, Germany.



- Do not apply within 3 days of harvest.
- 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 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, 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
011-49-5155-62421

EPA Registration #67702-24

EPA Establishment #67702-DEU-1

