UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

<u>VIA EMAIL</u> 6/30/2014

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

Subject: Label Notification – Adding Optional List of Ant Species to Several Sections

Product Name: Bug-N-Sluggo Insect, Slug and Snail Bait

EPA Registration Number: 67702-24 Submission Date: April 23, 2014

Decision Number: 491316

Dear Mr. Talarek:

The Agency is in receipt of your Application for Pesticide Notification dated April 23, 2014 for 67702-24. The Registration Division has conducted a review of this request for its applicability under the Pesticide Registration Notice (PRN) 98-10, and finds that the action requested does fall within the scope of the PRN.

Please note that PRNs are provided as guidance. They are not considered regulation by the Agency, and that the Registration Division reserves the right to make the determination of acceptability. The Registration Division has determined that this action is **acceptable** and the records for this product have been updated accordingly.

If you have any questions please contact Melody Banks at (703) 305-5413 or via email at "banks.melody@epa.gov".

Sincerely,

Mark Suarez, Product Manager 13

Insecticide Branch

Office of Pesticide Programs

Date: June 30, 2014

MASTER LABEL

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

Active Ingredient: Iron phosphate	By weight 0.97%	
Spinosad (a mixture of spino		
and spinosyn D)	0.07%	
Other Ingredients:	<u>98.96%</u>	NOTIFICATION
Total	100.0%	06/30/2014

SUBLABEL A: Home and Garden Use

SUBLABEL B: Commercial Agriculture Use

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Registration No. 67702-24

EPA Establishment No.

Registrant: W. Neudorff GmbH KG An der Muhle 3, Postfach 1209 D-31860 Emmerthal, Germany 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 5lbs, 10lbs, 20lbs, 25lbs, 40lbs, 45lbs, 50lbs, 55lbs (25 kg), 1984lbs (900 kg), 2011lbs (912 kg), 2116 lbs (960kg)

SUBLABEL A: Home and Garden Use

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:	<u>98.96%</u>
Total	100.0%

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)

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. For emergency information concerning this product, call the National Pesticide Information Center (NPIC) at 1-800-858-7378 seven days a week., 6:30 am to 4:30 pm Pacific Time (NPIC Web site: www.npic.orst.edu) [alternately insert subregistrants toll free number and hours of operation]. During other times, call the poison control center 1-800-222-1222.

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: 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.

PESTS CONTROLLED: Earwigs, cutworms, sowbugs, pillbugs, crickets, ants [optional list of ant species [including foraging ants, sweet-feeding ants, pavement ants, moisture ants, little black ants, argentine ants, crazy ants, acrobat ants, bigheaded ants, cornfield ants, ghost ants, odorous house ants, thief ants, Texas leafcutting ants, field ants, and other common 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. Scatter the bait around the perimeter of the area to provide a protective "barrier" for [pests] [ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)][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. Do not apply within 3 days of harvest.

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.

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 target pests because pests travel into plant areas from daytime refuges.

USE SITES

VEGETABLES: 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: apples, avocados, apricots, cherries, grapes, melons, peaches, plums, citrus, pears; BERRIES: 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.

PESTICIDE DISPOSAL AND CONTAINER HANDLING

Nonrefillable. Do not reuse or refill this container .:

IF EMPTY: Place in trash or 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, 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. 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)(Product) Facts
- (What it does:)Kills (snails), (slugs), (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), and (other)(listed) (insects),
- (Where to Use:) For use around (vegetables), (fruit trees), (citrus), (berries), (ornamentals), (shrubs), (flowers), (trees), (lawns), (gardens), and in (greenhouses (non-commercial)).
- Read the Label First!
- NOTE: This package is sold by weight. Contents may have settled during shipment.
- For Organic Gardening
- US Patent number 7,964,205
- 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)(formula).
- Patented (snail), (slug)(ant, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants) & (and) (other) (listed)(insect) killer.
- Easy-to-use (ready-to-use) (RTU) granular (pellet) formulation.
- Easy to apply granules (pellets).
- Kills (snails), (slugs), (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), & (and) (other) (listed) (insects)
- Pellets
- SLUGGO plus insect killer
- (Slug) and (bug) (control)(killer)
- (INSECT), (SLUG) AND (SNAIL) (BAIT)(PELLETS)
- Kills (earwigs,) (cutworm,) (sowbugs,) (pillbugs,) (crickets,) (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter 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.
- Treats (will treat) x,xxx sq. ft.
- 1 lb treats 2000 ft²
- (remains)(Effective for)(lasts) up to 4 weeks.
- Remains effective after sprinkling
- 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)(Ideal for) vegetable gardens.

- Use around (flowers), (gardens), (fruit trees), (turf), and (ornamentals).
- Lawn insecticide
- Can be used on lawns
- Home and Garden
- Ant Killer (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)
- No mess application
- (Controls)(Kills) ants including (foraging ants), (sweet-feeding ants), (pavement ants), (moisture ants), (little black ants), (argentine ants), (crazy ants), (acrobat ants), (bigheaded ants), (cornfield ants), (ghost ants), (odorous house ants), (thief ants), (Texas leafcutting ants), (field ants), (and other common ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants))
- People and pets can enter the area (once)(after) product is applied
- · Can be used on listed household ants around the home
- Bug N Sluggo is a soil-applied granular slug, snail and insect bait containing the active
 ingredients spinosad and iron phosphate that attracts and kills listed pests including Kills
 (earwigs,) (cutworm,) (sowbugs,) (pillbugs,) (crickets,) (ants, excluding fire ants, harvester
 ants, Pharaoh's ants and carpenter ants),) (slugs,) and (snails) in commercial agricultural
 crops, ornamentals, herbs, seed crops and lawns.
- See (inside)(panel)(attached) (booklet) for (additional) (complete) (precautionary statements), (directions for use), (first aid)
- 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: 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), (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants) and (other)(listed) (insects).
- Lures (slugs), (snails), (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants) and (other) (listed) (insects) from hiding places and plants.
- No slime trails
- No messy cleanup
- Dead snails, no slime trails
- Attracts and kills (slugs), (snails), (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants) and (other) (listed)(insects)
- Attracts and kills-For control (or suppression) of (earwigs), (cutworm), (sowbugs), (pillbugs), (crickets), (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)), (slugs), (snails)
- Contains Spinosad
- (Contains)(made with) FerramolTM 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.com
- Manufactured under a license of W. Neudorff GmbH KG, Germany.
- NEUDORFF
- For more information on Bug-N-Sluggo and other [sub registrant] products call 1-xxx-[sub registrant]-x or visit our web site at www. [sub registrant].com
- [Slugs and snails] [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.



- For Organic Use
- Listed by the Organic Materials Review Institute (OMRI)
- OMRI Listed

Registrant: W. Neudorff GmbH KG, Postfach 1209, An der Mühle 3,

D-31860 Emmerthal, Germany

011-49-5155-62421

SUBLABEL B: Commercial Agriculture Use

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

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Registration No. 67702-24 EPA Establishment No. 67702-DEU-

NET WEIGHT 5lbs, 10lbs, 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 pm Pacific Time (NPIC Web site: www.npic.orst.edu) [alternately insert subregistrants toll free number and hours of operation]. During other times, call the poison control center 1-800-222-1222.]

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: This product is toxic to aquatic invertebrates. 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).

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 4 hours.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil, or water is:

- Coveralls
- Waterproof gloves
- · Shoes plus socks

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 4 hours for this product.

HOW TO APPLY: Spread the bait on soil prior to planting, prior to plant emergence, and after plant emergence 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 2-4 weeks. Do not apply more than 3 times in any 30 day period.

Do not place in piles. The product works best when soil is moist but with little or no standing water. See specific directions for different use sites.

Bug-N-Sluggo contains 0.0007lbs of spinosad per lb. Use the following table to assist in calculating applied lbs spinosad per acre.

APPLICATION RATE REFERENCE TABLE

Application Rate of Bug-N-Sluggo	Spinosad Equivalent (lb ai/acre)
20 lbs/acre	0.014
25 lbs/acre	0.0175
30 lbs/acre	0.021
35lbs/acre	0.0245
40lbs/acre	0.028
44lbs/acre	0.0308

USE SITES

VEGETABLES: Scatter the bait around the perimeter of the field or greenhouse 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 pests entering the vegetable plantings. If pests are inside the rows, then scatter the bait on the soil around the plants and between the rows.

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

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Artichoke	Do not make more than 4 applications per crop	Do not make applications less than 7 days apart	Do not apply within 2 days of harvest.	Do not apply more than a total of 0.33 lb ai spinosad (including foliar uses) per crop.
Asparagus	Do not make more than 3 applications per crop.	Do not make applications less than 4 days apart.	Do not apply within 60 day of spear harvest.	For post harvest protection of ferns only. Do not apply more than a total of 0.28 lb a.i. spinosad per acre per season. Do not feed treated ferns to meat or dairy animals.
ROOT AND TUE	BER VEGETABLES:			
Potatoes, ginger, sweet potatoes, yams	Do not make more than 4 applications per crop.	Do not make applications less than 7 days apart	Do not apply within 7 days of harvest.	Do not apply more than a total of 0.33 lb ai spinosad (including foliar uses) per crop.
Carrots and Parsnips	Do not make more than 4 applications per calendar year.	Do not make applications less than 5 days apart.	Do not apply within 3 days of harvest.	Do not apply more than a total of 0.3 lb ai spinosad (including foliar uses) per acre per crop.
Beets and Sugar Beets	Do not make more than 4 applications per	Do not make applications less than 7	Do not apply within 3 days of harvest	.Do not apply more than a total of 0.33 lb ai spinosad

	crop.	days apart.		(including foliar
		, ,		uses) per crop.
BULB VEGETAB		I 5	l	
dry bulb onion, garlic, great- headed elephant garlic, green onion, leek, shallot, Welch onion	Do not make more than 5 applications per year.	Do not make applications less than 4 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar and seed uses) per acre per crop
LEAFY VEGETA	BLES (EXCEPT BRA	ASSICAS) AND L	EAVES OF ROOT A	ND TUBER AND
arugula, beets,celery, peas, lettuce, rhubarb, spinach, Swiss chard, turnip greens and watercress	Do not make for than 6 applications per year.	Do not make applications less than 4 days apart.	Do not apply within one day of harvest for leafy vegetables and watercress; 3 days for leaves of root, tuber and legume vegetables.	Do not apply more than a total of 0.45lb ai spinosad (including foliar and seed uses) per acre of crop. Do not apply to seedling leafy crops grown for transplant within a greenhouse or shade house.
COLE CROPS:		•		
broccoli, broccoli raab, Brussels sprouts, cabbage, cauliflower, cavalo, Chinese broccoli, Chinese cabbage (bok choy), Chinese cabbage (napa), Chinese mustard cabbage (gai choy), collards, kale, kohlrabi,	Do not make for than 6 applications per year.	Do not make applications less than 4 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre of crop. Do not apply to seedling cole crops grown for transplant.
LEGUME VEGE Succulent and	TABLES: Do not make	Do not make	Succulent beans	Succulent beans and
dried beans and peas	more than 6 applications per crop.	applications less than 5 days apart.	and peas: do not apply within 3 days of harvest Dried beans and peas: do not apply within 28 days of harvest.	peas: Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre per season. Dried beans and peas: Do not apply more than a total of 0.188lb ai spinosad per acre

				per season.
Soybean	Do not make more than 4 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within 28 days of harvest.	Do not apply more than a total of 0.186lb ai spinosad (including foliar uses) per acre per year. Do not feed treated forage or hay to meat or dairy animals.
CUCURBIT VEG				
cucumber, edible gourds, melons, muskmelons, cantaloupe, honeydew, pumpkin, summer squash, watermelon, and winter squash	Do not make more than 6 applications per crop.	Do not make applications less than 5 days apart.	Do not apply within one day of harvest for cucumber; 3 days for other cucurbits	Do not apply more than a total of 0.45lb ai spinosad (including foliar and seed uses) per acre per season.
FRUITING VEGI	TABLES:		•	
eggplant, groundcherry, pepino, pepper (except black), tomatillo, tomato and okra	Do not make more than 6 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre per crop. Do not apply to seedling fruiting vegetables and okra grown for transplant within a greenhouse, shade house, or field plot.
CORN:				
Corn – field corn	Do not make more than 3 applications per calendar year.		Do not apply within 28 days of harvest for grain or fodder; 7 days for forage.	Do not apply more than a total of 0.188lb ai spinosad (including foliar uses) per acre per year.
Corn – sweet corn	Do not make more than 6 applications per calendar year.		Do not apply within one day of harvest for grains; 7 days for forage, 28 days for fodder.	Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre per year.

FRUITS INCLUDING CITRUS, AND SMALL FRUITS: 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 in the field or greenhouse. For older trees, spread the bait around the base of the trees to intercept pests 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. For seedlings spread the bait around the base of the stem. Use the higher rates for heavy infestations.

PESTS CONTROLLED: ants [optional list of ant species [including foraging ants, sweet-feeding ants, pavement ants, moisture ants, little black ants, argentine ants, crazy ants, acrobat ants, bigheaded ants, cornfield ants, ghost ants, odorous house ants, thief ants, Texas leafcutting ants, field ants, and other common ants]] (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), earwigs, cutworms, sowbugs, pillbugs, crickets, slugs, snails

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions	
Banana and plantain	Do not make more than 6 applications per calendar year or 4 applications per crop	Do not make applications less than 7 days apart.	Do not apply within 8 weeks of harvest.	Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre per crop.	
Fig	Do not make more than 4 applications per calendar year	Do not make applications less than 7 days apart	Do not apply within 7 days of harvest.	Do not apply more than a total of 0.45lb ai spinosad per acre per crop.	
Grape	Do not make more than 5 applications per calendar year.	Do not make applications less than 5 days apart.	Do not apply within 7 days of harvest.	Do not apply more than a total of 0.45 lb ai spinosad per acre per season west of the Rocky Mountains, and no more than 0.36 lb ai spinosad per acre per season east of the Rocky Mountains.	
Tropical tree fruits (avocado, guava, mango, papaya, passion fruit)	Do not make more than 2 applications per calendar year	Do not make applications less than 7 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre per crop.	
CITRUS FRUITS					
grapefruit, lemons, limes, oranges, tangerines	Do not make more than 3 applications per calendar year.	Do not make applications less than 6 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45 ai spinosad (including foliar uses) per acre per crop.	
POME FRUITS:					
apples, crabapples, loquat, mayhaw, pears, quince	.Do not make more than 4 applications per calendar year.	Do not make applications less than 10 days apart	Do not apply within 7 days of harvest	Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre per crop.	
STONE FRUITS					

cherries, plums, prunes	Do not make applications less than 7 days apart.	Do not apply within 7 days of harvest	Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre per year.
peaches, nectarines, apricots	Do not make applications less than 7 days apart.	Do not apply within 14 days of harvest for apricots or within 1 day of harvest for nectarines and peaches.	Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre per year.

BERRIES: Spread the bait around the perimeter of the field or greenhouse to intercept pests 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 pests are already in the plots, then carefully spread bait between the furrows near the base of the plants.

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

CROP	Maximum	Application	Pre-Harvest	Additional
	number of applications	Interval	Interval (PHI)	Restrictions
Bushberries (blueberry, currant, elderberry, gooseberry, huckleberry, juneberry, ligonberry, salal)	Do not make more than 6 applications per calendar year or more than 3 applications per crop	Do not make applications less than 6 days apart.	Do not apply within 3 days of harvest.	Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre per crop.
Caneberries (blackberry, loganberry, red and black raspberry)	Do not make more than 6 applications per calendar year	Do not make applications less than 5 days apart.	Do not apply within one day of harvest	Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre per crop.
Cranberry	Do not make more than 6 applications per calendar year	Do not make applications less than 7 days apart.	Do not apply within 21 days of harvest	Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre per crop.
Strawberry	Do not make more than 5 applications per calendar year	Do not make applications less than 5 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre per crop.

TREE NUTS, PEANUTS AND PISTACHIOS: 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. For seedlings spread the bait around the base of the stem. For older trees, spread around the base of the trees to intercept pests traveling to the trunk. Use the higher rates for heavy infestations.

PESTS CONTROLLED: ants [optional list of ant species [including foraging ants, sweet-feeding ants, pavement ants, moisture ants, little black ants, argentine ants, crazy ants, acrobat ants, bigheaded ants, cornfield ants, ghost ants, odorous house ants, thief ants, Texas leafcutting ants, field ants, and other common ants]] (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), earwigs, cutworms, sowbugs, pillbugs, crickets, ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), slugs, snails

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Peanut (not for use in California)	Do not make more than 3 applications per calendar year	Do not make applications less than 7 days apart.	Do not apply within 3 days of nut harvest or 14 days of forage.	Do not apply more than a total of 0.28lb ai spinosad (including foliar uses) per acre per crop. Do not allow grazing of crop residue or harvest of crop residue for hay until 14 days after the last application.
Tree nuts (almond, cashew, chestnut, filbert, macadamia nut, pecan, walnut); Pistachios		Do not make applications less than 7 days apart.	Do not apply within 1 day of harvest	Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre per crop.

HERBS: At the seedling and later stages, apply the bait between the rows and around the perimeter of the field or greenhouse. Use the higher dosage for heavy infestations. Application Rate: - Use 20-44 lbs/acre (0.5-1 lb/1000 sq ft).

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

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
angelica, balm, basil, borage, burnet, chamomile, catnip, chervil (dried), chive, clary, costmary, cilantro, curry, dillweed, horehound, hyssop, lavender, lemongrass, lovage, marigold, marjoram, nasturtium, parsley, pennyroyal, rosemary, rue, sage, savory, sweet bay, tansy, tarragon, thyme, wintergreen, woodruff and wormwood	Do not make more than 5 applications per calendar year or more than 3 applications per crop.	Do not make applications less than 5 days apart.	Do not apply within one day of harvest.	Do not apply more than a total of 0.47lb ai spinosad (including foliar uses) per acre per crop.
Peppermint and spearmint	Do not make more than 4 applications per calendar year or more than 3 applications per crop.	Do not make applications less than 4 days apart.	Do not apply within 7 days of harvest.	Do not apply more than a total of 0.45lb ai spinosad (including foliar uses) per acre per crop.

GRASS FORAGE, FODDER, HAY, SEED PRODUCTION AND CEREAL GRAINS: When pests are detected, scatter the bait by hand or with a granular spreader 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. PESTS CONTROLLED: earwigs, cutworms, sowbugs, pillbugs, crickets, slugs, snails

CROP	Maximum number of applications	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
Small cereal grains (barley, buckwheat, grain amaranth, milo, oats, pearl millet, proso millet, rye, sorghum, triticale, wheat).	Do not make more than 3 applications per calendar year.	Do not make applications less than 4 days apart.	Do not apply within 3 days of harvest for forage, fodder or hay. Do not apply within 21 days of harvest for grain or straw.	Do not apply more than a total of 0.28 lb ai spinosad (including foliar uses) per acre per year.
Grass crops, grass grown for seed, pastures and rangeland	Do not make more than 6 applications per season.	No preharvest interval for forage.	Do not use within 3 days of harvest for hay or fodder.	Do not apply more than a total of 0.186 lb ai spinosad (including foliar uses) per acre per season.

TURF AND ORNAMENTAL:

When pests are detected, broadcast the bait by hand or with a granular spreader. Alternatively, in or around plant pots on greenhouse benches, or in or around container-grown plants 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.

Use the higher rate for heavy infestations. Application Rate: 0.23 to 1 lb. per 1000 square feet (10-44 lbs. per acre).

PESTS CONTROLLED: ants [optional list of ant species [including foraging ants, sweet-feeding ants, pavement ants, moisture ants, little black ants, argentine ants, crazy ants, acrobat ants, bigheaded ants, cornfield ants, ghost ants, odorous house ants, thief ants, Texas leafcutting ants, field ants, and other common ants]] (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), earwigs, cutworms, sowbugs, pillbugs, crickets, slugs, snails

CROP	Maximum number of applications	Application Interval	Additional Restrictions
Turf (lawns, athletic field and recreational areas, commercial turf, sod, golf courses, and grass buffers around gardens, crop areas and ornamentals)	аррисанонз	Do not make applications less than 7 days apart.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Outdoor Ornamentals (herbaceous and woody plants)		Do not make applications less than 7 days apart.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Greenhouse Ornamentals	Do not make more than 10 applications per calendar year.	Do not make applications less than 7 days apart.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre

			per year.
Outdoor container- grown nursery plants		Do not make applications less than 7 days apart.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Tree Farms and Plantations (Conifers, including Christmas trees, and deciduous trees)	Do not make more than 6 applications per calendar year.	Do not make applications less than 7 days apart.	Do not apply more than a total of 0.45 lb ai spinosad (including foliar uses) per acre per year.
Non-crop areas (pastures, rangeland, forests, parks, playgrounds, cemeteries, picnic areas, roadsides, campgrounds, industrial sites, fallow land, barrier strips and buffer zones)			

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 HANDLING: 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 any or none of these optional statements:

"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].

OR

SATISFACTION GUARANTEED.

OR

Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

OR

Unconditionally guaranteed by [insert name of supplemental registrant]."

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

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

- (Quick)(product) Facts
 - (What it does:)Kills (snails), (slugs), (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), and (other)(listed) (insects),
 - (Where to Use:) For use around (vegetables), (fruit trees), (citrus), (berries), (ornamentals), (shrubs), (flowers), (trees), (lawns), (gardens), and in (greenhouses).
- Read the Label First!
- Read Entire Container Label Before Using This Product.
- NOTE: This package is sold by weight. Contents may have settled during shipment.
- US Patent number 7,964,205
- This container is made from XX% recycled materials.
- The highly compressed granules (pellets) are easy to use and clean to handle.
- (Unique)Patented (technology)(formula).
- Patented (snail), (slug)(ant, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants) & (and) (other) (listed)(insect) killer.
- SLUGGO plus insect killer
- (Slug) and (bug) (control)(killer)
- (INSECT), (SLUG) AND (SNAIL) (BAIT)(PELLETS)
- (bug) and (slug) (control)(killer)
- Kills (earwigs,) (cutworm,) (sowbugs,) (pillbugs,) (crickets,) (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants),) (slugs,) (snails,)
- Spinosad is derived from (Saccharopolyspora spinosa),(a naturally occurring soil (organism)(bacterium)).
- 1 lb treats 2000 ft²
- Easy-to-use (ready-to-use) (RTU) granular (pellet) formulation.
- Easy to apply granules.
- Easy to use small (short) pellets
- Small (short) pellets for greater coverage.
- Shorts
- Pellets
- (For use)(can be used) (on)(around) (lawns), (turf), (ornamentals), (non-crop areas),
 (commercial turf), (recreational areas), and (golf courses)
- Kills (slugs), (snails), (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), and (&) (other)(insects)
- Treats (will treat) x,xxx sq. ft.

- Remains effective after rain or sprinkling.
- Proven (slugs), (snails), (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants), and (&) (other)(insects) (killer) (kill) (control).
- Convenient. Easy-to-use. Requires no mixing, spraying, or special applicators.
- 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.)
- No mess application
- Baits and Kills
- The slugs and snails controlled by this product: *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.
- Effective against a wide variety of (slugs), (snails), (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants) and (other)(listed) (insects).
- Lures (slugs), (snails), (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants) and (other) (listed) (insects) from hiding places and plants.
- No slime trails
- No messy cleanup
- Dead snails, no slime trails
- For control (or suppression) of (earwigs), (cutworm), (sowbugs), (pillbugs), (crickets), (ants, excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)), (slugs), (snails)
- Contains Spinosad
- Sluggo® is a registered trademark of W. Neudorff GmbH KG, Germany
- May be used as part of an Integrated Pest Management (IPM) program or for organic production.
- Patented insect killer
- Ant Killer (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants)
- (Controls)(Kills) ants including (foraging ants), (sweet-feeding ants), (pavement ants), (moisture ants), (little black ants), (argentine ants), (crazy ants), (acrobat ants), (bigheaded ants), (cornfield ants), (ghost ants), (odorous house ants), (thief ants), (Texas leafcutting ants), (field ants), (and other common ants (excluding fire ants, harvester ants, Pharaoh's ants and carpenter ants))
- Can be used on listed household ants around the home
- Bug N Sluggo is a soil-applied granular slug, snail and insect bait containing the active
 ingredients spinosad and iron phosphate that attracts and kills listed pests including Kills
 (earwigs,) (cutworm,) (sowbugs,) (pillbugs,) (crickets,) (ants, excluding fire ants, harvester
 ants, Pharaoh's ants and carpenter ants),) (slugs,) and (snails) in commercial agricultural
 crops, ornamentals, herbs, seed crops and lawns.
- See (inside)(panel)(attached) (booklet) for (additional) (complete) (precautionary statements), (directions for use), (first aid statements)
- (Contains)(made with) FerramolTM Slug and Snail Bait, a trademark of W. Neudorff GmbH KG
- Ferramol[™] is a trademark of W. Neudorff GmbH KG, Germany.
- www.neudorff.com
- (Sold)(Manufactured)under a license of W. Neudorff GmbH KG, Germany.



For Organic Production



Listed by the Organic Materials Review Institute (OMRI)

OMRI Listed

Registrant: W. Neudorff GmbH KG, Postfach 1209, An der Mühle 3,

D-31860 Emmerthal, Germany Phone: 250-652-5888 www.neudorff.com

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

be used]