

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

September 19, 2016

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 Amendment – Addition of PCO Sublabel; Multiple Marketing Claim

Adjustments

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

EPA Registration Number: 67702-24 Application Date: September 2, 2015

Decision Number: 509076

Dear Mr. Talarek:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Carlyn Petrella by phone at 703-347-0439, or via email at petrella.carlyn@epa.gov

Sincerely,

Richard Gebken Product Manager 10 Invertebrate & Vertebrate Branch 2

Office of Pesticide Programs

Enclosure

Text in braces is for informational purposes only and will not appear on label Text in brackets is optional language and may or may not appear on the label Text in parentheses is language that will appear on the label

# **{MASTER LABEL}**

# {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	100.00%

{SUBLABEL A: Home and Garden Use} {SUBLABEL B: Commercial Agriculture Use}

{SUBLABEL C: Commercial PCO Use}

# ACCEPTED

09/19/2016

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 67702-24

**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 31860 Emmerthal, Germany www.neudorff.com

[In the alternative, the supplemental distributor's name, address and telephone number 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 and PCO 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 poison control center 1-800-222-1222 {alternately, subregistrants can insert their own toll free hotline number}.

#### 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 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 hand or power operated broadcast, granular or drop 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 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. To the extent consistent with applicable law, 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 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.
  - 1
- For Organic Gardening
- US Patent number 7,964,205
- This container is made from XX% recycled materials.
- Patented [technology][formula].
- Patented [snail], [slug][ant, excluding fire ants, harvester ants, Pharaoh 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 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 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 ft<sup>2</sup>
- [Bait] [remains][Effective for][lasts] up to 4 weeks.
- Remains effective after light rain
- Remains effective after light watering
- Remains effective after sprinkling rain
- Remains effective after light rain or sprinkling rain
- Proven snail & [and] slug & [and] insect [killer] [kill][control]
- 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.
- Use around [flowers], [gardens], [fruit trees], [turf], and [ornamentals].
- Lawn insecticide for listed pests

- Can be used on lawns
- Home and Garden for Outdoor Use
- Ant Killer (excluding fire ants, harvester ants, Pharaoh 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 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 [earwigs,]
  [cutworm,][sowbugs,][pillbugs,] [crickets,][ants, (excluding fire ants, harvester ants, Pharaoh
  ants and carpenter ants),] [slugs,] and [snails] in fruits, vegetables, ornamentals, herbs, and
  lawns.
- See [inside] [side] [back][panel][attached] [booklet] for[additional] [complete] [precautionary statements], [directions for use], [first aid] {When the first aid statement will appear on the side or back panel, the claim "See side/back panel for "First Aid" will appear on the front panel}
- Read Entire Container Label Before Using This Product.
- Unconditionally guaranteed by {insert name of supplemental registrant}.
- Baits and Kills
- For outdoor 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 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
- 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 ants and carpenter ants)], [slugs], [snails]
- Contains Spinosad
- [Contains][made with] Ferramol<sup>™</sup> Slug and Snail Bait, a trademark of W. Neudorff GmbH KG
- Ferramol<sup>™</sup> 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 [insert name of supplemental distributor] products call 1-xxx-xxxx {supplemental distributor's telephone number}
- [Slugs and snails] [They] favor damp places around vegetable plants such as beans, tomatoes, lettuce, cabbage, celery and squash. Other areas where [they][slugs and snails] maybe be found are flower gardens, rockeries, hedges, dichondra, lawns, ivy patches, and other ground cover where they obtain shelter by day.



Listed by the Organic Materials Review Institute (OMRI)

OMRI Listed

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

31860 Emmerthal, Germany

011-49-5155-62421

[in the alternative, the supplemental distributor's name, address and telephone

number may be used]

### **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	100.0%

#### **KEEP OUT OF REACH OF CHILDREN**

# CAUTION

EPA Registration No. 67702-24 EPA Establishment No.

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 poison control center 1-800-222-1222 {alternately subregistrants may substitute their toll free hotline number}.

#### 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.

Keep unprotected persons out of treated area until after product is applied.

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	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.		
	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 crop.	Do not make applications less than 7 days apart.	Do not apply within 3 days of harvest.	Do not apply more than a total of 0.33 lb ai spinosad (including foliar uses) per crop.		
DULB VEGETAE	BULB VEGETABLES:					

dry bulb onion, garlic, greatheaded elephant garlic, green onion, leek, shallot, Welch onion  LEAFY VEGETA  LEGUME VEGETA  LEGUME VEGETA  LEGUME, peas, lettuce, rhubarb, spinach, Swiss chard, turnip greens and watercress	Do not make more than 5 applications per year.  BLES (EXCEPT BRATABLES: Do not make more than 6 applications per year.	Do not make applications less than 4 days apart.  ASSICAS) AND L  Do not make applications less than 4 days apart.	Do not apply within one day of harvest.  EAVES OF ROOT A  Do not apply within one day of harvest for leafy vegetables and watercress; 3 days for leaves of root, tuber and legume	Do not apply more than a total of 0.45 lb ai spinosad (including foliar and seed uses) per acre per crop  ND TUBER AND  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
			vegetables.	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 more 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	TABLES:			
Succulent and dried beans and peas	Do not make more than 6 applications per crop.	Do not make applications less than 5 days apart.	Succulent beans and peas: do not apply within 3 days of harvest Dried beans and peas: do not apply within 28 days of harvest.	Succulent beans and 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	T	T	T = .	
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		Description	B	D t t
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:	Da mat males	T	Da natanah	Do not on the contract
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 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	S:			
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 0.45lb ai spinosad (including foliar uses) per acre per crop.
POME FRUITS:				
apples, crabapples, loquat, mayhaw, pears, quince STONE FRUITS	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.
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 with a hand or power operated broadcast, granular or drop spreader (gravity or rotary). 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	Interval	Interval (PHI)	Restrictions
	applications			
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 with a hand or power operated broadcast, granular or drop spreader (gravity or rotary). 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 ants and carpenter ants), earwigs, cutworms, sowbugs, pillbugs, crickets, 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 with a hand or power operated broadcast, granular or drop spreader (gravity or rotary) 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	Application Interval	Pre-Harvest Interval (PHI)	Additional Restrictions
	applications			
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,	Do not make	No preharvest	Do not use within	Do not apply
grass grown for	more than 6	interval for	3 days of harvest	more than a total
seed, pastures	applications per	forage.	for hay or fodder.	of 0.186 lb ai
and rangeland	season.			spinosad
				(including foliar
				uses) per acre
				per season.

#### TURF AND ORNAMENTAL:

When pests are detected, broadcast the bait with a hand or power operated broadcast, granular or drop spreader (gravity or rotary). 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 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)		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. Completely empty metal drum, plastic bag, box or plastic tote into application equipment. Then dispose of the empty metal drum, plastic bag, box or plastic tote by incineration, or by offering for recycling if available, or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

#### **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. To the extent consistent with applicable law, 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] or your money back."

{The following claims and product information, may or may not be presented on the product's label and labelling:}

- [Quick][product] Facts
- [What it does:]Kills [snails], [slugs], [ants, (excluding fire ants, harvester ants, Pharaoh 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.
- [Unique]Patented [technology][formula].
- Patented [snail],[slug][ant, (excluding fire ants, harvester ants, Pharaoh 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 ants and carpenter ants),] [slugs,][snails,]
- Spinosad is derived from [Saccharopolyspora spinosa],[a naturally occurring soil [organism][bacterium]].
- 1 lb treats 2000 ft<sup>2</sup>
- 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 ants and carpenter ants)], and [&][other insects]
- Treats [will treat] x,xxx sq. ft.
- Remains effective after light rain or sprinkling rain
- Remains effective after light rain
- Remains effective after light watering
- Remains effective after sprinkling rain
- Proven [slugs], [snails],[ants, (excluding fire ants, harvester ants, Pharaoh ants and carpenter ants)], and [&] [other insects] [killer] [kill] [control].
- 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.]
- 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 ants and carpenter ants)] and [other listed insects].
- Lures [slugs], [snails], [ants, (excluding fire ants, harvester ants, Pharaoh ants and carpenter ants)] and [other listed insects] from hiding places and plants.
- No slime trails
- Dead snails, no slime trails
- For control [or suppression] of [earwigs], [cutworm], [sowbugs], [pillbugs], [crickets], [ants, (excluding fire ants, harvester ants, Pharaoh 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 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 ants and carpenter ants)]
- Can be used outdoors 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 [earwigs,]
  [cutworm,][sowbugs][pillbugs,] [crickets,][ants, (excluding fire ants, harvester ants, Pharaoh
  ants and carpenter ants),] [slugs,] and [snails] in commercial agricultural crops, ornamentals,
  herbs, seed crops and lawns.
- See [inside][side][back][panel](attached] [booklet] for [additional] [complete] [precautionary statements], [directions for use], [first aid statements] {When the first aid statement will appear on the side or back panel, the claim "See side/back panel for First Aid" will appear on the front panel}
- [Contains][made with] Ferramol<sup>™</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.
- www.neudorff.com
- [Sold][Manufactured ]under a license of W. Neudorff GmbH KG, Germany.



For Organic Production



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

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

31860 Emmerthal, Germany

Phone: 250-652-5888 www.neudorff.com

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

address may be used]

[in the alternative, the supplemental distributor Brandt Consolidated, Inc.'s WEB

address may be used, i.e., www.brandt.co]

# **{SUBLABEL C: Commercial PCO Use}**

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

# For outdoor use only

**KILLS**: 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 ants and carpenter ants), earwigs, cutworms, sowbugs, pillbugs, crickets, slugs, snails

**USE SITES [FOR USE IN AND AROUND]:** Residential yards and gardens, Lawns, Golf courses, Residential and Commercial landscaping, Hotel and motel landscaping, Parks, Athletic fields, Perimeter treatments of commercial, and industrial buildings.

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 5lbs, 10lbs, 20lbs, 25lbs, 40lbs, 45lbs, 50lbs, 55lbs (25 kg), 1984lbs (900 kg), 2011lbs (912 kg), 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 poison control center 1-800-222-1222 (alternately, subregistrants can insert their toll free hotline number).

### 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. Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes. For use on plants intended for aesthetic purposes or climate modification and being grown in ornamental gardens, parks, or lawns or grounds. Not for use on golf courses, sod farms, nurseries, in commercial greenhouses or on grass grown for seed.

BUG N SLUGGO is a patented, dual-active, ready-to-use product for use in controlling listed insects, slugs and snails outdoors. This product contains spinosad and iron phosphate. Spinosad is derived from a soil bacteria and kills insects by both contact and ingestion. Spinosad has a unique mode of action that excites the insect nervous system, which leads to involuntary muscle contractions, tremors, and finally paralysis and death. Slugs and snails are very sensitive to iron; the iron phosphate causes cellular damage to the gastrointestinal tract which causes them to cease feeding and die within a few days.

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.

#### Outdoor Applications:

**Broadcast**: Apply 0.23 to 1 lb. per 1000 square feet (equivalent to 10-44 lbs. per acre or 1 level teaspoon per square yard) with a hand or power operated broadcast, granular or drop spreader (gravity or rotary). Use the higher rate for heavy infestations or if the area is heavily watered or after long periods of heavy rain. **Perimeter**: Apply evenly at a rate of 0.4-1.6 oz (2.9 – 11.5 teaspoons) per 100 linear feet in a band 1-3 feet wide around building foundations, driveways, sidewalks or other areas where insects are present. Treat visible ant trails with approximately 0.3-0.9 oz (2.2-6.5 teaspoons) of product, depending on the number of ants in the trail. **Individual Ant Colony Treatment**: Apply 1.4-1.9 oz (3.36-4.55 tablespoons) of product around

#### STORAGE AND DISPOSAL

the perimeter of each mound.

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. Completely empty metal drum, plastic bag, box or plastic tote into application equipment. Then dispose of the empty metal drum, plastic bag, box or plastic tote by incineration, or by offering for recycling if

available, or reconditioning if appropriate, or puncture and dispose of in a sanitary landfill, or by other procedures approved by State and local authorities.

#### 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. To the extent consistent with applicable law, 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:}

- [What it does:] Kills [snails], [slugs], [ants, (excluding fire ants, harvester ants, Pharaoh ants and carpenter ants)], and [other listed insects]
- [Where to Use:] For use around [ornamentals], [shrubs], [flowers], [trees], [lawns], [yards], [gardens], [golf courses], [parks], [athletic fields], [hotels and motels] and [commercial and industrial buildings].
- 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
- This container is made from XX% recycled materials.
- Patented [technology][formula].
- Patented [snail], [slug][ant, (excluding fire ants, harvester ants, Pharaoh 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 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 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 ft<sup>2</sup>

- [remains][Effective for][lasts]up to 4 weeks.
- Remains effective after light rain or sprinkling rain
- Remains effective after light rain
- Remains effective after light watering
- Remains effective after sprinkling rain
- Proven snail & [and] slug & [and] insect [killer] [kill][control]
- 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.
- Use around [flowers],[gardens], [fruit trees], [turf], and [ornamentals]
- Lawn insecticide for listed pests
- Can be used on lawns
- Home and Garden for outdoor use
- Ant Killer (excluding fire ants, harvester ants, Pharaoh 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 ants and carpenter ants)]
- People and pets can enter the area [once][after] product is applied
- · Can be used outdoors 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 [earwigs,]
  [cutworm,] [sowbugs,] [pillbugs,] [crickets,] [ants, (excluding fire ants, harvester ants, Pharaoh
  ants and carpenter ants),] [slugs,] and [snails] in ornamentals, [yards], [gardens], [golf
  courses], [parks], [athletic fields], and [lawns].
- See [inside][side][back][panel][attached] [booklet] for [additional][complete] [precautionary statements] [directions for use], [first aid] {When the first aid statement will appear on the side or back panel, the claim "See side/back panel for First Aid" will appear on the front panel}
- Read Entire Container Label Before Using This Product.
- Unconditionally guaranteed by {insert name of supplemental registrant} or your money back.
- 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 ants and carpenter ants)] and [other listed insects].
- Lures [slugs],[snails], [ants, excluding fire ants, harvester ants, Pharaoh ants and carpenter ants)] and [other listed insects] from hiding places and plants.
- No slime trails
- Dead snails, no slime trails
- Attracts and kills[slugs], [snails], [ants, excluding fire ants, harvester ants, Pharaoh 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 ants and carpenter ants)], [slugs], [snails]
- Contains Spinosad
- [Contains][made with] Ferramol<sup>™</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® is a registered trademark of W. Neudorff GmbH KG, Germany
- www.neudorff.com
- Manufactured under a license of W. Neudorff GmbH KG, Germany.



- For more information on Bug-N-Sluggo and other [insert name of supplemental distributor] products call 1-xxx-xxx {supplemental distributor's telephone number}
- [Slugs and snails] [They] favor damp places around vegetable plants such as beans, tomatoes, lettuce, cabbage, celery and squash. Other areas where [they] [snails and slugs] may be found include 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,

31860 Emmerthal, Germany

011-49-5155-62421

[in the alternative, the supplemental distributor's name, address and telephone

number may be used

[in the alternative, the supplemental distributor Brant Consolidated, Inc.'s WEB

address may be used, i.e., www.brandt.co]