

67702-33

04/27/2011

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 27, 2011

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

RE: Product Name: Ferroxx
EPA Reg. No.: 67702-33
Application for Label Notification dated April 5, 2011 to add optional marketing claims and delete the "Commercial Agriculture" heading that is found above the "How to Apply" section in the Commercial Agriculture Use sublabel.

Dear Mr. Talarek:

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

If you have any questions concerning this action, please feel free to contact Mr. Colin Walsh at (703) 308-0298 or via email at walsh.colin@epa.gov.

Sincerely,

Linda A. Hollis

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



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 67702-33	2. EPA Product Manager Linda Hollis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ferroxx	PM# 91	
5. Name and Address of Applicant (Include ZIP Code) W. Neudorff GmbH KG c/o Walter G. Talarek PC 1008 Riva Ridge Drive Great Falls, VA 22066-1620 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: <input checked="" type="checkbox"/> EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	Notification Accepted Date: <u>APR 27 2011</u> Reviewer: <u>C. Walsh</u>
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

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

Notification of minor revisions to product's label under PR Notice 98-10. See the enclosed letter to Ms. Linda Hollis for a full explanation of the notification and the certification required by PR Notice 98-10.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container

3. Location of Net Contents Information
 Label Container

4. Size(s) Retail Container

5. Location of Label Directions
 On Label
 On Labeling accompanying product

6. Manner in Which Label is Affixed to Product
 Lithograph
 Paper glued
 Stenciled Other _____

Section - IV

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

Name Walter G. Talarek	Title Authorized Agent	Telephone No. (Include Area Code) 703-759-4837
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Certification

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

2. Signature 	3. Title Authorized Agent	6. Date Application Received (Stamped)
4. Typed Name Walter G. Talarek	5. Date April 5, 2011	

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

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

April 5, 2011

DELIVERED BY COURIER
CONTAINS CONFIDENTIAL BUSINESS INFORMATION

Linda Hollis, PM 91
Biopesticides and Pollution Prevention Division
c/o Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

cc: [illegible]
cc: [illegible]
cc: [illegible]
cc: [illegible]
cc: [illegible]
cc: [illegible]
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cc: [illegible]
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Re: Ferroxx
EPA Reg. No. 67702-33
Notification

Dear Ms. Hollis:

Please find enclosed W. Neudorff GmbH KG's ("Neudorff's") application for a notification under PR Notice 98-10 regarding the registration for Ferroxx, EPA Reg. No. 67702-33. In essence, the notification (1) adds 2 optional marketing statements to the home and garden use sublabel and (2) adds four optional marketing statements to the commercial agriculture use sublabel. In addition the "Commercial Agriculture" heading above the How to Apply section of the commercial agriculture use sublabel has been deleted. The deletion and the new optional marketing statements are consistent with the uses, sites and marketing statements currently on the label.

Two (2) copies of the revised label are enclosed for your review. One (1) copy of the revised label has the proposed changes highlighted in yellow for your convenience in reviewing this application.

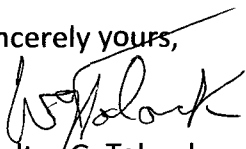
This is a notification of label changes under PR Notice 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 156.10 and 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false

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statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10, and 40 CFR 156.10 and 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

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

Sincerely yours,



Walter G. Talarek
Authorized Agent

Enclosure Notification

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MASTER LABEL

FERROXX

Active Ingredient:	By weight
Sodium Ferric EDTA.....	5.0%
Other Ingredients:	95.0%
Total	100.0%

Notification Accepted

Date: APR 27 2011

Reviewer: C. Walsh

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Registration #67702-33

EPA Establishment #

Registrant: W. Neudorff GmbH KG
An der Muhle 3, Postfach 1209
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, 1.75 lbs, 2lbs, 2.25lbs, 2.5lbs, 3lbs, 3.2lbs, 4.0 lbs, 5lbs, 5.25lbs, 5.5lbs, 6lbs, 7lbs, 8lbs, 10lbs, 12lbs, 15lbs, 20lbs, 25lbs, 40 lbs, 1lb. 4oz., 1lb. 14oz., 2lb. 8oz., 2116 lbs (960kg)

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

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SUBLABEL A: Home and Garden Use

FERROXX

Active Ingredient:	By weight
Sodium Ferric EDTA.....	5.0%
Other Ingredients:	95.0%
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Registration #67702-33

EPA Establishment #

NET WEIGHT 1oz, 13oz, 20oz, 26oz, 30oz, 0.5lb, 1 lb, 1.25lbs, 1.5 lbs, 1.75 lbs, 2lbs, 2.25lbs, 2.5lbs, 3lbs, 3.2lbs, 4.0 lbs, 5lbs, 5.25lbs, 5.5lbs, 6lbs, 7lbs, 8lbs, 10lbs, 12lbs, 15lbs, 20lbs, 25lbs, 40 lbs, 1lb. 4oz., 1lb. 14oz., 2lb. 8oz., 2116 lbs (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, 6:30 am to 4:30 Pacific Time, seven days a week (NPIC Web site: www.npic.orst.edu). During other times, call the poison control center at 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, and using the toilet.

Environmental Hazards: To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems

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DIRECTIONS FOR USE

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

HOW TO APPLY: Scatter the slug and snail bait granules on the soil around or near the plants to be protected. Do not use kitchen utensils for food uses after pesticide use. Do not place in piles.

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

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

AMOUNT TO APPLY:

0.11 - 0.44 lbs/1000 sq. ft. or 0.5 teaspoons/sq. yd.

[One of the following two directions for use may be used:

For use on vegetables, fruits including citrus, berries, herbs, outdoor ornamentals, greenhouses and lawns.

OR

Vegetables

Use the bait to protect any vegetables from slug and snail damage, including (but not limited to): artichokes, asparagus, beans, beets, blackeyed peas, broccoli, Brussels sprouts, cabbage, cantaloupe, carrots, cauliflower, celery, corn, cucumbers, eggplants, endive, garlic, ginseng, lettuce, mustard greens, okra, onions, parsnips, peas, peppers, potatoes, radishes, rutabagas, spinach, squash, sweet potatoes, Swiss chard, tomatoes and turnips. Scatter the bait around the perimeter of the vegetable plot to provide a protective "barrier" for slugs and snails entering the garden plot. If slugs or snails are inside the rows, then scatter the bait on the soil around the base of the plants and between the rows.

Fruits Including Citrus

Use the bait to protect fruits from slugs and snails, including (but not limited to): apples, avocados, apricots, cherries, grapes, melons, peaches, plums, citrus, pears. For seedlings spread the bait around the base of the stem. Apply in a 6 inch circular band around the base of the plants to be protected. For older trees, spread the bait around the base of the tree to intercept slugs and snails traveling to the trunk. Apply the bait using standard fertilizer granular spreaders.

Berries

Use the bait to protect berries from slugs and snails, including (but not limited to): strawberries, blackberries, blueberries, boysenberries, loganberries, marionberries and raspberries. Spread the bait around the perimeter of the plot to intercept slugs and snails migrating toward the berries. Scatter by hand or with granular spreaders. If slugs and snails are already in the plots, then carefully spread bait between the furrows near the base of the plants. For small plots, treat around the base of the plants to be protected. Do not spread over the entire area but apply selectively.

Herbs

Use the bait to protect any herbs from slug and snail damage, including (but not limited to): arugula, angelica, basil, chervil, dill, hops, marjoram, mint, oregano, sage, thyme. Scatter the bait around the perimeter of the area, to provide a protective "barrier" for slugs and snails entering the garden plot. If slugs or snails are inside the rows, then scatter the bait on the soil around the base of the plants and between the rows.

Outdoor Ornamentals

Scatter bait in a 6 inch circular band around the base of the plants to be protected. If plants are next to a grassy area, spread the bait between the ornamentals and the grass. Slugs and snails traveling to the plants will encounter the bait before reaching the plant.

Greenhouses

Where slugs or snails are a problem in greenhouses, scatter the bait in the plant pots of plants being damaged or around pots on greenhouse benches.

Lawns

When slugs or snails are detected, scatter the bait on the lawn by hand or with a granular spreader.]

STORAGE AND DISPOSAL

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

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

CONTAINER DISPOSAL:

Nonrefillable container.

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

or

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

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

- Slug and Snail Killer
- Slug and Snail Bait
- Quick Facts
- Product Facts
 - What it does: Kills snails and slugs
 - Where to Use: For use around vegetables, fruit trees, citrus, berries, herbs, ornamentals, shrubs, flowers, trees, lawns, gardens and in greenhouses
- Read the Label First!
- NOTE:** This package is sold by weight. Contents may have settled during shipment.
- US Patent number 5,437,870.

- This container is made from XX% recycled materials.
- Easy-pour, waterproof package.
- Convenient. Easy to Use. Requires no mixing, spraying or special applicators.
- No mixing required.
- Easily applied from (convenient) re-sealable package.
- The highly compressed granules (pellets) are easy to use, clean to handle and economical.
- Patented technology.
- Patented snail & (and) slug killer.
- Unique, patented formula.
- Easy-to-use (ready-to-use) (RTU) granular (pellet) formulation.
- Easy to apply granules.
- Easy to use small (short) pellets.
- Small (short) pellets for even coverage.
- Shorts
- Plant protection will be observed in the decrease in plant damage
- Kills snails & (and) slugs.
- Treats (will treat) up to x,xxx sq. ft.
- (1 lb) treats up to 9090 sq. ft
- (2 lb) treats up to 18180 sq. ft.
- (2.5 lbs) treats up to 22725 sq. ft.
- Remains effective after rain or sprinkling.
- Long-lasting: resistant to rain and watering
- Not easily dissipated by water
- Rain and irrigation resistant
- Rainfast formula! All weather formula
- Moisture resistant package (bag, box, pail, as appropriate)
- Effective under wet and dry conditions.
- New Formula
- May be used in areas where there are dogs, cats & (and) birds
- Proven snail & (and) slug killer (kill, control).
- Protects plants from slugs and snails.
- Stops plant damage from foraging slugs and snails.
- Protects plants from slug and snail damage.
- (Kills) (Controls) slugs and snails.
- Offers immediate protection to plants, even though slugs and snails may remain in the area
- After feeding, slugs and snails stop feeding and crawl to secluded places to die
- SATISFACTION GUARANTEED.
- Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.
- Can be used in vegetable gardens.
- Can be used up to and including day of harvest.
- For use around vegetables, fruit trees, citrus, berries, ornamentals, shrubs, flowers, trees, lawns, gardens, and in greenhouses.
- For use on turf, ornamentals, vegetables and fruit

- Effective at controlling snails and slugs commonly found in and around homes, lawns, ornamentals, fruit and vegetable gardens
- Gardeners may re-enter lawn & garden immediately after bait is applied
- Use around flowers, gardens, and fruit trees.
- For home and garden use.
- Can be used around domestic animals (pets) and wildlife.
- Read Entire Container Label Before Using This Product.
- The active ingredient in this product is exempt from the requirement for a tolerance when used as a molluscicide in or on all food commodities.
- For broadcast application standard broadcast applicators may be used, such as (but not limited to): Cyclone.
- For row application standard granular spreaders may be used, such as (but not limited to): Gandy and Clampco.
- Unconditionally guaranteed by [insert name of supplemental registrant].
- Baits and Kills
- Stops slugs and snails from feeding
- For household home garden use.
- The slugs and snails controlled by this product include (but are not limited to): *Deroceras reticulatum* (Gray field slug), *Deroceras laeve* (Marsh slug or meadow slug), *Arion subfuscus* (Dusky slug), *Arion circumscriptus* (Brown-banded Arion), *Arion hortensis* (Black field slug or Garden slug), *Arion rufus* (Large red slug), *Arion ater* (Large black slug), *Limax flavus* (Yellow cellar slug or yellow garden slug), *Limax tenellus* (Slender slug), *Ariolimax columbianus* (Banana slug), *Helix* spp. (snail species), *Helicella* spp. (snail species), and *Cepaea* spp. (snail species)
- Kills a wide variety of slugs and snails
- Effective against a wide variety of slugs and snails.
- No slime trails
- No messy cleanup
- Dead snails, no slime trails
- WHEN TO APPLY: Apply the bait during the morning or evening, as slugs and snails travel and feed mostly by night or early morning.
- When to apply: Apply when slugs and snails are active. This will usually mean treating during periods when evening frost is no longer likely. Check under rocks and other horizontal surfaces in contact with most soil for snail and slug activity in the early morning. Even a presence of 1-2 slugs per square yard can indicate a serious problem. Snails and slugs feed almost entirely at night, so the best time to treat is late afternoon or just before dusk and when temperatures are cooler. Try not to irrigate for 48 hours after application. Regular application will diminish the recurrence of slug or snail infestation.
- Just one slug or snail can hatch up to 40 or 80 eggs respectively, every 4-8 weeks.
- Where to apply: apply at the edge of the garden or area to be protected to reduce the chances of reinfestation from adjacent areas. Slugs and snails migrate toward better feeding and sheltering conditions, preferring moist shady environments with tender, succulent vegetation close to the ground. Use broadcast-type spreader for large areas. Also treat areas where these pests shelter during the day- damp places, around mulch, shady flower gardens, rock formations, ivy patches, hedges, vegetable plants, dichondra, lawns and other ground covers.

- Protects Flowers
- Protects Flower Quality
- Protects Sensitive Landscapes
- Rain-Proof Formula
- Guaranteed (Results)
- Protecting your garden and landscapes from snail and slug damage has never been easier!
- Easy (to use) Shaker Applicator
- Easy (to use) (Pour) Spout
- Ferroxx is a (registered) trademark of (W.)Neudorff (GmbH KG)
- Made with Ferroxx®(TM)
- www.neudorff.com
- Manufactured under a license of W. Neudorff GmbH KG, Germany.



-May be used up to and including day of harvest.

GENERAL INFORMATION (WHY SLUG AND SNAIL BAIT IS EFFECTIVE)

This product has a non-toxic mode of action and can be used in areas where pet and wildlife protection is a concern. When slugs and snails ingest the bait, they stop feeding and crawl back to their shelter where they eventually die. It remains effective under varying weather and environmental conditions.

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

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

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 distributor's telephone number and website address may be used]

13/21

SUBLABEL B: Commercial Agriculture Use

FERROXX

Active Ingredient:	By weight
Sodium Ferric EDTA.....	5.0%
Other Ingredients:	95.0%
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Registration #67702-33

EPA Establishment #

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

FIRST AID
If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
Hotline Number
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the National Pesticide Information Center at 1-800-858-7378 seven days a week, 6:30 am to 4:30 Pacific Time (NPIC Web site: www.npic.orst.edu)

PRECAUTIONARY STATEMENTS

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

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

User Safety Recommendations

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

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

DIRECTIONS FOR USE

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

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

AGRICULTURAL USE REQUIREMENTS

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

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

NON-AGRICULTURAL USE REQUIREMENTS

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

There are no restrictions.

HOW TO APPLY: Scatter the slug and snail bait granules on the soil around or near the plants to be protected. Do not apply bait directly to soft-leaved plants. May be applied with other baits or fertilizers of similar particle size. Apply the higher rates if the infestation is severe or if the area is heavily watered or after long periods of heavy rain. Reapply as the bait is consumed or at least every two weeks.

Do not place in piles. See specific directions for different plant types and for inside greenhouses.

WHERE TO APPLY: Treat all likely areas of infestation, especially around perimeters of plots where these pests travel into plant areas from daytime refuge sites. Slugs/snails favor damp places and in weeds or ditches around field margins. Other favorite areas are flower gardens, rockeries, hedges, dichondra lawns, citrus groves, ivy patches, and other ground cover where they obtain shelter by day.

AMOUNT TO APPLY:

5 - 20 lbs/acre or 0.11 - 0.44 lbs/1000 sq. ft.

0.5 teaspoons/sq. yd.

Use higher rates when slug/snail infestations are high.

Vegetables

Use the bait to protect any vegetables from slug and snail damage, including (but not limited to): artichokes, asparagus, beans, beets, blackeyed peas, broccoli, Brussels sprouts, cabbage, cantaloupe, carrots, cauliflower, celery, corn, cucumbers, eggplants, endive, garlic, ginseng, lettuce, mustard greens, okra, onions, parsnips, peas, peppers, potatoes, radishes, rutabagas, spinach, squash, sweet potatoes, Swiss chard, tomatoes and turnips. Scatter the bait around the perimeter of the vegetable plantings to provide a protective "barrier" for slugs and snails entering the vegetable plantings. If slugs or snails are inside the rows, then scatter the bait on the soil around the plants and between the rows.

Fruits Including Citrus

Use the bait to protect fruits from slugs and snails, including (but not limited to): apples, avocados, apricots, cherries, grapes, melons, peaches, plums, nectarines, citrus, pears. For seedlings spread the bait around the base of the stem. Apply in a 6 inch circular band around the base of the plants to be protected. For older trees, spread the bait around the base of the trees to intercept slugs and snails traveling to the trunk. Apply the bait in orchards, using standard granular spreaders methods.

Berries

Use the bait to protect berries from slugs and snails, including (but not limited to): strawberries, blackberries, blueberries, boysenberries, loganberries, marionberries, and raspberries. Spread the bait around the perimeter of the plot to intercept slugs and snails migrating toward the berries. Scatter by hand or with granular spreaders. If slugs and snails are already in the plots, then carefully spread bait between the furrows near the base of the plants. For small plots, treat around the base of the plants to be protected. Do not spread over the entire area but apply selectively.

Herbs

Use the bait to protect any herbs from slug and snail damage, including (but not limited to): arugula, angelica, basil, chervil, dill, hops, marjoram, mint, oregano, sage, thyme. Scatter the bait around the perimeter of the area to provide a protective "barrier" for slugs and snails entering the plot or field. If slugs or snails are inside the rows, then scatter the bait on the soil around the base of the plants and between the rows.

Field Crops

Use the bait to protect field and seed crops from slugs and snails, including: barley, beans, canola, field corn, sweet corn, soybeans, sugarbeets, sugar cane, tobacco, asparagus, beets, broccoli, Brussels sprouts, cabbage, carrots, cauliflower, cucumbers, lettuce, oats, onions, peas, peppers, potatoes, radishes, strawberries, tomatoes, and turnips. At the seedling and later stages, apply the bait between the rows and around the perimeter of the field.

Artichokes

Use the bait to protect artichokes from slugs and snails. At the seedling and later stages, apply the bait within the rows and around the perimeter of the field.

Outdoor Ornamentals

Scatter bait in a 6 inch circular band around the base of the plants to be protected. If plants are next to a grassy area, spread the bait between the ornamentals and the grass. Slugs and snails traveling to the plants will encounter the bait before reaching the plant

Greenhouses

Where slugs or snails are a problem in greenhouses, scatter the bait in the plant pots of plants being damaged or around pots on greenhouse benches.

Outdoor Container-Grown Nursery Plants

Where slugs or snails are a problem in outdoor nurseries, scatter the bait in the plant containers.

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

Use the bait on turf and sod for resale, golf courses, lawns and on buffer zones around gardens and agricultural crop areas.

Grass Grown for Seed Production and cereal crops (such as: wheat, barley, oats and rye)

Use the bait on grass grown for seed production and wheat (cereals).

Non-Crop Areas

Use the bait to protect non-crop areas, including: forests, parks, fallow land, barrier strips and buffer zones around agricultural crop areas.

STORAGE AND DISPOSAL
Do not contaminate water, food or feed by storage or disposal.
PESTICIDE STORAGE: Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals.
PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.
CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Completely empty metal drum, plastic bag, box or plastic tote into application equipment. Then dispose of empty metal drum, plastic bag, box or plastic tote in a sanitary landfill, or by incineration, or if allowed by State and local authorities, by burning. If burned, stay out of smoke.

BATCH CODE

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

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

or

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

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

- Slug and Snail Bait
- Slug and Snail Killer
- Agriculture
- Turf and Ornamental
- Product Facts
 - What it does: Kills snails and slugs
 - Where to Use: For use around vegetables, fruit trees, citrus, berries, herbs, ornamentals, shrubs, flowers, trees, lawns, gardens and in greenhouses
- Read the Label First!
- NOTE: This package is sold by weight. Contents may have settled during shipment.
- US Patent number 5,437,870.
- This container is made from XX% recycled materials.
- Moisture resistant package (bag, box, pail, as appropriate)
- The highly compressed granules (pellets) are easy to use, clean to handle and economical.
- Convenient. Easy to Use. Requires no mixing, spraying or special applicators.
- No mixing required.
- Easily applied from (convenient) re-sealable package.
- Patented technology.
- Patented snail & (and) slug killer.
- Unique, patented formula.
- Easy-to-use (ready-to-use) (RTU) granular (pellet) formulation.
- Easy to apply granules.
- Easy to use small (short) pellets
- Small (short) pellets for even coverage.
- Shorts
 - Kills snails & (and) slugs.
 - Plant protection will be observed in the decrease in plant damage
 - Treats (will treat) x,xxx sq. ft. (acres)
 - Effective under wet and dry conditions.
- New Formula
 - May be used in areas where there are dogs, cats & (and) birds
 - Proven snail & (and) slug killer (kill, control).
 - Protects plants from slugs and snails.
 - Stops plant damage from foraging slugs and snails.

- Protects plants from slug and snail damage.
- (Kills) (Controls) slugs and snails.
- Plant protection will be observed in the decrease in plant damage
- Remains effective after rain or sprinkling.
- Long-lasting: resistant to rain and watering
- Not easily dissipated by water
- Rain and irrigation resistant
- Rainfast formula!
- All weather formula
- SATISFACTION GUARANTEED.
- Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.
- Can be used in vegetable gardens.
- Can be used up to and including day of harvest.
- May be used up to and including day of harvest.
- For use around vegetables, fruit trees, citrus, berries, ornamentals, shrubs, flowers, trees, lawns, gardens, and in greenhouses.
- For use on turf, ornamentals, vegetables and fruit
- Effective at controlling snails and slugs commonly found in and around homes, lawns, ornamentals, fruit and vegetable gardens
- Use around flowers, gardens, and fruit trees.
- Can be used around domestic animals (pets) and wildlife.
- Read Entire Container Label Before Using This Product.
- The active ingredient in this product is exempt from the requirement for a tolerance when used as a molluscicide in or on all food commodities.
- For broadcast application standard broadcast applicators may be used, such as (but not limited to): Cyclone.
- For row application standard granular spreaders may be used, such as (but not limited to): Gandy and Clampco.
- Gardeners (workers) may re-enter lawn & garden immediately after bait is applied.
- Unconditionally guaranteed by [insert name of supplemental registrant].
- Baits and Kills
- Stops slugs and snails from feeding
- Offers immediate protection to plants, even though slugs and snails may remain in the area
- After feeding, slugs and snails stop feeding and crawl to secluded places to die
- The slugs and snails controlled by this product include (but are not limited to): *Deroceras reticulatum* (Gray field slug), *Deroceras laeve* (Marsh slug or meadow slug), *Arion subfuscus* (Dusky slug), *Arion circumscriptus* (Brown-banded Arion), *Arion hortensis* (Black field slug or Garden slug), *Arion rufus* (Large red slug), *Arion ater* (Large black slug), *Limax flavus* (Yellow cellar slug or yellow garden slug), *Limax tenellus* (Slender slug), *Ariolimax columbianus* (Banana slug), *Helix* spp. (snail species), *Helicella* spp. (snail species), and *Cepaea* spp. (snail species)
- WHEN TO APPLY: Apply the bait during the morning or evening, as slugs and snails travel and feed mostly by night or early morning.

-When to apply: Apply when slugs and snails are active. This will usually mean treating during periods when evening frost is no longer likely. Check under rocks and other horizontal surfaces in contact with moist soil for snail and slug activity in the early morning. Even a presence of 1-2 slugs per square yard can indicate a serious problem. Snails and slugs feed almost entirely at night, so the best time to treat is late afternoon or just before dusk and when temperatures are cooler. Try not to irrigate for 48 hours after application. Regular application will diminish the recurrence of slug or snail infestation.

-Just one slug or snail can hatch up to 40 or 80 eggs respectively, every 4-8 weeks.

-Where to apply: apply at the edge of the garden or area to be protected to reduce the chances of reinfestation from adjacent areas. Slugs and snails migrate toward better feeding and sheltering conditions, preferring moist shady environments with tender, succulent vegetation close to the ground. Use broadcast-type spreader for large areas. Also treat areas where these pests shelter during the day- damp places, around mulch, shady flower gardens, rock formations, ivy patches, hedges, vegetable plants, dichondra, lawns and other ground covers.

-Rainproof Formula

-Protects Flowers

-Protects Flower Quality

-Protects Sensitive Landscapes

-Kills a wide variety of slugs and snails

-Effective against a wide variety of slugs and snails.

-No slime trails

-No messy cleanup

-Dead snails, no slime trails

- Rain-Proof Formula

- Guaranteed (Results)

- Protecting your garden and landscapes from snail and slug damage has never been easier!

-Easy (to use) Shaker Applicator

-Easy (to use) (Pour) Spout

-Ferroxx is a (registered) trademark of (W.)Neudorff (GmbH KG)

-Made with Ferroxx®(TM)

-www.neudorff.com

-Manufactured under a license of W. Neudorff GmbH KG, Germany.



GENERAL INFORMATION (WHY SLUG AND SNAIL BAIT IS EFFECTIVE)

This product has a non-toxic mode of action and can be used in areas where pet and wildlife protection is a concern. When slugs and snails ingest the bait, they stop feeding and crawl back to their shelter where they eventually die. It remains effective under varying weather and environmental conditions.

The bait is ingested by slugs and snails when they travel from their hiding places to plants. Ingestion, even in small amounts, will cause them to cease feeding. This

physiological effect of the bait gives immediate protection to the plants even though the slugs and snails may remain in the area. After eating the bait, the slugs and snails cease feeding, become less mobile and begin to die within three to six days. Dead slugs and snails may not be visible as they often crawl away to secluded places to die. Plant protection will be observed in the decrease in plant damage.

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

Registrant: W. Neudorff GmbH KG, Postfach 1209, An der Mühle 3,
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[in the alternative, the distributor's telephone number and website address
may be used]