

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

October 5, 2015

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

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – To Add a

Container Size, Revise the Directions for Use, and Revise or Add Optional Statements

Product Name: Ironworxx[™] Slug and Snail Gel Bait

EPA Registration Number: 67702-48 Application Date: April 28, 2015 OPP Decision Number: 504063

Dear Mr. Talarek:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or 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 (1) copy of the final printed labeling before you release this 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 your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the 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 EPA find or if it is brought to our attention that a website contains false

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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 Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Sandra Owusu-Ansah of my team by phone at (703) 347-0350 or via email at owusu-ansah.sandra@epa.gov.

Sincerely,

Andrew Bryceland, Team Leader Biochemical Pesticides Branch Biopesticides and Pollution Prevention Division (7511P) Office of Pesticide Programs

andrew . Buycelow

Enclosure

MASTER LABEL

SUBLABEL A: Home and Garden Use

SUBLABEL B: Commercial Agriculture Use

IRONWORXXTM SLUG AND SNAIL GEL BAIT

Active Ingredient: By weight
Iron phosphate 3.0%
Other Ingredients: 97.0%
Total 100.0%

ACCEPTED

10/05/2015

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2770 2 40

67702-48

KEEP OUT OF REACH OF CHILDREN

EPA Registration No. 67702-48

EPA Establishment No.

Registrant: W. Neudorff GmbH KG An der Muhle 3 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 4 fl. oz., 8 fl. oz., 12 fl. oz., 16 fl. oz., 18 fl. oz. 20 fl. oz., 24 fl. oz., 32 fl. oz., 0.5 gal, 1 gal, 2.5 gal, 200 gal, 211 gal, 227 gal, 250 gal, 257 gal

Commercial Agriculture Use: NET WEIGHT 5 gal, 10 gal, 20 gal, 30 gal, 30 gal, 40 gal, 45 gal, 50 gal, 55 gal, 200 gal, 211 gal, 227 gal, 228 gal, 250 gal, 257 gal

SUBLABEL A: Home and Garden Use

IRONWORXXTM SLUG AND SNAIL GEL BAIT

Active Ingredient:	By weight
Iron phosphate	3.0%
Other Ingredients:	<u>97.0%</u>
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

EPA Registration No. 67702-48
EPA Establishment No. 67702-DEU-1, 67702-DEU-2, 67702-DEU-3, 48498-CA-1, 48498-CA-2

NET WEIGHT 4 fl. oz., 8 fl. oz., 12 fl. oz., 16 fl. oz., 18 fl. oz., 20 fl. oz., 24 fl. oz., 32 fl. oz., 0.5 gal, 1 gal, 2.5 gal, 200 gal, 211 gal, 227 gal, 250 gal, 257 gal

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.

DIRECTIONS FOR USE

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

HOW TO APPLY: Apply ½ inch diameter (dime sized) drops near the base of plants or apply a line (¼ inch width) as a circle around plants to be protected. Do not apply directly to plant foliage. Reapply as the bait is consumed or as needed. Protects plants for up to 2 weeks. Apply ¼ inch drops 1 to 2 inches apart around plants to be protected.

WHEN TO APPLY: Apply this product when first signs of slug damage appear. For best results, apply in the evening, as slugs and snails travel and feed mostly by night or early morning.

WHERE TO APPLY: Treat areas of infestation, especially around the base of plants, between rows and around the perimeter of garden plots as a continuous line or line of drops to provide a 'barrier' against slugs and snails entering the plot. [Optional: 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.]

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

For use around vegetables, nut trees, fruits including citrus, berries, herbs, outdoor ornamentals, residential greenhouses and lawns.

OR

Vegetables

Such as: artichokes, asparagus, beans, beets, black-eyed peas, broccoli, Brussels sprouts, cabbage, cantaloupe, carrots, cauliflower, celery, corn, cucumbers, eggplants, garlic, lettuce, mustard, onions, parsnip, potatoes, peas, peppers, potatoes, pumpkin, radishes, rhubarb, rutabagas, spinach, squash, Swiss chard, tomatoes, and turnips.

Fruits Including Citrus

Such as: apples, nectarine, avocados, apricots, cherries, grapes, melons, oranges, peaches, plums, citrus, and pears.

Berries

Such as: strawberries, blackberries, currant, blueberries, boysenberries, loganberries, and raspberries.

Herbs

Such as: angelica, balm, basil, borage, burnet, chamomile, catnip, chervil, chive, clary, costmary, cilantro, curry, dillweed, horehound, hyssop, lavender, lemongrass, lovage, marigold, nasturtium, parsley, pennyroyal, peppermint, rosemary, rue, sage, savory, spearmint, sweet bay, tansy, tarragon, thyme, wintergreen, woodruff and wormwood.

Outdoor Ornamentals

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

Nut Trees

Such as: almonds, hazelnuts, pecans, and walnuts.

Greenhouses

Apply on residential greenhouse benches, floors and in or around the pots and containers of plants being damaged.

Lawns

Use around lawns as a buffer zone around gardens where the slugs or snails are observed.

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. 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 any 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]."

OR

[The] (insert company name) Guarantee- If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of your purchase price.

OR

The [brand name] promise. Satisfaction guaranteed or your money back! If you apply IronWorxxTM Slug and Snail Gel Bait as directed and are not completely satisfied, send proof of purchase from this package and the original cash register receipt to the address at right (below). We will refund the purchase price you paid.]

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

- -Quick Facts
- -Product Facts
 - -What it does: Kills snails and slugs
 - Where to Use: For use around (vegetables), (nut trees), (fruit trees), (citrus), (berries), (herbs), (ornamentals), (shrubs), (flowers), (trees), (lawns), (gardens) and (in greenhouses)
- -Read the Label First!
- -Shake lightly before use.
- -US Patent number xxxxxxx
- -US Patent number 6,352,706
- -This container is made from XX% recycled materials.
- -Resealable waterproof package.
- -IronWorxxTM Slug and Snail Gel Bait is easy to use, clean to handle and economical.
- -Patented technology
- -Patented snail & (and) slug killer.
- -Unique, patented formula.
- -Easy-to-use (ready-to-use) formulation.
- -Easy to use gel formula
- -Easy to apply gel
- -Kills snails & (and) slugs.
- -(xx oz) Treats (will treat) xxxx (linear)(sq.) feet
- -16 oz treats (will treat) over 30 linear feet
- Slugs and Snails stop feeding immediately
- Effective for up to 2 weeks
- -Squeeze, Apply & Die- Dye free. No artificial colors.
- Easy-to-use squeeze bottle
- -Treats xxx sq. ft.
- -Convenient
- -Hide & Die
- -Remains effective after rain or sprinkling.

- -Proven snail & (and) slug killer (kill) (control).
- -Convenient. Easy-to-use. Requires no mixing, spraying, or special applicators.
- -SATISFACTION GUARANTEED.
- -Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.
- -Can be used in vegetable gardens.
- -For use around (vegetables), (fruit trees), (nut trees), (citrus), (berries), (ornamentals), (shrubs), (flowers), (trees), (lawns), (gardens), and (in greenhouses).
- -For use on (lawns), and around (ornamentals), (vegetables) and (fruit)
- (When used as directed) Can be used around domestic animals (pets) and wildlife.
- -Read Entire Container Label Before Using This Product.
- -Unconditionally guaranteed by [insert name of supplemental registrant].
- -Baits (attracts) and Kills (Slugs and Snails)
- -For household home garden use.
- -The slugs and snails controlled by this product include (but are not limited to): Deroceras reticulatum (Field slug), Deroceras laeve (Smooth slug), Arion subfuscus (Dusky slug), Arion circumscriptus (Gray garden slug), Arion hortensis (Black field slug), Arion rufus (Large red slug), Arion ater (Large black slug), Limax flavus (Spotted garden slug), Limax tenellus (Slender slug), Ariolimax columbianus (Banana slug), Achatina fulica (Giant African land snail), Helix spp., Helicella spp., and Cepaea spp.
- -Kills (effective against) a wide variety of slugs and snails
- -Kills XX species of slugs and snails including *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), *Achatina fulica* (Giant African land snail), *Helix* spp., *Helicella* spp., and *Cepaea* spp.
- Kills all common species of land slugs and snails
- -GIANT AFRICAN LAND SNAIL (Florida): This product can be used to control the Giant African land snail, *Achatina fulica*
- -Effective against the Giant African land snail
- -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) (tube) Applicator
- Kills slugs and snails fast
- -www.neudorff.com
- -Manufactured under [a] license of W. Neudorff GmbH KG, [Germany].



- -For information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the National Pesticide Information Center at 1-800-858-7378. All other inquiries: [subregistrants' email and/or phone number]
- -Questions or comments? Cal 1-XXX-XXX-XXXX or visit our website at [subregistrant's website]
- -May be used up to and including day of harvest.
- -Iron phosphate occurs naturally in soil.
- -Unconsumed bait will degrade and become part of soil
- -Questions, comments (or medical information) X-XXX-XXXX
- -© 20XX Licensed (insert company name). World rights reserved.
- -Manufactured. Distributed by: (insert company name)
- -Made in/Produced in:_____(from US and imported products/parts)
- -Can be used around (domestic animals) (pets) and wildlife
- -Can be used by domestic animal (pet) owners
- -(When used as directed) May be used in areas where there are dogs, cats & (and) birds
- (When used as directed) People and pets can enter the area immediately after product is applied.
- (When used as directed) People and pets can enter the area once product is applied
- Do not over-apply product
- Contains iron phosphate, which is found in soil
- Iron phosphate is a component of soil.
- -Protects vegetable gardens from (slugs) (snails)
- -Protects seedlings and perennials from (slugs) (snails)
- -Protects vegetable gardens
- -Contains iron phosphate, a plant nutrient
- -Contains iron phosphate, which is a fertilizer
- -Iron phosphate is a plant nutrient that occurs in soil and is used as an ingredient in fertilizers.
- -Iron phosphate is a plant nutrient that occurs in soils
- Protects plants from slug and snail damage
- -Unique, iron-based slug and snail Gel Bait.
- -Slugs (snails) eat bait and then hide to die
- Just add (specific amount: (1/2 inch) (dime sized)) drops to the soil near the base of plants
- -One punch technology
- -Snails and slugs eat, hide and die
- -Powerful plant protection
- -Kills slugs and snails. Stops plant feeding.
- -Stops slugs and snails from feeding
- -New concentrated formula
- -Liquid gel bait
- -Won't stain (sidewalks/pots/planters)

GENERAL INFORMATION (WHY IRONWORXXTM SLUG AND SNAIL GEL BAIT IS EFFECTIVE)

This product is a unique blend of an iron phosphate active ingredient, originating from soil, with slug and snail bait additives. The product which is not ingested by snails and slugs will degrade and become a part of the soil.

IronWorxx™ Slug and Snail Gel 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 and die. This physiological effect of the gel gives immediate protection to the plants even though the slugs and snails may remain in the area. After eating the gel, the slugs and snails cease feeding and die. Dead slugs and snails may not be visible as they often crawl away to secluded places to die. Immediate 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, nut trees, citrus and crop plants. IronWorxxTM Slug and Snail Gel Bait can be applied around lawns, the perimeter of plots, or on the soil around any vegetable plants, flowers or fruit trees or bushes to be protected.

Registrant: W. Neudorff GmbH KG, 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]

SUBLABEL B: Commercial Agriculture Use

IRONWORXXTM SLUG AND SNAIL GEL BAIT

Active Ingredient:	By weight
Iron phosphate	3.0%
Other Ingredients:	<u>97.0%</u>
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

EPA Registration No. 67702-48 EPA Establishment No. 67702-DEU-1, 67702-DEU-2, 67702-DEU-3, 48498-CA-1, 48498-CA-2

NET WEIGHT 5 gal, 10 gal, 20 gal, 30 gal, 30 gal, 40 gal, 45 gal, 50 gal, 55 gal, 200 gal, 211 gal, 227 gal, 228 gal, 250 gal, 257 gal

PRECAUTIONARY STATEMENTS

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 four 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: Apply ½ inch diameter (dime sized) drops near the base of plants or apply a line (¼ inch width) as a circle around plants to be protected. Do not apply directly to plant foliage. Reapply as the bait is consumed or as needed. Protects plants for up to 2 weeks. Apply 0.8 to 1.6 gallons per acre.

Under severe infestation pressure, applications can be repeated if required. Apply more heavily if the infestation is severe, if the area is heavily watered or after long periods of heavy rain.

WHEN TO APPLY: Apply this product when first signs of slug damage appear. For best results, apply in the evening, as slugs and snails travel and feed mostly by night or early morning.

WHERE TO APPLY: Treat areas of infestation, especially around the base of plants and around the perimeter of plants as a continuous line or line of drops to provide a 'barrier'

against slugs and snails entering the plot. [Optional: 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.]

Vegetables

Such as: artichokes, asparagus, root and tuber vegetables (beet, carrot, ginger, parsnip, potato, radish, rutabaga, sweet potato, sugar beet, turnip, yam), bulb vegetables (dry bulb onion, garlic, great-headed elephant garlic, green onion, leek, shallot, Welch onion), leafy vegetables (arugula, beet, blackeyed pea, celery, lettuce, pea, rhubarb, spinach, Swiss chard, turnip greens, watercress), 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), legume vegetables (dried beans and peas, soybean, succulent bean), cucurbit vegetables (cantaloupe, cucumber, edible gourd, honeydew, melon, muskmelon, pumpkin, summer squash, watermelon, winter squash), fruiting vegetables (eggplant, ground cherry, okra, pepino, pepper, tomatillo, tomato), and corn (field corn, sweet corn).

Fruits Including Citrus

Such as: bananas, plantain, figs, grapes, tropical tree fruits (avocado, guava, mango, papaya, passion fruit), citrus fruits (grapefruit, lemon, lime, orange, tangerine), pome fruits (apple, crabapple, loquat, mayhaw, pear, quince), and stone fruits (apricot, cherry, nectarine, peach, plum, prune).

Berries

Such as: bushberries (blueberry, currant, elderberry, gooseberry, huckleberry, juneberry, lingonberry, salal), caneberries (blackberry, boysenberry, loganberry, red and black raspberry), cranberries, and strawberries.

Herbs

Such as: angelica, balm, basil, borage, burnet, chamomile, catnip, chervil, chive, clary, costmary, cilantro, curry, dillweed, horehound, hyssop, lavender, lemongrass, lovage, marigold, nasturtium, parsley, pennyroyal, peppermint, rosemary, rue, sage, savory, spearmint, sweet bay, tansy, tarragon, thyme, wintergreen, woodruff and wormwood.

Tree Nuts, Peanuts, and Pistachios

Such as: tree nuts (almond, cashew, chestnut, filbert, macadamia nut, pecan, walnut), peanuts (*not for use in California), and pistachios.

Outdoor Ornamentals

Use around herbaceous and woody plants, greenhouse ornamentals, outdoor container-grown nursery plants, tree farms and plantations (conifers, including Christmas trees, and deciduous trees).

Apply around the base of the plants to be protected or around the perimeter of the plants to intercept snails and slugs traveling to the plot. Where slugs or snails are a problem in outdoor nurseries, apply in or on the plant containers or on the soil around the containers.

Greenhouses

Apply on greenhouse benches, floors and in, on or around the pots and containers of plants being damaged.

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

Use around lawns, athletic fields, recreational areas, commercial turf, sod, golf courses, and grass buffers around gardens, and ornamentals.

Grass Grown for Seed Production, Forage, Sugarcane, and Cereal Crops (such as: wheat, barley, oats and rye)

Use to protect small cereal grains (barley, buckwheat, grain amaranth, milo, oats, pearl millet, proso millet, rye, sorghum, triticale, wheat), grass crops, sugarcane, and grass grown for seed.

Pastures, Rangeland, Forests, Parks, Playgrounds, Cemeteries, Picnic Areas, Roadsides, Campgrounds, Industrial Sites,, Fallow Land, Barrier Strip and Buffer Zones

Use to protect non-crop areas, such as: pastures, rangeland, forests, parks, playgrounds, cemeteries, picnic areas, roadsides, campgrounds, industrial sites, fallow land, barrier strips, and buffer zones.

STORAGE AND DISPOSAL

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

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

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. Completely empty plastic drum or plastic tote into application equipment. Then dispose of plastic bag 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:

- -Read the Label First!
- -Shake lightly before use.
- -US Patent number xxxxxxx
- -US Patent number 6,352,706
- -This container is made from XX% recycled materials.
- -IronWorxxTM Slug and Snail Gel Bait is easy to use, clean to handle and economical.
- -Patented technology. Patented snail & (and) slug killer.
- -Unique, patented formula.
- -Easy-to-use (ready-to-use) gel formulation.
- -Easy to apply gel
- -Kills snails & (and) slugs.
- -(xxx oz) Treats (will treat) x,xxx (linear)(sq) feet
- -16 oz treats (will treat) over 30 linear feet.
- -Treats xxx sq. ft.
- Slugs and Snails stop feeding immediately
- Effective for up to 2 weeks
- Attracts and kills (slugs and snails)
- Dye free. No artificial colors.
- Easy-to-use squeeze bottle

- -Remains effective after rain or sprinkling.
- -Proven snail & (and) slug killer (kill) (control).
- -Convenient. Easy-to-use. Requires no mixing, spraying, or special applicators.
- -SATISFACTION GUARANTEED.
- -Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.
- -For use around (vegetables), (fruit trees), (nuts), (citrus), (berries), (herbs), (ornamentals), (shrubs), (flowers), (trees), (lawns), (gardens), and (in greenhouses).
- -For use on (turf), and around (ornamentals), (vegetables) and (fruit)
- -Iron phosphate occurs naturally in soil.
- -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.
- -Unconditionally guaranteed by [insert name of supplemental registrant].
- -Baits and Kills
- -(When used as directed) May be used in areas where there are dogs, cats & (and) birds
- -(When used as directed) People and pets can enter the area immediately after product is applied.
- (When used as directed) People and pets can enter the area once product is applied
- -The slugs and snails controlled by this product include (but are not limited to):

Deroceras reticulatum (Field slug), Deroceras laeve (Smooth slug), Arion subfuscus (Dusky slug), Arion circumscriptus (Gray garden slug), Arion hortensis (Black field slug), Arion rufus (Large red slug), Arion ater (Large black slug), Limax flavus (Spotted garden slug), Limax tenellus (Slender slug), Ariolimax columbianus (Banana slug), Achatina fulica (Giant African land snail), Helix spp., Helicella spp., and Cepaea spp.

- -Kills a wide variety of slugs and snails
- -Effective against a wide variety of slugs and snails.
- -GIANT AFRICAN LAND SNAIL (Florida): This product can be used to control the Giant African land snail, *Achatina fulica*
- -Effective against the Giant African land snail
- -No slime trails
- -No messy cleanup
- -Dead snails, no slime trails
- -www.neudorff.com
- -Manufactured under a license of W. Neudorff GmbH KG, Germany.



- -May be used up to and including day of harvest.
- Contains iron phosphate, which is found in soil
- -Iron phosphate is a component of soil.
- -Iron phosphate occurs naturally in the soil
- -Protects crops from (slugs) (snails)
- -Protects seedlings and perennials from (slugs) (snails)
- Unconsumed IronWorxx $^{\mathrm{TM}}$ Slug and Snail Gel Bait will degrade and become part of soil

- -Contains iron phosphate, a plant nutrient
- -Contains iron phosphate, which is a fertilizer
- -Iron phosphate is a plant nutrient that occurs in soil and is used as an ingredient in fertilizers.
- -Iron phosphate is a plant nutrient that occurs in soils
- Protects plants from slug and snail damage
- -Unique, iron-based slug and snail Gel Bait.
- -Slugs (snails) eat bait and then hide to die
- Just add (specific amount: (1/2 inch) (dime sized)) drops to the soil near the base of plants
- Protects plants from slug and snail damage
- -Unique, iron-based slug and snail Gel Bait.
- -Slugs (snails) eat bait and then hide to die
- -Final knockout for slugs & snails
- -Final meal for slugs and snails
- -One punch technology
- -Snails and slugs eat, hide and die
- -Powerful plant protection
- -Kills slugs and snails. Stops plant feeding.
- -New concentrated formula
- Liquid gel bait

GENERAL INFORMATION (WHY IRONWORXXTM SLUG AND SNAIL GEL BAIT IS EFFECTIVE)

This product is a unique blend of an iron phosphate active ingredient, originating from soil, with slug and snail bait additives. The product which is not ingested by snails and slugs will degrade and become a part of the soil.

IronWorxx[™] Slug and Snail Gel 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 and die. This physiological effect of the gel gives immediate protection to the plants even though the slugs and snails may remain in the area. After eating the gel, the slugs and snails cease feeding and die. Dead slugs and snails may not be visible as they often crawl away to secluded places to die. Immediate 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, nut trees, citrus and crop plants. IronWorxxTM Slug and Snail Gel Bait can be applied around lawns, the perimeter of plots, or on the soil around any vegetable plants, flowers or fruit trees or bushes to be protected.

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

31860 Emmerthal, Germany

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

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

may be used]