

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

March 19, 2018

Walter G. Talarek W. Neudorff GmbH KG c/o Walter G Talarek, PC 5153 ALLISON MARSHALL DRIVE WARRENTON, VA 20187-8980

Subject: Pesticide Registration Improvement Act (PRIA) Labeling Amendment – Addition of

Aerial Application, Increased Application Rate for Golden Snail, Expanded Crops Listing.

Product Name: IronWorxx 3 Slug and Snail Bait

EPA Registration Number: 67702-49

Application Date: 8/29/17 OPP Decision Number: 532867

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 or misleading statements or

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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 Chris Pfeifer of my team by phone at (703) 308-0031 or via email at pfeifer.chris@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

IronWorxxTM 3 Slug and Snail Bait (ABN: Ferroxx AQ)

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

SUBLABEL A: Home and Garden Use

SUBLABEL B: Commercial Agriculture Use

ACCEPTED

03/19/2018

67702-49

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Registration No. 67702-49

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 1 oz., 13 oz., 20 oz., 26 oz., 30 oz., 0.5 lb., 1 lb., 1.25 lbs., 1.5 lbs., 2 lbs., 2.5 lbs., 3 lbs., 3.2 lbs., 4 lbs., 5 lbs., 5.25 lbs., 5.5 lbs., 6 lbs., 7 lbs., 8 lbs., 10 lbs., 20 lbs., 25 lbs., 40 lbs., 1 lb. 4 oz., 1 lb. 14 oz., 2 lb. 8 oz., 2116 lbs. (960 kg)

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

SUBLABEL A: Home and Garden Use

IronWorxxTM 3 Slug and Snail Bait

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Registration No. 67702-49 EPA Establishment No. 67702-DEU-1, 67702-DEU-2, 67702-DEU-3, 48498-CA-1, 48498-CA-2

NET WEIGHT 1oz, 13oz, 20oz, 26oz, 30oz, 0.5lb, 1 lb, 1.25lbs, 1.5 lbs, 2lbs, 2.5lbs, 3lbs, 3.2lbs, 4lbs, 5lbs, 5.25lbs, 5.5lbs, 6lbs, 7lbs, 8lbs, 10lbs, 20lbs, 25lbs, 40 lbs, 1lb. 4oz., 1lb. 14oz., 2lb. 8oz., 2116 lbs (960 kg)

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 <u>Poison</u> Control Center 1-800-222-1222. [alternately the subregistrant's toll free number can be inserted].]

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.

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 place in piles. Apply more heavily if the infestation is severe, if the area is heavily watered or after long periods of heavy rain. The product works best when soil is moist but with little or no standing water. Do not use kitchen utensils for food uses after pesticide use.

Reapply as the bait is consumed or as needed. See specific directions for different plant types and for inside residential greenhouses.

WHEN TO APPLY: For best results, apply the bait during the evening, as slugs and snails travel and feed mostly by night or early morning.

AMOUNT TO APPLY:

1.5-5.5 oz/1000 sq. ft. (4-15 lbs/acre) or 0.5 teaspoons/sq. yd.

WHERE TO APPLY: Treat areas of infestation, especially around the base of plants, between rows and around the perimeter of the garden plot to provide a protective "barrier" for slugs and snails entering the garden plot. Slugs/snails favor damp places around vegetable plants. 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

Use the bait to protect any vegetables from slug and snail damage, 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. Scatter the bait around the perimeter of the vegetable plot. If slugs or snails are inside the rows, 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, such as: apples, nectarines, avocados, apricots, cherries, grapes, melons, oranges, peaches, plums, citrus, and 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. Apply the bait by hand or using standard fertilizer granular spreaders.

Berries

Use the bait to protect berries from slugs and snails, such as: strawberries, blackberries, currant, blueberries, boysenberries, loganberries, and raspberries. Spread the bait around the perimeter of the plot. 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. Scatter by hand or with granular spreaders.

Herbs

Use the bait to protect herbs from slugs and snails, 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, rosemary, rue, sage, savory, sweet bay, tansy, tarragon, thyme, wintergreen, woodruff and wormwood. Scatter the bait around the perimeter of the herb 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. Scatter the bait around the perimeter of the plot to intercept snails and slugs traveling to the plot. If plants are next to a grassy area, spread the bait between the ornamentals and the grass.

Nut Trees

Use this bait to protect nut trees from slugs and snails, such as: almonds, hazelnuts, pecans, and walnuts. For seedlings spread the bait around the base of the stem. Apply in a 6 inch circular band around the base of the plants or trees to be protected. Apply the bait by hand or using standard fertilizer granular spreaders.

Residential Greenhouses

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

Lawns

Broadcast the bait on lawns or use as a buffer zone around gardens. When slugs or snails are detected, scatter the bait by hand or with a granular spreader 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 3 Slug and Snail 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!
- **-NOTE**: This package is sold by weight. Contents may have settled during shipment.
- -US Patent number 6,352,706
- US Patent number xxxxxxx
- -This container is made from XX% recycled materials.
- -Resealable waterproof package.
- -The highly compressed granules (pellets) are easy to use, clean to handle and economical.
- -Patented technology
- -(Patented) micropellet formula
- Patented snail & (and) slug killer.
- -Unique, patented formula.
- -Easy-to-use (ready-to-use) (RTU) granular (pellet) formulation.
- -Easy to apply granules.
- -Kills snails & (and) slugs (fast)
- -Treats (will treat) x,xxx sq. ft.
- -1 lb treats (will treat) 11,000 sq. ft.
- -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)
- -Read Entire Container Label Before Using This Product.
- -Unconditionally guaranteed by [insert name of supplemental registrant].
- -Baits and Kills (Slugs and Snails)
- -For household home garden use.
- -Can be used around domestic animals (pets) and wildlife.
- -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), Pomacea canaliculata (Goldern Apple Snail), Helix spp., Helicella spp., and Cepaea spp.
- -Effective against (kills) 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
- 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
- -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]
- -Iron phosphate occurs naturally in the soil
- -Unconsumed bait will degrade and become part of soil
- -Exclusive smaller particle size makes it easier for pests to find
- -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)
- -See back (booklet) label for additional first aid
- -This container is made with a minimum X% recycled material
- -May be used up to and including day of harvest.

- Do not over-apply product
- Contains iron phosphate, which is found in soil
- Iron phosphate is a component of soil.
- -Iron phosphate occurs naturally in the soil
- -Protects vegetable gardens from (slugs) (snails)
- -Protects seedlings and perennials from (slugs) (snails)
- Exclusive smaller particle size makes it easier for pests to find
- -Protects vegetable gardens from slugs (and snails)
- -Protects plants for up to four (4) weeks
- -Bait lasts up to four (4) weeks
- Unconsumed bait will degrade and become part of soil
- (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
- -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
- -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.
- -(3.5X) (3.5 times) the coverage of 1% (iron phosphate) bait formula
- -(3X) (3 times) more (active ingredient) (power) in each pellet (when compared to 1% iron phosphate bait)
- -New concentrated formula

GENERAL INFORMATION (WHY IronWorxx 3 Slug and Snail Bait IS EFFECTIVE)

This product contains a unique combination of iron phosphate, which is a plant nutrient that occurs in soils, with slug and snail bait additives. The bait which is not ingested by snails and slugs will degrade and become a part of the soil.

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 and die. 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 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. 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, 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 3 Slug and Snail Bait

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

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Registration No. 67702-49 EPA Establishment No. 67702-DEU-1, 67702-DEU-2, 67702-DEU-3, 48498-CA-1, 48498-CA-2

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 <u>Poison</u> Control Center 1-800-222-1222). [alternately the subregistrant's toll free number can be inserted].]

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.

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.

{The following section is also required when optional aquatic application directions are used} For aquatic uses: Do not apply directly to water to treated, finished drinking water reservoirs or drinking water receptacles when the water is intended for human consumption. 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 bait granules around or over the plants to be protected at the rate of 4-15 lbs per acre (0.09-0.34 lbs per 1000 sq. ft.) and reapply as the bait is consumed or as needed. For heavy pest pressure apply 20-25 lbs per acre. Do not place in piles.

[Optional: Broadcast or Aerial Application: Apply uniformly with appropriate, calibrated equipment within the application rates on this label. Do not apply when weather conditions favor drift from treated areas. Test for phytotoxicity prior to broadcast or aerial application on sensitive soft leaved plants such as leafy greens and herbs, or take precautions to avoid contact with sensitive plant parts.]

[Optional: Aquatic Application:

For the control of aquatic slugs or snails, such as Golden Apple Snail, apply at a rate of 20-44 lbs per acre (0.46-1.0 lbs per 1000 sq. ft.). Broadcast or aerial applications may be made to crops that are flooded intentionally, such a rice and taro. Apply the bait directly to the water in likely areas of infestation. Re-apply if the infestation is severe. Use the higher application rates for larger snails. The water level should be high enough such that the target pests don't estivate.]

WHEN TO APPLY: For best results, apply the bait in the evening, as slugs and snails travel and feed mostly by night or early morning.

WHERE TO APPLY: Treat all likely areas of infestation, especially around the base of plants, between rows and around the perimeter of the plot to provide a protective barrier for slugs and snails entering the field.

Vegetables

Apply bait to protect any vegetables from slug and snail damage, such as:

Artichoke

Asparagus

Root and Tuber Vegetables: beet, carrot, ginger, ginseng, parsnip, potato, radish, rutabaga, sweet potato, sugar beet, taro, turnip, yam

Bulb Vegetables: dry bulb onion, garlic, great-headed elephant garlic, green onion, leek, onion, shallot, Welch onion

Leafy Vegetables and Leaves of Root and Tuber and Legume Vegetables: arugula, beet, blackeyed pea, celery, lettuce, pea, rhubarb, spinach, Swiss chard, turnip greens, watercress

Cole Crops and Brassica Leafy Vegetables: broccoli, broccoli raab, Brussels sprouts, cabbage, canola, cauliflower, cavalo, Chinese broccoli, Chinese cabbage (bok choy), Chinese/napa cabbage, Chinese mustard cabbage (gai choy), collards, kale, kohlrabi

Legumes: beans and peas, soybean

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

Corn: field corn, sweet corn, pop corn

Fruits (Including Citrus) and Nuts

Apply bait to protect fruits and nuts from slugs and snails, such as:

Banana
Plantain
Fig
Grape
Kiwi
Tropical Tree Fruits: avocado, guava, mango, papaya, passion fruit

Citrus Fruits: calamondin, citron, grapefruit, kumquat, lemon, lime, mandarin orange, pummel, tangerine, tangelo

Pome Fruits: apple, crabapple, loquat, mayhaw, pear, quince

Stone Fruits: apricot, cherry, nectarine, peach, plum, prune

Berries: bushberries (blueberry, currant, elderberry, gooseberry, huckleberry, juneberry, ligonberry, salal), caneberries (blackberry, boysenberry, loganberry, red and black raspberry), cranberry, strawberry

Tree Nuts, Peanuts and Pistachios: tree nuts (almond, cashew, chestnut, filbert, macadamia nut, pecan, walnut), peanut (*not for use in CA), pistachio

Herbs

Apply bait to protect herbs from slugs and snails, such as

Herbs: 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

Hops

Apply bait to protect hops from slugs and snails.

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

Apply bait to grass grown for seed production, grass crops, sugarcane, legume forage, including legumes grown for seed production (such as clover and alfalfa), and small cereal grains (such as barley, buckwheat, corn, grain amaranth, milo, oats, pearl millet, proso millet, rice, rye, sorghum, triticale, wheat).

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

Apply bait to lawns, athletic fields, and recreational areas including schools and parks, to commercial turf, sod, and golf courses, and to grass buffers around gardens and ornamentals.

Outdoor Ornamentals

Apply bait to protect herbaceous and woody plants, greenhouse ornamentals, outdoor container-grown nursery plants, tree farms and plantations (conifers, including Christmas trees, and deciduous trees).

Greenhouses

Apply bait to greenhouse benches, floors and in or around the pots and containers.

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 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:

- -Read the Label First!
- **-NOTE**: This package is sold by weight. Contents may have settled during shipment.
- -US Patent number xxxxxxx
- -US Patent number 6,352,706
- -This container is made from XX% recycled materials.
- -The highly compressed granules (pellets) are easy to use, clean to handle and economical.
- -Patented technology. Patented snail & (and) slug killer.
- -(Patented) micropellet formula
- -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 greater coverage.
- -Maximum number of baiting points
- -Shorts
- -Kills snails & (and) slugs (fast)
- -Treats (will treat) x,xxx sq. ft.
- -1 lb treats (will treat) 11,000 sq. ft.
- -Remains effective after rain or sprinkling.
- -Protects plants for up to four (4) weeks
- -Bait lasts up to four (4) weeks
- -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), (nut trees), (citrus), (berries), (herbs),
- (ornamentals), (shrubs), (flowers), (trees), (lawns), (gardens), and (in greenhouses).
- -For use on (turf), and around (ornamentals), (vegetables) and (fruit)
- -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.
- -(Can)(may) be applied by aircraft
- -Unconditionally guaranteed by [insert name of supplemental registrant].
- -Baits and Kills
- -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),

Pomacea canaliculata (Goldern Apple Snail) Achatina fulica (Giant African land snail), Helix spp., Helicella spp., and Cepaea spp.

- -Effective against (kills) 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.neudorffpro.com
- -Manufactured under a license of W. Neudorff GmbH KG, Germany.



- -May (can) be used up to and including day of harvest.
- -(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
- Contains iron phosphate, which is found in soil
- Iron phosphate is a component of soil.
- -Iron phosphate occurs naturally in the soil
- -Protects seedlings and perennials from (slugs) (snails)
- -Protects crops from slugs and snails
- Exclusive smaller particle size makes it easier for pests to find
- Unconsumed 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.
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- -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
- -New concentrated formula

GENERAL INFORMATION (WHY IronWorxx 3 Slug and Snail Bait IS EFFECTIVE)

This product contains a unique combination of iron phosphate, which is a plant nutrient that occurs in soils, with slug and snail bait additives. The bait which is not ingested by snails and slugs will degrade and become a part of the soil.

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 and die. 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 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. 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, 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]