


72155-69

08/08/2005

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	U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division (H7505C) 401 "M" St., S.W. Washington, D.C. 20460	EPA Reg. Number: 72155-69	Date of Issuance: AUG 8 2005
	NOTICE OF PESTICIDE: <u> x </u> Registration <u> </u> Reregistration (under FIFRA, as amended)	Term of Issuance: Conditional	
		Name of Pesticide Product: Imidacloprid 2.15 RBS Insecticide	
Name and Address of Registrant (include ZIP Code): Mr. Charles W. Boyd Bayer Environmental Science P.O. Box 12014, 2 T.W. Alexander Drive Research Triangle Park, NC 27709			
Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.			
On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others. This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A). Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3)(c)(2)(B). 1. Revise the EPA Registration Number to read, "EPA Reg. No. 72155-69"			
Signature of Approving Official: Dani Daniel Insecticide-Rodenticide Branch Registration Division (7505C)		Date: AUG 8 2005	

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2. The following claims are unsubstantiated and therefore, must be removed from the proposed label otherwise, data must be submitted to support these claims.

- Preventative maintenance against roaches
- Keeps roaches out of sight
- Destroys entire nest/colony
- Even attractive to roaches up to 24 months after application
- Stays moist and attractive for months
- Overnight results
- Remove the word "Innovative" from the claims that continues with fast-acting formula that quickly kills roaches
- Starts killing in hours and keeps on killing.

There is no objection to the quick claims based on 24 hour 31-40% mortality for the imidacloprid baits. Further, there is no objection to six months control claim. The following wording should be included everywhere the claim is made on the labeling in order to communicate to the user that the product will only remain efficacious for six months if there is bait still left in the station.

- "Up to six 6 months protection or until bait is fully consumed, and even attractive to roaches up to 6 months or until bait is fully consumed."

3. The Agency does not allow "Guaranteed" claims unless such claims are qualified with further information in the same location. Therefore, delete the claims from the labeling, or add a qualifying statement to these claims, such as "...or your money back

- Guaranteed to kill roaches
- Guaranteed day and night roach control
- Guaranteed to rid your home of roaches
- Guaranteed to protect your home from roaches
- Guaranteed to solve your roach problem

4. Submit two (2) copies of your final printed labeling before you release the product for shipment.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this notice, please contact me at (703) 305-5409.

Enclosure :

[FRONT PANEL]

Imidacloprid 2.15 RBS Insecticide

READY-TO-USE

- Effective performance
- The lethal roach killer
- Kills roaches fast before they multiply
- Provides long term control
- Continuous action for [a]round the clock protection
- Works every minute of every hour of every day
- Works on roaches day and night
- Works continuously, [24 hours a day,] [7 days a week] [24/7]
- Works day after day/ works day and night
- Works on roaches while you sleep
- Works on roaches while you are away
- Kills/stops/destroys roaches before they become a problem
- ~~Preventative maintenance against roaches~~
- Protects – or – defends your home against roaches
- ~~Keeps roaches out of sight~~
- Protect your home from roaches
- Rid[s] your home from roaches
- Gets rid of roaches [in your home]
- ~~Destroys roach nest/colony~~
- Easy to hide station[s]
- Hide the bait from everything but the roaches
- Effectively kills roaches without a trace – no fumes, no mess, no odor
- Hands off way to get rid of roaches
- Easy to use, nothing to activate
- The clean way to kill roaches, no clean-up
- Treat your roaches to their last meal
- ~~Even attractive to roaches up to 24 months after application~~
- Stays moist and attractive for months
- RoachF food and water source
- Easy to use
- ~~Overnight Results~~
- Keeps working under different heat and moisture conditions
- Very attractive to roaches, so they die fast
- Kills roaches hiding in cracks, crevices, cabinets, and & other areas.
- Kills the roaches where they hide/breed/live
- Kills roaches where you can't find them
- Kills roaches so you don't see them
- Kills roaches you don't see
- Kills roaches you see and (even) those you don't [for complete protection]
- Ideal for kitchen use
- Kills all major types of small roaches
- Easy to apply
- Stays in place
- Stays where you put it
- Easy to clean-up
- No odor / No mess
- No fumes or vapor
- Non-oily
- ~~Fast-acting~~, fast-acting – or – fast-action formula that quickly kills roaches
- Kills roaches quickly
- [Delivers] fast killing results
- ~~Starts killing in 12 hours and keeps on killing~~
- Quick kill formula
- Special formula
- Fast action – or – acting formula
- Easy to use – no odor/ no mess
- Even controls hidden cockroaches
- Kills small roaches
- Guaranteed to kill roaches
- Guaranteed day and night roach control
- Guaranteed to rid your home of roaches
- Guaranteed to protect your home from roaches
- Guaranteed to solve your roach problem
- Patented formula – or – ingredient
- Contains the active ingredient in Merit®

ACTIVE INGREDIENT:

Imidacloprid 2.15%

OTHER INGREDIENT:

..... 97.85%

Net Weight: ___ grams

KEEP OUT OF REACH OF CHILDREN**CAUTION**

See back panel for precautionary statements

ACCEPTED
with COMMENTS
In EPA Letter Dated:

AUG 8 2005


Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.
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[BACK PANEL]

Imidacloprid 2.15 RB Insecticide provides a better way to control household roaches. This easy-to-use stations immediately attracts hidden roaches and keeps working up to 12 months, or until the bait is fully consumed – without any odor or oily mess. Controlling roaches in and around your home has never been easier.

READ THE LABEL FIRST!

Quick Facts	
<ul style="list-style-type: none"> • Very attractive to roaches so they die fast! • Dual Action - Starts working immediately and remains attractive to roaches for up to 12 months* • Kills roaches in cracks, crevices, cabinets, and wall voids • Easy to use – no odor / no mess 	
KILLS	Small Cockroaches, including German cockroaches.
WHERE TO USE	Areas cockroaches seek food, water, or shelter. Areas cockroaches travel. For example, Kitchens, Bathrooms, Laundry rooms, Basements, Garages, Outdoor areas.
WHEN TO USE	When cockroaches are present
	For questions or comments, call toll-free 1-877 BayerAG (1-877-229-3724) or visit us on-line at www.BayerAdvanced.com

* Or until bait is fully consumed.

ACTIVE INGREDIENT:

Imidacloprid 2.15%

OTHER INGREDIENT: 97.85%
100%

EPA Reg. No. 72155-XX

EPA Est. No. XXXX-AA-XX


PRECAUTIONARY STATEMENTS
Hazards to Humans and Domestic Animals

CAUTION

- Causes moderate eye irritation.
- Avoid contact with eyes, skin or clothing
- Wash thoroughly with soap and water after handling and before eating, drinking or using tobacco.

First Aid + neonicotinyl insecticide	
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 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.
If swallowed	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
NOTE: Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may contact 877-229-3763 for emergency medical treatment information. Active Ingredient: 2.15% Imidacloprid [CAS # 138261-41-3]	

DIRECTIONS FOR USE	
It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For best results, read and follow all label directions.	
HOW IMIDACLOPRID 2.15 RB INSECTICIDE WORKS	<ul style="list-style-type: none"> • This bait was specifically formulated to be both a food and water source with extra long attractiveness. It contains a low level of insecticide which cockroaches cannot detect.
HOW TO USE	<ul style="list-style-type: none"> • Use all stations in package. Break stations away from plastic frame. • Place stations where you see or have seen roaches. Use diagram as a guide. (graphic) • Place stations so they are touching walls or corners. Use enclosed stickers when placing on upright surfaces.
WHERE TO USE	<ul style="list-style-type: none"> • Kitchens, bathrooms, laundry rooms, basements, garages. And other likely hiding places.
FOR BEST RESULTS	<ul style="list-style-type: none"> • Heavily infested areas may require additional stations, or consider using this product in conjunction with Imidacloprid 2.15 RB Insecticide. • Do not use sprays around stations. The sprays may repel roaches from the baited areas. • Replace all stations every 6 months, or sooner if roaches return – This likely means that the bait has been fully consumed. • For additional information, please visit bayer advanced.com.
ADDITIONAL INFORMATION	<ul style="list-style-type: none"> • Results may be affected by the number of roaches, the cleanliness of the area, and the use of other roach control measures throughout the structure.

Storage and Disposal	
Do not contaminate water, food, or feed by storage or disposal.	
STORAGE CONDITIONS:	Store in original container in a cool, dry place, out of the reach of children, preferably a locked storage cabinet.
DISPOSAL 	<ul style="list-style-type: none"> • If Empty: Do not reuse this container. Place in trash or offer for recycling if available. • If partly filled: Call your local solid waste agency or call 1-877-229-3724 for disposal instructions. Never place unused product down any indoor or outdoor drain.

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NOTICE

Research and testing has determined that the "Directions for Use" are appropriate for the proper use of Imidacloprid 2.15 RB under expected conditions. The Buyer assumes responsibility for lack of performance or safety if not used according to the directions.

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

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of liability before using this product.

If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS: The directions for use of this product are believed to be adequate and should be followed carefully. However, because of manner of use and other factors beyond Bayer Environmental Science's control it is impossible for Bayer Environmental Science to eliminate all risks associated with the use of this product. As a result, crop injury or ineffectiveness is always possible. All such risks shall be assumed by the user or buyer.

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Bayer Environmental Science

A Business Group of Bayer CropScience LP

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Imidacloprid 2.15 RBS (MASTER) Approved 01/24/05, Notifi 08/02/05