

72155-70

6-9-2006

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

JUN 9 2006

Mr. Charles W. Boyd  
Bayer Advanced  
2. T.W. Alexander Drive  
Research Triangle Park, NC 27709

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Subject: Additional Claims on Label  
Imidacloprid 2.15 RB Insecticide  
EPA Reg. No. 72155-70  
Your Submission date, March 3, 2006

Dear Mr. Boyd:

The labeling referred to above, submitted in connection with registration under the Federal insecticide, and Rodenticide Act as amended is acceptable provided you make the following claim changes.

The efficacy review team does not agree that the data submitted June 28, 2000 support the proposed two year/twenty-four month residual claims. To obtain claims in the future, two-year field trails must be completed following the criteria described in "**Product Performance Test Guidelines OPPTS 8.10.3500 Premises Treatments**". The submitted studies should be based upon pre-and post-application counts of cockroaches and the degree of sanitation must be recorded for all locations. The following recommendations apply:

1. The following residual claims are not supported and must be deleted from the label:
  - "Up to 24 months protection (or until bait is fully consumed)"
  - "Up to 2 years protection (or until bait is fully consumed)"
  - Even attractive to roaches up to 24 months (2 years) after application"
  - Bait breakthrough/breakthru -attractive up to 12 months"
  - Begins working immediately and keeps working for up to 12 months".
2. The statement "This easy-to-use formula immediately attracts hidden roaches and keeps working up to 24 months, or until the bait is fully consumed - without any odor or oily mess", located on the back panel must be rephrased to read as follows: "This easy-to-use formula quickly attracts hidden roaches - without any odor or oily mess."



Recycled/Recyclable  
Printed with Soy/Canola Ink on paper that  
contains at least 50% recycled fiber

3. The following "protection" claims must be deleted:
  - "Protects – or- defends your home against roaches"
  - "Protect your home from roaches"
  - Enough to protect an entire house".
4. The claim "For a roach free home" must be deleted because it implies 100% control.
5. The claim "keeps working under different heat and moisture conditions" must be deleted or have a range of both temperature and moisture conditions by which the product is still efficacious.
6. The statement "Dual Action Gel – Starts working immediately and remains attractive to roaches for up to 24 months\*" located within the **Quick Facts** section of the label must be rephrased "Dual Action Gel – Starts working quickly".
7. The terms dishwashers, stoves, bathtubs, laundry tubs, washing machines, and water pipes located within the **Where to Use** section of the label are followed by an asterisk. All asterisks must be deleted or a footnote must be included on the label explaining why they are there.
8. The terms "rid and clean" are too broad and misleading. Delete each of the following label claims:
  - Rid[s] your home from roaches"
  - "Gets rid of roaches [in your home]
  - "Clean, white gel".
9. Under the label section **For Best Results**, delete the statement "*for severe infestations consider using this product in conjunction with Imidacloprid 2.15 RBS Insecticide.*" Imidacloprid 2.5 Insecticide has been found to be efficacious as a stand along pesticide, and therefore should not be advertising the use of additional pesticides.

A stamped copy is enclosed for your records. Submit two (2) copies of your final printed labeling before you release the product for shipment. If there are questions, call me at 703 305-5409.

Sincerely,



Dani Daniel  
Insecticide-Rodenticide Branch  
Registration Division 7505P

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ACCEPTED  
with COMMENTS  
In EPA Letter Dated

JUN 9 2006

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
72155-70

[FRONT PANEL]

# Imidacloprid 2.15 RB Insecticide

## READY-TO-USE

- Effective performance
- The lethal roach killer
- Kills roaches fast before they multiply
- Provides long term control
- Controls roaches at their source
- Kills the source of the roach problem
- 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
- Protect your home from roaches
- Rid[s] your home from roaches
- Gets rid of roaches [in your home]
- For a roach free home
- Treat your roaches to their last meal
- Bait breakthrough/breakthru – attractive up to 12 months
- Stays moist and attractive for months
- RoachF food and water source
- Easy to use
- Begins working immediately and keeps working for up to 12 months
- 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
- Ideal for kitchen use
- Kills roaches weather they eat the bait or share it.
- Kills all major types of roaches
- Easy to apply
- Stays in place
- Stays where you put it
- For hard to reach places such as cracks and crevices
- Easy to clean-up
- No odor / No mess
- No fumes or vapor
- Non-oily
- Innovative, fast-acting – or – fast-action formula that quickly kills roaches
- Kills roaches quickly
- Starts killing roaches in hours
- [Delivers] fast killing results
- Starts killing in hours and keeps on killing
- Quick kill formula
- Fast action – or – acting formula
- Dual action – attracts and kills
- Dual action formula– attracts and kills
- Double action – attracts and kills
- Double action formula– attracts and kills
- 2-in-1 formula – attracts and kills
- Clean, white gel.
- No unsightly brown gel/residue (color)
- Enough to protect an entire house
- Even controls hidden cockroaches
- Kills large and small roaches
- Kills all common roaches
- Patented formula – or - ingredient
- Contains the active ingredient in Merit®
- Up to 24 months protection (or until bait is fully consumed)
- Up to 2 years protection (or until bait is fully consumed)
- Even attractive to roaches up to 24 months (2 years) after application.

### 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

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[BACK PANEL]

Imidacloprid 2.15 RB Insecticide provides a better way to control household roaches. This easy-to-use formula immediately attracts hidden roaches and keeps working up to 24 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!**

<b>Quick Facts</b>	
<ul style="list-style-type: none"> <li>• Very attractive to roaches so they die fast!</li> <li>• Dual Action Gel - Starts working immediately and remains attractive to roaches for up to 24 months*</li> <li>• Kills roaches in cracks, crevices, cabinets, and wall voids</li> <li>• Easy to apply – no odor / no mess</li> </ul>	
<b>KILLS</b>	Cockroaches, including German, American, Smokybrown, Oriental and other species
<b>WHERE TO USE</b>	Areas cockroaches seek food, water, or shelter. Areas cockroaches travel. For example, Kitchens, Bathrooms, Laundry rooms, Basements, Garages, Outdoor areas.
<b>WHEN TO USE</b>	When cockroaches are present
	For questions or comments, call toll-free 1-877 BayerAG (1-877-229-3724) or visit us on-line at <a href="http://www.BayerAdvanced.com">www.BayerAdvanced.com</a>

\* Or until bait is fully consumed.

**ACTIVE INGREDIENT:**

Imidacloprid ..... 2.15%

**OTHER INGREDIENT:** ..... 97.85%  
100.00%

EPA Reg. No. 72155-70

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

<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advise.</li> </ul>
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call a poison control center or doctor immediately for treatment advice</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>


**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 # 13826,-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.

<p><b>BEFORE YOU USE</b></p> <p>Read and follow these directions when using:</p>	<ul style="list-style-type: none"> <li>• Apply only to areas not easily accessible to children and pets.</li> <li>• Avoid applying gel to fabric or carpeting, as it may stain some materials.</li> <li>• Do not apply in or on electrical equipment due to the possibility of shock.</li> <li>• Gel cleans up easily with damp paper towel while still wet, or scrap away with putty knife once dry. Discard the clean-up debris.</li> </ul>
<p><b>WHERE TO USE</b></p>	<ul style="list-style-type: none"> <li>• Kitchens - Cupboards, Dishwashers*, Garbage Cans, Refrigerators*, Stoves*.</li> <li>• Bathrooms - Bathtubs*, Garbage Cans</li> <li>• Laundry Rooms - Drains, Laundry Tubs*, Washing Machines*</li> <li>• Basements, Garages, Outdoor Areas - Drains, Garbage Cans, Laundry Tubs*, Manholes, Pipe Collars, Sewers, Washing Machines*, Water Pipes*</li> <li>• <i>General - Cabinets, Closets, Counters, Cracks, Crevices, Shelving, Sinks</i></li> </ul>
<p><b>HOW MUCH TO APPLY</b></p>	<ul style="list-style-type: none"> <li>• Spot Treatment: 1 – 2 spots per square yard, each spot ¼" across.</li> <li>• Crack and Crevice Treatment: Squeeze a small amount into crack or crevice.</li> </ul>
<p><b>HOW TO APPLY</b></p>	<ul style="list-style-type: none"> <li>• Remove cap from tip, touch tip to surface and depress plunger.</li> </ul>
<p><b>FOR BEST RESULTS</b></p>	<ul style="list-style-type: none"> <li>• Numerous, smaller bait placements will provide faster more effective control than fewer larger placements.</li> <li>• For thorough control, use entire tube at one time.</li> <li>• Gel should be applied to clean, dry surfaces.</li> <li>• If bait is completely eaten, reapply more to the same site since additional roaches will be attracted by the secretions and droppings left by the earlier cockroaches.</li> <li>• Do not apply roach baits to areas recently sprayed with insecticides and do not spray insecticides over these baits. The spray insecticides may repel roaches from the baited area.</li> <li>• For severe infestations consider using this product in conjunction with <b>Imidacloprid 2.15 RBS Insecticide</b>.</li> <li>• For additional information on proper placement and sustainable roach control, please visit <a href="http://bayeradvanced.com">bayeradvanced.com</a>.</li> </ul>
<p><b>HOW IMIDACLOPRID 2.15 RB INSECTICIDE WORKS</b></p>	<ul style="list-style-type: none"> <li>• 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.</li> </ul>

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<b>Storage and Disposal</b> 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"><li>• <b>If Empty:</b> Do not reuse this container. Place in trash or offer for recycling if available.</li><li>• <b>If partly filled:</b> 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.</li></ul>

**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.

**D - 9802 092004**

*Bayer Advanced*

A Business Unit of Bayer CropScience LP  
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Research Triangle Park, North Carolina 27709

Imidacloprid 2.15 RB (MASTER) Approved 09/20/04, Notification 02/28/05