

OCT 24 2005

INNOVATIVE PEST CONTROL PRODUCTS
PO BOX 880216
BOCA RATON FL 33488-0216

Dear Ms Warkentien:

Subject: Label Revisions/Efficacy Review
EPA Registration No. 73766-2
Product Name: GOURMET ANT BAIT
Application Date: May 6, 2004

The Efficacy study referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act submitted May 6, 2005 (MRID #s 465560-01, 465424-02, and 465424-03 have been evaluated/reviewed with comments and recommendations. A copy of the review prepared by the Entomologist Mr. Mark Suarez dated October 18, 2005 has been enclosed for your convenience.

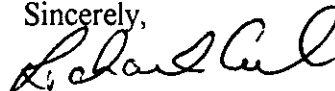
1) Your label has been accepted subject to comment listed below:

Replace all references to roaches on the label with "German Cockroaches".

Enclosed is a copy of your label stamped "Accepted with Comments". Submit four (4) copies of the final printed labeling before you release the product for shipment.

To expedite handling please, return a copy of the letter with four (4) copies of your finished labeling for review. If you have any questions regarding the Efficacy review, you may contact Mr. Suarez @ (703-3305-0120) any questions regarding this letter contact Ms. Pat Quarles @ 703-305-6876.

Sincerely,



Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division 7505

enclosures

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if swallowed. Causes eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling

FIRST AID

If inhaled	-Move person to fresh air. -If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible -Call a poison control center or doctor for further advice.
If on skin or clothing	-Rinse skin with plenty of water for 15-20 minutes. -Take off contaminated clothing. -Call poison control center or doctor for additional treatment advice.
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.
If swallowed	-Call 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.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-483-4997 for emergency medical treatment information

ENVIRONMENTAL HAZARDS

Do not apply directly to water.

ACCEPTED
with COMMENTS
In EPA Letter Dated:

OCT 24 2005

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

13266-2



No Mess - No Ants
Use Indoors or Outdoors

Gourmet Ant Bait

Honeydew Formula With

UNI-TRACT II™

UNI-TRACT II™ is an insect attractant
proven to enhance bait acceptance by a
variety of sweet and protein feeding ants and
german cockroaches roaches.

Active Ingredient:

Disodium Octaborate Tetrahydrate

1%

Inert Ingredients:

Total

99%
100%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

Net Contents: __ FLUID OZ.

MANUFACTURED BY:

INNOVATIVE PEST CONTROL PRODUCTS
Boca Raton, Florida 33488 USA

EPA Reg. No. 73766-2
EPA Est. No. 075540-OH-001

__ Ant Café RTU Prefilled, Refillable, Locking
Bait Stations

DIRECTIONS FOR USE

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

Notice: Buyer and user assume all the risk and liability of use, storage and/ or handling of this product not in accordance with terms of this label.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal of this product.
Storage: Store product in original container in a cool dry place out of reach of children. Do not allow product to freeze.

Disposal: 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 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Do not contaminate feed or foodstuffs. Place baits in areas inaccessible to children and pets.

To control ants and *german cockroaches* use indoors and outdoors near: homes, apartments, condominiums, schools, hospitals, restaurants, grocery stores, food processing plants, boats, cruise ships, institutional and commercial buildings, nursing homes, hotels and warehouses

Gourmet Ant Bait may be used at full strength, diluted with distilled water or other food grade liquid 1:1 to make bait containing .5% active ingredient. Bait may be used in "Ant Café", "Ant & Roach Buffet", "KM AntPro", "Ant Café RTU" (Ready To Use) or other similar bait stations.

To activate Ant Café RTU bait station, place station on a horizontal surface, deflect cone to the left, right, forward and back to break the seal on the inner ring allowing bait to flow into inner cone, snip off top of cone exposing 1/8" inch entry port, apply a small amount of pressure to outer ring of bait station, so that a small amount of liquid bait will flow out of the cone and into the valley created by the cone and outer ring. Place the bait station on a horizontal surface near ant activity. Place stations under food cabinets, sinks, stoves, refrigerators, food storage areas, attics, garages, basements, storage areas, closets, etc. Place on exterior windowsills and in doorways to help prevent entry of ants. Some bait stations may be designed to be affixed to a wall, hung on pipes or branches, or placed on a flat surface

When using bait stations, wash hands thoroughly before handling to remove any odors that may be repellent to ants, i.e. tobacco, garlic, strong chemicals/ cleaners etc.

(OPEN PLACEMENT METHOD NOT TO BE USED IN CALIFORNIA)

Gourmet Ant Bait can also be used to make small, pea sized placements and/ or long thin lines in areas where ants are a problem.

Ants are attracted to and will feed on Gourmet Ant Bait until they die. The bait is designed to work slowly and sufficient bait should be made available for at least 14 days of continuous feeding. The ants will return to their nests after consuming the bait and will feed their young and the queen destroying the colony. Repeat placement of the bait until satisfactory control has been achieved.

Do not use sprays, foggers or any strong chemicals or cleaners near the bait containers or placements. This may contaminate the bait and cause the insects to cease feeding.

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Ant Café RTU Bait Station Instructions:

1. To activate Ant Café RTU, position vial so that red plug faces upwards.
2. To lock vial, thread serrated plastic string up through large square hole and then down through two smaller square holes.
3. Serrations on thread will engage and lock station closed.
4. Remove red plug and place bait station according to directions for use.
5. To refill bait station, disengage lock, open vial, and add additional bait. If bait has dried out, add additional water to rehydrate the bait. Alternatively, you may discard the old bait and add fresh bait. Follow disposal guidelines for proper disposal of used material.
6. Reengage lock and repeat steps 1-5 as necessary.

See pictures for additional guidance.

