



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

OCT 21 2005

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. Ellsworth R. Stewart
Stewart Agricultural Research Services, Inc.
P. O. Box 509
Macon, Missouri 63552

Subject: Master Label Revision Using Lower Rates
Metarex 4% Snail and Slug Bait
EPA Reg. No. 74941-2
Your Submission date, August 10, 2005

Dear Mr. Stewart:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable provided the following claims are removed from the label.

1. Remove the following Bitrex claims: "Contains bittering agent", Bitrex is a registered trademark of Macfarlane Smith Ltd., Edinburgh, Scotland; and Bitrex logo." Contains Bitrex to deter feeding by pets, Contains an additive reducing the risk of consumptions by pets. In order that Bitrex is not seen as misleading and having special properties, the allowing packaging the use the statement "Contains Bitrex" with no further claim or explanation.
2. The following claims are false and misleading without data and specific prove: Will not harm beneficial micro-organisms and insects; will not harms beneficial insects, when eaten by slugs and snails, even in small amounts, causes them to stop feeding, reduce movement and dry out, highly species specific product Only kills slugs and snails, Metarex works on a cellular level and is selectively toxic to slugs and snails, but won't harm soil micro-organisms & insects such as earthworms, carabid beetles, spiders, or bees which are helpful to the ecological balance of the soil and garden. If you want to add the above claims, submit to the Agency data in support of the each claim.
3. Complete the statement "Enough for _____ applications to a typical 20 ft x 20 ft garden", or remove it from the package.

4. The label claim "Rainfast for up to 30 days- rain or shine guaranteed" is unacceptable as is. Either the word "guaranteed" must be deleted, or it must be qualified in the same statement. A statement such as "Rainfast for up to 30 days – rain or shine guaranteed or your money back" would be acceptable.

A stamped copy is minus the misleading language 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 7505C

Enclosure:

[Master label]

Metarex 4% Snail and Slug Bait

[Alternate Brand Name: Rain and Shine Snail and Slug Bait]

[Product Information: see Version A - Commercial Uses or Version B - Consumer Uses]

Active ingredient:

metaldehyde (2,4,6,8-tetramethyl-

1,3,5-7-tetraoxycyclo-octaine 4.0%

inert ingredients 96.0%

Total 100.0%

EPA Reg. No. 74941-2

EPA Est. No. 74926-FRA-1

Net Weight: [see Version A and Version B]

KEEP OUT OF REACH OF CHILDREN CAUTION

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand the label, find someone to explain it to you in detail).

FIRST AID

If on skin:

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice.

If swallowed:

- 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 a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

Note to Physician: No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to humans and domestic animals:

Harmful if swallowed or absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

IMPORTANT: Keep granules away from children and pets. Bait may be attractive to dogs. Confine pets during application to prevent them from believing they are being fed.

[Continued in Version A - Commercial Uses or Version B - Consumer Uses]

ACCEPTED
with COMMENTS
In EPA Letter Dated:

OCT 21 2005

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
74941-2

[Master label]

[Version A - Commercial Uses]

For control of snails and slugs in turf, ornamentals, field crops, tobacco,
seed crops, vegetables, tree crops & small fruits

Net Weight: 1 pound up to 2000 pounds

[Continuation of Front Panel]

Personal Protective Equipment (PPE)

Applicators and other handlers must wear long-sleeved shirt, long pants, shoes plus socks and chemical-resistant gloves made of any waterproof material such as polyethylene or polyvinyl chloride.

Follow the manufacturer's instructions for cleaning/maintaining PPE. If no instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

Environmental Hazards

Do not apply directly to water, to areas where surface water is present or to intertidal area below the mean high water mark. Do not contaminate water when disposing of equipment washwater.

[Master label]

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For any requirements by your State or Tribe, consult the agency responsible for pesticide regulation. Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application.

Agricultural Use Requirement

Use this product only 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 contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment (PPE) and restricted-entry interval.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 12 hours. PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated, such as plants, soil or water is: long-sleeved shirt and long pants, shoes plus socks and chemical-resistant gloves made of any waterproof material.

Non-Agricultural Use Requirements

These requirements 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, forest, nurseries or greenhouses.

STORAGE AND DISPOSAL

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

STORAGE: Store product in original labeled container in a cool, dry, locked place out of the reach of children. Keep container tightly closed when not in use. Do not store in direct sun light.

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

CONTAINER DISPOSAL: Dispose of empty container in a sanitary landfill, by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

APPLICATION DIRECTIONS

Apply to the soil surface. Granules may be broadcast by air or ground equipment unless specified otherwise on in the label. Use a band treatment between rows after formation of edible crop parts. Do not contaminate edible parts.

Best results are obtained if applied in the evening, after irrigation or rain. Do not irrigate for 48 hours after application. Apply when plant damage first appears. Repeat every 2 to 4 weeks or as reinfestation occurs.

Most plants are tolerant of Metarex. On extremely tender plants, such as orchids, the user should make a test application to determine any plant sensitivity before large scale use or broadcast treatment over many plants. Metarex granules may be applied to the following crops to control slugs and snails:

[Master label]

Turf and Ornamentals (ornamental greenhouses, ornamental plantings, commercial ornamental nurseries, ground covers, turfgrass and grasses grown for sod, dichondra and around building foundations): Apply at 1/2 to 2 pounds per 1,000 sq. ft. (approx. 4 to 16 pellets per square foot).

Field Crops (cereal grains, corn, legumes and mint): Apply 5 to 40 pounds per acre.

Tobacco (field, greenhouse and lathe house): Apply 5 to 40 pounds per acre or 1 pound per 1,100 to 8,800 sq. ft.

Seed Crops (sugar beets, flowers, grasses, vegetable and legume crops grown for seed): Apply 5 to 40 pounds per acre.

Vegetables (asparagus, beans, beets, black-eyed peas, broccoli, Brussels sprouts, cabbage, cantaloupe, carrots, cauliflower, celery, collards, corn, cowpeas, cucumbers, eggplants, endive, garlic, ginseng, horseradish, kale, kohlrabi, leeks, legumes, lettuce, melons, mustard greens, okra, onion, parsnips, peas, peppers, pimentos, potatoes, pumpkins, radishes, rhubarb, rutabagas, salsify, shallots, spinach, squash, sweet potatoes, Swiss chard, tomatoes, turnips and watermelons): Apply 5 to 40 pounds per acre.

Artichokes (by air or ground before tight bud stage or by ground only after tight bud stage): Apply 9 to 40 pounds per acre.

Tree Crops (citrus, avocado, cherries, peaches, apricots, apples, pears, bananas and papaya): Apply 10 to 40 pounds per acre or 2 ounces up to 1 pound per 1000 sq. ft.. May be applied in a circular band (not less than 6 inches wide) around base of tree trunks.

Small Fruit (blackberries, blueberries, boysenberries, cranberries, loganberries, raspberries, strawberries and grapes): Apply 10 to 40 lbs per acre or 2 ounces up to 1 pound per 1000 sq. ft. May be applied in a circular band (not less than 6 inches wide) around base of tree trunks.

Non-crop areas, such as: Fallow land, barrier strips & uncultivated non-agricultural areas; parks & recreational areas; golf courses; brush; railroad, pipeline, highway, power & telephone rights of way; road sides; lumberyards; storage areas; industrial sites; parking lots; airports and similar non-crop areas which may be infested and offer transient harborage to slugs & snails. Apply 5 to 40 pounds per acre.

NOTICE TO USER

Seller makes no warranty, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risks of use and/or handling of this material when such use and/or handling is contrary to label instructions.

Distributed by:
Liphatech, Inc.
a division of De Sangosse
3600 West Elm Street
Milwaukee, WI 53209

Manufactured for:
De Sangosse UK
P.O.Box 191
Romsey SO51 5YP
United Kingdom

[Master label]

Alternate warranty statements:

Satisfaction guaranteed or your money back

Optional marketing statements:

~~Contains bittering agent~~

Contains Bitrex™

~~Bitrex™ is a trademark of MacFarlane Smith Ltd., Edinburgh, Scotland~~

~~(Bitrex logo™)~~

Meta™ is a registered trademark of Lonza AG, Switzerland

(Meta logo™)

Kills snails & slugs fast

Smaller, highly visible pellets offer more baiting points (than the same weight of competing products)

Rain-fast for up to 30 days (under normal rainfall)

Protects for up to 4 weeks

~~Will not harm beneficial micro-organisms and insects~~

~~Will not harm beneficial insects~~

Reduced rate technology

Low rate technology

Power pellets

The power pellet

The power is in the pellet

Moisture resistant package (bag, box, pail, as appropriate)

Spreader Settings

To Apply:	rate 1	rate 2	rate 3	rate 4
spreader A				
spreader B				
spreader C				

[Master label]

[Version B - Consumer Uses]

For control of snails and slugs commonly found in and around homes, lawns,
ornamental plantings, fruit and vegetable gardens

Net Weight: 8 ounces up to 10 pounds

[Continuation of Front Panel]

User Safety Recommendations

Wear long-sleeved shirt and long pants, socks, shoes and waterproof gloves when applying this product.

Environmental Hazards

- Do not apply directly to water.
- Do not dump leftover pesticide or rinse water into drains or sewers.

[Master label]

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read entire label and follow all directions and precautions. Not for use on plants being grown for sale or other commercial use, or for commercial seed production, or for research purposes.

Apply before damage occurs or as soon as infestation is seen. Repeat application every 2 to 4 weeks or as needed for control. Best results are obtained if applied in the evening, after rain or irrigation.

Home lawns, ground covers, ornamental beds, around home foundations, home greenhouses and lathe houses: Apply ____ ounces (or pounds) per ____ sq. ft. (*actual statements based on container size and application rate of 2 ounces per 1000 sq ft*). Sprinkle evenly over soil surface and do not apply in piles. Scatter on and beneath greenhouse benches and in pots but not on foliage.

Home vegetable gardens (asparagus, beans, beets, black-eyed peas, broccoli, Brussels sprouts, cabbage, cantaloupe, carrots, cauliflower, celery, collards, corn, cowpeas, cucumbers, eggplants, endive, garlic, ginseng, horseradish, kale, kohlrabi, leeks, legumes, lettuce, melons, mustard greens, okra, onion, parsnips, peas, peppers, pimentos, potatoes, pumpkins, radishes, rhubarb, rutabagas, salsify, shallots, spinach, squash, sweet potatoes, Swiss chard, tomatoes, turnips and watermelons): Apply ____ ounces (or pounds) per ____ sq. ft. (*actual statements based on container size and application rate of 2 ounces per 1000 sq ft*). Apply to soil surface around plants – do not apply to the foliage. Do not contaminate edible parts of plants.

Home fruit trees and bushes (citrus, avocado, cherries, peaches, apricots, apples, pears, bananas, papaya, blackberries, blueberries, boysenberries, cranberries, loganberries, raspberries, strawberries and grapes): Apply ____ ounces (or pounds) per ____ sq. ft. (*actual statements based on container size and application rate of 2 ounces per 1000 sq ft*). May be applied in a circular band (not less than 6 inches wide) around base of tree trunks.

STORAGE AND DISPOSAL

STORAGE: Store product in original container in a dry place inaccessible to children and pets.

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.

NOTICE TO USER

Seller makes no warranty, express or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risks of use and/or handling of this material when such use and/or handling is contrary to label instructions.

Distributed by:
Liphatech, Inc.
a division of De Sangosse
3600 West Elm Street
Milwaukee, WI 53209

Manufactured for:
De Sangosse UK
P.O.Box 191
Romsey SO51 5YP
United Kingdom

[Master label]

Alternate warranty statements:

Satisfaction guaranteed or your money back

Optional marketing statements:

~~Contains bittering agent~~

Contains Bitrex™

~~Contains Bitrex™ to deter feeding by pets~~

~~Contains an additive reducing the risk of consumption by pets~~

~~Bitrex™ is a trademark of MacFarlane Smith Ltd., Edinburgh, Scotland~~

~~(Bitrex logo™)~~

Meta™ is a registered trademark of Lonza AG, Switzerland

(Meta logo™)

For use on Turf, Ornamentals, Vegetables & Fruit

Kills snails & slugs fast

Effective at controlling snails and slugs commonly found in and around homes; lawns; ornamental, fruit and vegetable gardens

Smaller, highly visible pellets offer more baiting points (than the same weight of competing products)

Rain-fast for up to 30 days (under normal rainfall)

~~Rain-fast for up to 30 days rain or shine guaranteed~~

Protects for up to 4 weeks

Reduced rate technology

Low rate technology

Power pellets

The power pellet

The power is in the pellet

Approx. 4 pellets per square foot

Covers ____ sq. ft.

(label statement based on application rate of 2 ounces per 1000 sq ft and actual package size)

~~Enough for ____ applications to a typical 20 ft x 20 ft garden~~

(label statement based on application rate of 2 ounces per 1000 sq ft and actual package size)

Practical & easy to use: The shaker lid permits very accurate and uniform dosage without requiring you to touch the bait.

Dust free

Highly visible pellets help assure proper coverage and prevent over application.

~~Effective (How It Works): When eaten by slugs and snails, even in small amounts, causes them to stop feeding, reduce movement and dry out.~~

Offers immediate protection to plants, even though slugs & snails may remain in the area.

After feeding, slugs & snails dehydrate and die within 2-6 days, often crawling to secluded places to die..

Plant protection will be observed in the decrease in planted damage.

High palatability=quick attraction: Made with food-grade cereal ingredients, manufactured to the highest of standards.

In controlled tests, preferred 3-to-1 vs. fresh carrots & lettuce.

Rain & irrigation resistant: Due to exclusive manufacturing techniques, Metarex granules resist heavy watering – holding their shape longer than competitive pellets.

Metarex granules can remain effective and provide protection for up to four weeks!

~~Will not harm beneficial micro-organisms, insects and earthworms.~~

~~Will not harm beneficial insects~~

~~Highly species specific product ONLY kills slugs and snails.~~

~~Metarex works on a cellular level and is selectively toxic to slugs & snails, but won't harm soil micro-organisms & insects such as earthworms, carabid beetles, spiders or bees which are helpful to the ecological balance of the soil and garden.~~

When to apply (usage tips): Apply when slugs and snails are active. If ground is dry, water the area before application.

This will usually mean treat during periods when evening frost is no longer likely. Check under rocks and other horizontal surfaces in contact with moist soil for snail & slug activity in the early morning. Even a presence of 1-2 slugs per square yard can indicate a serious problem. Snails & slugs feed almost entirely at night, so best time to treat is late afternoon or just before dusk and when temperatures are cooler; just before slugs & snails become active. Try not to irrigate for 48 hours after application. Regular application will diminish the recurrence of slug or snail infestation. Retreat if necessary, or if you begin to see recurring damage to your plants.

Just one slug or snail can hatch up to 40 or 80 eggs respectively, every 4-8 weeks!

Where to apply (usage tips): Apply at the edge of the garden or area to be protected to reduce the chances of re-infestation from adjacent areas. Slugs & snails migrate toward better feeding and sheltering conditions, preferring moist shady environments with tender, succulent vegetation close to the ground. Use broadcast-type spreader for large areas. Also treat areas where these pests shelter during the day – damp places, around mulch, shady flower gardens, rock formations, ivy patches, hedged, vegetable plants, dichondra lawns and other ground covers.