


85125-2

3/19/2012

1/9

	<p align="center">U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division (H7505C) 401 "M" St., S.W. Washington, D.C. 20460</p>	<p>EPA Reg. Number: <b>85125-<del>E</del>2</b></p>	<p>Date of Issuance:</p>									
<p>NOTICE OF PESTICIDE: <u>  x  </u> Registration <u>    </u> Reregistration  (under FIFRA, as amended)</p>		<p>Term of Issuance: <b>Conditional</b>  Name of Pesticide Product: <b>Attractive Toxic Sugar Bait</b></p>										
<p>Name and Address of Registrant (include ZIP Code):  Westham Ltd. c/o Micah Renyolds Technology Science Group Inc. 1150 18<sup>th</sup> St, Ste 1000 Washington, DC 20036</p>												
<p><b>Note:</b> 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.</p>												
<p>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.</p> <p>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 other</p> <p>This product is <b>conditionally</b> registered in accordance with FIFRA sec. 3(c)(7)(B) provided that you meet the following requirements:</p> <ol style="list-style-type: none"> <li>1. On the label, revise the EPA Registration Number to read, "EPA Reg. No. 85125-2."</li> <li>2. Submit the data listed below by the associated due dates:</li> </ol> <table border="1" data-bbox="191 1436 1349 1555"> <thead> <tr> <th><u>OPPTS Guideline #</u></th> <th><u>Title of Study</u></th> <th><u>Date Due</u></th> </tr> </thead> <tbody> <tr> <td>830.6317</td> <td>Storage Stability</td> <td>1 year of the date of this letter</td> </tr> <tr> <td>830.6320</td> <td>Corrosion Characteristics</td> <td>1 year of the date of this letter</td> </tr> </tbody> </table>				<u>OPPTS Guideline #</u>	<u>Title of Study</u>	<u>Date Due</u>	830.6317	Storage Stability	1 year of the date of this letter	830.6320	Corrosion Characteristics	1 year of the date of this letter
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830.6317	Storage Stability	1 year of the date of this letter										
830.6320	Corrosion Characteristics	1 year of the date of this letter										
<p>Signature of Approving Official:  See page 2  Mark Suarez, Project Manager 13 Insecticide Branch/Registration Division</p>		<p>Date:  <b>MAR 19 2012</b></p>										

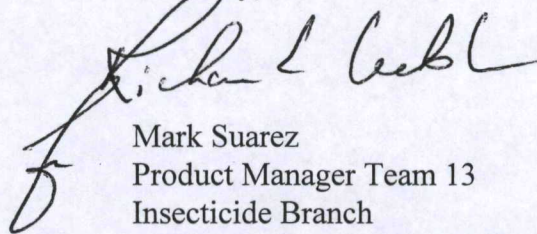


- iii. The phrases 'diseases' from the third statement on the page must be deleted. 'yellow fever\*', dengue fever, and malaria\*' may remain, however yellow fever and malaria must have an \*asterisk with a note that these diseases are not endemic to the United States.
- iv. Remove claim beginning with 'Mosquitoes are not only a nuisance...'
- v. The following statements are unacceptable because every word is in an optional text bracket and it is unclear what permutations the registrant is interested in.
  1. '[Replace] [each] [refill]...'
  2. '[Take] [the] [portable]...'
  3. '[For] [use][in]...'
- f. The term 'Protecting your lifestyle' may not appear as part of the Westham logo.
4. Submit a trap and refill cartridge as intended for use.
5. Efficacy data required
  - a. The data support the addition of sand flies to the label provided the biting midge study is conducted in the USA and the data are submitted by October 31, 2013. The addition of mosquitoes is acceptable to the label provided data on the Asian tiger mosquito, *Aedes albopictus*, are submitted by October 31, 2013. See efficacy review enclosed for additional information.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please contact Samantha Hulkower of my team at (703) 603-0683.

Sincerely,



Mark Suarez  
Product Manager Team 13  
Insecticide Branch  
Registration Division (7505P)

Enclosures:

- Label stamped "Accepted with Comments"
- Product Chemistry Review, dated January 11, 2012
- Product Performance/Efficacy Review, dated March 8, 2012
- Toxicology Memorandum, dated January 24, 2012



(Note to Reviewer: [bracketed text] is optional; (parenthetical text) is informational.)

# Attractive Toxic Sugar Bait

## (MASTER LABEL)

[Alternate names: Mosquito Bait and Killer, Liquid Mosquito Bait, Liquid Mosquito Killer, Attractive Toxic Bait, honeyTrap™]

### Active Ingredient:

Boric Acid .....4.0%

Other Ingredients: .....96.0%

Total: 100.0%

EPA Reg. No.: 85125-E 2

EPA Est. No.: [XXXXX-XX-XXX]

Keep out of Reach of Children

### CAUTION

[See [back][side][other] panel for additional first aid and precautionary statements.]

Manufactured [by] [for]:

Westham Ltd.

8 King David Ave.

Tel-Aviv 64953 Israel

Net Contents: (8.5 oz. (250mL))

(Batch or Lot) [No.]: (Note to Reviewer: The lot or batch number may also be stamped or imprinted directly on the packaging or refill container.)

(Note to reviewer: Boxed format or bullets may be used in First Aid section depending on available space.)

### FIRST AID

**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.

**If on skin or clothing:** 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 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. Call a poison control center or doctor immediately for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-222-1222, 24 hours a day, for emergency medical treatment information.

ACCEPTED  
with COMMENTS  
In EPA Letter Dated:

MAR 19 2012

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
85125-2



(Note to Reviewer: [bracketed text] is optional; (parenthetical text) is informational.)

## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

**CAUTION.** Harmful if swallowed or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

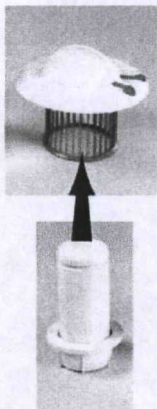
## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label.

*(Directions for Use for package containing reusable bait station and one bait/attractant cartridge.)*

For Residential use. [Attractive Toxic Sugar Bait] [and ~~honeyTrap™~~] bait station] [Product Name] [This product] is designed to [lure] [attract] mosquitoes to the bait [by floral and fruit notes] where the mosquito ingests the toxin, boric acid. The bait is available to mosquitoes and sand flies to feed from freely but the station design does not allow larger and beneficial insects, such as honeybees, to gain access.

This product may be used in outdoor areas around the home, including patios, decks, play yards, backyards, garages, and outdoor shelters. For [best performance] [maximum effectiveness] against mosquitoes and sand flies, place station in the shade. [Bait] [Attractant] [~~honeyTrap™~~] [station] may be placed on table or stool or can be hung outdoors in tree or surrounding vegetation with provided [rope] [string] [twine]. If hung, hang at least 3 feet from the ground. This product may also be used indoors to lure and kill mosquitoes escaping inside. Each [bait] [attractant] [~~honeyTrap™~~] [station] is effective for up to ¼ acre (approx. 10,900 square feet) for 3 weeks.



How to install [bait] [attractant] cartridge into [bait] [attractant] [~~honeyTrap™~~] [station]:

- 1) Unwrap [bait] [attractant] cartridge from outer ~~wrap~~.
- 2) Push cartridge into [bait] [attractant] [~~honeyTrap™~~] [station] outer housing until you hear a "click" meaning that the unit is fully assembled.
- 3) Place or hang your [bait] [attractant] [~~honeyTrap™~~] [station] in desired location.
- 4) Turn the base 90 degrees [clockwise] [counterclockwise] so foil seal is broken and liquid [bait] [attractant] can flow by capillary action onto absorbent pad and be available for mosquito [and sand fly] feeding.
- 5) After [3] [three] weeks [or when cartridge is empty], discard old cartridge by pressing the two green levers [on top of the station housing] together to separate the station outer housing from the cartridge.
- 6) Replace with fresh cartridge [every 3 [three] weeks] as done above [for maximum effectiveness].

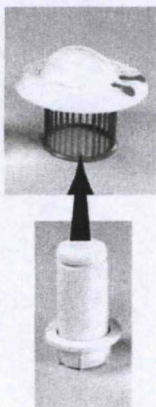


(Note to Reviewer: [bracketed text] is optional; (parenthetical text) is informational.)

(Directions for Use for package containing one bait/attractant cartridge refill.)

For Residential use. This refill of [Attractive Toxic Sugar Bait] [Product Name] is designed for use with Westham's [Attractive Toxic Sugar Bait Station] [~~honeyTrap™~~] [bait station] to [lure] [attract] mosquitoes to the bait [~~by floral and fruit notes~~], where the mosquito ingests the toxin, boric acid.

This product may be used with the [~~honeyTrap™~~] [bait station] in outdoor areas around the home, including patios, decks, play yards, backyards, garages, and outdoor shelters. For [best performance] [maximum effectiveness] against mosquitoes and sand flies, place [~~honeyTrap™~~] [station] in the shade. [Bait] [Attractant] [~~honeyTrap™~~] [station] may be placed on table or stool or can be hung outdoors in tree or surrounding vegetation. If hung, hang at least 3 feet from the ground. This product may also be used with the bait station indoors to lure and kill mosquitoes escaping inside. Each [bait] [attractant] [~~honeyTrap™~~] [station] is effective for up to ¼ acre (approx. 10,900 square feet) for 3 weeks.



How to replace [bait] [attractant] cartridge into [bait] [attractant] [~~honeyTrap™~~] [station]:

- 1) Remove empty [bait] [attractant] cartridge from [bait] [attractant] [~~honeyTrap™~~] [station] by pressing the two green levers [on top of station housing] together to separate the station outer housing from the cartridge.
- 2) Unwrap [bait] [attractant] cartridge from outer <sup>c c c c c</sup>wrap. Discard wrapper in trash.
- 3) Push cartridge into [bait] [attractant] [~~honeyTrap™~~] [station] outer housing until you hear a "click" meaning that the unit is fully assembled. <sup>c c c c c</sup>
- 4) Replace or rehang your [bait] [attractant] [~~honeyTrap™~~] [station] in desired location. <sup>c c c c c</sup>
- 5) Turn the base 90 degrees [clockwise] [counterclockwise] so foil seal is broken and liquid [bait] [attractant] can flow by capillary action onto absorbent pad available <sup>c c c c c</sup>for mosquito [and sand fly] feeding.
- 6) After [3] [three] weeks [or when cartridge is empty], discard old cartridge by pressing the two green levers [on top of the station housing] together to separate the station outer housing from the cartridge.
- 7) Replace with fresh cartridge every [3] [three] weeks for maximum effectiveness.

#### STORAGE AND DISPOSAL

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

**Cartridge Storage:** Store unopened attractant cartridge in a cool, dry place out of reach of children until ready to use.

**Cartridge Disposal:** Nonrefillable container. Do not reuse or refill attractant cartridge. If empty: Dispose of used attractant cartridge in the trash or 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.



(Note to Reviewer: [bracketed text] is optional; (parenthetical text) is informational.)

**[Warranty and Disclaimer:** To the extent consistent with applicable law, Westham Ltd. makes no warranty of merchantability, fitness for any particular purpose or otherwise, express or implied, concerning this product or its uses which extend beyond the use of the product under normal conditions in accordance with the statements made on this label.]

[Questions?] [Comments?] [Call 1-888-722-3069]

[Made in (insert country of manufacture origin) [for Westham Ltd.] [for Westham Innovations.]]

### Optional Label Statements, Marketing Claims, and Pictograms:

Mosquito Bait Station

New Technology (can be used for the first 6-months of product commercialization)

Formulated with Westham's BaitStab™ [for increased product life][extended effectiveness]

Fatal Attraction for Mosquitoes

Effective against sand flies [too]

Attracts [and kills] sand flies too!

Attracts and Kills All Mosquitoes

- ~~Proven effective floral lures attract sugar feeding mosquitoes~~
- ~~Patented formula kills mosquitoes in less than 24 hours after just 1 feeding~~
- ~~Quickly reduces backyard mosquito populations~~
- Kills mosquitoes that may carry West Nile Virus, E. Equine Encephalitis, Malaria and Dengue Fever

Simply Hang in Your Yard [with provided string] or place on table or stool

- Pre-filled & ready to use
- No drips, spills or mess
- No electricity, nets, traps, sprays or fogs
- No zapping; no lotions; no sprays; no electrical cords
- ~~Will not harm vertebrates (birds, animals, humans)~~
- ~~Protective grid protects honey bees and other large beneficial insects~~

(Call outs)

- ~~Entomologist developed and tested; University tested and results published~~
- ~~Proven effective in independent lab tests~~
- ~~Effective for up to 1/4 acre (approx. 10,900 square feet)~~

(For bait station/trap plus initial bait cartridge)

[Package] [Kit] Contains 1 Reusable Bait Station and 3 week Ready-to-Use supply of [Attractive Toxic Sugar Bait] [Product name].

(For bait station/trap cartridge refills – sold individually)

[1 Bait Refill][Product name] [refill cartridge] for use with [Westham's][Attractive Toxic Bait Station][~~honey trap~~™].

Attractive Toxic Sugar Bait; EPA File Symbol 85125-E  
MASTER LABEL - Label version (2) - dated February 14, 2012

Proposed Master Label

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(Note to Reviewer: [bracketed text] is optional; (parenthetical text) is informational.)

~~Attracts and kills mosquitoes before they search for their first blood meal~~

~~Professional Grade; Professional mosquito control~~

~~Kills them fast~~

For control of all backyard mosquitoes

For use anywhere outdoors

Suitable for [backyards] [campsites] [patios] [decks] [porches] [fishing trips] [camping]

Suitable for use indoors for those mosquitoes following you or your pets indoors

Use bait station inside to attract and kill mosquitoes escaping indoors

Breakthrough; innovation

Works 24 hours a day

Odorless

Each refill last 3 weeks

Hang anywhere; weather resistant

Patented formula attracts and kills mosquitoes

1 Year Warranty

Low maintenance

Effective; Proven Effective

Easy to use

Easy to refill [bait station] [~~honeyTrap™~~]

Patented

Patented innovative control

Reduces mosquito populations over time

[Lures] [Attracts] [and kills] mosquitoes to help reduce populations of disease-spreading mosquitoes in your backyard.

[Lures] [Attracts] [and kills]

Slow release bait [lasts up to 3 weeks] [effective for 3 weeks]



(Note to Reviewer: [bracketed text] is optional; (parenthetical text) is informational.)

Replace every 3 weeks

~~Exclusive combination [of floral lures] [of food grade attractants] [and reduced risk insecticide] lures [and kills] a wide variety of mosquitoes~~

Attracts [and kills] mosquitoes, including those which may [carry] [transmit] [West Nile Virus], [encephalitis], [Eastern Equine Encephalitis (EEE)], ~~[diseases]~~, [yellow fever], [dengue fever], [malaria], [and heartworm disease].

~~Attracts [and kills] hard to catch mosquito species such as those that may [carry] [transmit] [West Nile Virus], [encephalitis], [Eastern Equine Encephalitis (EEE)], [diseases], [yellow fever], [dengue fever], [malaria], [and heartworm disease].~~

Attracts mosquitoes, including those which may [transmit] [carry] heartworm disease to dogs and cats.

~~Mosquitoes are not only a nuisance; they may transmit diseases that are a serious health threat to people and pets.~~

Developed to target a wide range of mosquito species.

Attracts and kills sand flies

Does not [require] [batteries] [or] [electricity] [to operate]

Replaceable [refill] [cartridge]

~~[Replace] [Each] [refill] [provides] [effective] [dependable] [personal space] [protection] [lasts] up to 3 weeks [protection] [per refill].~~

Portable protection

[Convenience] [and] [Portability]

Easy to use

~~[Take] [the] [Portable] [Outdoor] Protection [with you] [that goes with you] [that stays with you] [that] [allows] [lots] [you] [to] [enjoy] [the outdoors] [your outdoor] [activities] [events] [fun]~~

[Easy to use] [Convenient]

Created for your [outdoor] [active] lifestyle

~~[For use] [in] [Enjoy] [Product Name's] [protection] [when you're] [camping], [fishing], [hunting], [boating], [in] [the] [backyard], [while] [gardening], [playing] [outside], [entertaining], [relaxing] on/in, [patio or deck], [the backyard], [activities] [events], [at] [the beach], [outside]~~

### Optional Logos and Pictograms:

Westham Innovations Logo



(Note to Reviewer: [bracketed text] is optional; (parenthetical text) is informational.)

