



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 4, 2023

Kristen Cianni
Regulatory Manager
Atticus, LLC
940 NW Cary Parkway, Suite 200
Cary, NC 27513

Subject: Label Amendment – Revising Environmental Hazards Statement per California
Product Name: A197.01a
EPA Registration Number: 91234-260
Application Date: April 4, 2023
Decision Number: 591176

Dear Ms. Cianni:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact David Gardner by phone at (202) 566-2677, or via email at gardner.david@epa.gov.

Sincerely,



Tamica Cain, Product Manager 10
Invertebrate & Vertebrate Branch 2
Registration Division (7505T)

Enclosure

MASTER LABEL – Unless otherwise noted, all text shown prior to the start of sub-label A will be present on both sub-label A and sub-label B when printed.

{Note to reviewer: [Text] in brackets denotes optional or explanatory language}

{Note to reviewer: {Text} in braces denotes where in the final label text will appear}

{BOOKLET FRONT PANEL LANGUAGE}

INDOXACARB	GROUP	22A	INSECTICIDE
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A197.01a

[Alternate Brand Name: Savitri Cockroach Gel Bait]

FOR USE IN COMMERCIAL, INDUSTRIAL, INSTITUTIONAL AND RESIDENTIAL AREAS [Sub-Label A]

FOR USE IN RESIDENTIAL AREAS [Sub-Label B]

ACTIVE INGREDIENTS:

Indoxacarb0.6%

OTHER INGREDIENTS:99.4%

TOTAL: 100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact SafetyCall® 1-844-685-9173 for emergency medical treatment information.

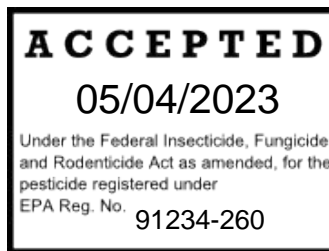
DO NOT TREAT AREAS THAT ARE EASILY ACCESSIBLE TO CHILDREN AND PETS.

[A197.01a] is not manufactured, or distributed by Syngenta Professional Products, seller of Advion® Cockroach Gel Bait].
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EPA Reg. No.: 91234-260

EPA Est. No.:

Net Contents:



Manufactured for:

Atticus, LLC

5000 CentreGreen Way, Suite 100

Cary, NC 27513

{LANGUAGE INSIDE BOOKLET}

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

All handlers must wear long-sleeved shirts, long pants, shoes and socks. [*Note to reviewer: only on Sub-Label A*]

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish and aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate. Drift and runoff may be hazardous to aquatic organisms in water adjacent to treated areas. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 24 hours. Rinsing application equipment over the treated area will help avoid runoff to water bodies or drainage systems. Do not apply to any impervious surfaces which may contact or lead directly to surface water, storm drains, or urban runoff conveyance systems (gutters)

PHYSICAL AND CHEMICAL HAZARDS

Do not use this product in or on electrical equipment where possibility of shock hazard exists.

{SUB-LABEL A: COMMERCIAL USE LANGUAGE}

DIRECTIONS FOR USE

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

Use **A197.01a** as a spot or crack and crevice treatment for the indoor and outdoor (adjacent to homes & structures) control of cockroaches.

A197.01a is designed to control pest species of cockroaches such as German, American, Australian, Smoky-Brown, Brown, Asian, Oriental, and Brown-Banded.

USE RESTRICTIONS:

- Do not treat areas that are easily accessible to children and pets.
- Do not treat food preparation surfaces. Keep gel away from foods and food contact surfaces.
- Do not allow gel material to contact open foods.
- Do not apply **A197.01a** to surfaces recently treated with repellent residual sprays.
- Do not apply repellent residual sprays to surfaces treated with **A197.01a**.
- In pet shops and zoos place bait out of reach of pets and zoo animals.

APPLICATION DIRECTIONS

Apply **A197.01a** to areas frequented by cockroaches such as between different elements of construction, between equipment and floors, openings leading into voids and hollow spaces in floors, walls, ceilings, equipment legs and bases, around plumbing pipes, doors and windows, and behind and under appliances, cabinets, sinks, closets, and any other equipment that cockroaches are typically known to hide.

Treatment Rates for All Uses		
Cockroach Infestation Level	Treatment Rate (per 10 linear feet)	Specific Instructions
Heavy	3 to 5 spots	<ul style="list-style-type: none"> Each spot of A197.01a must equal about 0.5 grams (approx. 1/4" diameter) When a bead of A197.01a is used, apply a small thin bead that is less than 1/8" wide and approximately 2 inches long.
Light to Moderate	1 to 3 spots	

INDOOR USE DIRECTIONS

A197.01a can be used in residential areas and the non-food/non-feed areas of institutional, warehousing and commercial establishments, including warehouses, restaurants, food processing plants, supermarkets, hospitals, nursing homes, motels, hotels, apartment buildings, bakeries, beverage plants, breweries, bottling facilities, candy plants, canneries, cereal processing and manufacturing plants, dairies and dairy product processing plants, frozen food plants, schools, laboratories, computer facilities, sewers, aircraft, buses, boats/ships, trains, homes, houses, industrial buildings, office buildings, kennels, kitchens, manufacturing facilities, spice plants, stores, wineries and similar structures, mausoleums, meat processing and packaging plants, meat and vegetable canneries, pet shops, and zoos. Non-food/non-feed areas include bedrooms, living rooms, bathrooms, closets, media rooms, garbage rooms, lavatories, entries, and vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets, and storage (after canning or bottling). This product may also be used in food/feed areas of food/feed handling establishments as outlined below.

- Infested areas must be carefully inspected to determine overall infestation levels, locations of harborage areas, and most appropriate application points.
- Apply **A197.01a** as a small spot of material, approximately 0.5 grams (approx. 1/4" in dia.), to areas not able to be contacted by children or pets.
- Several small applications distributed within an area are more effective than 1 or 2 applications of large quantities. In some cases, a small thin bead (less than 1/8" wide and 2" long) may be appropriate such as between construction elements or other cracks and crevices.
- Indoor applications include cracks and crevices along walls or floors, behind or under equipment, under tables, within framing of tables or furniture, around sinks, within or near garbage collection areas, attics, crawl spaces, and cracks and crevices in cabinets.
- Inspect **A197.01a** placements periodically for consumption or attractiveness and reapply as needed.

APPLICATIONS IN FOOD/FEED HANDLING AREAS

Apply in food/feed areas of food handling establishments as a crack and crevice treatment only. Apply **A197.01a** directly into cracks and crevices by placing the bait dispenser tip approximately 1/2 inch into cracks, crevices, holes and similar openings where cockroaches are found or are entering.

Food and feed handling areas include areas for receiving, storage, packing (canning, bottling, wrapping, boxing), preparing edible waste storage, and enclosed processing systems (mills, dairies, edible oils, syrups). Serving areas are also considered a food/feed area when food is exposed and facility is in operation.

- Do not apply **A197.01a** to areas where food/feed, food utensils or food processing surfaces may come into contact and become contaminated.
- Do not apply **A197.01a** to areas that are routinely washed such as cracks and crevices in tops of tables, food/feed preparation and prepared food holding surfaces as bait could be removed by the

washing.

- Do not apply **A197.01a** to surfaces where the temperature exceeds 120-130°F because this could cause the bait to liquefy and lose effectiveness.
 - Examples include, but are not limited to, parts of stoves, ovens, grills, fume hoods, saunas, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers, and hot water pipes.
- Use good application practice to avoid movement of **A197.01a** to exposed surfaces used for food preparation.
- If **A197.01a** contacts an exposed surface/first remove as much of the gel bait as possible, then wash with soap and water.

APPLICATIONS IN NON-FOOD/NON-FEED HANDLING AREAS

A197.01a is designed to be used as a spot or crack and crevice treatment in non-food areas such as behind baseboards, behind cabinetry, under shelves/racks, garbage rooms, machine rooms, boiler rooms, garages, mop closets, storage rooms (after canning/bottling), locker rooms, lavatories, entry ways, floor drains (to sewers), and offices. If making applications in food/feed handling areas, refer to section above: Applications in Food/Feed Handling Areas.

OUTDOOR USE DIRECTIONS

A thorough inspection around a structure may reveal areas where cockroaches are gaining access. Attempts should be made to remove the access. Apply **A197.01a** bait as a spot or thin bead (see above) to pest entry sites such as along windows, doors, between construction elements, sewer areas, adjacent trees which harbor cockroaches, along walls, garbage holding areas, or suitable placement site acting as a cockroach harborage. Place baits in such a way as to reduce the potential for subsequent human contact. Inspect **A197.01a** placements periodically and apply fresh bait as needed.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry area out of reach of children and pets.

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

CONTAINER HANDLING: Nonrefillable Container: Do not reuse or refill this container. Offer for recycling if available. Place empty bait dispensers in trash. **If partially filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

LIMITATION OF WARRANTY AND LIABILITY

IMPORTANT: READ BEFORE USE. Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability. **CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. To the extent consistent with applicable law, ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of ATTICUS, LLC. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, ATTICUS, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label. **LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, neither ATTICUS, LLC the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

[**A1907.01**] is a trademark of Atticus, LLC

[Advion®] is a registered trademark of a Syngenta Group Company.

{SUB-LABEL B: CONSUMER USES}

DIRECTIONS FOR USE

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

A197.01a is designed to control pest species of cockroaches such as German, American, Australian, Smoky-Brown, Brown, Asian, Oriental, and Brown-Banded.

USE RESTRICTIONS:

- Do not treat food preparation surfaces. Keep gel away from foods and food contact surfaces.
- Do not apply bait gel to areas which have been recently sprayed with a repellent insecticide, and do not spray insecticide over gel as it may cause the bait to become repellent.
- USE ONLY IN AREAS NOT EASILY ACCESSIBLE TO CHILDREN AND PETS.
- Do not apply bait to areas that are routinely washed such as cracks and crevices in tops of tables, food/feed preparation, and prepared food holding surfaces as bait may be removed by washing.
- Do not apply bait to surfaces where the temperature exceeds 130°F as bait may run. Examples include, but are not limited to, portions of stoves, ovens, grills, fume hoods, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers, and hot water pipes.
- Do not apply gel to exposed surfaces. If gel contacts an exposed surface, remove gel and wash exposed surface.
- Do not apply in areas exposed to direct sunlight.

If needed, gel bait deposits may be cleaned up with a damp paper towel or rag, or if dried, use a putty knife to scrape and discard in trash.

WHERE TO USE:

Indoors in kitchens, bathrooms, basements, garages and laundry rooms as a crack and crevice, spot treatment or bait station application. Apply to areas frequented by cockroaches such as openings leading to voids and hollow spaces in floors, walls, ceilings, equipment legs and bases, around plumbing pipes, doors and windows, and behind and under appliances and cabinets where cockroaches are typically known to hide.

Outdoors as a spot, thin bead or bait station application at pest entry sites such as along windows and doors, sewer areas, adjacent trees that harbor cockroaches, utility entry points, along walls, garbage holding areas, and other locations that serve as harborage for cockroaches. Select bait gel placement locations to help reduce the potential for subsequent human contact.

HOW TO APPLY (DIRECTLY FROM SYRINGE):

Cockroaches prefer pressure on two sides of their body and spend 75% of their existence living in cracks and crevices. For this reason, syringe applications directly into cracks and crevices will go a long way in eradicating the cockroach population.

For light to moderate infestations, apply 1 to 3 spots of this gel bait per 10 linear feet or one square yard. For heavy infestations, use 3 to 5 spots of gel bait per 10 linear feet. Each bait spot should equal about 0.5 grams (1/4" diameter spot).



Figure 1: Spot of gel bait approx. 0.5 gram

For all levels of cockroach infestation, you can also apply this gel bait in lines approximately 1/8-inch wide by 2 inches long. Inspect placements of gel bait periodically and apply fresh bait as needed.

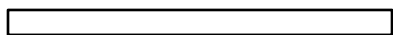


Figure 2: Line of gel bait approximately 1/8 inch by 2 inches

For bait spots or lines:

- Remove cap from syringe tip.
- Place syringe tip at the surface to be treated.
- Apply light pressure to the plunger of the syringe.
- After dispensing gel bait, replace cap on syringe tip.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Store in a cool, dry area out of reach of children and pets.

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

CONTAINER HANDLING: Nonrefillable Container: Do not reuse or refill this container. Offer for recycling if available. Place empty bait dispensers in trash. **If partially filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

LIMITATION OF WARRANTY AND LIABILITY

IMPORTANT: READ BEFORE USE. Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability. **CONDITIONS:** The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. To the extent consistent with applicable law, ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of ATTICUS, LLC. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, ATTICUS, LLC makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label. **LIMITATIONS OF LIABILITY:** To the extent consistent with applicable law, neither ATTICUS, LLC the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

[A197.01] is a trademark of Atticus, LLC

[Advion®] is a registered trademark of a Syngenta Group Company.

UNIT LABEL FOR A197.01a
[Applicable for both commercial and consumer products]

A197.01a
[Alternate Brand Name: Savitri Cockroach Gel Bait]

NOTE: Do not remove this label. Use only in areas not easily accessible to children and pets.

ACTIVE INGREDIENTS:

Indoxacarb0.6%

OTHER INGREDIENTS:99.4%

TOTAL:100.00%

KEEP OUT OF REACH OF CHILDREN

CAUTION

Keep gel away from foods and food contact surfaces. Avoid contact with skin, eyes, and clothing. Wash thoroughly with soap and water after handling.

CONTAINER DISPOSAL: Nonrefillable Container: Do not reuse or refill this container. Offer for recycling if available. Place empty bait dispensers in trash. **If partially filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

[A197.01a] is not manufactured, or distributed by Syngenta Professional Products, seller of [Advion® Cockroach Gel Bait].

EPA Reg. No.: 91234-260

EPA Est. No.:

Net Contents:

Manufactured for:
Atticus, LLC
5000 CentreGreen Way, Suite 100
Cary, NC 27513

SEE [OUTER CARTON][PACKAGE LABEL] FOR COMPLETE DIRECTIONS AND PRECAUTIONS

[Optional Marketing Claims:]

[Use Related]

- For crack and crevice cockroach control
- Use in cracks and crevices
- Use in cracks and crevices against cockroaches
- For hard to reach places [such as cracks and crevices]
- Ready to Use
- Easy to use [apply] [; nothing to activate]
- Designed [Ideal] for use in kitchens
- For indoor and outdoor (adjacent to home -or- structure) use [cockroach control]
- Kills cockroaches where you can't find them
- Kills cockroaches you don't see
- Kills cockroaches you see and [even] those you don't
- Works inside and outside (adjacent to home -or- structure)
- Gets bait where cockroaches live
- Easy [way] to apply bait
- Where to use: In and around homes and other [buildings] [structures] where roaches have infested or where they travel to seek food, water or shelter.
- When to use: When cockroaches are observed or there is evidence of an infestation in or around homes and building.

[Formulation/Applicator Related]

- Contains No "Big 8" Allergens*
- No messy residue
- No mixing required
- Precision syringe applicator
- Convenient [syringe] applicator

*Milk, eggs, fish, crustacean shellfish, tree nuts, peanuts, wheat or soybeans.