



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

February 27, 2025

Kyleigh Toomey
Label Facilitator
Atticus, LLC
940 NW Cary Parkway, Suite 200
Cary, NC 27513-3792

Subject: Notification per PRN 98-10 – Addition of Previously Approved Graphic on
Sublabel A to Provide Additional Clarity to User
Product Name: A197.02a
EPA Registration Number: 91234-261
Application Date: October 11, 2022
Case Number: 606315

Dear Nancy Huebl:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

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 (FIFRA) 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) lists 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.

If you have any questions, please contact Carmen Rodia via e-mail at Rodia.Carmen@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Tamica Cain".

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

Enclosure: Master Label Stamped "NOTIFICATION", dated February 27, 2025

{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}

{Text in brackets separated by a backslash “/” are considered either or statements.}

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

{BOOKLET FRONT PANEL LANGUAGE}

INDOXACARB	GROUP	22A	INSECTICIDE
------------	-------	-----	-------------

A197.02a [™]

[Alternate Brand Name: Savitri Ant Gel]

[Optional Descriptors: [Insecticide] [Ant Gel Bait] [Bait Solutions] [[Clear] Ant [Gel] [Bait]] [[Invisible] [Ant] Gel [Bait]]]

ACTIVE INGREDIENT:

(% by weight)

Indoxacarb*0.05%

OTHER INGREDIENTS:99.95%

TOTAL100.0%

*Indoxacarb belongs to the oxadiazine chemical class.

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.)

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.

See side/back/inside panel(s) for Precautionary Statements, Directions for Use and Storage and Disposal.

[A197.02a is not manufactured, or distributed by Syngenta Professional Products, seller of [Advion® Ant Gel].]

EPA Reg. No.: 91234-261

EPA Est. No.:

Net Contents:

20220930ap1

NOTIFICATION

91234-261

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

02/27/2025

Manufactured for:

Atticus, LLC

940 NW Cary Parkway, Ste 200
Cary, NC 27513

{LANGUAGE INSIDE BOOKLET}

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

All handlers must wear long-sleeved shirts, long pants, shoes, and socks.

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. 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).

{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.

READ ALL DIRECTIONS COMPLETELY BEFORE USE.

A197.02a is applied as a crack and crevice or spot treatment to indoor or outdoor sites where ant infestations are a problem.

Kills ants* in and around residential, institutional, commercial and industrial areas. These sites include inside residential buildings (including apartments and single and multi-family buildings), commercial and industrial facilities (including warehouses, supermarkets, restaurants, motels, hotels, hospitals & nursing facilities, zoos, food handling/storage establishments), schools, day care facilities, transportation equipment (including aircraft, trains, ships, boats, cars, trucks, semi trucks, and buses) and other similar sites where ant infestations or activity can be problematic.

*Except Pharoah ants

A197.02a is specifically formulated to be attractive to all* major pest species of ants. This product kills ants* such as Acrobat, Argentine, Big-Headed, Carpenter, Cornfield, Crazy, Field, Ghost, Honey, Little Black, Odorous House, Pavement, Pyramid, Red Imported Fire Ant, Rover, Thief and Whitefooted. For complete control of outdoor nests of Harvester and Red Imported Fire Ants, use additional treatments labeled for outdoor management of these pest species.

*Except Pharoah

USE RESTRICTIONS:

- **DO NOT** treat areas that are easily accessible to children, domestic animals and pets.
- **DO NOT** apply to surfaces that food contacts.
- **DO NOT** allow open foods to contact gel material.

USE PRECAUTIONS:

- Avoid applying **A197.02a** to surfaces recently treated with repellent residual sprays.
- **DO NOT** apply repellent residual sprays to surfaces treated with **A197.02a**.

APPLICATION INSTRUCTIONS AND USE RATES

- **A197.02a** may be applied as spots or small beads of gel.
- Spots or beads of gel should be applied to areas where ants are active, to foraging trails, or nest sites.
- For spot applications: apply 0.1 to 1.0 gram of **A197.02a** per spot. Spots should be approximately 1/4" in diameter. Make as many placements as necessary.
- For bead applications: apply **A197.02a** as a bead approximately 1/8" wide and 2" long; for highly active foraging trails, extend the bead up to 3".
- When making applications of gel, avoiding disrupting the natural foraging of ants.
- If the ant nest can be located, inject up to 2.0 grams of bait directly into the nest or harborage entrance. [*]
- For applications into commercially available refillable bait stations, apply only an appropriate amount of **A197.02a** so the bait does not spill from the station and the station is not over-filled.
- After application, inspect bait placements for consumption/activity. If needed, apply additional **A197.02a** and reapply bait in the same location if all the bait is consumed or in a different area if new ant activity is observed.

[*Not for Use in California]



Figure 1. Example line of gel approximately 1/8" x 2".

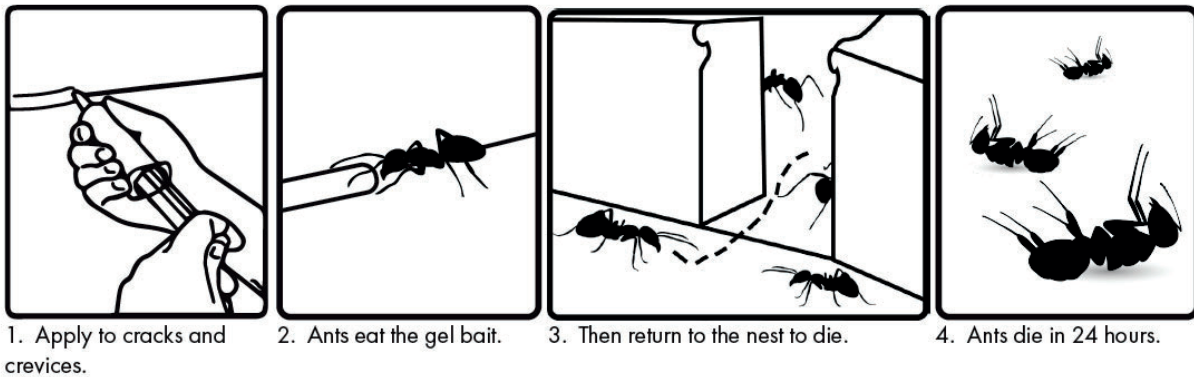


Figure 2. Spot of gel approximately 0.1 g of gel bait.



Figure 3. Example spot of gel approximately 1 g of gel bait.

[HOW IT WORKS]



1

[WHERE IT WORKS]



1

INDOOR APPLICATION DIRECTIONS

- Carefully inspect infested areas to determine infestation levels, where ants are foraging, nesting sites, and specific areas where bait should be applied.
- Bait should be applied indoors into cracks and crevices along walls, ceilings or floors, cabinets, behind or under equipment or appliances, under tables, within framing of tables or furniture, around sinks, within or near garbage collection areas, attics, or other inaccessible areas indoors.
- Bait applications may also be made between elements of construction, behind baseboards or molding, at openings into voids, and within hollow spaces in equipment bases and legs, near sinks or stoves, and in bathrooms.
- If using refillable bait stations, place the stations where ants are foraging or near their trails or nests. Inspect gel placements regularly and replace gel with fresh gel as needed.

APPLICATIONS IN FOOD/FEED HANDLING AREAS

Apply **A197.02a** only as a crack and crevice application to food/feed areas of food/feed handling establishments. Applications may be made while the facility is in operation. Place the bait dispenser directly into the crack or crevice, hole or other similar opening where ants are found or suspected and dispense bait. Food and feed handling 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. Use good application practice to avoid movement of **A197.02a** to exposed surfaces used for food preparation.

Food/Feed Handling Use Restrictions:

- **DO NOT** apply **A197.02a** to areas where food/feed, food utensils or food processing surfaces may come into contact and become contaminated.
- **DO NOT** apply **A197.02a** 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 **A197.02a** 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, heat producing equipment, parts of stoves, ovens, grills, fume hoods, saunas, heat lamps, coffee urns, steam tables, toasters, fryers, dishwashers, and hot water pipes.

If **A197.02a** contacts an exposed surface, first remove as much of the gel bait as possible, then wash area with soap and water.

APPLICATIONS IN NON-FOOD/NON-FEED HANDLING AREAS

A197.02a can be used as a spot or crack and crevice treatment in areas inaccessible to children and pets to control ants in residential structures and the non-food/non-feed areas of commercial, industrial, public and institutional buildings/structures, including restaurants, warehouses, food processing plants, supermarkets, hospitals, nursing homes, motels, hotels, schools, laboratories, computer facilities, aircraft, buses, boats/ships, trains, pet shops and zoos.

Non-food/non-feed areas include garbage rooms, lavatories, floor drains (to sewers), entries, vestibules, offices, locker rooms, machine rooms, boiler rooms, garages, mop closets and storage (after bottling or canning).

[WAX PAPER APPLICATION

For gel bait applications under appliances and other similar areas, or to protect the bait from possible existing contamination, apply the bait using 2" - 3" wax paper squares. Fold the wax paper in half to make a triangle and apply the 1/8" wide and 2" long bait bead in the center. Place the folded wax paper containing the bait into the appropriate bait placement location. Wax paper squares can easily be inspected, removed and/or replaced as needed.]

OUTDOOR APPLICATION DIRECTIONS

- Thoroughly inspect around structures for entry points, openings, and other similar areas where ants can access and crawl in.
- If access points are identified, make effort to remove or patch to prevent entry into structure.
- Apply spots or beads of **A197.02a** (see application rates for all uses) to windows, doors, between construction elements, sewer areas, adjacent ant harborage (trees, ornamental plants), along walls, garbage holding areas, or other suitable placement sites.
- Apply **A197.02a** to suitable areas to reduce the potential of subsequent human contact.
- After application, inspect bait placements for consumption/activity and apply fresh ant gel as needed.
- If outdoor temperatures are high, the consistency of the gel may be affected. Inspect placements after application to determine if additional gel is needed.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep this product in its tightly closed original container. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals, in such a manner as to prevent cross contamination with other pesticides, fertilizers, food and feed.

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: DO NOT reuse or refill this container. Offer to recycling if available. Place empty bait dispensers in trash. If partially filled: Call your local solid waste agency 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. 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.

[A197.02a is a trademark of Atticus, LLC]

[[Advion® Ant Gel] 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.

READ ALL DIRECTIONS COMPLETELY BEFORE USE.

This product will kill ant pests* including Acrobat, Argentine, Big-Headed, Carpenter, Cornfield, Crazy, Field, Ghost, Honey, Little Black, Odorous House, Pavement, Pyramid, Red Imported Fire Ant, Rover, Thief and White-footed ants. (*Except Pharaoh ants)

USE RESTRICTIONS:

- **DO NOT** treat areas that are easily accessible to children, domestic animals and pets.
- **DO NOT** apply to surfaces that food contacts.
- **DO NOT** allow open foods to contact gel material.

USE PRECAUTIONS: Avoid applying **A197.02a** to surfaces recently treated with repellent residual sprays. Surfaces treated with **A197.02a** should not be treated with repellent residual sprays.

WHERE TO APPLY:

Indoor and outdoor uses in residential sites including houses, apartments, boats, cars, trucks, sheds, garages and RVs.

For food/feed handling areas such as kitchens, apply as crack and crevice treatments along walls, baseboards or floors, behind or under appliances (such as refrigerators, dishwashers and stoves), under tables, around window frames, within framing of tables or furniture, around sinks, within or near garbage collection areas, attics, crawl spaces, and cracks and crevices in cabinets.

For areas other than kitchens (non-food/non-feed handling areas), apply as spot or crack and crevice treatments.

[WHERE IT WORKS



HOW TO USE:

Remove cap from the tip of the bait dispenser [tube]. [Place plunger into rear of tube.] [Use with provided plunger] [or in conjunction with a gel gun.] [Insert tube into gel gun.] Place tip where gel bait is to be applied and [depress plunger/pull trigger]. Apply gel in pea sized droplets (approximately 1/4" in diameter) or in 2" lines. See figures below for size examples. Apply as many placements of **A197.02a** as possible to active ant areas without disrupting the natural foraging behavior of ants. The amount of bait required for effective control will depend on the severity of the ant infestation. Inspect gel regularly and replace as needed. Replace cap on gel tip when finished dispensing gel. Use a paper towel to remove unwanted bait placements and then discard in trash. Inspect applications periodically for consumption/activity and apply fresh bait placements as needed. Reapply bait in the same location if the bait is all gone or in a different area if new ant activity is evident.

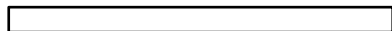


Figure 1. Example line of gel approximately 1/8" x 2".



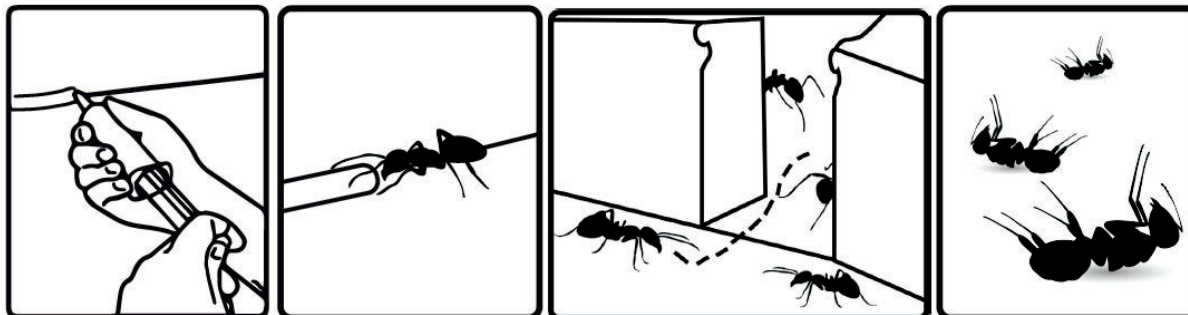
Figure 2. Spot of gel approximately 0.1 g of gel bait.



Figure 3. Example spot of gel approximately 1 g of gel bait.

Bait is still attractive when dry, however, it is best to re-apply if continued ant activity is noticed. Ant activity may continue [for a period of time] and will be related to the level of infestation. Proper sanitation (removal of refuse/garbage/crumbs/food residues) will increase the effectiveness of **A197.02a**.

[HOW IT WORKS



1. Apply to cracks and crevices.

2. Ants eat the gel bait.

3. Then return to the nest to die.

4. Ants die in 24 hours.

]

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Keep this product in its tightly closed original container. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals, in such a manner as to prevent cross contamination with other pesticides, fertilizers, food and feed.

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: DO NOT reuse or refill this container. Offer to recycling if available. Place empty bait dispensers in trash. **If partially filled:** Call your local solid waste agency 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. 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.

[A197.02a is a trademark of Atticus, LLC]

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

UNIT LABEL FOR UNIT LABEL FOR A197.02a

[Applicable for both commercial and consumer products]

A197.02a

[Alternate Brand Name: Savitri Ant Gel]

[1.06 oz. (30 g)] Net Weight

Non-refillable Container

Contains 0.05% Indoxacarb

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.

Refer to the full label for Use Directions, Precautionary Statements and Storage and Disposal.

[**A197.02a** is not manufactured, or distributed by Syngenta Professional Products, seller of [Advion® Ant Gel].]

EPA Reg No. 91234-261

EPA Est. No. _____

[Syringe label is anticipated to be approximately 3" x 3.5"]

[Lot number to be printed on the syringe or on the syringe label.]

[Optional Marketing Statements for Either Sub-label:]

[Use Related Claims]

- Apply to cracks and crevices [hard to reach places]
- Put the bait where the ants are
- [For] [Can be used in] Hard to reach places
- For hard to reach places [such as cracks and crevices]
- Kills the ants* you see and the ones you don't *excluding Pharoah
- Kills ants* you don't see *excluding Pharoah
- Easy way to apply bait
- Easy to apply/use
- For use in a total ant management program
- One tool in a total ant management program
- Kills ants where they breed
- Ants eat the gel bait and return to the nest to die.
- Apply to [cracks and crevices] [hard to reach places]
- Kills the colony [nest]
- Proven efficacy for listed pests
- Starts working in minutes
- Kills sugar feeding ants
- Kills ants before they enter your home
- Kills ants at their source
- Kills ants where they hide and breed
- Use Indoors & Outdoors

[Formulation/Applicator Based Claims]

- Non-staining [gel]
- Odorless [gel]
- Ready-to-use
- No messy residue
- Kills ants (excluding Pharoah) without a trace – no fumes or odor
- Convenient [syringe] applicator
- No mixing required
- Quick kill formula
- Ultra Clear formula
- Super Clear formula
- Water-based formula is clear and non-staining.
- Starts Clear - Stays Clear
- Water-based formula
- New
- Non-staining gel
- Gel stays attractive even when dry
- Clear gel technology
- COMIENZA DESPEJADO - SE MANTIENE DESPEJADO

[Efficacy Based Claims]

- Kills ants* *excluding Pharoah
- [Kills] Carpenter Ants [Works] [kills] in 24 hours
- Kills common household ants [in 24 hours]

{Optional Marketing graphics}

