



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

October 17, 2018

Charmonte Watkins  
SenesTech, Inc.  
3140 N. Caden Court, Suite 1  
Flagstaff, AZ 86004

Subject: Label Amendment – Amendment to remove Restricted Use Classification for ContraPest; add an alternate bait station and revise label format for clarity  
Product Name: ContraPest  
EPA Registration Number: 91601-1  
Application Date: June 27, 2018  
Decision Number: 545080

Dear Ms. Watkins:

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.

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

Page 2 of 2  
EPA Reg. No. 91601-1  
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with FIFRA section 6. If you have any questions, please contact Gene Benbow by phone at 703-347-0235, or via email at [Benbow.Gene@epa.gov](mailto:Benbow.Gene@epa.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Gene Benbow".

Gene Benbow, Product Manager 7  
Invertebrate & Vertebrate Branch 3  
Registration Division (7505P)  
Office of Pesticide Programs

## ContraPest®

A liquid bait for the reduction of reproductive capacity in Norway and roof rats.

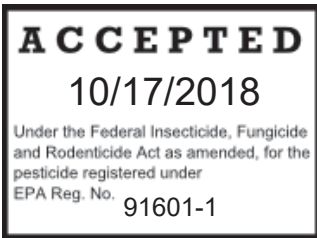
### Intended for Professional Use Only

**Active Ingredients:**

4-Vinylcyclohexene diepoxide ..... 0.09604%  
Triptolide..... 0.00118%

**Other Ingredients:** ..... 99.90278%

**Total:** 100.0000%



Keep Out of Reach of Children

## CAUTION

### FIRST AID

<b>If on skin or clothing:</b>	<ul style="list-style-type: none"><li>• Take off contaminated clothing.</li><li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li><li>• Call a poison control center or doctor for treatment advice.</li></ul>
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**Note to Physician or Veterinarian:** This product has been formulated for fertility control in rats. It may possibly induce transient infertility in small male and female mammals capable of reproduction.

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

EPA Reg. No. 91601-1  
Net Contents:  
Bell Evo 13.53 fl. oz. (400 ml)  
JT Eaton 18.59 fl. oz. (550 ml)

EPA Est. No. \_\_\_\_\_  
Manufactured by: SenesTech, Inc.  
3140 Caden Court  
Flagstaff, AZ 86004

### PRECAUTIONARY STATEMENTS Hazards to Humans and Domestic Animals

CAUTION. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

**Personal Protective Equipment:** Wear protective nitrile gloves  $\geq$  14 mils or butyl rubber  $\geq$  14 mils, long sleeved shirts, and long pants when handling this product.

**Treatment for Pet Ingestion:** If animal consumes bait, and adverse health effects are observed, call a veterinarian.

## **DIRECTIONS FOR USE**

**READ THIS LABEL:** Read label attached to product. Follow all use directions and use precautions. Use only for sites, pests, and application methods described on this label. It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**FOR INDOOR NON-FOOD USE AND EXTERNAL PERIMETER TREATMENT ONLY:** For use inside and within 1 ft around external perimeters of transit systems, public and private buildings, commercial residential buildings, and/or other man-made structures.

### **USE RESTRICTIONS:**

1. Store unused bait inserts out of reach of children, pets, and livestock.
2. Bait stations must not be placed in areas where the contamination of food or surfaces that come in direct contact with food is possible.
3. Apply bait inserts only in a JT Eaton 903TP tamper resistant or Bell Labs PROTECTA EVO Express bait stations only.
4. To avoid damage to the bait station, do not use bait stations in areas open to hooved livestock or potentially destructive wildlife.
5. Do not place bait stations beyond 1 ft of the exterior perimeter of man-made structures.
6. Bait station must be secured when placed in areas where children, pets, non-target animals (including livestock), and when placed within 1 ft of the exterior perimeter of a building or transit station, or the general public may be present.
7. Do not place bait stations where they are likely to become submerged or inundated with water, (e.g., below the mean higher high-water mark in tidal areas, in storm sewers, or in catch basins), or on an uneven surface.
8. Do not dilute or add anything to the product.

**SELECTION OF TREATMENT AREAS:** Determine areas where rats are most likely to find and consume bait. It is recommended that chew cards or non-toxic bait blocks be used to determine these locations. Reassess, if foraging locations change (e.g., due to seasonal changes or construction).

**APPLICATION DIRECTIONS:** Place bait station on a firm, level surface in an area of rat activity. Maintain an uninterrupted supply of bait in bait stations. Keep filled bait station clean, dry and on a level surface. Check bait stations and replace bait insert as necessary, or at least every 1 month. Properly dispose of any leftover bait, as instructed in the Storage and Disposal section of this label.

### **Installing Bait Inserts in Bait Stations:**

**To use new bait insert (tank and feeder tray):**

1. Remove cap, keeping the opening down, screw tank onto tray while keeping it level. Do not overtighten.
2. The flow of liquid should begin immediately. Do not squeeze tank to encourage flow of bait.
3. Place insert into the appropriate side of the bait station (R or L, as applicable).

**To reuse feeder tray with new tank:**

1. Remove insert (tank and tray) from bait station. Keep insert level to limit spills.
2. Slowly rotate insert away from you, as indicated by arrow on top of the tank, until feeder tray is on top.
3. Hold insert in this position for approximately 5 seconds to ensure all bait flows back into tank.
4. Unscrew feeder tray from tank and flip tray over until it is in upright position.
5. Remove cap on the new tank and keeping the opening down, screw the tank onto the tray. Do not overtighten.
6. The flow of liquid should begin immediately. Do not squeeze tank.
7. Place insert into the appropriate side of the bait station (R or L, as applicable).
8. Screw new tank cap onto old tank and dispose in trash.

**STORAGE AND DISPOSAL**

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

**Storage:** Store only in original, tightly secured, bait tank in a room temperature environment, inaccessible to children, pets, livestock, and other non-target animals.

**Disposal:** Do not re-use empty tanks. **If empty:** Place container in trash or offer for recycling.

**If partly filled:** Cap the tank and place in the trash container.

**Container Handling:** Non-refillable tank. Dispose of tanks by recapping and placing in trash can or an approved waste disposal facility.

**DISCLAIMER**

To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling of this material when such use and/or handling is contrary to label instructions.

Patent 9,956,235

{Individual Bait Insert Label}

## ContraPest®

### Intended for Professional Use Only

**Active Ingredients:**

4-Vinylcyclohexene diepoxide ..... 0.09604%  
Triptolide..... 0.00118%

**Other Ingredients:** ..... 99.90278%

**Total:** 100.0000%

Keep Out Of Reach Of Children

#### CAUTION

EPA Reg. No. 91601-1  
Net Contents:  
18.59 fl. oz. (550 ml)  
{Alternate: 13.53 fl. oz. (400 ml)}  
Batch Code: see stamp

EPA Est. No. \_\_\_\_\_  
Manufactured by: SenesTech, Inc.  
3140 Caden Court  
Flagstaff, AZ 86004

#### **Directions for Use:**

**For use in JT Eaton 903TP bait station only {Alternate: for use in Bell Labs PROTEVA EVO Express bait stations only}** . Applicator must be in possession of the full label at the time of application. Replace at least every 1 month.

#### **To use new bait insert (tank and feeder tray):**

1. Remove cap, keeping the opening down, screw tank onto tray while keeping it level. Do not overtighten.
2. The flow of liquid should begin immediately. Do not squeeze tank to encourage flow of bait.
3. Place insert into the appropriate side of the bait station (R or L). {Alternate: This step for JT Eaton trays only. EVO trays do not have orientation.}

#### **To reuse feeder tray with new tank:**

1. Remove insert (tank and tray) from bait station. Keep insert level to limit spills.
2. Slowly rotate insert away from you, as indicated by arrow on top of the tank, until feeder tray is on top.
3. Hold insert in this position for approximately 5 seconds to ensure all bait flows back into tank.
4. Unscrew feeder tray from tank and flip tray over until it is in upright position.
5. Remove cap on the new tank and keeping the opening down, screw the tank onto the tray. Do not overtighten.

6. The flow of liquid should begin immediately. Do not squeeze tank.
7. Place insert into the appropriate side of the bait station (R or L). {Alternate: This step for JT Eaton trays only. EVO trays do not have orientation.}
8. Screw new tank cap onto old tank and dispose in trash.

**Disposal:** Do not re-use empty bait insert. **If empty:** Place container in trash or offer for recycling.  
**If partly filled:** Cap the container and place in the trash.

*See full product label for First Aid and Directions for Use.*  
Patent 9,956,235.