



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 10, 2022

Charmonte Watkins
Sr. Regulatory Compliance Mgr.
Senestech, Inc.
23460 N. 19th Ave., Suite 110
Phoenix, AZ 85027

Subject: PRIA Label Amendment –To add a sublabel for a new ‘sipper’ bottle application method; adding marketing claims and making other minor revisions.
Product Name: ContraPest
EPA Registration Number: 91601-1
Application Date: 4/23/2021
Decision Number: 575331

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

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EPA Reg. No. 91601-1
Decision No. 575331

with FIFRA section 6. If you have any questions, please contact Jasmin Jackson by phone at 202-566-2797, or via email at Jackson.Jasmin@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

{All text in brackets [xxx] is optional and may or may not appear on final label.}
{All text in braces {xxx} is administrative and will not appear on a final label.}

{OPTIONAL COVER PAGE}

ContraPest®

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

Not Intended for Consumer Use

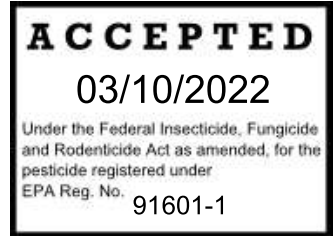
Active Ingredients:

4-Vinylcyclohexene diepoxide 0.09604%

Triptolide..... 0.00118%

Other Ingredients: 99.90278%

Total: 100.0000%



Keep Out of Reach of Children

CAUTION

FIRST AID

If on skin or clothing:	<ul style="list-style-type: none">• 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.
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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.

Sublabel #1: ContraPest® - For use in tamper-resistant bait stations indoors and within 1 ft around external perimeters of agricultural farm buildings, transit systems, public and private buildings, commercial residential buildings, retail buildings, and/or other man-made structures.

Sublabel #2: ContraPest® - For indoor, sipper bottle use in rafters, ceilings, attics, and other elevated areas of agricultural farm buildings, transit systems, public and private buildings, commercial residential buildings, retail buildings, and/or other man-made structures.

{Sublabel # 1 – For use in tamper-resistant bait stations}

ContraPest®

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

For use in tamper-resistant bait stations indoors and within 1 ft around external perimeters of agricultural farm buildings, transit systems, public and private buildings, commercial residential buildings, retail buildings, and/or other man-made structures.

Not Intended for Consumer Use

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

If on skin or clothing:	<ul style="list-style-type: none">• 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.
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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.

[Made in USA]

EPA Reg. No. 91601-1

Net Contents:

[Bell Evo 4, 6, 8 or 13.53 fl. Oz.(or 120, 180, 240 or 400 ml)]

[JT Eaton 18.59 fl. Oz. (550 ml)]

EPA Est. No. _____

Manufactured by/for: SenesTech, Inc.

23640 N 19th Ave. Suite 110

Phoenix, AZ 85027

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 in tamper-resistant bait stations inside and within 1 ft around external perimeters of agricultural farm buildings, transit systems, public and private buildings, commercial residential buildings, retail buildings, and/or other man-made structures.

USE RESTRICTIONS:

1. Store unused bait tanks 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 tanks in a JT Eaton 903TP tamper resistant or Bell Labs PROTECTA EVO Express bait stations.
4. To avoid damage to the bait station, do not use 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.
9. When used in a agricultural or retail setting, place bait stations away from food animals, animal feed, and customers.

SELECTION OF TREATMENT AREAS: Determine areas where rats are most likely to find and consume bait. These areas can include concealed areas along wall, near burrows, near structural openings in floor, walls, or ceiling areas (e.g. in rafters, beams or attics) or where other signs of rat activity have been observed. 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). Multiple bait stations may be placed in identified foraging areas if needed.

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 bait station, tank and tray insert clean, dry and on a level surface. Check bait stations and replace bait insert as necessary, or at least every 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 unit (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 tank into the appropriate side of the bait station (R or L, as applicable).

To reuse feeder tray with new tank:

1. Remove unit (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 unit 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 unit 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 unauthorized users, 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 Handling: Tanks are not to be reused or refilled. Dispose of tanks by recapping and placing in the trash or offer for recycling at 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

{Master Label}
{March 08, 2022}
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and/or handling of this material when such use and/or handling is contrary to label instructions.
Always read all Directions for Use carefully before applying.
Patent 9,956,235

ContraPest® is a registered trademark of SenesTech, Inc.
PROTECTA EVO EXPRESS® is a registered trademark of Bell Laboratories, Inc. and
SenesTech, Inc. is not related or affiliated with Bell Laboratories, Inc.

{CONTINUING SUBLABEL #1 ON NEXT PAGE}

{Master Label}
{March 08, 2022}
{Page 6 of 16}

{Sublabel #1: Individual Bait Station Insert Label}

ContraPest®

For use indoors and within 1 ft around external perimeters of agricultural farm buildings, transit systems, public and private buildings, commercial residential buildings, retail buildings, and/or other man-made structures.

Not Intended for Consumer Use

Active Ingredients:

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

Other Ingredients: 99.90278%

Total: 100.0000%

Keep Out Of Reach Of Children

CAUTION

[Made in USA]

EPA Reg. No. 91601-1

Net Contents:

18.59 fl. oz. (550 ml)

[Alternate: 4,6,8 or 13.53 fl. oz. (or 120, 180, 240 or 400 ml)]

Batch Code: see stamp

EPA Est. No. _____

Manufactured by/for: SenesTech, Inc.

23640 N 19th Ave, Suite 110

Phoenix, AZ 85027

Directions for Use:

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

To use new bait unit (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 unit (tank and tray) from bait station. Keep insert level to limit spills.
2. Slowly rotate unit away from you, as indicated by arrow on top of the tank, until feeder tray is on top.
3. Hold unit 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 unit 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 or refill empty containers. **If empty:** Place container in trash or offer for recycling. **If partly filled:** Cap the container and place in the trash.

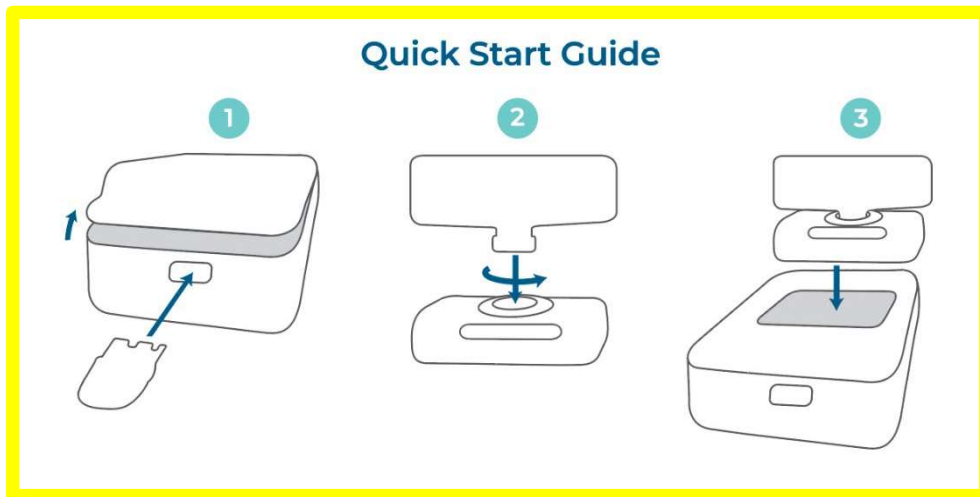
See full product label for First Aid and Directions for Use.
Patent 9,956,235.

ContraPest® is a registered trademark of SenesTech, Inc.
PROTECTA EVO EXPRESS® is a registered trademark of Bell Laboratories, Inc. and SenesTech, Inc. is not related or affiliated with Bell Laboratories, Inc.

{CONTINUING SUBLABEL #1 ON NEXT PAGE}

{Sublabel #1 - Optional Marketing Claim Statements and images:}

1. Palatable bait formulation
2. ContraPest is effective against both male and female rats.
3. For reduction of reproduction capacity of both male and female rats
4. For indoor non-food use
5. Liquid Bait
6. Formulated for rat control
7. Controls rats
8. For use indoors to control rats
9. For use with [JT Eaton 903TP] [or] [and] [Bell Labs PROTEVA EVO Express] bait station(s)
10. Made in the USA
11. Works best in known foraging locations
12. Easy to deploy
13. Treats rat populations at the source of reproduction
14. Male rats are affected too!
15. Rat contraceptive that works
16. First and only EPA approved contraceptive for both male and female rats.



{Sublabel 1: Optional Individual Marketing Handout}

[1.Place Stations

Best baiting locations are where rats are known to be feeding (ex: dumpsters, animal feed, loose trash, etc.)

When possible, utilize areas where previous baiting has been successful (keep bait stations at least 30 feet away from lethal methods).



2. Deploy ContraPest

Place one(1) ContraPest tank and tray in the station(s) in either the left or right side.



3. Monitor

Add a second ContraPest tank and tray to stations when 50% or more of the tank has been consumed between service visits to ensure a constant supply.

If consumption is repeatedly low or ceases, try relocating the bait station to a different location.



4. Maintain:

Replace ContraPest monthly, or as often as needed to retain optimum flow of bait.



©SenesTech, Inc. 2021 ContraPest® is registered federally as a General Use Product. However, some states may classify ContraPest as a Restricted Use Product. Please check with your local state regulatory agency to determine restriction status. Read and follow all label instructions for target species Norway and roof rats.

PROTECTA EVO EXPRESS® is a registered trademark of Bell Laboratories, Inc. and SenesTech is not related or affiliated with Bell Laboratories, Inc.

ContraPest® is a registered trademark of SenesTech, Inc.]

{END OF SUBLABEL #1}

{Sublabel #2 – For use in sipper bottles}

ContraPest®

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

For indoor use in rafters, ceilings attics, and other elevated areas of agricultural farm buildings, transit systems, public and private buildings, commercial residential buildings, retail buildings, and/or other man-made structures.

Not Intended for Consumer Use

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

If on skin or clothing:	<ul style="list-style-type: none">• 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.
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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.

[Made in USA]

EPA Reg. No. 91601-1

Net Contents:

[HDPE Bottle 4, 8 and 16 fl. oz (or 120, 240 and 480 ml)]

EPA Est. No. _____

Manufactured by/for: SenesTech, Inc.

23640 N 19th Ave. Suite 110

Phoenix, AZ 85027

**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: in rafters, ceilings, attics, and other elevated areas of agricultural farm buildings, transit systems, public and private buildings, commercial residential buildings, retail buildings, and/or other man-made structures. **DO NOT** apply bottles outdoors. **DO NOT** apply bottles in areas accessible to children, pets or non-target species.

USE RESTRICTIONS.

1. Bottles must not be placed in areas where the contamination of food or surfaces that come in direct contact with food is possible.
2. Place bottle indoors only, *DO NOT* apply outdoors.
3. Do not dilute or add anything to the product.
4. Store product in a location where children, pets, or other non-target animals have no access.
5. Dispose of product container, unused, spoiled, and unconsumed bait as specified on this label.
6. Bottle mounting bracket is mandatory for use. Mounting bracket may either secured to a sturdy vertical or horizontal surface.

SELECTION OF TREATMENT AREAS: Determine areas where rats will most likely find and consume bait. Generally these are along ceiling rafters, ledges, or beams; attics, along walls, or in locations where rats or their signs have been observed.

APPLICATION DIRECTIONS: Maintain an uninterrupted supply of bait. Check and replace bait as necessary, or at least every month.

Installing Bottles into Mounting Bracket:

To use bottle and mounting bracket

1. Secure mounting bracket to a solid surface. When placed on a vertical surface, secure the bracket so that it does not move side to side. When placed on horizontal surface, secure the bracket so that it cannot be knocked over.

2. Adjust the height of the bracket to ensure that once the bottle and nozzle are attached, rats can consume from the drinking nozzle.
3. Remove the bottle cap and seal from the bottle.
4. Attach the nozzle to the bottle.
5. Invert the bottle and place in the mounting bracket.
6. Once inverted and in place, remove the stopper covering the end of the nozzle.
7. It is recommended to place a secondary container under mounting bracket when hung from a vertical surface.

Installing replacement bottle

1. Remove the bottle from the mounting bracket by pulling straight up. **Note:** If you are unable to grip the bottle securely to remove, you can push the bottle up from underneath.
2. Invert the bottle.
3. Remove the nozzle and recap the empty bottle with the cap from the replacement bottle and dispose of (see storage and disposal). If necessary replace the nozzle.
4. Remove the cap and seal from the replacement bottle.
5. Attach the drinking attachment to the replacement bottle.
6. Invert the replacement bottle and place the bottle in the mounting bracket.
7. Once inverted and in place, remove the plug covering the end of the drinking attachment.

STORAGE AND DISPOSAL

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

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

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

If partly filled: Cap the bottle and place in the trash.

Container Handling: Bottles are not to be reused or refilled. Dispose of bottles by recapping and placing in the trash or offer for recycling at 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

ContraPest® is a registered trademark of SenesTech, Inc.

{CONTINUING SUBLABEL #2 ON NEXT PAGE}

{Sublabel #2- Individual Bottle Label Insert}

ContraPest®

For indoor use in rafters, ceilings attics, and other elevated areas of agricultural farm buildings, transit systems, public and private buildings, commercial residential buildings, retail buildings, and/or other man-made structures.

Not Intended for Consumer Use

Active Ingredients:

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

Other Ingredients: 99.90278%

Total: 100.0000%

Keep Out Of Reach Of Children

CAUTION

[Made in USA]

EPA Reg. No. 91601-1

Net Contents:

HDPE Bottle 8 and 16 fl. oz. (240 and 480 ml)

Batch Code: see stamp

EPA Est. No. _____

Manufactured by/for: SenesTech, Inc.

23640 N 19th Ave, Suite 110

Phoenix, AZ 85027

Directions for Use

For use in bottle mounting bracket only. Applicator must be in possession of the full label at the time of application. Replace bottle at least every month.

Installing Bottles into Mounting Bracket:

To use bottle and mounting bracket

1. Secure mounting bracket to a solid surface. When placed on a vertical surface, secure the bracket so that it does not move side to side. When placed on horizontal surface, secure the bracket so that it cannot be knocked over.
2. Adjust the height of the bracket to ensure that once the bottle and nozzle are attached, rats can consume from the drinking nozzle.
3. Remove the bottle cap and seal from the bottle.
4. Attach the nozzle to the bottle.
5. Invert the bottle and place in the mounting bracket.
6. Once inverted and in place, remove the stopper covering the end of the nozzle.
7. It is recommended to place a secondary container under mounting bracket when hung from a vertical surface.

Installing replacement bottle

1. Remove the bottle from the mounting bracket by pulling straight up. **Note:** If you are unable to grip the bottle securely to remove, you can push the bottle up from underneath.
2. Invert the bottle.
3. Remove the nozzle and recap the empty bottle with the cap from the replacement bottle and dispose of (see storage and disposal). If necessary replace the nozzle.
4. Remove the cap and seal from the replacement bottle.
5. Attach the drinking attachment to the replacement bottle.
6. Invert the replacement bottle and place the bottle in the mounting bracket.
7. Once inverted and in place, remove the plug covering the end of the drinking attachment.

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

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

ContraPest® is a registered trademark of SenesTech, Inc.

{CONTINUING SUBLABEL #2 ON NEXT PAGE}

{Sublabel #2 - Optional Marketing Claim Statements}

1. Palatable bait formulation
2. ContraPest is effective against both male and female rats.
3. For reduction of reproduction capacity of both male and female rats
4. For indoor [non-food] use to control rats
5. Liquid Bait
6. Formulated for rat control
7. Controls rats
8. Made in the USA
9. Works best in known foraging locations
10. Easy to deploy
11. Treats rat populations at the source of reproduction
12. Male rats are affected too!
13. Rat contraceptive that works
14. First and only EPA approved contraceptive for both male and female rats.

{END OF SUBLABEL #2}