



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

December 9, 2009

MEMORANDUM

Subject: Name of Pesticide Product: RF 2042 (CDSO)
EPA Reg. No. /File Symbol: 2724-796
DP Barcode: DP 369326
Decision No.: 419448
Action Code: R340
PC Codes: 067501 (Piperonyl butoxide: 5%)
105402 (S-methoprene: 3.6%)
128965 (Etofenprox: 30%)

From: Byron T. Backus, Ph.D., Toxicologist
Technical Review Branch
Registration Division (7505P)

Byron T. Backus
Dec. 9 2009
DMc

To: Kevin Sweeney/Richard Gebken, RM 13
Insecticide Branch
Registration Division (7505P)

Registrant: WELLMARK INTERNATIONAL

FORMULATION FROM LABEL:

<u>Active Ingredient(s):</u>		
128965 Etofenprox		30.0%
105402 S-Methoprene		3.6%
067501 Piperonyl butoxide		5.0%
<u>Other Ingredient(s):</u>		<u>61.4%</u>
	TOTAL	100.000%

ACTION REQUESTED: The Risk Manager requests:

“Please review labelling of etofenprox product and associated discussion in the attached MRID.”

BACKGROUND:

The material received for review includes a cover letter from the registrant dated August 31, 2009, a regulatory label data sheet from the registrant indicating revisions, and a document (MRID 47844001) titled: "Evaluation of the toxicity of Dog Spot-on RF2042 [CDSO] to Cats and Kittens." The two proposed label revisions which are relevant to toxicity are 1) [Non-Irritating][Formula] [with special coat conditioning agent, Lanolin][Contains lanolin for coat conditioning] Ideal for dogs with sensitive skin, and 2) Based on testing, accidental exposure to cats from treated dogs will not cause serious harmful effects.

COMMENTS AND RECOMMENDATIONS:

1. We can accept a statement indicating that this formulation contains lanolin for coat conditioning. We cannot accept a statement that the formulation is non-irritating or ideal for dogs with sensitive skin.
2. Although the material in MRID 47844001 references studies on cats and kittens conducted with etofenprox-containing formulations in which no significant adverse effects were observed, the Agency has received incident reports for both the primary registration (2724-504) and distributor products (2724-504-270 and 2724-504-2596) of a 40% Etofenprox and 3.6% S-methoprene containing formulation. These incidents include a total (for 2008) of 82 deaths (by all exposure routes) in cats or kittens. In addition, the presence of lanolin in 2724-796 creates a potential problem, as some cats (particularly Siamese) may be attracted to lanolin (see <http://www.messybeast.com/pica.htm>), and may go out of their way to lick lanolin-treated items. It is also noted that 2724-504 does not contain piperonyl butoxide, which is present in 2724-796 and which could enhance the toxicity of the etofenprox to the cat. Based on these considerations TRB recommends against any statement indicating that accidental exposure to cats from treated dogs will not cause serious harmful effects.
3. Based on the incident reports for EPA Reg. No. 2724-504 and the attractiveness of lanolin to some cats, TRB strongly recommends that lanolin be removed from 2724-796. Otherwise some cats in multiple-pet households will ingest this product by licking or grooming the dog's treated coat.