



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 15, 2016

Georgia Anastasiou
Combat Insect Control Systems
c/o Lewis & Harrison, LLC
112 C Street, Suite 505
Washington, DC 20001

Subject: Label Amendment – Add Optional Marketing Claims and Use Recommendations
Product Name: COMBAT ANT BAIT F1
EPA Registration Number: 64240-30
Application Date: October 15, 2015
Decision Number: 510544

Dear Ms. Anastasiou:

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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with FIFRA section 6. If you have any questions, please contact Maggie Rudick by phone at 703-347-0257, or via email at rudick.maggie@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to be 'KBD', enclosed within a large, hand-drawn oval.

Kable Bo Davis, Product Manager 3
Invertebrate and Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

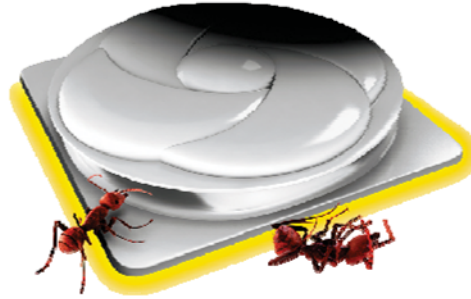
Enclosure

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***
[Bracketed information is optional text.]

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COMBAT[®] Ant Bait F1

Approved Alternate Brand Names:
[Combat Quick Kill Formula 3]
[Combat Source Kill Max A1]
[Combat Max Ant Killing Bait]



[FOR INDOOR AND OUTDOOR (adjacent to the home) USE]
[ANT]S]

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS

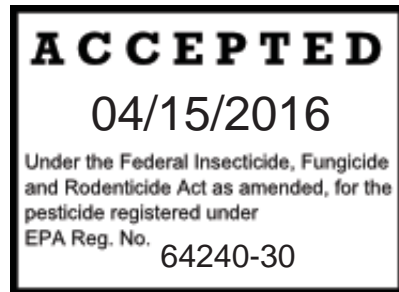
CAUTION:

SEE PRECAUTIONARY STATEMENTS ON BACK *-or-* SIDE PANEL

ACTIVE INGREDIENTS: Fipronil*0.01%
OTHER INGREDIENTS:99.99%
TOTAL.....100.00%

*CAS No. 120068-37-3

EPA Reg. No. 64240-30
EPA Est. No. _____



[Contains] [2] [4] [6] [8] [12]
CHILD-RESISTANT BAIT STATIONS
[TOTAL] NET WT _____

[Manufactured for] [Distributed by] [&] ©[Year] Combat Insect Control Systems
[7201 E. Henkel Way], Scottsdale, [AZ] [ARIZONA] 85255
MADE IN [USA][KOREA]

[Patent Pending] [Patent Number]

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PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

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

STORAGE AND DISPOSAL: Do not remove baits from [bait] station[s].

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

CONTAINER HANDLING: If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. If recycling is not available, place in trash. If partially filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Note to Reviewer: *Per PR-Notice 2007-4, this product will receive a batch code. The batch code will be printed on each bait station.*

For front or back or side panel:

[[Satisfaction guaranteed] [Guaranteed to work] or your money back[!]]

[EFFECTIVENESS GUARANTEED: COMBAT® [Insect Control Systems] stands behind this [insect killing system] [product] with a full [Satisfaction] Guarantee. Should you have any questions regarding COMBAT® [baits] [products], please call 1-800-426-6228.]

[For information, [call the Combat® [Labs] [Information] Helpline at 1-800-426-6228.]]

[[For questions or comments,] [please] [call the] Combat® [Labs] [Information] Helpline at 1-800-426-6228 [for information].]

[The distinctive design and elements of this package are proprietary and owned by The Dial Corporation, A Henkel Company.]

[[] [[The] [Paperboard in this] Carton [contains] [is made from] ____% Recycled fiber [minimum ____% post consumer content].] [PLEASE RECYCLE EMPTY CARTON]

Optional Henkel statement for front or back or side panel:



[PRODUCT INFORMATION] [USE INFORMATION]

[[THIS IS] HOW [THE] COMBAT® ANT BAIT F1 [QUICK KILL FORMULA 3] WORKS:]

- [[Worker] Ants enter bait station and eat the bait ***-or-*** leave after eating ***-or-*** feeding on bait inside]

-or-

[This product will attract foraging worker ants to the bait feeding station. The ants will feed on the bait.]

- [Ants carry bait back to colony so that the bait can kill the queen and other ants.]

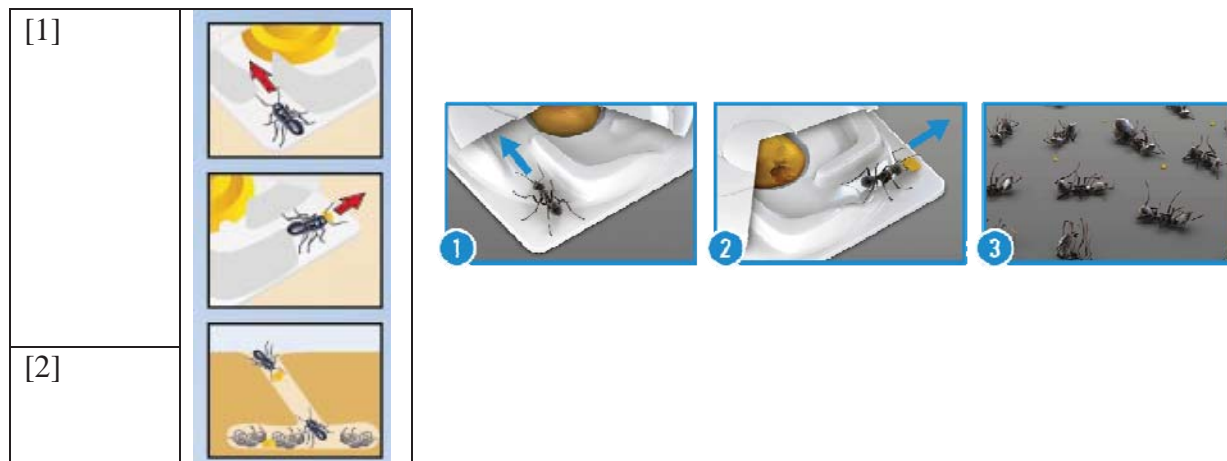
-or-

[Worker ants will take some of the bait back to the nest where they pass it on to kill the queen and entire colony.]

-or-

[Ants take the bait back to the nest.]

- [Ants pass the bait on to the queen and destroy the entire colony.]



- [This product contains an effective insecticide ingredient which kills most ants commonly found in households ***-or-*** homes. This product is effective because ants carry bait back to where they live (the colony) to destroy queen the entire colony. It even kills ants [you don't see] outside (adjacent to) your home to prevent more ants from coming inside.]

- [This product kills the following ants which feed on sweet and greasy materials: Fire, Argentine, Cornfield Ants, Little Black, Odorous House, and Pavement Ants.]

-or-

- [Kills common household ants, including Argentine, Cornfield, Odorous House and Pavement Ants.]

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***
[Bracketed information is optional text.]

DIRECTIONS FOR USE:

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

1. Use all [*package count*] bait[s] [station[s]]. [Large or heavily infested areas may require more bait stations.] Break bait[s] [station[s] apart Place bait[s] [station[s] near ant trails – ***and/ or*** –close to areas where ants are numerous –***and/ or*** –where you frequently see ants. [Place additional bait[s] [stations] [near cracks, along sills or] anywhere ants may enter your home.]
2. Do not spray insecticide on or around the bait stations. [Spray[s] [will] contaminate [the] baits and reduce [their] effectiveness.]
3. Replace all [*package count*] bait[s] [stations] every [after] 3 months to keep ants from reappearing – ***or*** – returning.



– ***or*** –

[Inside, COMBAT can be placed in cabinets, next to dishes, or anywhere your ant problem occurs.]

[For general control of ants outdoors (adjacent to your home) and to prevent them from coming indoors, place a bait station every 15-20 feet around the perimeter of your home.]

[Place additional COMBAT bait stations near cracks or crevices, along sills, or anywhere ants may gain entry indoors – *or* – that ants might enter your home.]

[Outside (adjacent to) your home, place additional COMBAT bait stations near cracks and crevices, along sills, or anywhere ants may gain entry.]

[Increased ant activity may be seen near the bait stations for short periods, but you can expect to see less activity within a day – *or* – a few days – *or* – a week. [**TIP:**] For best results, do not interfere with the ants or the bait stations during [its] use because ants must carry bait back to the colony so that it can kill – *or* – destroy the queen and the other ants – *or* – the entire colony.]

Optional Claims for front or back:

- With [a blend of] [multiple] foods ants eat
- With foods ants find attractive [appealing]
- With multiple foods to kill [the] queen and [the] [entire] colony
- Destroys – ***or*** – Kills [the] queen and [the] [entire] colony [source]
- Quick kill formula
- Fast formula
- Kills the ants you see and ones you don't see
- Long lasting power
- Non-stop ant control
- Provides long lasting ant killing power
- Kills common household ants, including: Argentine Ants, [, Little Black Ants, Cornfield Ants, Odorous House Ants, Pavement Ants]
- Kills ants without messy residue and without insecticide odors – ***or*** – fumes
- For common household ants
- Kills grease and sugar loving ants
- Ants carry bait back to the colony so that the bait can kill the queen and other ants so that they don't invade your home
- Kills ants outdoors (adjacent to the home) before they come indoors so that they don't invade your home
- Kills [the} entire colony
- Child-resistant [bait] [stations]
- Attracts worker ants to the bait stations
- Leaves no residue or odor

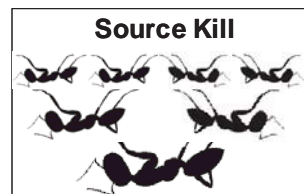
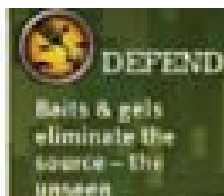
Claims for front or back (continued):

- Kills ants without insecticide odors [fumes]
- Kills ants at their source
- Controls ant problem
- Starts [working] as soon as you activate
- Lasts for 1-3 months
- Kills [ants] [quickly] [fast]
- No vapor, fumes or odor [easy to use] [nothing to activate]
- Easy to use
- Nothing to activate
- [Destroys] [kills] [the] [queen and] [the] [entire] [colony] [source] [nest]
- [For] indoor [and] [&] outdoor (adjacent to the home) use
- Starts working as soon as ants feed on bait
- Starts killing overnight
- Kills ants 24/7 for up to 3 months
- Kills quickly [and keeps on killing] [[for] up to 3 months]
- [Kills] [Starts Killing] in hours – up to 3 months
- Kills non-stop [for] [up to 3 months]
- Kills fast – up to 3 months
- Kills in hours, [Non-stop] [for] up to 3 months
- [Fast Acting] [and] [effective] killing [[for] up to 3 months]
- Kills [with][in] 24 hours [and [for] [Lasts] up to 3 months]

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For 6 count or more (will not exceed 12 bait stations):

- Great value
- Value size
- Economy size
- [Bonus Pack] (***applies to packs to which more baits are added***)
- [50% More Free] (***applies to packs to which 50% more baits are added***)
- [6 Bonus Baits With Purchase] (***applies to packs to which 6 more baits are added***)
- [x] [x [Bait]] [[x%] More^{††} [With Purchase]
- [x%] for free^{††} [With Purchase]
- [X][Extra] [Free] [Bonus] [Bait(s)] ^{††} [With Purchase] ^{††} [for free]
- More Baits [- Better Value]
- Value Pack [- More Baits]
- Value Size [- More Baits]
- Better Value
- SUPER VALUE
- INSTITUTIONAL SIZE
- ECONOMY PACK
- GREAT VALUE [X] number [more] [extra] bait stations]
- Double Pack
- Kill the ones you see and the ones you don't [see]
- Kill[s] [the] [entire] nest [colony]
- [Your] Secret weapon [against ants]
^{††}vs. [standard] [x] [count] [ct.][package] [pkg.] [of this product]



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UNIT LABEL

COMBAT[®] Ant Bait F1

THIS SIDE DOWN OR AGAINST SURFACE

Note: Do not remove or puncture this label

ACTIVE INGREDIENTS: Fipronil*.....	0.01%
<u>OTHER INGREDIENTS:</u>	<u>99.99%</u>
TOTAL.....	100.00%

*CAS No. 120068-37-3

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS

CAUTION:

Wash hands thoroughly with soap and water after handling bait stations.

CONTAINER HANDLING: If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. If recycling is not available, place in trash. If partially filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[For more information,] [call the] Combat[®] [Labs] [Information] Helpline at 1-800-426-6228 – ***or*** – For questions or comments, please [call the] Combat[®] [Labs] [Information] Helpline at 1-800-426-6228 [for [more] information]. – ***or*** – Call the Combat[®] Helpline at 1-800-426-6228 [for information]. – ***or*** – Questions or Comments? Call 1-800-426-6228.

[Manufactured for] [Distributed by] [&] © [Year]
Combat Insect Control Systems
Scottsdale, [AZ] [Arizona] 85255
Made in [U.S.A.][KOREA]

EPA Reg. No. 64240-30
EPA Est. No.

SEE OUTER CARTON – ***or*** – BAG – ***or*** – CONTAINER FOR COMPLETE DIRECTIONS AND PRECAUTIONS

[Total] Net Weight 0.035 oz (1.0g)