



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 11, 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 SMALL ROACH BAIT F.03
EPA Registration Number: 64240-33
Application Date: October 15, 2015
Decision Number: 510552

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 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]

Master Label, March 10, 2016
EPA Reg. No. 64240-33
Combat Small Roach Bait F.03
Pg 1 of 7

COMBAT[®] Small Roach Bait F.03

Approved Alternate Brand Names:

Combat Quick Kill Formula 1
Combat Plus^{Brand} Quick Kill Formula 1 Roach Baits
Combat Source Kill Max R1
Combat Defense System^{Brand} Source Kill Max R1
Combat Max Roach Killing Bait S
Combat Defense System^{Brand} Max Roach Killing Bait S
Combat Max Defense System^{Brand} Roach Killing Bait S



Above illustration is a placeholder for graphic(s) depicting roaches in or near a representative bait station.

ACTIVE INGREDIENT: Fipronil[†] 0.03%
OTHER INGREDIENTS:..... 99.97%
TOTAL..... 100.00%

[†] CAS No. 120068-37-3

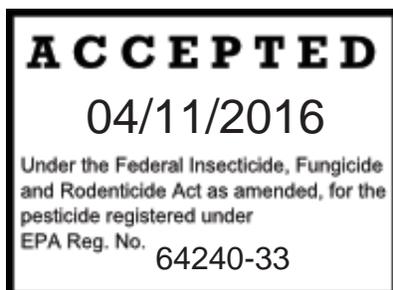
DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS

CAUTION:

See precautionary statements on [back] [side] [bottom] panel.

EPA Reg. No. 64240-33 EPA Est. No. _____

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



[Small Bait Stations:] [CONTAINS] [2] [4] [6] [8] [12] [18]
[Large Bait Stations:] [CONTAINS] [6] [8]
Child-resistant bait stations [for large and small roaches]
[TOTAL] NET WT. _____

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:

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.

[U.S. Patent Nos. _____ [and others pending.]]

[[Combat®] [Guaranteed to work or your money back!]]

[EFFECTIVENESS GUARANTEED: To the extent consistent with applicable law, 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 information]. **-or-** [For questions [or comments], [please] call the Combat® [Labs] [Information] Helpline at 1-800-426-6228 [for information]].



[[The paperboard in this] [C]carton [contains] [is made from] _____% Recycled fiber [minimum _____% post consumer content]] [Please Recycle Empty Carton.]

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

{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.}

Optional Henkel statements for front or back or side panel:



-or-



[PRODUCT INFORMATION] [USE INFORMATION]

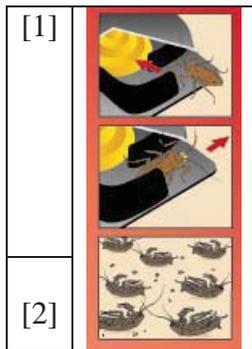
[THIS IS] [HOW] [THIS] [Combat] [*Alternate Brand Name*] WORKS:

1. Roaches enter the bait station and eat the bait.
2. Roaches return to their nest and die.
3. Other roaches eat them and die, creating a chain reaction.

-or-

1. Roaches enter the bait station and eat [feed on] the bait.
2. Roaches take the bait back to the nest.
3. Roaches share the bait, killing other roaches and destroying the nest.

Optional images



[Table below is optional.]

DATE PLACED (Month/Year)	LOCATION	REPLACEMENT DATE (After [3] [6] Months)

[This product is specifically designed for small and large roaches.]

[Small, ½” Cockroach Habits: Primarily live and breed in moist areas like kitchens and bathrooms.]

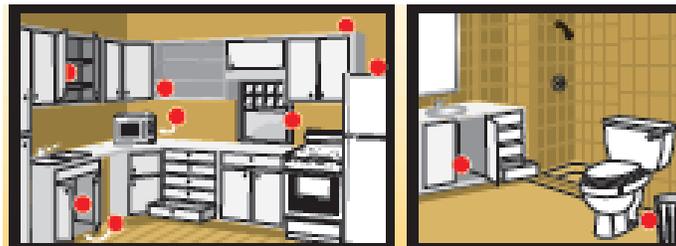
[Large, 1” to 1 ½” Cockroach. Habits: Primarily live and breed outdoors and enter homes in search of food. Bait station placement near potential points of entry is key.]

DIRECTIONS FOR USE

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

1. Use all [2] [4] [6] [8] [12] [18] baits [at one time] [at the same time]. Break baits apart from plastic frame. Do not remove or puncture [the] label[s] on bait station[s]. [Now the baits are ready to use.]
2. Place baits wherever you see or have seen [signs of] roaches ***-and/or-*** where roaches are found ***-and/or-*** in the following places: [under appliances and sinks,] [on floor along baseboards,] [near pet food storage] and [inside cabinets and drawers.]
Then place additional baits about 1½ feet away. [Put any remaining baits as shown in the diagram[s] to the [right] [[left] [above] [below.]] [Some of the most likely [locations for roaches] [roach hiding places] are shown in the diagram[s] to the [right] [left] [above] [below]. [Roaches find the bait faster when all bait stations [baits] are placed out.]
Do not use in beehives.
3. Place baits properly so that they are touching walls or corners. [Only use enclosed stickers [as needed] when placing baits on walls or upside down. It is not necessary to use stickers on all baits.] Do not use sprays or foggers around bait stations. [They can contaminate bait stations and reduce effectiveness.]
4. Replace all [number of baits] baits every [3] [6 months], or sooner if roaches return [because roaches have probably eaten all of the bait inside]. [Baits will need to be replaced since [because] [the] roaches have probably eaten all the bait inside.]

[Note to reviewer: Label may include these graphic depictions of recommended placement locations.]



Optional Claims for front or back

- Kills large and small roaches
- Kills [for] up to 6 months
- Kills [roaches] [quickly] [fast]
- Kills [roaches] in hours
- Quick kill formula
- For [Large] [and] [Small] Roaches
- Starts Killing Overnight [& Keeps on Killing for up to 6 Months]
- Starts working overnight [& Keeps on Killing for up to 6 Months]
- Starts working as soon as [cock]roaches feed on bait
- ROACH
- Large Roach
- Small Roach
- Kills roaches [where they [hide] [breed] [live]] [at the source]
- Non-stop roach control for up to 6 months
- [Satisfaction] [Quality] Guaranteed
- Kills roaches you see and [even] those you don't
- [Protects] [Defends] your home against roaches
- Child resistant bait stations
- Continuous roach control for up to 6 months
- Kills non-stop for up to 6 months
- Kills roaches and keeps on killing for up to 6 months
- Provides maximum roach control for up to 6 months
- Works within hours and for up to 6 months
- Starts [working] [killing] in hours, doesn't stop working for up to 6 months
- Keeps killing for up to 6 months
- Better bait formula [for improved control]** ** vs. previous formula
- Increased feeding [for improved control]** ** vs. previous formula
- With foods roaches prefer
- With [a blend of] [multiple] foods roaches eat
- With multiple foods to kill roaches [and the nest]
- [Destroy(s)] [kill(s)] the nest
- Easy to use
- Nothing to activate
- No [mess] [or] [and no] objectionable odor
- No [mess] [or] [and no] bad odor
- Starts working as soon as roaches feed on bait
- Starts killing overnight
- Kills roaches 24/7 for up to 6 months
- Kills quickly [and keeps on killing] [[for] up to 6 months]
- [Kills] [Starts Killing] in hours – up to 6 months
- Kills non-stop [for] [up to 6 months]
- Kills fast – up to 6 months
- Kills in hours, [Non-stop] [for] up to 6 months
- [Fast Acting] [and] [effective] killing [[for] up to 6 months]

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

- Kills [with][in] 24 hours [and [for] [Lasts] up to 6 months]
- Kill the ones you see and the ones you don't [see]
- Kill[s] [the] [entire] nest
- [Your] Secret weapon [against roaches]



Will not exceed 18 small bait stations or 8 large bait stations:

- Bonus Pack***
- 50% More [Free]***
- 100% More [Free]***
- [50%] More Baits***
- [100%] More Baits***
- [6] [2] Bonus Baits With Purchase
- More Baits [-Better Value]***
- Value Pack [- More Baits]***
- [x] [x [Bait]] {[x%] More^{††} [With Purchase]
- [x%] for free^{††} [With Purchase]
- [X][Extra] [Free] [Bonus] [Bait(s)]^{††} [With Purchase]^{††} [for free]
- Value Size [- More Baits]
- Better Value
- SUPER VALUE
- INSTITUTIONAL SIZE
- ECONOMY SIZE
- ECONOMY PACK
- GREAT VALUE [X] number [more] [extra] bait stations]
- Double Pack

*** vs. [standard size] [count] [ct.] [package] [pkg.] [of this [Combat] product]

^{††} vs. [standard] [x] [count] [ct.][package] [pkg.] [of this product]

BAIT STATION UNIT LABEL

COMBAT[®] Small Roach Bait F.03

Alternate Brand Names:

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Combat Source Kill Max R1
Combat Defense System^{Brand} Source Kill Max R1
Combat Max Roach Killing Bait S
Combat Defense System^{Brand} Max Roach Killing Bait S
Combat Max Defense System^{Brand} Roach Killing Bait S

THIS SIDE DOWN OR AGAINST SURFACE

Note: Do not remove or puncture this label.

ACTIVE INGREDIENT: Fipronil[†] 0.03%
OTHER INGREDIENTS:..... 99.97%
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 questions, comments or information about COMBAT, call toll free 1-800-426-6228.]
[Questions or Comments? Call 1-800-426-6228.]
[Combat [Information] Helpline: 1-800-426-6228]

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

SEE OUTER [CARTON] [BAG] FOR [FULL] [COMPLETE] DIRECTIONS AND PRECAUTIONS

[Total] NET WT [0.035 oz (1g)] **-or-** [0.05 oz (1.4g)]