

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE: 23 June 1977

SUBJECT: Addendum to EEE Branch Efficacy Review of 6/9/77

FROM: Phil Hutton, Entomologist, EEE Branch

TO: PM 15

While the sum of the submitted data do not confirm that this collar will be effective for the total period of 5 months, it should be stressed that the data indicate that the collar will perform its intended function sometime into the 5th month for fleas and for as least 4 months for ticks. Indeed, the subject compound appeared equal to and sometimes better than the 5 month registered product used for comparison in the submitted data, for the periods of time tested. As with all collars, there are times when control is not evident for the entire period, hence the labeling "Replace when effectiveness diminishes."

Our overall evaluation of the data remains the same as that in our review of 6/9/77. That is, essentially, the data do not confirm efficacy for a 5 month period, although we suspect that there is a likelihood that this would be the case if such data were developed.

This clarification is added as requested in our meeting of 6/22/77 with Dr. William Perlberg of Hartz Mountain. Hopefully, this will facilitate your analysis of the appropriateness for utilizing the options outlined in the May 12th Johnson memo for this submission. As far as the use pattern is concerned, this is a registered product, and no new sites or pests are involved.