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FILE OR REG. NO. 2596-62

PETITION OR EXP. PERMIT NO. \_\_\_\_\_

DATE DIV. RECEIVED June 22, 1990

DATE OF SUBMISSION April 2 and June 18, 1990

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TYPE PRODUCT(S): (U), D, H, F, N, R, S

DATA ACCESSION NO(S). 415326-01;  
415326-02; Record Number: 266656; Action Code: 305  
415326-03

PRODUCT MGR. NO. 15-LaRocca

PRODUCT NAME(S) Hartz® 2 in 1® Long Lasting Collar for Dogs

COMPANY NAME The Hartz Mountain Corporation

SUBMISSION PURPOSE Provide performance data obtained according to a  
company devised protocol in support of claim for  
kill of Lyme-disease-carrying deer tick on dogs.

CHEMICAL & FORMULATION Tetrachlorvinphos: 2-chloro-1-(2,4,5-trichloro-  
phenyl)vinyl dimethyl phosphate 13.7%

(0.85 oz., 0.68 oz., & 1.15 oz. [24 g, 19 g & 33 g] net wt.  
impregnated material)

CONCLUSIONS & RECOMMENDATIONS The data presented in EPA Accession (MRID)  
Number 415326-03, having been obtained according to a company devised protocol  
which incorporates all essential requirements of § 95-9(a)(2) and (3) on p. 263  
and meets the standard of § 95-9(b)(2)(i) on p. 264 of the Product Performance  
Guidelines, are adequate to support the claim for killing the deer tick, Ixo-  
des dammini, the carrier of Lyme disease, by demonstrating the effectiveness  
of the subject product when worn according to label directions. Similarly, the  
data presented in MRID No. 415326-01, having been obtained according to the  
same protocol, incorporating the same requirements and meeting the same stan-  
dard, are likewise adequate to support the claim for killing the deer tick  
by demonstrating the effectiveness of a collar nearly identical in formula-  
tion to the subject product when worn according to label directions. The  
data presented in MRID No. 415326-02, having been obtained according to a  
company devised protocol which incorporates most of the requirements of §  
95-30(b)(11)1-4, 5, a. and 6-10 on pp. 280-4 of the Product Performance Guide-  
lines are adequate to support the claim for killing deer tick on dogs when  
the subject collar is worn according to label directions, provided the follow-  
ing information is supplied for the record: 1) an unambiguous statement that  
the collar designated 8743 on pp. 4-8, 10, 13-14 and 17 is a placebo collar as  
required in § 95-30(b)(11)6.2; and 2) a statement that the formulation desig-  
nated 8743 is not used in the manufacture of the subject collar supported by  
these data, since said formulation was totally ineffective. Because of diffi-  
culty involved in collecting nymphal ticks from hosts, we will waive require-  
ment for large dogs as stated in § 95-30(b)(11)6.7 on p. 282.

RL Vernd L. McFarland, IRB