

PRODUCT PERFORMANCE / EFFICACY REVIEW

Mark Suarez, Entomologist - JB

Mark Suarez
1 March 2007

DATE: 1 March 2007

EPA REG. NUMBER: 2517-OU

PRODUCT NAME: Sergeant's Gold Squeeze-On for Dogs
REGISTRANT: Sergeant's Pet Care Products, Inc.

PM: George LaRocca, PM 13
REVIEWER: Olga Odiott

DECISION #.: 370175
DP BARCODE: 332704

ACTION: R31

ACTIVE INGREDIENT(S): 109701, Permethrin.....45.0%
129032, Pyriproxyfen.....1.9%

TYPE: Dog Squeeze-On

OPPTS GUIDELINE(S): 810.3100
810.3300

MRID:	46281101	Cited	GLP? No
	46039501	Cited	GLP? No
	45364808	Cited	GLP? No
	46425801	Cited	GLP? No
	46346601	Cited	GLP? No

SITES & PESTS	Cats & Dogs	Fleas, Ticks, Mosquitoes, Lice & Mites
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LABEL APPLICATION RATE: 1.5 mL: Dogs <33 lbs.
3.0 mL: Dogs 33 to 66 lbs.
6.0 mL: Dogs >66 lbs.

STUDY APPLICATION RATE: Variable

ENTOMOLOGIST'S COMMENTS AND RECOMMENDATIONS:

The registrant is supporting the subject registration via the selective method. The data submitted in support of currently registered products [EPA Reg. No. 73510-2 and 2517-87] with similar directions for use with a substantially similar formulation. The registrant has selectively cited four MRIDs. (No authorization to cite the data owned by MarketQuest, Inc. was provided.) These data were previously reviewed (2 March 2004, 18 November 2004, 6 July 2005, 18 January 2006, and 13 July 2006). The data have been found to support all of the claims requested, except claims against mosquitoes. However, the 13 July 2006 stamped approved label for EPA Reg. No. 73510-2 permitted claims against mosquitoes.

The data cited are acceptable with respect to the claims requested, conditional upon the receipt within 6 months from the date of the notice of registration that:

- 1.) An authorization to cite the data owned by MarketQuest, Inc. is provided. → Not needed since certification statement that was signed state they obtained permission.
- 2.) Data supporting claims against mosquitoes are provided. → "kill" claim only was allowed in lieu of data for 73510-2. Do same reg. 6/2 3/9/07

The alternate brand name "Sergeant's SEVEN WAY Squeeze-On Protection for Dogs" is not acceptable, as it is misleading. The consumer is likely to think that the product contains 7 active ingredients. Remove this alternate brand name.

The net contents of the package are listed only in milliliters, the volume must be presented in conventional U.S. units of measurement (e.g., fl. oz.) [as per 40CFR§156.10(d)(2)].

On page 4 of 6 remove the claim, "This product has demonstrated greater than 92% control of fleas within one day of application."

Enclosure
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