

PRODUCT PERFORMANCE/EFFICACY REVIEW

BY

Kevin J. Sweeney, Entomologist, IB

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Date: February 19, 2004

Reviewer: George LaRocca

PM: PM 13, George LaRocca

Product Reg. No: 75257-R

Product Names: Freedom 45 for Dogs

Decision # 333369

DP: 294246

OPPTS Guideline: 810.3300

Chemical: permethrin 45%

Use pattern: RTU spot-on for dogs

Application rate: apply 1.5 cc per dog (33 lbs. or less) every 4 weeks. Dose increases in proportion to body weight - 3.0 cc for 33-66 lbs. and 6.0 cc for large dogs.

Pests: kill/repel, and prevent re-infestation of fleas, ticks, lice, mites, and mosquitoes.

Length of time claims: 4 weeks for mosquitoes, lice and mites; 5 weeks for fleas; 6 weeks for ticks.

Submitted Studies: **MRID 46062801** Freedom 45 for Dogs: a spot-on product for control of fleas, ticks, lice, mites, and mosquitoes on dogs.

Entomologist Recommendation and Comments:

1. The subject product cited/referred to the label Exspot Insecticide for Dogs, EPA Reg. No. 773-73, a 65% permethrin spot-on, and made the same kills, repels and prevents claims (including length of time). The subject product is applied at a higher volume in order to deliver the same amount of permethrin to the dog's skin as would be the case for the Exspot product.
2. The submitted study and label are acceptable.

3. My only other comment is that if you apply a product every four weeks, how can a 5 or 6 week control claim, which is greater than the re-application interval, be acceptable?