

DATE OUT: 04/02/08

SUBJECT: FEE **PRODUCT CHEMISTRY REVIEW OF MP** [] **EP** [X]

DP BARCODE No.: D350263 **REG. No. /File Symbol No.** 75844-I

PRODUCT NAME: FREEDOM 50 PLUS IGR SPOT ON FOR DOGS

PCC: 129032, 109701 **Decision No.** 389796

FOOD USE []

COMPANY: ANDREW M MARTIN CO.NV.INC.

FROM: Indira Gairola, Chemist
Product Chemistry Team
Technical Review Branch/RD (7505P)

SJB
4/3/08

TO: George Larocca/Linda DeLuise 13
Insecticide Branch/RD (7505P)

INTRODUCTION:

ANDREW M MARTIN CO.NV.INC is seeking registration for the subject product FREEDOM 50 PLUS IGR SPOT ON FOR DOGS. Applicant has submitted Basic CSF and Alternate CSF dated 04/01/08. Applicant claims the subject product to be a similar to EPA Reg. No. 67505-3.

The submitted package was reviewed and details will be discussed below:

SUMMARY OF FINDINGS:

1. The subject FREEDOM 50 PLUS IGR SPOT ON FOR DOGS contains 50.0% of Permethrin and 1.2% of Pyriproxyfen.
2. ANDREW M MARTIN CO.NV.INC has submitted (MRID # 473467-01 & cited MRID #s 433964-01) for Product Chemistry data to support the registration of FREEDOM 50 PLUS IGR SPOT ON FOR DOGS.
3. The sources for active ingredients are registered.
4. The inerts used are approved for non food use.
5. Basic and Alternate CSF dated 04/01/08 meets the label claim of contains 50.0% of Permethrin and 1.2% of Pyriproxyfen are found to be acceptable.

6. The subject product is not similar to EPA Reg. No. 67505-3 since the concentration of Permethrin is 45.0%, Pyriproxyfen 5.0% for the cited product, v.s. 50.0% of Permethrin and 1.2% of Pyriproxyfen for the subject product.
7. Data corresponding to the guideline reference 830.1800 (Enforcement of Analytical Method) for the active ingredient satisfy the data requirements of 40CFR§158.180. GC with FID detector as used for analyses of active ingredients.
8. Data corresponding Sub Group A completely satisfy the data requirements of 40CFR§58.155 to §158.180.
9. Except for storage stability / corrosion studies the remaining product Chemistry subgroup B data (MRID No. 473467-01) adequately fulfill the data requirements.

CONCLUSIONS:

TRB has reviewed the product chemistry data submitted for the above mentioned subject product and has concluded that:

1. The subject product FREEDOM 50 PLUS IGR SPOT ON FOR DOGS contains 50.0% of Permethrin, 1.2% of Pyriproxyfen.
2. The label claim is in compliance with PR Notice 91-2.
3. Basic CSF and Alternate CSF dated 04/01/08 meets the label claim of contains 50.0% of Permethrin and 1.2% of Pyriproxyfen is found to be acceptable.
4. The product chemistry data requirements for series 830 Subgroup A and B have been satisfied except findings #9.
5. The subject product is not similar to EPA Reg. No. 67505-3. See finding #6.

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<u>PRODUCT CHEMISTRY DATA</u> <u>(SERIES 830 Subgroup A & Subgroup</u> <u>B)Subgroup A</u>	<u>Data Required Fulfilled</u>	<u>MRID No.</u>
830.1550. Chemical Identity (Basic CSF)	Y	04/01/08
830.1600. Beginning Materials	Y	473467-01
30.1650. Formulation Process	Y	473467-01
830.1670. Discussion of Impurities	Y	
830.1700. Preliminary Analysis	NA	
830.1750. Certified Limits (Basic CSF)	Y	04/01/08
830.1800. Enforcement Analytical Method	Y	433964-01 cited