

PRODUCT PERFORMANCE / EFFICACY REVIEW

Mark Suarez, Entomologist - IB

DATE: 21 December 2005

EPA REG. NUMBER: 2517-IO

PRODUCT NAME: Squeeze-On Flea & Tick Control for Dogs & Puppies

REGISTRANT: Sergeant's Pet Care Products, Inc.

PM: George LaRocca, PM 13
REVIEWER: BeWanda Alexander

DECISION #: 351711
DP BARCODE: 318485

ACTION: R31

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

TYPE: Squeeze-On for Dogs/Puppies

OPPTS GUIDELINE(S): 810.1000
810.3000
810.3300

MRID: 46346601
46039501
46281101

GLP ?: No.

SITES: Dogs/Puppies

PESTS: Fleas, Ticks, Mosquitoes

STUDY APPLICATION RATE: variable.

LABEL APPLICATION RATE: 1.5 mL (dogs <33 lbs)
3.0 mL (dogs >33 lbs)

ENTOMOLOGIST'S COMMENTS AND RECOMMENDATIONS:

The registrant has cited data in support of the desired registration that were found to support previous registrations. In particular the data originally submitted in connection with EPA Reg. # 2517-87 provide support for the current registration action. Comments specific to the desired registration are provided below.

Recommendations:

1. Remove the following marketing claims:
 - a. Mosquitoes are Vectors of Heartworm Disease
 - b. Mosquitoes are carriers of West Nile Virus
 - c. Mosquitoes are carriers of Heartworm and West Nile Virus
 - d. Any and all claims associated with West Nile Virus
 - e. Control claims
 - f. 5 Way Protection, Kills Fleas, Ticks, Mosquitoes, Flea Eggs and Larvae

2. Revise the following:
 - a. Marketing claims:
 - i. Kills and repels fleas & ticks for up to a month – replace with up to 3 to 4 weeks.
 - ii. Kills and repels fleas for up to 1 month – replace with up to 3 to 4 weeks.
 - b. Directions for use:
 - i. The current label has only 2 weight classes of dogs. Those >33 lbs are to receive 1.5 mL; those >33 lbs are to receive 3.0mL.
 - ii. Replace the two weight classes, including all directions for application, with the approved rate application rates per EPA Reg. # 2517-87:
 1. <15 lbs –1.0mL
 2. 15-33 lbs – 1.5 mL
 3. 33-66 lbs – 3.0 mL
 4. >66 lbs – 4.5 mL