

CHILD-RESISTANT PACKAGING REVIEW  
Technical Review Branch

IN 08/22/2000 OUT September 25, 2000

Reviewed by Rosalind L. Gross *Rosalind L. Gross*  
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Date Division Received 08/14/2000

Type Product(s) Insecticide

Data Accession No(s). MRID 451883-02 (99-13)

Product Mgr./Chemical Review Mgr/Contact Person PM 03 Division RD

Product Name(s) Combat Gold

Company Name(s) Combat Insect Control Systems

Submission Purpose Examine results of CRP test to see if the CRP certification is acceptable for this 18 station (as 3 6-ups) retail package with a 12 month in use claim and if self certification is possible

Active Ingredient(s), PC code, & % Fipronil 0.05%

**Summary of Findings**

The study is a pass of the child test according to the sequential test chart in 16 CFR 1700.20, but only for a product life of 3 months or less. The 8/11/2000 CRP certification is acceptable but only for a product life of 3 months or less. The product label is for a 12 month time period. Therefore a new CRP certification citing both study 99-13 and 99-14 is required for the 12 month product life to be a pass of the child test according to the sequential test chart in 16 CFR 1700.20.

**Company Data**

The station tested is 5.72cm x 5.72cm x 1.07cm with holes 0.65cm. The station is 25ml black HIPS base and 25ml black HIPS debossed lid index weld. The station

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sold is the same as the station tested. Station containing lipstick placebo mixture tested with children getting 18 stations (as 3 6-ups) at the beginning of the test. Failure was defined as evidence of lipstick indicator on the child or meeting a set of criteria agreed to by EPA and the registrant. A child failure was defined as access to more than eight individual bait stations. The results indicate a total of 0 children accessed one or more bait stations. 2 children were eliminated from the test.

### **Discussion of Results and Conclusion**

The station is 1g of bait at 0.05% Fipronil, which means each station contains 0.5mg Fipronil. Therefore a toxic or harmful amount in terms of a child failure is access to 9 bait stations/more than 8 bait stations. Note 28.5 mg of Fipronil is a toxic amount.

The station tested is 5.72cm x 5.72cm x 1.07cm with holes 0.65cm. The station is 25ml black HIPS base and 25ml black HIPS debossed lid index weld. The station sold is the same as the station tested. Station containing lipstick placebo mixture tested with children getting 18 stations (as 3 6-ups) at the beginning of the test. Failure was defined as evidence of lipstick indicator on the child or meeting a set of criteria agreed to by EPA and the registrant. A child failure was defined as access to more than eight individual bait stations. The results indicate a total of 0 children accessed one or more bait stations. 2 children were eliminated from the test (total 52 children tested). The study is a pass of the child test according to the sequential test chart in 16 CFR 1700.20, but only for a product life of 3 months or less. The 8/11/2000 CRP certification is acceptable but only for a product life of 3 months or less. The product label is for a 12 month time period. Therefore the CRP certification must cite both study 99-13 and study 99-14 as evidence that the product is CRP for this long. Therefore a new CRP certification citing both study 99-13 and 99-14 is required for the 12 month product life to be a pass of the child test according to the sequential test chart in 16 CFR 1700.20.

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