

AUG 18 2005

Jerry Alperin
Farnam Companies, Inc.
301 West Osborn
Phoenix, AZ 85013

Subject: Proposed Additional Efficacy Claim For:
Flys-Off Insect Repellent For Dogs
EPA Registration No. 270-218
Application dated March 11, 2005

Dear Mr. Alperin:

The data submitted support the claim of blood-feeding inhibition by the Asian tiger mosquito, *Aedes albopictus*. The Asian tiger mosquito naturally feeds on dogs and is an important vector of canine heartworm, *Dirofilaria immitis*. However, susceptibility of dogs to illness associated with West Nile virus infection is not established. Neither are dogs confirmed to exhibit clinical symptoms of West Nile virus (WNV); although they may become infected with WNV. Furthermore, dogs have not been found to function as intermediate hosts of the virus, resulting in subsequent transmission to humans or other susceptible hosts.

At this time, there is insufficient evidence (i.e., clinically recognizable presentation of symptoms) to support the inclusion of claims that refer to protection of dogs from vectors of WNV. Should demonstrable evidence of dog susceptibility become generally recognized within the veterinary community, this proposed amendment may be revisited.

The data submitted generally substantiate the suitability of this product for use against vectors of canine heartworm.

The proposed label is being accepted subject to the following comments:

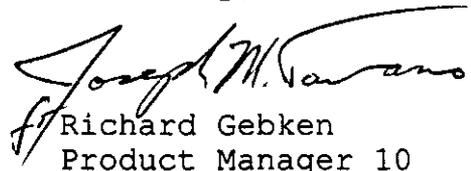
- 1) Delete the claim, "Repels mosquito(es) [(vectors of) (which may transmit) West Nile Virus]."
- 2) Delete the claim, "Protects against blood feeding by mosquito(es) [(vectors of) (which may carry) (which may transmit) West Nile Virus]."
- 3) Delete the claim, "(Inhibits) (reduces) (prevents) blood feeding by mosquito(es) [(vectors of) (which may carry) (which may transmit) West Nile Virus]."

Submit five copies of revised labeling corrected in accordance with the comment listed above.

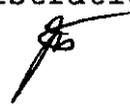
A copy of the Efficacy review is enclosed for your information

If you have any questions please contact Joseph Tavano at (703) 305-6411.

Sincerely,



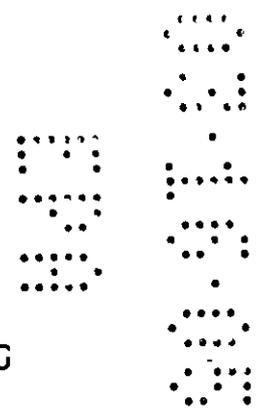
Richard Gebken
 Product Manager 10
 Insecticide Branch
 Registration Division (7505C)



ACCEPTED
With COMMENTS
In EPA Letter Dated:
AUG 18 2005
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
270-218

[] () Optional Language

FARNAM PET PRODUCTS
FLY-OFF
INSECT REPELLENT FOR DOGS



- PROTECTS DOGS FROM FLIES, GNATS AND MOSQUITOES
- CAN ALSO BE USED ON SURFACES, INCLUDING PET BEDDING
- PLEASANT CITRONELLA SCENT
- REPELS MOSQUITO(ES) [(VECTORS OF) (WHICH MAY CARRY) (WHICH MAY TRANSMIT) HEARTWORM]
- PROTECTS AGAINST BLOOD FEEDING BY MOSQUITO(ES) [(VECTORS OF) (WHICH MAY CARRY) (WHICH MAY TRANSMIT) HEARTWORM]
- (INHIBITS) (REDUCES) (PREVENTS) BLOOD FEEDING BY MOSQUITO(ES) [(VECTORS OF) (WHICH MAY CARRY) (WHICH MAY TRANSMIT) HEARTWORM]
- **REPELS MOSQUITO(ES) [(VECTORS OF) (WHICH MAY CARRY) (WHICH MAY TRANSMIT) WEST NILE VIRUS]**
- **PROTECTS AGAINST BLOOD FEEDING BY MOSQUITO(ES) [(VECTORS OF) (WHICH MAY CARRY) (WHICH MAY TRANSMIT) WEST NILE VIRUS]**
- **(INHIBITS) (REDUCES) (PREVENTS) BLOOD FEEDING BY MOSQUITO(ES) [(VECTORS OF) (WHICH MAY CARRY) (WHICH MAY TRANSMIT) WEST NILE VIRUS]**

ACTIVE INGREDIENTS:

BUTOXPOLYPROPYLENE GLYCOL	17.589%
TECHNICAL PIPERONYL BUTOXIDE*	0.375%
PYRETHRINS	0.136%
INERT INGREDIENTS:	81.900%

* equivalent to 0.3% (butylcarbityl) (6-propylpiperonyl) ether and 0.075% related compounds

KEEP OUT OF REACH OF CHILDREN

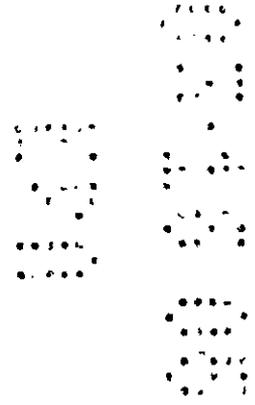
WARNING

See additional precautions on back label

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[] () Optional Language

NET WEIGHT: 9 OZ. (255 g)



**READ ENTIRE LABEL BEFORE EACH USE
FOR USE ONLY ON DOGS**

**FLYS-OFF Insect Repellent For Dogs
PROTECTS DOGS FROM – FLIES – GNATS - MOSQUITOES**

Contains no CFC's or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols.

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS & DOMESTIC ANIMALS
WARNING**
Causes substantial but temporary eye injury. Do not get in eyes, on skin or on clothing. Wear safety glasses. Harmful if swallowed. Wash hands thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse. Do not spray food, feed, serving or cooking utensils.

FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 – 20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 – 20 minutes. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice • Have a person sip a glass of water if able to swallow • Do not induce vomiting unless told to do so by a poison control center or doctor • Do not give anything by mouth to an unconscious person
In case of medical emergencies or health and safety inquiries, or in case of fire, leaking or damaged containers, or for product use information, call 602/285-1660.	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment.	

ENVIRONMENTAL HAZARDS
This product is extremely toxic to fish. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

PHYSICAL OR CHEMICAL HAZARDS
EXTREMELY FLAMMABLE. Do not use or store near fire, sparks, or heated surfaces. Turn off pilot lights in gas appliances and unplug or turn off electrical equipment in the use area. After airing out phase in completed, delight pilot lights and reconnect electrical current. Do not smoke in the use area. Contents under pressure. Do not puncture or incinerate container. Exposure to temperatures

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[] () Optional Language

above 130 degrees F may cause bursting. Incineration of container may cause explosion.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

READ ENTIRE LABEL BEFORE EACH USE

Use Restrictions: Use only on dogs and non-food/non-feed surfaces to repel flies, gnats and mosquitoes. DO NOT USE ON PUPPIES LESS THAN 12 WEEKS OLD OR ON CATS.

Consult a veterinarian before using this product on debilitated, aged pregnant, nursing, or medicated animals. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

Application Directions for Dogs: Hold container 8 to 10 inches from dog and lightly spray on back, underside, legs, back of neck, base of tail, and inside and outside ears. Do not get in eyes, nose or mouth. Avoid any contact with sores. If hissing noise disturbs dog during ear application, mist cotton swab and rub product on ear surfaces. Repeat every day.

Application Directions for Surfaces: Hold container 8 to 10 inches from non-food/non-feed surfaces such as pet bedding where insects rest. Do not spray this product when there is food present or when there are pets present. Remove any pets from the area before spraying. Repeat application when needed.

STORAGE AND DISPOSAL

STORAGE: Store only in a cool, dry place away from heat and sunlight and inaccessible to children and pets.

DISPOSAL: If empty: Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

EPA Reg. No. 270-218

EPA EST. NO. 11715-TN-1

Manufactured For:
FARNAM COMPANIES, INC.
P.O. Box 34820
Phoenix, Arizona 85067

[] () Optional Language

602/285-1660, Monday - Friday 7:00 a.m. - 3:45 p.m. MST