

PR 29 1992

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Ms. Filomena King
Reckitt & Coleman Household Products
1655 Valley Road
Wayne, NJ 07474-0941

Dear Ms. King:

Subject: Amendment - Alternate Confidential Statement of Formula
and Additional Label Claims
Black Flag Ant Killing System I
EPA Registration No. 475-331
Your Letters Dated December 3, 1991 and April 1, 1992

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided that you make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. The terms "New" and "New Formula" may be used on the labeling for a period of 6 months following approval of the labeling.
2. Words or phrases which implies the product possesses unique characteristics because of its composition, implies total eradication or elimination of pests, indirectly implies safety of the pesticide, or makes comparative statement are not acceptable. Therefore delete the following statements or highlighted words:

- o Has no insecticide odor or mess.
- o A totally different way to kill ants
- o Kills ants indoors & outdoors
- o Provides fast relief of ant problems
- o Clean
- o Odorless
- o Works continuously [24 hours a day][7 days a week] to rid your home of ants
- o A specially blended bait with natural ingredients [components]
- o Attractively colored [bait] stations
- o Contains Avermectin, a [revolutionary] [advanced] ingredient for household ant control
- o Revolutionary component for effective killing

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- o [Contains resistant] baits can be placed anywhere you see ants [even next to food and dishes] [even on countertops]
- o **Advanced** ant killing system
- o Can be used around children, pets and food
- o Kills with **natural** insecticide
- o Will make your home **ant-free** or your money back
- o Contains, **Avermectin**, a **powerful**, **natural** insecticide
- o The **most** effective Black Flag formula ever
- o No ant bait kills more effectively
- o Provides **unsurpassed** [maximum] efficacy

In the future please note those advertising statements that are unacceptable to avoid submitting the same statements for other Reckitt & Coleman Household Products' products.

Submit five copies of your final printed labeling before you release the product for shipment. A stamped copy of the labeling is enclosed for your records.

In regards to the alternate Confidential Statement of Formula (CSF), we note the certified limits for Avermectin B1 differs from that listed for the basic formulation dated 11/20/90. As required in 40 CFR 152.43, the alternate formulation must have the same certified limits for the active ingredient as the basic formulation. Please revise so both CSFs agree.

Sincerely yours,

George T. LaRocca
 Product Manager 13
 Insecticide-Rodenticide Branch
 Registration Division (H7505C)

Enclosure

RECKITT & COLMAN HOUSEHOLD PROD.
COMPANY NUMBER: 475 - 331

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PROPOSED LABELING: "BLACK FLAG ANT KILLING SYSTEM I

12/3/91

CARTON - FRONT PANEL

NEW! BLACK FLAG ANT KILLING SYSTEM I

- The new ant killing system
- Special insecticide works so workers can feed the bait to the queen.
- Contains [avermectin] a patented insecticide ingredient.
- Kills ants you see and others in the nest [colony] you don't see.
- Has no insecticide odor or mess.
- Ants take the bait back to nest and feed it to the queen.
- Can be placed in cabinets or anywhere you have seen ants.
- Kills a variety of household ants.
- Kills the queen, kills the colony.
- Contains 3 [4, 6] child resistant [patented] bait stations.
- Guaranteed to work or your money back.

ACTIVE INGREDIENT: Avermectin B1 [A mixture of avermectins containing 80% avermectin B1a (5-O-demethyl avermectin A1a) and 20% avermectin B1b (5-O-demethyl-25-de (1-methylpropyl)-25-(1-methylethyl) avermectin A1a)]....00.010%

INERT INGREDIENTS.....99.990%

TOTAL 100.000%

For use in residential areas.
Do not allow children or pets to play with bait stations.

CAUTION

See back panel for additional precautionary statements.

3 [4, 6] Bait Stations, Net Wt. 0.035 oz. each.
Total Net Wt. 0.11 (0.14 or 0.21) oz.

ACCEPTED
with COMMENTS
in EPA Letter Dated

APR 29 1992

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.

475-331

Reckitt & Colman Household Products
Company No. 475

Black Flag Ant Killing System I

Carton-Front Label cont.

- Kills ants indoors & outdoors
- Provides fast relief of ant problems
- Works [Provides killing power] for 4 months or until bait is consumed
- Clean
- Odorless
- Works continuously [24 hours a day][7 days a week] to rid your home of ants
- A special blend of ingredients that appeal to a wide variety of ants
- A specially blended bait with natural ingredients [components]
- A totally different way to kill ants
- No ant bait kills more effectively
- Kills ants which feed on sweet and greasy materials
- Child resistant patented bait stations
- Attractively colored [bait] stations
- Contains Avermectin, a [revolutionary] [advanced] ingredient for household ant control
- Revolutionary ingredient for effective killing power
- [Child resistant] baits can be placed anywhere you see ants [even next to food and dishes] [even on countertops]
- Advanced ant killing system
- Ants carry the bait [food] back to the nest to kill the queen and destroy the entire colony
- For maximum effectiveness, do not use [in conjunction] with other insecticides as the worker ants must remain alive [for a period of time] to carry the bait back to the nest
- Do not use other insecticides in the immediate vicinity of bait stations [as the worker ants must remain alive to carry the bait back to the nest]

[]- indicate optional language

Black Flag Ant Killing System I

Front Label cont.

- You will see results in 7 days [1 week]
- Contains Avermectin a delayed action insecticide [stomach poison]
- May be used for the control of ants wherever they are a problem
- Provides unsurpassed [maximum] efficacy
- Black Flag's [revolutionary][special] formula attracts the scout ants who seek food for the ant colony. They take the [poison] bait back home where it is eaten by both the queen and the worker ants. The colony stops reproducing and dies.
- Convenient
- Easy to use
- Works up to 4 months or until bait is consumed
- Provides killing power for up to 4 months or until bait is consumed
- Can be used around children, pets and food
- Proven effective
- Will make your home ant-free or your money back
- New Formula
- Kills for months
- Kills with natural insecticide
- Contains, Avermectin, a powerful, natural insecticide
- The most effective Black Flag formula ever

[]- Indicate optional language

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PROPOSED LABELING: "BLACK FLAG ANT KILLING SYSTEM I"
(cont'd)

CARTON - BACK PANEL

Black Flag bait stations contain [avermectin] a patented insecticide, plus a bait. Kills common household ants including [SWEET AND grease eating] pavement ants, carpenter ants, odorous house ants, little black ants, crazy ants, acrobat ants, Pharoah ants, Argentine ants, and cornfield ants.

Black Flag bait stations can be placed in cabinets or any place you have seen ants.

DIRECTIONS FOR USE

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

STORAGE: Store in a cool place away from children. DISPOSAL: Wrap bait stations and put in trash collection.

Use Instructions - (For indoor use)

1. Remove all 3 [4, 6] bait stations from the carton. NOTE: For effective ant control, you must use all 3 [4, 6] bait stations at once.
[Additional bait stations may be necessary for heavy infestations]
2. Place all stations right by ant trails or in areas where ants are numerous. [When necessary, stations may be placed on vertical surfaces by exposing the self-adhesive backing.]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if absorbed through the skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling.

Statement of Practical Treatment

If On Skin: Wash with plenty of soap and water. Get medical attention.

For medical emergency call 800-338-6167

If not satisfied, return package to manufacturer for full refund.

RECKITT & COLMAN HOUSEHOLD PRODUCTS
WAYNE, NJ 07474

EPA Reg. No. 475-331
EPA Est. 475-IL-1

[] -- optional language

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RECKITT & COLMAN HOUSEHOLD PROD.
COMPANY NUMBER: 475

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PROPOSED LABELING: "BLACK FLAG ANT KILLING SYSTEM I"
(cont'd)

INDIVIDUAL BAIT STATIONS

Black Flag Ant Killing System I
This side down.
See outer carton for complete
directions and precautions.

ACTIVE INGREDIENT: Avermectin B1 [A mixture of avermectins containing 80% avermectin B1a (5-O-demethyl avermectin A1a) and 20% avermectin B1b (5-O-demethyl-25-de (1-methylpropyl)-25-(1-methylethyl) avermectin A1a)]....		00.010%
INERT INGREDIENTS		<u>99.990%</u>
TOTAL		100.000%

For use in residential areas

CAUTION: Harmful if absorbed through the skin.
Avoid contact with skin, eyes or clothing.
Wash thoroughly with soap and water after handling.

DO NOT ALLOW children or pets to play with bait stations.

DISPOSAL: Wrap and put in trash collection.

EPA Reg. No. 475-331 EPA Est. 475-1L-1

RECKITT & COLMAN HOUSEHOLD PROD
WAYNE, NJ 07474