

#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

DEC 2 2 2008

Joseph E. Dyer Product Registration Virbac AH Inc. PO Box 162059 Fort Worth, TX 76161

SUBJECT:

Application for Pesticide Notification (PRN 98-10) Request General Label Changes EPA Reg. No. 2382-104 Application Dated November 27, 2008

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated 11/27/08 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

Linda Arrington Notifications & Minor Formulations Team Leader Registration Division (7505P) Office of Pesticide Programs

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October 27, 2008

Document Processing Desk (NOTIF) Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202-4501 ATTENTION: Akiva Abramovitch, Ph. D.

Subject: NOTIFICATION OF (minor labeling changes) PER PR NOTICE 98-10 PREVENTIC TICK COLLAR FOR DOGS EPA Reg. No.: 2382-104 (Contains 9% Amitraz)

Dear Dr. Abramovitch:

In accordance with 40CFR Section 152.46, Virbac AH, Inc. submits herewith an application for pesticide notification for subject product.

The purpose of this submission is to allow for minor labeling changes for clarification to the side/back panel of the label. The two labeling changes are noted below:

- 1) Add statement to the side/back label to better clarify the available collar sizes
  - 18" available for dogs up to 60lbs (this will be on the 25" collar IFC)
  - 25" available for dogs over 60lbs (this will be on the 18" collar IFC)
- 2) Add a new EPA Establishment # to the label to account for use of an additional company for a step in the packaging process: EPA Est. No. 85440-TX-1

"This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations AT 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under setions 12 and 14 of FIFRA."

The contents and attachments to this notification include the following:

- 1) Cover Letter
- 2) Application for Pesticide Notification (EPA FORM 8570-1)

Dr. Akiva Abramovitch Page 2 of 2 October 27, 2008

If there are any questions concerning this notification, please contact me at 816-637-2015 or by fax at 816-637-2116 or by email at <u>ioe@ectodev.com</u>

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Boseph E. Dyer Regulatory Agent for Virbac A.H., Inc.

Enclosures

SENT TO ABOVE ADDRESS BY UPS SECOND DAY AIR

bcc – w/att:

RACentral File – PREVENTIC TICK COLLAR FOR DOGS EPA Reg. No.: 2382-104 EPA Correspondence c/o JEDyer Michelle Foster – VB/FW/TX Nikita Mapp – VB/STL/MO

#### DRAFT LABEL

Front Panel

#### PREVENTIC TICK COLLAR FOR DOGS

- USE ONLY ON DOGS
- ◆ DO NOT USE ON CATS {PICTURE OF CAT WITH DIAGONAL LINE DRAWN THROUGH CAT}
- ♦ ANTIPARASITIC
- ♦ FITS NECKS UP TO 18"
- ♦ FITS NECKS UP TO 25"
- ♦ KILLS AND DETACHES TICKS FOR 3 MONTHS
- ♦ ADJUSTABLE ONE SIZE FITS MOST DOGS
- ♦ ADJUSTABLE FOR DOGS OVER 60 LBS.
- ♦ TICK COLLAR FOR DOGS
- 90 DAY TICK COLLAR FOR DOGS
- KILL TICKS FOR 3 MONTHS
- KILL TICKS FOR 90 DAYS
- ♦ THE ONE THAT KILLS AND DETACHES TICKS
- FOR DOGS UP TO 60 LBS
- ♦ FOR DOGS OVER 60 LBS
- ◆ SIX MONTHS OF TICK PREVENTION {I.E., FOR CARTON CONTAINS TWO COLLARS}
- ♦ INDIVIDUAL COLLARS NOT TO BE SOLD SEPARATELY
- ♦ ADJUSTABLE FOR DOGS UP TO 60 LBS
- ♦ 18" AVAILABLE FOR DOGS UP TO 60 LBS (THIS WILL BE ON THE 25" COLLAR IFC)
- ◆ 25" AVAILABLE FOR DOGS OVER 60 LBS (THIS WILL BE ON THE 18" COLLAR IFC)

ACTIVE INGREDIENTS:	
Amitraz: <b>CAS#</b> 33089-61-1	
OTHER INGREDIENTS:	91.08
TOTAL	100.0%

# KEEP OUT OF THE REACH OF CHILDREN CAUTION

#### SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS AND DIRECTIONS

DO NOT ALLOW CHILDREN TO PLAY WITH THE COLLAR DO NOT OPEN UNTIL READY TO USE

FOR DOGS UP TO 60 LBS.: NET CONTENTS: ONE 18" COLLAR - NET. WT.: 0.652 OZ. (18.5g) FOR DOGS UP TO 60 LBS.: NET CONTENTS: 2(TWO) 18" COLLARS - NET. WT.: 1.304 OZ. (37g) FOR DOGS OVER 60 LBS.: NET CONTENTS: ONE 25" COLLAR - NET. WT.: 0.97 OZ. (27.5g) FOR DOGS OVER 60 LBS.: NET CONTENTS: 2(TWO) 25" COLLARS - NET. WT.: 1.94 OZ. (55g)

Page 1 of 4

## NOTIFICATION

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October 27, 2008 VB104LAE.DOC-1

Draft Label

#### Side/Back Panel

#### READ ENTIRE LABEL BEFORE EACH USE USE ONLY ON DOGS. DO NOT USE ON CATS

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

**HAZARDS TO HUMANS:** Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water before eating, drinking, chewing gum, or using tobacco.

This collar is intended for use as an acaracide generator and is not to be taken internally by man or animal. Not intended for use on humans. Do not allow children to handle or play with this collar.

Some humans may develop skin irritation through contact with collared pet. Remove collar, shampoo pet and consult physician if irritation persists.

#### HAZARDS TO DOMESTIC ANIMALS: FOR USE ON DOGS ONLY. DO NOT USE ON CATS.

Do not use on puppies under 12 weeks of age. Consult a veterinarian before using on debilitated, aged, medicated, pregnant or nursing animals. Do not treat collared dogs with other monoamine oxidase inhibitors, or with tricyclic antidepressants, selective serotonin reuptake inhibitors, or pressor agents.

Sensitivities may occur after using ANY pesticide product for pets. Remove at first sign of irritation or adverse reaction, bathe dog with mild soap or non-pesticidal shampoo and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

**DO NOT APPLY TO CATS.** There is a risk of collar breakage and ingestion if collar is worn by unattended dogs that play by mouthing each other in the neck area. If collar is missing from a dog, search for, retrieve and recover the entire collar. Immediately consult a veterinarian if dog is depressed or if injestion is suspected.

**NOTE TO VETERINARIAN:** If a dog ingests this collar and exhibits intoxication (primary sign is severe depression), induce vomiting, administer non-oily laxative, activated charcoal or enema. Provide supportive therapy until collar fragments are voided. If dog cannot be roused, Yohimbine, 0.1mg/kg by intravenous injection is antidotal. Repeat as needed.

**NOTICE:** This product contains an ingredient known to the State of California to cause birth defects or other reproductive harm. Wash hands thoroughly after applying this product. Dispose of as instructed below.

Page 3 of 4 October 27, 2008 VB104LAE.DOC-3

## Draft Label Side/Back·Panel

= STORAGE AND DISPOSAL = Storage: Store in original container in locked storage area.

**Disposal:** Do not reuse empty pouch or box. Wrap pouch and put in trash collection. When discarding cut off end and used collar, wrap in newspaper and place in trash collection.

EPA Reg. No.: 2382-104

EPA Est. No.: 2382-TX-1 EPA Est. No.: 83680-TX-1 EPA Est. No.: 85440-TX-1 OR EPA Est. No.: 2382-FRA-1

Made in France Manufactured For Virbac AH, Inc. Consumer Brands Division P.O. BOX 162059 Fort Worth, TX 76161 (800) 338-3659

# NOTIFICATION

DEC 22 2008

#### AVAILABLE THROUGH LICENSED VETERINARIANS ONLY

October 27, 2008 VB104LAE.DOC-2

## Draft Label Side/Back Panel

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	FIRST AID					
<b></b>						
If In eyes	<sup>o</sup> Hold eye open and rinse slowly and gently with water for 15-20 minutes.					
	<ul> <li>Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> </ul>					
	° Call a Poison Control Center or doctor for treatment advice.					
If On skin or clothing	<ul> <li>Take off contaminated clothing.</li> <li>Rinse Skin immediately with plenty of water for 15-20 minutes.</li> <li>Call a Poison Control Center or doctor for treatment advice.</li> </ul>					
=						
HOT LINE NUMBER						
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or doctor, o	duct container or label with you when calling a Poison Control Center r going for treatment. You may also contact 1-800-345-4735 for emergency tment information.					
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#### DIRECTIONS FOR USE

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

#### DO NOT USE ON CATS {PICTURE OF CAT WITH DIAGONAL LINE DRAWN THROUGH CAT}

**Application Instructions:** Place this collar around the dog's neck, adjust for proper fit and buckle in place. Cut off and dispose of excess length. Do not allow dogs to play with cut-off excess. Do not apply both collars at once. The collar must be worn tightly enough to contact skin and so that the dog cannot remove it.

Activity against ticks starts within 24 hours and continues as long as the collar is worn (up to 90 days). Ticks present in the dogs environment that may reappear on the dog will not attach and will be killed in less than 24 hours. Replace collar when effectiveness diminishes. The effectiveness of the collar is not diminished by normal wetting such as rainfall, however, it is suggested that the collar be removed before bathing. This product does not control fleas.