

2517-82

06/15/2006

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Mr. Steve Rogosheske
Agent for Sergeant's Pet Care Products, Inc.
1479 West Pond Road
Eagan, MN 55122

JUN 15 2006

Dear Mr. Rogosheske:

Subject: Label Amendment- efficacy data to support flea eggs
Sergeant's Dog Shampoo
EPA Registration Number 2517-82
Your submission dated April 20, 2005

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. The cited data have previously been reviewed and found to support flea claims on other products. Therefore, summaries are not necessary within this review. The pertinent consideration is whether any of the cited data support a dog shampoo applied at the label rate. None of the submitted data were conducted in vivo on dogs. However, the data demonstrated that the product was efficacious against flea eggs <4 hours old and affected the larval development of the insects. The label claims (1) "Kills flea eggs for 30 days" and (2) "Sterilizes (All new) fleas and kills their eggs for 30 days" may be added to the label, under the condition that you submit product specific data generated in trials with dogs consistent with the 810.3300 product performance guidelines that confirm the claims made within 12 months.

A copy of a stamped label is enclosed for your records.

Sincerely yours,

George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)

Enclosure

[Master Product Label - Front/Primary Label Panel]

Sergeant's Dog Shampoo

Permethrin Flea and Tick Shampoo with IGR for Dogs

[Optional text appears in brackets [] and the Final Printed Label may include some or all of the optional text on the front, back or side label panels]

Do Not Use On Cats [Box/Icon with Cat Image and Cross-Out]

[Kills Adult Fleas & Ticks For Up To 10 Days]

[Sterilizes (All New) Fleas And Kills Their Eggs For 30 Days]

[Breaks The Flea Life Cycle]

[pH Balanced For Pet's Coat]

[Cleans]

[Deodorizes]

[Conditions]

[Contains Nylar[®] Insect Growth Regulator (IGR)]

[Kills Flea Eggs For 30 Days]

[Fresh [Pleasant][Fragrance][Scent][!]] *{Note: Specific type of "Scent" or "Fragrance may be identified (e.g. "Pleasant Baby Powder Fragrance")}*

[Kills Fleas & [and] Ticks]

[For Dogs]

ACCEPTED
with COMMENTS
in EPA Letter Dated

JUN 15 2006

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

2517-82

ACTIVE INGREDIENTS:

Permethrin: 3-(Phenoxyphenyl) methyl (+/-) cis,trans*-3-(2,2 dichloroethenyl)- 2,2-dimethyl cyclopropane carboxylate.....	0.10%
MGK 264: n-Octyl bicycloheptene dicarboximide.....	0.50%
Pyriproxyfen: 2-(1-Methyl-2-(4-phenoxyphenoxy) ethoxy) pyridine**.....	0.01%

OTHER INGREDIENTS:	99.39%
TOTAL:	100.00%

*cis/trans isomers ratio: min. 35%(+/-) cis and max. 65% (+/-) trans.

** Nylar[®] Insect Growth Regulator. Nylar[®] is a registered trademark of McLaughlin Gormley King Co.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel for Directions and Precautions

Net Contents _____ Fl. Oz. [and][or][pint, quart, gallon, etc.]

[BACK PANEL]

[Product Name] [This Product] kills fleas and ticks while it cleans and deodorizes in one easy and convenient step. This rich, conditioning, non-staining formula contains a highly effective flea and tick killing ingredient combined with an insect growth regulator that sterilizes new fleas and kills their eggs for 30 days.

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

[Symbol/graphic: Do Not Use on Cats] or [Text: Do Not Use on Cats]

**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION: Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Only for use on adult dogs or dogs older than 6 months. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant or nursing 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.

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.
<p>Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may contact 1-800-781-4738 for emergency medical treatment information.</p>	

DIRECTIONS FOR USE

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

Wet dog's coat thoroughly. Wear waterproof gloves when applying this product. Pour [product name] [this product] into the cup of your hand. Starting at the head and working back, work up a lather with this quick lathering formula, being sure that the lather is worked thoroughly into dog's coat down to the skin. Allow lather to stand five minutes, then rinse completely and towel dry. It should not be necessary to repeat the

[BACK PANEL CONTINUED]

shampoo application unless the animal is excessively dirty. Kills fleas fast and begins to kill ticks within 1 or 2 days; reaching maximum effectiveness in 7 to 10 days. Do not apply more frequently than at 30 day interval.

STORAGE AND DISPOSAL

STORAGE: Store in cool dry place.

DISPOSAL: If empty: Do not reuse this container. 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. Never place unused product down any indoor or outdoor drain.

MADE IN USA

Sergeant's Pet Products, Inc is committed to providing high quality products. If you have questions or comments about this product write: Sergeant's Consumer Response, P. O. Box 540399, Omaha, NE 68154-0399.

www.sergeants.com

[In case of emergency, call: 1-800-937-3059]

[For product use information, please call
800-234-2269 Monday - Friday, 7am - 3:45pm MST]

[Non-emergency call: 1-800-224-PETS]

Manufactured For
Sergeant's Pet Care Products, Inc.
Omaha, NE 68130

EPA Reg. No. 2517-82
EPA Est. No.

REVISED: 04/20/05