

JUN 24 1991

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Ms. Pat Bieler
The Hartz Mountain Corporation
700 Frank E. Rodgers Blvd. South
Harrison, NJ 07029

Dear Ms. Bieler:

Subject: Amendment - Addition of Deer Tick Claim
Longlife 90 Day Brand Collar for Cats
EPA Registration No. 2596-49
Longlife 90 Day Brand Collar for Dogs
EPA Registration No. 2596-50
Hartz 2 in 1 Plus Longlasting Collar for Dogs
EPA Registration No. 2596-62
Hartz 2 in 1 Flea & Tick Collar for Cats
EPA Registration No. 2596-63
Your Application Dated February 23, 1990

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 additional information requested and make the labeling changes indicated below prior to release for shipment of product bearing the amended labeling.

1. Revise the wording of the deer tick claim as follows:
"... the Deer Tick, that may carry Lyme Disease".

The efficacy data submitted is adequate to support the claim of killing deer tick when the subject products are worn according to label direction. However please provide the following efficacy information for our records:

1. Please verify statement that the collar designated 8743 on pp. 4-8, 10, 13-14, and 17 (MRID 41532602) is a placebo collar as required in Section 95-30(b)(11)6.2.
2. Please verify that the formulation designated 8743 is not used in the manufacture of the subject collar supported by these data, since said formulation was found ineffective.

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.

Sincerely,

George T. LaRocca
Product Manager 15
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure

LONGLIFE **90 DAY** COLLAR
FOR DOGS WITH NECKS TO 21"

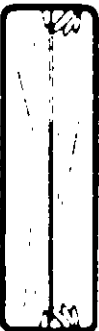
LONGLIFE[®]

90 DAY[™] COLLAR
BRAND FOR DOGS

KILLS FLEAS • KILLS TICKS



To activate collar hold
at each end...STRETCH
...it's ready to work.



ALL INFORMATION
REGARDING THIS
PRODUCT IS CONTAINED
ON THE COLLAR'S LABEL
AND THE PRODUCT'S
PACKAGING.

CONTENTS 1 COLLAR.
NET WT 0.67 oz 19 g

CAUTION: Do not let
children play with this collar.

LONGLIFE **90 DAY** COLLAR
FOR DOGS WITH NECKS TO 21"

UNCONDITIONAL MONEY-BACK GUARANTEE by LONGLIFE

DIRECTIONS FOR USE

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



**REMOVE COLLAR FROM PACKAGE,
STRETCH TO ACTIVATE INSECTICIDE**

Do not unroll collar until ready to use. Place the collar around the dog's neck, adjust for proper fit, and be sure it must be worn loosely to allow for growth of the dog's neck. The collar may move about the neck. Generally, a properly fitted collar fastened will snugly slide over the dog's head. Leave the collar on for extra adjustment and cut off and dispose of the collar. Some animals may become irritated by any collar if it is too tight. If irritation occurs, loosen the collar. If irritation continues, remove the collar from the animal. This collar is intended for use only as an insecticide. For continuous flea protection under normal conditions, replace the collar every 3 months. Under conditions where dogs are infested with ticks, including Rocky Mountain Wood Tick, Lone Star Tick, Spotted Fever, and the Deer Tick, carrier of Lyme Disease, the collar will continue to aid in their control an additional 30 days. The collar should be replaced when symptoms begin to appear. Wetting will not impair the collar's protection. If the dog goes swimming or is in water, it is necessary to remove the collar. The Longlife 90 Day Collar should be replaced with a regular collar.

DISPOSAL - Do not use empty pouch. Dispose in trash collection.

MADE IN NEW JERSEY
THE HARTZ MOUNTAIN CORPORATION
New York, New Jersey 07003
Made and printed in U.S.A.

ACCEPTED
with COMMENTS
in EPA Letter Dated:

Jan 24 1991

Under the Federal Insecticide, Fungicide, and Rodenticide Act, amended for the purpose of...
EPA 108-108-0101