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Systems Integration Group, Inc.

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	U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division (H7505C) 401 "M" St., S.W. Washington, D.C. 20460	EPA Reg. Number: 2596-83	Date of Issuance: JUN 2 3 1999
	NOTICE OF PESTICIDE:	Term of Issuance: Unconditional	
Registration (under FIFRA, as amended) Reregistration		Name of Pesticide Product:	
		Hartz 2 in 1 [®] plus seven month collar for cats	
Name and Address of Registrar	nt (include ZIP Code):		
Hartz Mountain Co	orp		
400 Plaza Drive			
Secaucus, New Jer	sey 07094		
	ring in substance from that accepted in connection with this registr. . In any correspondence on this product always refer to the above f		accepted by the Registration Division

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide. Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by other.

Based on your response to the Reregistration Eligibility Documents, EPA has reregistered the product listed above. This action is taken under the authority of section 4 (g) (2) (c) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended. Registration under this section does not eliminate the need for control reassessment of pesticides. EPA may require submission of data at anytime to maintain the registration of your product. With regards to labeling, you must make the labeling changes listed below:

- Per PR Notice 96-6, please place your company or Animal Poison Control Center telephone number on your label. This number should be a resource for consumers in the event of an emergency or to receive information concerning the proper use of your product.
- 2) Based on your Tox categories, your product is required to have a "Hazards to Humans and Domestic Animals" statement. It should be located under the general heading of "Precautionary Statements" and read as follows:

CAUTION

Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling.

Signature of Approving Official: Date: Ayna Keighein La Rora JUN 2 3 1999

 Based on your Tox categories, your product is required to have a "First Aid"statement, which should be located near your "Precautionary Statements". It should state the following:

IF SWALLOWED: Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting or if available by administering syrup of ipecac. If person is unconscious, do not give anything by mouth and do not induce vomiting.

276

IF ON SKIN: Wash with plenty of soap and water. Get medical attention if irritation persists.

IF IN EYES: Flush eyes with plenty of water. Call a physician if irritation persists.

- 4) Your product is also required to have a "Note to Physicians and Veterinarians". This should be located directly below your First Aid Statement and should contain the following information:
 - Technical information on symptomatology;
 - Use of supportive treatments to maintain life functions;
 - Medicine that will counteract the specific physiological effects of the pesticide;
 - Company telephone number to specific medical personnel who can provide specialized medical advice.
 - Information for veterinarians.
- 5) Please revise the first sentence of the first full paragraph under DIRECTIONS FOR USE to read as follows: "Do not use on kittens under 12 weeks of age". Per our November 23, 1998 letter from John Leahy to Ms. Pat Bieler, the data you cited was for use of collars on dogs younger than 12 weeks. Those data can not be used for products that are applied to cats. Thus your statement must be consistent with PR Notice 96-6.
- 6) Please revise the statement concerning debilitated, aged, or medicated animals to read "Consult a veterinarian before using this product on debilitated, aged, medicated pregnant or nursing animals."

7) Please add the following statement: "Do not use this product on animals simultaneously or within 30 days before or after treatment with or exposure to cholinesterase inhibiting drugs, pesticides or chemicals. Flea and tick collars may be immediately replaced with new collars". The technical review of the data you cited does not support the omission of this statement from the product label. 3/6

- 8) Per our November 23, 1998 letter from John Leahy to Ms. Pat Bieler, delete the phrase " ...or augment its activity with another product registered for this use, such as Hartz 2 in 1 Flea and Tick Powder or Spray." from the sentence which begins "Under conditions where cats are exposed to severe flea and tick infestations...". This phrase contradicts the required statement in #9, above. Additionally, the remaining sentence ("Under conditions where cats are exposed to severe flea or tick infestations it may be necessary to replace the collar more frequently") should be clarified so that it reads "Under conditions where cats are exposed to severe flea or tick infestations it may be necessary to replace the collar more frequently. but not more frequently than every months".
- 9) We have enclosed a copy of your label stamped "Accepted with Comments". Please submit two (2) copies of your final printed label before you release the product for shipment. Please refer to the A-79 enclosure for a further description of final printed labeling.

If you have any questions regarding this action, please call me at (703) 305-6100 or contact Tracy Keigwin of my team at (703) 305-6605.

Sincerely,

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

Enclosure

3

FRONT PANEL

SEVEN MONTH COLLAR

HARTZ 2 IN 1[®] PLUS SEVEN MONTH COLLAR FOR CATS With Rabon®*

KILLS UP TO 7 MONTHS

• Kills Ticks



(Kills fleas and ticks) (Kills for seven months with Rabon®)

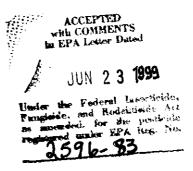
With Deodorant (Optional Copy) Fresh Deodorant Scent (Optional Copy) Waterproof (Optional Copy) Safety Snap Buckle (Optional Copy)

(Ingredient Statement - optional front or back panel)

ACTIVE INGREDIENT:

Tetrachlorvinphos:	
(Z)-2-Chloro-1-(2,4,5-trichloro-	
phenyl) vinyl dimethyl phosphate	14.55%
INERT INGREDIENTS	85.45%
TOTAL	100.00%

CAUTION: Do not let children play with this collar. CONTENTS: 1 COLLAR, NET WT. 0.9 oz 25 g



4/6

BY WEIGHT (Nom.)

ÉACK PANEL

IMPORTANT: CONSUMER INFORMATION AND PET I.D. TAG OFFER PRINTED ON INSIDE OF PACKAGE

READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON CATS

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 UNROLL AND STRETCH TO ACTIVATE INSECTICIDE GENERATOR. As the collar begins to work, a fine white powder will appear on the surface.

5/6

It is not advisable to use this collar or similar pesticides on kittens less than six weeks old. Do not unroll collar until ready to use. Place the Hartz 2 in 1 Plus collar around the cat's neck, adjust for proper fit, and buckle in place. The collar must be worn loosely to allow for growth of the cat and to permit the collar to move about the neck. Generally, a properly fitted collar is one that when fastened will snugly slide over the at's head. Leave 2 or 3 inches on the collar for extra adjustment and cut off and dispose of the extra length. Consult a veterinarian before using this product on debilitated, aged or medicated animals. Sensitivity may occur after using ANY pesticide product for pets. Some animals may become irritated by any collar if it is applied too tightly. If this occurs loosen the collar. If irritation continues, remove the collar from the animal. If signs of sensitivity occur remove the collar and bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately. This collar is intended for use only as an insecticide generator.

Kills fleas and ticks common to cats, including the Deer Tick, which may carry Lyme Disease, and the Rocky Mountain Wood Tick, which may carry Rocky Mountain Spotted Fever. The collar will begin to kill fleas and ticks immediately. Its full protection against harder to kill ticks will be built up within a few days after being placed on the pet. For continuous flea and tick protection under normal conditions replace the collar every seven months. The collar kills ticks for 5 months and aids in their control an additional 2 months. Under conditions where cats are exposed to severe flea and tick infestations it may be necessary to replace the collar more frequently or augment its activity with another product registered for this use, such as Hartz 2 in 1 Flea and Tick Powder or Spray. Wetting will not impair the collar's effectiveness or the pet's protection. If the cat goes swimming or is out in the rain it is not necessary to remove the collar. The Hartz 2 in 1 Plus collar may be worn with a regular collar. It is recommended that the pet's bedding or sleeping quarters be treated for flea and tick control with a product registered for this use, such as Hartz 2.

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

EPA Reg. No. 2596-83 EPA Est. No. 2596-NJ-1

Made in U.S.A. by © The Hartz Mountain Corporation Secaucus, New Jersey 07094 and St. Thomas, Ontario N5P 3W7 Canada

*Rabon is the Hartz trademark for Tetrachlorvinphos

ALTERNATE COPY



On Animal Protection

Relief for your

Use Releve Pet Protection System Conditioning Shampoo, Dip, Spray or Powder to kill fleas and ticks living on your pet.

676

Repellent

Keep fleas and ticks off your pet

Prevent any more fleas and ticks from coming onto your pet by spraying your pet with Releve Pet Protection System Repellent for Cats or Repellent for Cats.

Continuous Protection

Long-term protection for your pet

Keep fleas and ticks from reinfesting your pet wit Releve Pet Protection System 7 Month Flea & Flea Egg Collar with vIGRen[®], which will prevent flea eggs from hatching and Rabon[®] to kill adult fleas and ticks.

Home & Yard

Protect your home and yard

Kill fleas and ticks around your home with Releve Pet Protection System Carpet Powder, Yard and Kennel Spray, Home Flea & Tick Killer and Home Fogger.

Remember to always read each product label and follow the directions carefully.

Rabon[•] is a registered trademark for Tetrachlorvinphos vIGRen[•] is a registered trademark of Wellmark Ltd.