

2596-84

09/16/2005

1/7

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

September 16, 2005

Ms. Patricia Sheehy, Director
Regulatory Affairs
The Hartz Mountain Corporation
400 Plaza Drive
Secaucus, NJ 07094

Subject: Revise labeling per PR Notices 2001-1 and 2001-6, etc.

Hartz 2 in 1 Plus Seven Month Collar for Cats (EPA Reg. No. 2596-83)
Hartz 2 in 1 Plus Seven Month Collar for Dogs (EPA Reg. No. 2596-84)

Your submissions dated April 19, 2005

Dear Ms. Sheehy:

We have reviewed the above referenced submissions regarding registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended. The labeling for the subject products are acceptable with the following comments:

1. **Precautionary Statements:**

Revise the statement "Wash thoroughly with soap and water after handling" to read "Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco".

2. Under Directions for Use, change the collar replacement interval from four (4) to five (5) *months*, to be consistent with the kill claim.

3. Under Non-pesticides related claims and other optional text, change the term "Waterproof" to "*Water resistant*".

CONCURRENCES

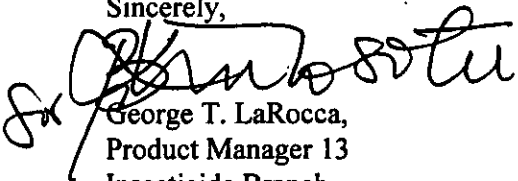
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2/7

The alternate brand names are acceptable. Please make the above stated changes for each product, and submit to the Agency, two copies of the revised final printed label. Enclosed, find copies of the stamped labels for your records.

If you have any questions concerning this action, please contact Dr. B.A. Akinlosotu at (703) 605-0653.

Sincerely,



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

enclosure:

Hartz® 2 in 1® Plus Seven Month Collar for Dogs

Alternate Brand Name(s)

- Hartz® Advanced Care™ 2 in 1® 7 Month Flea and Tick Collar for Dogs
- Hartz® Advanced Care™ 2 in 1® 7 Month Flea and Tick Collar for Large Dogs
- Hartz® Advanced Care™ 2 in 1® 7 Month Flea and Tick Collar for Puppies
- Hartz® Advanced Care™ 2 in 1® Reflecting 7 Month Flea and Tick Collar for Dogs
- Hartz® Advanced Care™ 2 in 1® Reflecting 7 Month Flea and Tick Collar for Large Dogs
- Hartz® Advanced Care™ 2 in 1® Reflecting 7 Month Flea and Tick Collar for Puppies

- Hartz® Advanced Care™ 2 in 1® Collar for Dogs
- Hartz® Advanced Care™ 2 in 1® Collar for Large Dogs
- Hartz® Advanced Care™ 2 in 1® Collar for Puppies
- Hartz® Advanced Care™ 2 in 1® Reflecting Collar for Dogs
- Hartz® Advanced Care™ 2 in 1® Reflecting Collar for Large Dogs
- Hartz® Advanced Care™ 2 in 1® Reflecting Collar for Puppies

ACTIVE INGREDIENT:	(By Weight) (Nom.)
Tetrachlorvinphos (CAS #22248-79-9).....	14.55%
OTHER INGREDIENTS	85.45%
(TOTAL	100.00%)

Notes—CAS numbers may or may not appear on product label; Ingredient Statement – optional front or back panel

CAUTION: Do not let children play with this collar. See back panel for (ingredient statement,) (additional) precautionary statements and directions for use.

CONTENTS: 1 (white) (pink) (orange) (blue) (yellow) (purple) (red) (grey) (hunter green)(green)(black)(silver)(gold)(reflecting)(reflective) COLLAR, NET. WT. (Range from 19 g to 32 g depending on size of animal)

EPA Reg. No. 2596-84
EPA Est. No. 2596-NJ-1

[Made in (the) U.S.A. (by)]

©The Hartz Mountain Corporation
Secaucus, NJ 07094 (U.S.A.)
(and St. Thomas, Ontario N5P 3W7 Canada)

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**
SEP 16 2005
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
2596-84

4/7

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

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Wash thoroughly with soap and water after handling. / 7.

FIRST AID

IF SWALLOWED: Call a Poison Control Center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: 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.

IF IN EYES: 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.

Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment.

Note to Physicians and Veterinarians: This product contains an organophosphate and may cause cholinesterase inhibition. Cholinergic symptoms may include salivation, miosis, incoordination, muscle fasciculation and/or weakness, vomiting and diarrhea. Atropine is antidotal. 2-PAM may be effective as an adjunct to atropine. Call 1-800-275-1414 or your local Poison Control Center for further information.

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.

Do not use on puppies under 6 weeks of age. Do not unroll collar until ready to use. Place the (Hartz® 2 in 1® Plus) (alternate brand name) collar around the dog's neck, adjust for proper fit, and buckle in place. The collar must be worn loosely to allow for growth of the dog 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 dog's head. Leave 2 or 3 inches on the collar for extra adjustment and cut off and dispose of the extra length.

5/7

Consult a veterinarian before using this product on debilitated, aged, or medicated animals. If used on pregnant or nursing dogs, do not replace collar until the puppies are at least 6 weeks old. 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. 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. However, flea and tick collars may be immediately replaced.

This collar is intended for use only as an insecticide generator.

(Kills fleas and ticks common to dogs, 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 dogs are exposed to severe flea and tick infestations it may be necessary to replace the collar more frequently; however, do not replace the collar more frequently than every 4 months. Wetting will not impair the collar's effectiveness or the pet's protection. If the dog goes swimming or is out in the rain it is not necessary to remove the collar. The (Hartz® 2 in 1® Plus) (alternate brand name) 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 in 1® Flea and Tick Spray) (alternate brand name).

STORAGE AND DISPOSAL

STORAGE: Store at room temperature.

DISPOSAL: Do not use empty pouch. Place in trash or offer for recycling if available.

For more information (or in case of emergency) (or for help during any step) call (our flea and tick experts at) 1-800-275-1414 weekdays, 9am-5pm E.S.T.

OPTIONAL/ALTERNATE LABEL TEXT

With Rabon®*

*Rabon® is the Hartz trademark for Tetrachlorvinphos

Kills Up to 7 Months

Kills Ticks

Kills Fleas

Kills fleas and ticks

Kills for seven months with Rabon®

Kills fleas and ticks (for) up to 7 (seven) months

(Long Term) (7-Month) (Continuous) Protection (against fleas and ticks)

The active ingredient will work its way from the surface of the collar onto your pet's coat providing continuous protection against fleas and ticks

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

The Stress Free System for Controlling Fleas & Ticks

On Animal Protection

Relief for your pet

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

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 Dogs.

Continuous Protection

Long-term protection for your pet

Keep fleas and ticks from reinfesting your pet with 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 registered trademark of Wellmark Ltd.

7/7

NON-PESTICIDE RELATED CLAIMS AND OTHER OPTIONAL TEXT

For Dogs
For Puppies

With deodorant
Fresh (deodorant) scent

Waterproof

Fits up to (15")(26") necks
For dogs with necks up to (15")(26")
Reflects Direct Light up to (200 ft.) (250 ft.) (300 ft.) (400 ft.) (450 ft.) (500 ft.) (550 ft.) (600 ft.)
White Collar with Reflecting Technology
White Collar with Reflective Technology
Visible (in) (to) headlights

The (Hartz® 2 in 1® Reflecting Flea & Tick Collar) (Hartz® 2 in 1® Reflective Flea & Tick Collar)
(alternate brand name) provides an added dimension of nighttime safety for you and your pet.
The collar will reflect when light shines directly on the reflective strip

Important: Consumer information and pet I.D. tag offer printed on inside of package.

Money back guarantee by Hartz®
Hartz® Every Pet's Best Friend™

VISIT OUR WEBSITE
www.hartz.com

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