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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Ms. Pat Bieler  
Hartz Mountain Corp  
400 Plaza Drive  
Secaucus, NJ 07094

NOV 2 1998

Dear Ms. Bieler:

Subject: Proposed Label Amendments Under PRN 96-6 for the Following Products:

EPA Reg. No.	Product Name	Submission Date
2596-49	Hartz 2 in 1 Collar for Cats	1 April 1998
2596-50	Hartz 2 in 1 Collar for Dogs	1 April 1998
2596-62	Hartz 2 in 1 Flea & Tick Collar for Dogs	25 March 1998
2596-63	Hartz 2 in 1 Flea & Tick Collar for Cats	25 March 1998
2596-78	Hartz 2 in 1 Flea & Tick Powder for Cats	10 April 1998
2596-79	Hartz 2 in 1 Flea & Tick Powder for Dogs	10 April 1998
2596-83	Hartz 2 in 1 Plus Seven Month Collar for Cats	1 April 1998
2596-84	Hartz 2 in 1 Plus Seven Month Collar for Dogs	1 April 1998
2596-119	Hartz Rabon Flea & Tick Dip for Dogs & Cats	29 May 1998
2596-122	Hartz 2 in 1 Fast Acting Flea & Tick Spray for Dogs III	29 May 1998
✓ 2596-123	Hartz 2 in 1 Fast Acting Flea & Tick Spray for Cats III	29 May 1998
2596-125	Hartz 2 in 1 Flea & Tick Pump for Dogs II	29 May 1998
2596-126	Hartz 2 in 1 Flea & Tick Pump for Cats II	29 May 1998
2596-136	Hartz 2 in 1 Flea & Tick Spray for Cats & Dogs	3 June 1998

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable provided you

make the revisions indicated below before release for shipment of any product bearing amended labeling.

Technical review of your submission dated July 16, 1998, responding to EPA's June 16, 1998, objection to your request to deviate from the requirements of PR Notice 96-6, has been completed and supports your request to make some, but not all, of the deviations requested for the above-mentioned products.

**Hartz 2 in 1 Collar for Cats, EPA Reg. No. 2596-49:**

- a. 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." Although the data you cited support use of collars on dogs younger than 12 weeks, those data cannot be used for products that are applied to cats. The statement must be consistent with the definitive wording presented in PRN 96-6.
- b. Revise the statement concerning debilitated, aged, and medicated animals to read as follows: "Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant or nursing animals."
- c. Add the following statement regarding cholinesterase inhibitors: "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." The technical review of the data you cited does not support omitting this statement from this product label.

**Hartz 2 in 1 Collar for Dogs, EPA Reg. No. 2596-50:**

- a. Revise the first sentence of the first full paragraph under DIRECTIONS FOR USE to read as follows: "Do not use on puppies under 6 weeks of age." Although the statement, "It is not advisable to use this collar on puppies less than 6 weeks of age," had been previously approved by the Agency, the statement must now be revised to be consistent with the definitive wording presented in PRN 96-6 to clearly indicate the minimum age of animals.
- b. After the statement, "Consult a veterinarian before using the product on debilitated, aged, or medicated animals," insert the following statement: "If used on pregnant or nursing dogs, do not replace collar until the puppies are at least 6 weeks old."
- c. 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. However, flea and tick collars may be immediately replaced." The technical review of the data you cited does not support omitting this statement from this product label.

Hartz 2 in 1 Flea & Tick Collar for Dogs, EPA Reg. No. 2596-62:

- a. Revise the first sentence in the paragraph that follows the list of pests controlled to read as follows: "Do not use on puppies under 6 weeks of age." Although the statement, "It is not advisable to use this collar on puppies less than 6 weeks of age," had been previously approved by the Agency, the statement must now be revised to be consistent with the definitive wording presented in PRN 96-6 to clearly indicate the minimum age of animals.
- b. After the statement, "Consult a veterinarian before using the product on debilitated, aged, or medicated animals," insert the following statement: "If used on pregnant or nursing dogs, do not replace collar until the puppies are at least 6 weeks old."
- c. Include the company or Animal Poison Control Center telephone number on the label so consumers can call for the purpose of receiving information concerning proper use of the product and specific actions to take in case of emergencies.
- d. 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. However, flea and tick collars may be immediately replaced." The technical review of the data you cited does not support omitting this statement from this product label.

Hartz 2 in 1 Flea & Tick Collar for Cats, EPA Reg. No. 2596-63:

- a. 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." Although the data you cited support use of collars on dogs younger than 12 weeks, those data cannot be used for products that are applied to cats. The statement must be consistent with the definitive wording presented in PRN 96-6.
- b. Revise the statement concerning debilitated, aged, and medicated animals to read as follows: "Consult a veterinarian before using this product on debilitated, aged, medicated, *pregnant or nursing* animals."
- c. Add the following statement regarding cholinesterase inhibitors: "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." The technical review of the data you cited does not support omitting this statement from this product label.
- d. Include the company or Animal Poison Control Center telephone number on the label so consumers can call for the purpose of receiving information concerning proper use of the product and specific actions to take in case of emergencies.

Hartz 2 in 1 Flea & Tick Powder for Cats, EPA Reg. No. 2596-78:

- a. Revise the fifth sentence in the paragraph under PRECAUTIONARY STATEMENTS to read as follows: "Do not use on kittens under 12 weeks of age." Although the data you cited support use on dogs younger than 12 weeks, those data cannot be used for products that are applied to cats. The statement must be consistent with the definitive wording presented in PRN 96-6.
- b. Revise the statement concerning debilitated, aged, and medicated animals to read as follows: "Consult a veterinarian before using this product on debilitated, aged, medicated, *pregnant or nursing* animals."
- c. Add the following statement regarding cholinesterase inhibitors to the PRECAUTIONARY STATEMENTS: "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." The technical review of the data you cited does not support omitting this statement from this product label.

Hartz 2 in 1 Flea & Tick Powder for Dogs, EPA Reg. No. 2596-79:

- a. Revise the fifth sentence in the paragraph that follows "CAUTION" to read as follows: "Do not use on puppies under 6 weeks of age." Although the statement, "It is not advisable to use this collar on puppies less than 6 weeks of age," had been previously approved by the Agency, the statement must now be revised to be consistent with the definitive wording presented in PRN 96-6 to clearly indicate the minimum age of animals.
- b. After the statement, "Consult a veterinarian before using the product on debilitated, aged, or medicated animals," insert the following statement: "If used on pregnant or nursing dogs, do not retreat until the puppies are at least 6 weeks old."
- c. In the precautionary paragraph, 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. However, flea and tick collars may be immediately replaced." The technical review of the data you cited does not support omitting this statement from this product label.

Hartz 2 in 1 Plus Seven Month Collar for Cats, EPA Reg. No. 2596-83:

- a. Revise the first sentence in the first full paragraph under DIRECTIONS FOR USE to read as follows: "Do not use on kittens under 12 weeks of age." Although the data you cited support use on dogs younger than 12 weeks, those data cannot be used for products that are applied to cats. The statement must be consistent with the definitive wording presented in PRN 96-6.

- b. Revise the statement concerning debilitated, aged, and medicated animals to read as follows: "Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant or nursing animals."
- c. Add the following statement regarding cholinesterase inhibitors: "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." The technical review of the data you cited does not support omitting this statement from this product label.
- d. 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 comment c above.

**Hartz 2 in 1 Plus Seven Month Collar for Dogs, EPA Reg. No. 2596-84:**

- a. Revise the first sentence in the paragraph under DIRECTIONS FOR USE to read as follows: "Do not use on puppies under 6 weeks of age." Although the statement, "It is not advisable to use this collar on puppies less than 6 weeks of age," had been previously approved by the Agency, the statement must now be revised to be consistent with the definitive wording presented in PRN 96-6 to clearly indicate the minimum age of animals.
- b. After the statement, "Consult a veterinarian before using the product on debilitated, aged, or medicated animals," insert the following statement: "If used on pregnant or nursing dogs, do not replace collar until the puppies are at least 6 weeks old."
- c. 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. However, flea and tick collars may be immediately replaced." The technical review of the data you cited does not support omitting this statement from this product label.
- d. In several places on the label, the word "cat" appears where it should say "dog". Since this product is for use only on dogs, replace every instance of the word "cat" with the word "dog".

**Hartz Rabon Flea & Tick Dip for Dogs & Cats, EPA Reg. No. 2596-119:**

- a. Replace the retreatment interval with a specific time interval. "Repeat as needed for control" does not meet the PR Notice 96-6 criteria for product specific statements. You need to provide a specific number of days or weeks in the reapplication limitation statement, taking into consideration efficacy and domestic animal safety data, to meet the requirement of PR Notice 96-

6. Section IV, No. 3.

b. Revise the last sentence in the paragraph under DIRECTIONS FOR USE to read as follows: "Do not use on kittens under 12 weeks of age, or puppies under 6 weeks of age." Although the data you cited support use on dogs younger than 12 weeks, those data cannot be used for products that are applied to cats. The statement must be consistent with the definitive wording presented in PRN 96-6.

c. Revise the third sentence under PRECAUTIONARY STATEMENTS to read as follows: "Do not use on kittens under 12 weeks of age, or puppies under 6 weeks of age."

d. Revise the statement concerning debilitated, aged, and medicated animals to read as follows: "Consult a veterinarian before using this product on debilitated, aged, or medicated dogs or cats, or pregnant or nursing cats. If used on pregnant or nursing dogs, do not retreat until the puppies are at least 6 weeks old."

e. Add the following statement regarding cholinesterase inhibitors to the PRECAUTIONARY STATEMENTS: "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." The technical review of the data you cited does not support omitting this statement from this product label.

Hartz Fast Acting Flea and Tick Spray for Dogs, EPA Reg. No. 2596-122:

a. Replace the reapplication limitations with a specific time interval. "Every few days," and "as needed," do not meet the PR Notice 96-6 criteria for product specific statements. You need to provide a specific number of days or weeks in the reapplication limitation statement, taking into consideration efficacy and domestic animal safety data, to meet the requirement of PR Notice 96-6, Section IV, No. 3.

b. Revise the fifth sentence in the paragraph that follows "CAUTION" to read as follows: "Do not use on puppies under 6 weeks of age." Although the statement, "It is not advisable to use this collar on puppies less than 6 weeks of age," had been previously approved by the Agency, the statement must now be revised to be consistent with the definitive wording presented in PRN 96-6 to clearly indicate the minimum age of animals.

c. After the statement, "Consult a veterinarian before using the product on debilitated, aged, or medicated animals," insert the following statement: "If used on pregnant or nursing dogs, do not retreat until the puppies are at least 6 weeks old."

d. In the directions for use, 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. However, flea and tick collars may be immediately replaced." The technical review of the data you cited does not support omitting this statement from this product label.

Hartz 2 in 1 Fast Acting Flea & Tick Spray for Cats III, EPA Reg. No. 2596-123:

- a. Replace the reapplication limitations with a specific time interval. "Every few days," and "as needed," do not meet the PR Notice 96-6 criteria for product specific statements. You need to provide a specific number of days or weeks in the reapplication limitation statement, taking into consideration efficacy and domestic animal safety data, to meet the requirement of PR Notice 96-6, Section IV, No. 3.
- b. Revise the fourth sentence in the paragraph under PRECAUTIONARY STATEMENTS to read as follows: "Do not use on kittens under 12 weeks of age." Although the data you cited support use on dogs younger than 12 weeks, those data cannot be used for products that are applied to cats. The statement must be consistent with the definitive wording presented in PRN 96-6.
- c. Revise the statement concerning debilitated, aged, and medicated animals to read as follows: "Consult a veterinarian before using this product on debilitated, aged, medicated, *pregnant or nursing* animals."
- d. Add the following statement regarding cholinesterase inhibitors to the PRECAUTIONARY STATEMENTS: "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." The technical review of the data you cited does not support omitting this statement from this product label.

Hartz 2 in 1 Flea & Tick Repellent for Dogs, EPA Reg. No. 2596-125:

- a. Below PRECAUTIONARY STATEMENTS, after the statement, "Consult a veterinarian before using the product on debilitated, aged, or medicated animals," insert the following statement: "If used on pregnant or nursing dogs, do not retreat until the puppies are at least 6 weeks old."
- b. In the directions for use, 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. However, flea and tick collars may be immediately replaced." The technical review of the data you cited does not support omitting this statement from this product label.
- c. Since the active ingredient and concentration in this product is identical to EPA Reg. No.

2596-122. this product should also have a statement on the front panel of the label indicating that it kills fleas and ticks.

d. Under "Directions for Use" delete the statement, "Use on bedding and other areas as needed." No directions are given for spraying inanimate objects.

**Hartz 2 in 1 Flea & Tick Pump for Cats II (Flea and Tick Repellent for Cats), EPA Reg. No. 2596-126:**

a. Revise the last sentence in the paragraph under PRECAUTIONARY STATEMENTS to read as follows: "Do not use on kittens under 12 weeks old." Although the data you cited support use on dogs younger than 12 weeks, those data cannot be used for products that are applied to cats. The statement must be consistent with the definitive wording presented in PRN 96-6.

b. Revise the statement concerning debilitated, aged, and medicated animals to read as follows: "Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant or nursing animals."

c. Add the following statement regarding cholinesterase inhibitors to the PRECAUTIONARY STATEMENTS: "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." The technical review of the data you cited does not support omitting this statement from this product label.

d. Under "Directions for Use" delete the statement, "Use on bedding and other areas as needed." No directions are given for spraying inanimate objects.

e. Please note that since the active ingredient and concentration in this product is identical to EPA Reg. No. 2596-123, this product should also have a statement on the front panel of the label indicating that it kills fleas and ticks.

**Hartz 2 in 1 Flea & Tick Spray Cats & Dogs, EPA Reg. No. 2596-136:**

a. Revise the last sentence under PRECAUTIONARY STATEMENTS to read as follows: "Do not use on kittens under 12 weeks of age, or puppies under 6 weeks of age." Although the data you cited support use on dogs younger than 12 weeks, those data cannot be used for products that are applied to cats. The statement must be consistent with the definitive wording presented in PRN 96-6.

b. Revise the statement concerning debilitated, aged, and medicated animals to read as follows: "Consult a veterinarian before using this product on debilitated, aged, or medicated dogs



or cats, or pregnant or nursing cats. If used on pregnant or nursing dogs, do not retreat until the puppies are at least 6 weeks old."

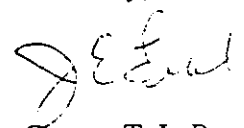
c. Add the following statement regarding cholinesterase inhibitors to the PRECAUTIONARY STATEMENTS: "Do not use this product on animals simultaneously or within 30 days before or after treatment with or exposure to cholinesterase inhibiting drugs, pesticides, or chemicals. However, flea and tick collars may be immediately replaced." The technical review of the data you cited does not support omitting this statement from this product label.

d. Under "Directions for Use" delete the statement, "Use on bedding and other areas as needed." No directions are given for spraying inanimate objects.

Submit two copies of your final printed labeling for each product before you release the products for shipment. Stamped copies of the labeling are enclosed for your records.

If you have any questions regarding this letter, please contact John Leahy of my team at (703) 305-6703.

Sincerely,



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

for

Enclosure

Front Panel

Enclosure <sup>1913</sup> 2

**HARTZ**  
**Control**  
**Pet Care System**  
**Flea & Tick Repellent for Dogs**  
 with Rabon®\*

ACTIVE INGREDIENT: By Weight (Nom)  
 Tetrachlorvinphos (CAS# 22248-79-9) ..... 1.08%  
 OTHER INGREDIENTS: ..... 98.92%

KEEP OUT OF REACH OF CHILDREN  
 CAUTION: SEE BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Net Wt. 14.5 fl oz 428 mL

**NOTIFICATION**  
 JUN 24 1998

ACCEPTED  
 with COMMENT  
 in EPA Letter Board

NOV 23

Use only as directed. Do not use on cats, birds, or other animals. For use on dogs only. See back panel for complete directions. Do not use on dogs with open wounds or skin irritation. For use on dogs only. For use on dogs only. For use on dogs only.

2596-123J

# BACK PANEL

11/13

- Fast Acting, Deodorizing Formula
- Fine Mist Spray
- Kills the Deer Tick which may carry Lyme Disease

Control Pet Care System™ Flea & Tick Repellent **prevents** fleas and ticks from living on your pet. This spray may also be used to **kill** any fleas and ticks already on your dog. Once sprayed, fleas will be killed within 5 to 10 minutes. In addition to controlling fleas and ticks, this product leaves your pet's coat soft, glossy, and manageable.

## SHAKE WELL BEFORE USE

1. Reg. No. 2596-125  
A Est. 2596-NJ-1

For full precautions and directions for use, peel back here.

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

## UNCONDITIONAL MONEY BACK GUARANTEE

\*Dabon® is a registered trademark for Tetrachlorvinphos

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

### DIRECTIONS FOR USE:

It is a violation of Federal Law in a manner inconsistent with its labeling.

## SHAKE WELL BEFORE USE

1. Hold bottle upright 6 inches from pet. Direct spray towards pet and spray entire coat pressing dispenser with quick short strokes. Move bottle to get even coverage of coat (until tips of hair are moist).
2. Apply lightly and rub into animal's coat. For long haired dogs, ruffle hair for spray to reach skin.
3. Ticks are tough - spray directly.
4. After 10 minutes, dry dog with towel.
5. Comb and brush coat.
6. Repeat once a week. Use on bedding and other areas as needed.

# BACK PANEL

12/13

**Storage and Disposal:** Do not re-use empty container. Wrap container trash collection. Do not contaminate water, food or feed by storage and disposal.

## PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

**CAUTION:** Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands and exposed skin thoroughly with soap and water after handling. Consult a veterinarian before using this product on debilitated, aged or medicated animals. Sensitivity 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. Do not use near birds, fish or foodstuffs. Do not use on puppies under 6 weeks old.

## STATEMENT OF PRACTICAL TREATMENT

**I** )eyes: Flush with plenty of water, call a physician if irritation persists.

For more information or help at any step, call our flea and tick experts at 1-800-XXX-XXX,  
9AM-5PM

## OPTIONAL COPY #1

### IMPORTANT INFORMATION

#### THE ABC'S OF FLEA AND TICK CONTROL

**B** - Protect your Pet

**C** )ontrol products are designed to work together in a complete insecticidal system. For total control of fleas and ticks, it is necessary to treat not only the pet but also its surrounding environment. Use Control products to know these simple ABC's for control of fleas and ticks on your pet and around your home.)

**Step A - TREAT YOUR PET** with one of the Control on-animal products such as Conditioning Shampoo, Dip, Powder or Spray. Use a Control product containing vIGRen®, an Insect Growth Regulator (I.G.R.), to also stop hatching flea eggs from developing into biting adults.

**Step B - PROTECT YOUR PET** with a Control repellent or flea and tick collar to keep fleas and ticks from reinfesting your pet. The Control Pet Care System Ultimate Flea Collar™ with vIGRen® IGR will also prevent flea eggs from hatching.

**Step C - TREAT YOUR HOME**, both indoors and outdoors, with Control Pet Care System Home Flea & Tick Killer or Fogger with vIGRen and Control Pet Care System Yard and Kennel Spray to protect your entire home and guard against reinfestation. The Control Pet Care System Flea Trap will also serve to help break the flea life cycle by killing fleas in hard-to-reach areas in your home.

Be sure to read full directions and precautions on the label of each product you use.

Rabon® is a registered trademark for Tetrachlorvinphos  
vIGRen® is a registered trademark of Wellmark Intl.

# OPTIONAL COPY #2

## The Stress-Free System for Eliminating Fleas & Ticks

### 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.

### 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 Dogs or Repellent for Cats.

### 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 Control 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 Intl.

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