



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460-0001

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

October 9, 2008

Mr. Robert Rosenwasser, Director, Regulatory Affairs The Hartz Mountain Corporation 400 Plaza Drive Secaucus, NJ 07094-3688

Subject:

Amended Labeling, Incorporation of Previously Rescinded Notification Language

Hartz<sup>®</sup> Rabon<sup>®</sup> Collar with Methoprene, EPA Reg. No. 2596-139

Your Submission Dated July 2, 2008

Dear Mr. Rosenwasser:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with the following provision(s):

#### General Statement:

Delete all text throughout the label marked with "strikethrough."

#### Precautionary Statements section, Hazards to Humans and Domestic Animals subsection comment(s):

2. Replace the 4<sup>th</sup> sentence in paragraph #1 with: "Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet."

### First Aid Statement section, Note to Physicians and Veterinarians subsection comment(s):

- 3. It is important to note that the "1-800-275-1414" phone number should be available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns.
- 4. In the "**Note to Physicians and Veterinarians:**" subsection, replace the 1<sup>st</sup> sentence with: "This product contains tetrachlorvinphos (an organophosphate), which is a cholinesterase inhibitor."

## Storage and Disposal Statement section comment(s):

5. To facilitate inclusion of language from PR Notice 2007-1, you should replace this section with:

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal. **Pesticide Storage:** Store this product in a cool, dry place that is inaccessible to children. **Pesticide Disposal:** If empty: Nonrefillable container. Do not reuse or refill this container.

Offer for recycling, if available. If partly filled: Call your local solid waste agency [or toll free number or website which meets the criteria in paragraph II.E., P.R. Notice 20007-1] for disposal instructions. Never place unused product down any indoor or outdoor drain.

Non-Pesticide Related Marketing Claims and Other Optional Text section comment(s):

- 6. In the 13<sup>th</sup> non-pesticide related marketing claim, delete the word "Safety" since it is an implied safety claim.
- 7. Delete the 16<sup>th</sup> non-pesticide related marketing claim, since it is an implied safety claim.
- 8. In the 25<sup>th</sup>, 38<sup>th</sup> and 40<sup>th</sup> non-pesticide related marketing claims, replace the word "safety" with the word "visibility."

Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under section 12(a)(1)(E) of FIFRA. 40 CFR §156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not be substantially differ from those claims approved through the registration process. Therefore, should the Agency find, or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at *Rodia.Carmen@epa.gov*.

Sincerely Yours,

Richard J. Gebken

Product Manager (10)

Soul of least

Insecticide Branch

Registration Division (7505P)

Enclosure: Label stamped "Accepted with Comments" 002596~00139 p397420

# Hartz<sup>®</sup> Rabon<sup>®</sup> Collar with Methoprene

## Alternate Brand Names

Hartz<sup>®</sup> UltraGuard Plus™ Flea (&) (and) Tick Collar for Puppies Hartz<sup>®</sup> UltraGuard Plus™ Flea (&) (and) Tick Collar for Dogs (&) (and) Puppies Hartz<sup>®</sup> UltraGuard Plus™ Flea (&) (and) Tick Collar for Large Dogs Hartz<sup>®</sup> UltraGuard Plus™ Flea (&) (and) Tick Collar for Cats (&) (and) (Kittens)

Hartz<sup>®</sup> Advanced Care<sup>™</sup> 3 in 1<sup>™</sup> Control<sup>™</sup> Collar for Cats Hartz<sup>®</sup> Advanced Care<sup>™</sup> 3 in 1<sup>™</sup> Control<sup>™</sup> Collar for Kittens Hartz<sup>®</sup> Advanced Care<sup>™</sup> 3 in 1<sup>™</sup> Control<sup>™</sup> Collar for Dogs Hartz<sup>®</sup> Advanced Care<sup>™</sup> 3 in 1<sup>™</sup> Control<sup>™</sup> Collar for Puppies Hartz<sup>®</sup> Control Pet Care System<sup>®</sup> Ultimate Flea Collar for Cats Hartz<sup>®</sup> Control Pet Care System<sup>®</sup> Ultimate Flea Collar for Kittens Hartz<sup>®</sup> Control Pet Care System<sup>®</sup> Ultimate Flea Collar for Dogs Hartz<sup>®</sup> Control Pet Care System<sup>®</sup> Ultimate Flea Collar for Puppies Hartz<sup>®</sup> 3 in 1<sup>™</sup> Control<sup>™</sup> Collar for Cats Hartz<sup>®</sup> 3 in 1<sup>™</sup> Control<sup>™</sup> Collar for Kittens

Hartz<sup>®</sup> 3 in 1<sup>™</sup> Control<sup>™</sup> Collar for Kittens
Hartz<sup>®</sup> 3 in 1<sup>™</sup> Reflecting Control<sup>™</sup> Collar for Cats
Hartz<sup>®</sup> 3 in 1<sup>™</sup> Control<sup>™</sup> Collar for Dogs

Hartz<sup>®</sup> 3 in 1<sup>TM</sup> Control<sup>TM</sup> Collar for Puppies

Hartz<sup>®</sup> 3 in 1<sup>™</sup> Reflecting Control<sup>™</sup> Collar for Dogs

ACCEPTED
With COMMENTS
In EPA Letter Dated:

October 9, 2008
Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:

2596-139

InControl by Hartz<sup>®</sup> Flea & Tick Collar for Cats
InControl by Hartz<sup>®</sup> Flea & Tick Collar for Kittens
InControl by Hartz<sup>®</sup> Reflecting Flea & Tick Collar for Cats
InControl by Hartz<sup>®</sup> Flea & Tick Collar for Dogs
InControl by Hartz<sup>®</sup> Flea & Tick Collar for Puppies
InControl by Hartz<sup>®</sup> Reflecting Flea & Tick Collar for Dogs
Hartz<sup>®</sup> InControl Flea & Tick Collar for Dogs
Hartz<sup>®</sup> InControl Flea & Tick Collar for Cats
Hartz<sup>®</sup> InControl Flea & Tick Collar for Cats
Hartz<sup>®</sup> InControl Flea & Tick Collar for Cats

#### **ACTIVE INGREDIENTS:**

 Tetrachlorvinphos
 14.55%

 (S)-methoprene
 1.02%

 OTHER INGREDIENTS
 84.43%

 TOTAL
 100.00%

(Ingredient Statement – optional front or back panel)

Hartz® Rabon® Collar with Methoprene

EPA Reg. No.: 2596-139

MASTER LABEL BASED ON 12/16/02 EPA STAMPED APPROVED LABEL

**CAUTION:** Do not let children play with this collar.

See (side) (back) panel(s) for (ingredient statement and) additional precautionary statements.

**NET CONTENT(S):** 1 (color designation) collar (with silver Reflect-X Shield<sup>TM</sup>),

(NET. WT.) (Range from 10 g to 50 g depending on animal for use)

EPA Reg. No. 2596-139 EPA Est. No. 2596-NJ-1

Made (in the U.S.A.) by
The Hartz Mountain Corporation
400 Plaza Drive
Secaucus, NJ 07094 (U.S.A.)

READ ENTIRE LABEL BEFORE EACH USE USE (ONLY) ON (DOGS) (CATS) (DOGS and CATS)

## 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.

#### FIRST AID

Contains an organophosphate that inhibits cholinesterase.

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. You may also contact 1-800-275-1414 for emergency medical treatment information.

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 (The Hartz-Mountain Corporation at) 1-800-275-1414 or your local Poison Control Center for further information.

Hartz® Rabon® Collar with Methoprene

EPA Reg. No.: 2596-139

MASTER LABEL BASED ON 12/16/02 EPA STAMPED APPROVED LABEL

**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 old) (kittens under 12 weeks old). Do not unroll collar until ready to use. Place the Hartz<sup>®</sup> (brand name) (collar) around the (dog's)(puppy's) (dog's or puppy's) (cat's)(kitten's)(cat's or kitten's) neck, adjust for proper fit, and buckle in place. The collar must be worn loosely to allow for growth of the (cat) (dog) (animal) and to permit the collar to move (around)(about) the neck. (Generally,) A properly fitted collar is one that, when fastened, will snugly slide over the pet'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. If used on pregnant or nursing (dogs)(cats), do not replace collar until the (puppies are at least 6 weeks old)(kittens are at least 12 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 (similar) chemicals. However, flea and tick collars may be immediately replaced (with new collars).

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

The collar will begin to kill fleas, ticks and flea eggs and larvae 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)(7) months. Under conditions where pets are exposed to severe flea and tick infestations, it may be necessary to replace the collar more frequently.

Wetting will not impair the collar's effectiveness or the pet's protection. If the pet goes swimming or is out in the rain it is not necessary to remove the collar. The Hartz<sup>®</sup> (brand name) (collar) may be worn with a regular collar.

#### STORAGE AND 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 for disposal instructions. Never place unused product down any indoor or outdoor drain.

Hartz<sup>®</sup> Rabon<sup>®</sup> Collar with Methoprene

EPA Reg. No.: 2596-139

MASTER LABEL BASED ON 12/16/02 EPA STAMPED APPROVED LABEL

For more information (about flea and tick problems) (and how to solve them), call our experts at 1-800-275-1414 (weekdays, 9am-5pm)(E.S.T.)

## OPTIONAL/ALTERNATE LABEL TEXT

(Plus)(Starts Killing)(Starts to Kill) (Kills) (&) (and)(Repelling)(Repel)(Repels) (Prevents)

(Fleas) (Ticks) (Flea eggs) (&) (and) (Larvae) (through contact) for (up to)(7) (seven) Months

(Plus)(Starts Killing)(Starts to Kill)(&)(and) (Repelling)(Repel)(Preventing)(Prevent)(Fleas)

(Ticks) (Flea eggs) (&) (and) (Larvae)(on contact) for (up to)(7)(seven) Months

(Plus) Kills Flea Eggs and Larvae to Prevent (Future) Infestations

(Plus)(Kills) (Keeps Killing) (and)(&)(prevents)(preventing) pre-adult flea stages (too)

(Plus) Kills (fleas and ticks and) pre-adult fleas before they (grow) (change) (develop) into (biting) adults

(Plus)(Kills fleas and ticks and) (continues to protect against) (prevents) pre-adult fleas from

(changing) (growing) (developing) into (biting) adults

(Plus) Prevents infestation by halting the flea reproductive cycle

(Plus) Halts the flea life cycle by killing flea eggs and larvae

One step to treat (existing problems) and prevent (reinfestations)

(Plus)Provides protection against future infestations

(Treatment) (and) (&) (Prevention) in one step

(Plus) Kills flea eggs and larvae (to prevent) (preventing) reinfestations.

(Plus) Kills fleas before they (can) hatch

(Plus) Stops (fleas) (and) (&) (ticks) from multiplying

(Plus) Helps prevent flea reinfestation(s) for (up to)(7)(seven) months.

(Plus) Kills (3 Stages of) (ticks) (the tick) (the flea) life cycle

(Plus) kills (adult ticks) (larvae) (and) (&) (nymphs)

(Plus) Kills (pre-adult) ticks

Kills fleas that may cause flea allergy dermatitis (and)(or) flea bite anemia.

Kills fleas that may transit tapeworm.

(Controls)(Kills)(fleas)(and)(&)(ticks) round-the-clock for (up to)(7)(seven) months

Controls flea (population growth) (infestation).

Controls flea infestations where they start.

Focused on breaking the flea life cycle.

Starts Working (on) (through) Contact

(Complete your defense against fleas with)(2)(two) ingredients targeted at (killing

fleas)(and)(&)(breaking the flea life cycle).

Active ingredient (specifically) targeting flea eggs (and flea larvae) stopping their ability to (mature and) infest your home.

(Plus) Prevents flea eggs from hatching (for 7 months)

(Plus) Kills (and) (&) (Prevents) (flea) eggs before they hatch

(Plus) Kills(and)(&)(Prevents) flea eggs (and larvae)

(Plus) Kills (and)(&)(Prevents) hatching eggs

(Plus) Breaks the (flea) (and)(&)(tick) life cycle

7 month flea and tick collar

Kills for 7 months

Hartz® Rabon® Collar with Methoprene

EPA Reg. No.: 2596-139

MASTER LABEL BASED ON 12/16/02 EPA STAMPED APPROVED LABEL

Kills (adult)(fleas)(and)(&)(ticks)

7 month(s) protection

With Rabon®

Plus IGR

Kills the Deer tick, which may carry Lyme disease

Kills the Rocky Mountain wood tick, which may carry Rocky Mountain Spotted fever

The Hartz® (brand name)(collar) contains (both) an insecticide to kill adult fleas and ticks and an (insect growth regulator) (IGR) to kill flea eggs before they hatch.

The Hartz® (brand name)(collar) is designed to kill both the adult flea and its eggs and larvae, thereby breaking the flea life cycle.

## NON-PESTICIDE RELATED CLAIMS AND OTHER OPTIONAL TEXT

(blue)(red)(pink)(purple)(yellow)(orange)(silver)(gold)(white)(color designation) collar (with Silver Reflect-X Shield M)

White & purple collar

White & blue collar

For dogs

For puppies

For cats

For kittens

For dogs (&) (and) puppies

For cats (&) (and) kittens

Water Resistant

With deodorant

(Clean) (Fresh) scent

(With) safety (release)(snap) (buckle) (release)

(With) breakaway buckle

Breakaway collar

## 10 -Pulls apart for safety-

Re-attachable

Powerful Results When You Need (it)(them)

Dual-action for immediate and long-lasting effects

With Reflect-X Shield

Patent Pending

(Reflect-X Shield) focuses the active ingredients toward the pet and away from you (....PLUS it reflects direct light up to 450 feet)

EASY ACTIVATION

To activate collar, hold at each end ... STRETCH .... and it's ready (to work)(for your)(cat) (kitten) (dog) (puppy) (to wear)(to kill fleas & ticks)(to kill fleas; ticks, and flea eggs)

Hartz<sup>®</sup> Rabon<sup>®</sup> Collar with Methoprene EPA Reg. No.: 2596-139 MASTER LABEL BASED ON 12/16/02 EPA STAMPED APPROVED LABEL The Hartz UltraGuard Plus M Flea & Tick Collar For (Cats) (Kittens) (Large) Dogs) (Puppies) provides an added dimension of nighttime safety for you and your pet. The collar will reflect when light shines (directly) on the reflective strip

Contains one collar (for all size dogs)(for all size cats)

Fits necks up to inches (cm)

Fits up to inch (cm) necks

Revolutionary technology

With deodorant

Continuous protection

Dual action

Contains one collar (for all size dogs, cats)

Fits necks up to inches (cm)

Reflects Direct Light up to (200 ft.) (250 ft.) (300 ft.) (400 ft.) (450 ft.) (500 ft.) (550 ft.) (600 ft.)

(Color designation) Collar with Reflecting Technology

(Color designation) Collar with Reflective Technology

The (brand name) provides an added dimension of nighttime safety for you and your pet. (The collar will) reflect(s) (up to 450 feet) when light shines directly (on)(onto) the reflective strip.

40 Reflects direct light up to 450 feet (away) for an added dimension of nighttime safety. Hartz (brand name) products are designed to complement each other in an integrated program for flea (and)(&) tick management. To assure proper treatment, we recommend use of only Hartz<sup>®</sup> (brand name) products.

To learn more about treating current infestations and preventing future outbreaks (please) visit (our website)(at) (www.hartz.com)(www.hartzultraguard.com)(www.hartzincontrol.com)

To learn more, visit (www.hartz.com)(www.hartzultraguard.com)

(PLEASE) VISIT (OUR WEBSITE) (AT)

(www.hartz.com)(www.hartzultraguard.com)(www.hartzincontrol.com)

Hartz® and other trademarks are trademarks of The Hartz Mountain Corporation For more information, call our experts at 1-800-275-1414 (weekdays, 9am-5pm) (E.S.T.)