



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

MAR 19 2003

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Nancy Huebel
Regulatory Specialist
Welmark International
1100 E. Woodfiel Road
Schaumburg, IL 60173

Subject: Label Amendment: 2001-1 First Aid and Storage and Disposal
Flea collar RF-75 for Dogs (Carbaryl)
EPA Reg. No. 2724-273
Submission dated August 8, 2002, **accepted with comments**

Dear Ms. Huebel:

The revised labeling referenced to above, submitted in connection with the registration under the Federal Insecticide, fungicide, and Rodenticide Act (FIFRA) as amended, is accepted with the following comments:

- 1) Replace "Keep out of Reach of Children" with "Do not let children play with this collar".
- 2) Revise the Precautionary Statements to read "Harmful if swallowed or absorbed through the skin. Avoid contact with eyes, skin or clothing. Wash hands with soap and water after handling collar. Do not allow children to play with this collar". Move the statement "Do not open package until ready to use" to the Directions for Use.
- 3) Add the prohibition "Use only on dogs" also under the Directions for Use.

A stamped copy "accepted with comments" of the label is enclosed for your records.

Please submit two (2) copies of the final printed before shipment. If you have any questions please call me at (703) 308-8328.

Sincerely yours,

A handwritten signature in black ink that reads "Akiva Abramovitch".

Akiva Abramovitch, Ph.D.

Chemist

Insecticide-Rodenticide Branch
Registration Division (7505C)

[] indicates optional statements

FLEA COLLAR RF-75 FOR DOGS

Contains Sevin®
 Kills fleas up to 4 months
 [4 month flea protection]
 Flea Protection for 4 Months
 Kills ticks up to 1 month, continues to aid in tick control for an additional 1 month
 Kills fleas & ticks
 Kills ticks
 Continuous action even when wet
 100% satisfaction guaranteed
 [One-piece buckle design]
 [Integrated plastic buckle]
 [Unique buckle design]
 [Integrated one-piece buckle]
 [One-piece buckle]
 [Step 2][Part of the (Brand Name)(#) Step Guarantee Pet Protection Program]
 [For medium dogs with necks up to (#) inches]

ACCEPTED
with COMMENTS
In EPA Letter Dated:

MAR 19 2003

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.
2724-273

ACTIVE INGREDIENT:

Carbaryl (CAS #63-25-2) 17.0%

OTHER INGREDIENTS: 83.0%

TOTAL: 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Precautions on back

EPA Reg. No. 2724-273

EPA Est. No.

NET CONTENTS:

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

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. Buckle collar around dog's neck. [Thread flat end of the collar through buckle hole and tighten as necessary, so that at least two ridges are covered by the buckle. Since the plastic buckle is molded into the collar, the possibility of neck irritation and buckle failure is reduced.] Fit collar snug enough to prevent placement of the dog's leg or lower jaw through the collar, yet loose enough to be rotated about the neck. [Generally, if used on large dogs, two or three fingers should fit between the collar and dog's neck.]
2. Leave 1-2 extra inches on the collar for adjustment, cut off excess length and dispose of in trash.
3. Check periodically and adjust fit if necessary, especially when puppies are rapidly growing.
4. May be used in addition to regular collar. Replace collar every 4 months if necessary. [To release the collar, squeeze buckle between thumb and finger and pull sharply.]

STORAGE and DISPOSAL: Store in original unopened container away from children. Do not reuse container or reuse collar. Dispose of in trash.

WHAT TO EXPECT:

For Fleas:

1. This [brand name] collar is designed to kill adult fleas.
2. This collar starts killing fleas as soon as it is placed around dog's neck.
3. Protection against fleas will be achieved within a few days, providing continuous protection for up to 4 months.

For Ticks:

1. Ticks are tougher to kill than fleas and are killed more slowly.
2. Full protection against adult and immature ticks will be achieved within a few days, providing continuous protection for up to 1 month, and will aid in tick control for an additional month. [If your dog goes swimming or is out in the rain, it is not necessary to remove the collar. The continuous action will rapidly replace any flea and tick killing material removed.]
3. Adult ticks will be killed over the entire pet. Dead ticks will fall off or may be easily removed.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION:

Humans: Do not open package until ready to use. Do not allow children to play with this collar. May be harmful if swallowed. Avoid contact with eyes, skin, or clothing. Wash hands thoroughly with soap and water after handling collar.

Animals: Do not use on puppies under 12 weeks of age. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant, or nursing animals. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, remove collar and bathe your pet with mild soap and rinse with large amounts of water. 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.

FIRST AID	
Call a poison control center or doctor immediately for treatment advice.	
If swallowed	<ul style="list-style-type: none"> • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.
If in eyes	<ul style="list-style-type: none"> • 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.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15-20 minutes.
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-[phone number] for emergency medical treatment information.	
NOTE TO PHYSICIAN/VETERINARIAN: Atropine is antidotal only if symptoms of cholinesterase inhibition are present. Usual symptoms in animals include salivation, labored breathing, incoordination, and pin-point pupils.	

[Note: First Aid statement paragraph format may be used if space is limited.]

Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risks of use and handling of this material when such use and handling are contrary to label instructions.

For product use information, or in case of an emergency, call [phone number] or visit our Web site: [web site address]

Wellmark International
Schaumburg, IL 60173

Sevin® is a registered trademark of Rhone-Poulenc for the active ingredient carbaryl

Made in USA