



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 20, 2008

Wellmark International
1501 East Woodfield Road, Suite 200W
Schaumburg, Illinois 60173

Subject: RF-75 Flea Collar for Dogs
EPA Reg. No. 2724-273
Efficacy Data and Label Received January 18, 2008

Dear Ms. Kendrick;

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

- Delete "Kills ticks [Up to 3 months] [and continues to aid in tick control for up to 50 days]"
- Delete "Kills ticks"
- Delete the entire paragraph "**For Ticks:** 1. Ticks are tougher to kill 3. Adult ticks will be killed over the entire pet. Dead ticks will fall off or may be easily removed."
- Delete "...or visit our Web site: [web site address]"
- Under **Animals**, delete "However, flea and tick collars may be immediately replaced."
- Delete "[Step 2]"
- Revise the HAZARDS TO HUMANS AND DOMESTIC ANIMALS section to read:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING

May be fatal if swallowed. Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Remove contaminated clothing and wash before reuse. Do not open [package][inner envelope] until ready to use. Do not allow children to play with this collar.

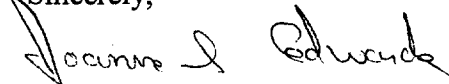
A stamped copy is enclosed for your records. Please submit on copy of the final printed label before releasing the product for shipment.

Approval of this label does not constitute approval of your application for reregistration of this product. Product reregistration is currently pending, and future labeling changes and/or additional data may be required.

You may distribute products bearing old labels/labeling for 12 months from receipt of this letter or your next printing of the label, whichever comes first.

If you have questions, email me at edwards.joanne@epa.gov or by telephone at (703) 305-6736.

Sincerely,



Joanne S. Edwards, Entomologist
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 3 months] [and continues to Aid in tick control for up to 50 days]~~
- Kills fleas & ticks
- ~~Kills ticks~~
- [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]

ACTIVE INGREDIENT:

Carbaryl (CAS #63-25-2).....	17%
OTHER INGREDIENTS:	83%
TOTAL:	100%

KEEP OUT OF REACH OF CHILDREN

WARNING

See Precautions on back

EPA Reg. No. 2724-273
 EPA Est. No.

NET CONTENTS:

ACCEPTED
with COMMENTS
In EPA Letter Dated:
 . 5/20/08

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

**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 [brand name] collar effectively provides continuous protection against adult fleas for up to 4 months.
3. Replace collar every 4 months to help control [prevent] flea infestations on your dog.

~~**For Ticks:**~~

- ~~1. Ticks are tougher to kill than fleas and are killed more slowly.~~
- ~~2. This [brand name] collar effectively provides continuous protection against adult and immature ticks for [up to] 3 months, and will aid in tick control for [up to] 50 days.~~
- ~~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 - WARNING:

Humans: Do not open package until ready to use. Do not allow children to play with this collar. May be fatal if swallowed. Harmful if absorbed through skin. Avoid contact with eyes, skin, or clothing. Wash hands thoroughly with soap and water after handling collar and before eating, drinking, or using tobacco. Remove contaminated clothing and wash clothing before reuse.

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 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-[950-4783] for emergency medical treatment information.	
NOTE TO PHYSICIAN/VETERINARIAN: Contains an N-methyl carbamate that inhibits cholinesterase. 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
1501 East Woodfield Road 200 W
Schaumburg, IL 60173

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

Made in USA