

270-270
DEC 13 1991

Ms. Kelly J. Parker
Zoecon Corporation
A Sandoz Company
12200 Denton Drive
Dallas, TX 75234

Dear Ms. Parker:

Subject: Label Claim for Ixodes dammini
Propoxur Flea Collar for Cats RF-101
EPA Registration No. 2724-275
Your Application Dated June 17, 1991

The amendment referred to above, submitted in connection with registration under FIFRA sec. 3(c)(7)(A), is acceptable, provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data.

2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

- a. The Ingredients Statement should appear on the front panel of the label. Additionally, a column total of 100% should be added to this statement.
- b. Add a Statement of Practical Treatment which includes instructions for "If Swallowed" and "If In Eyes."
- c. Add the heading "Precautionary Statements" to the paragraph beginning "Caution: Do not open inner envelope...", and add the phrase "Hazards To Humans and Domestic Animals" directly after this heading and prior to the signal word.
- d. Regarding the instruction "See cautions on back," replace the word "cautions" with "precautions."
- e. Add the required Misuse Statement, "It is a violation

of Federal Law to use this product in a manner inconsistent with its labeling" to the beginning of the Directions for Use Section.

3. Submit five (5) copies of your final printed labeling before you release the product for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

DHE

Dennis H. Edwards, Jr.
Product Manager (19)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enc.

PROPOXUR FLEA COLLAR FOR CATS RF-101

REFUND IF NOT SATISFIED

[] indicates optional statements

Really kills fleas and ticks
up to 5 months

Kills [deer] ticks (including
Ixodes dammini), which may transmit
Lyme disease

Effective against [vectors, ticks,
Ixodes dammini] which may transmit
Lyme disease

Controls [Kills] Lyme disease-carrying ticks

FOR CATS OF ALL SIZES

**DO NOT ALLOW CHILDREN
TO PLAY WITH THIS COLLAR**

CAUTION

See cautions on back.

NET CONTENTS: 0.29 oz. (8.2g)

DIRECTIONS: Remove collar from package and
Adjust for proper fit and buckle in place. Collar must
be fastened securely enough to prevent easy removal and loss. ()
of collar, leaving ample length for expansion as the cat
grows. Discard by discarding in trash. Check and adjust collar periodically
for proper fit.

Do not use on kittens under 6 weeks of age.

RESULTS EXPECTED: The flea and tick collar starts
killing fleas when it is placed around the cat's neck. Fleas which
may temporarily appear on the cat will also be killed.
Ticks are tough occasional pests of cats and will be
killed. For continuous protection, replace collar when effective
protection is no longer obtained.

STORAGE & DISPOSAL: Store in original unopened container
from children. Do not reuse container or used collar.

ACTIVE INGREDIENT:

o-Isopropoxyphenyl methylcarbamate+.....

INERT INGREDIENTS.....

CAUTION: Do not open inner envelope until ready to use.
Do not allow children to play with this collar. Dust will form on the
collar. Do not get dust or collar in mouth, harmful if swallowed.
If dust gets in eyes, will cause temporary pupillary constriction.* In case
of contact with water, wash thoroughly with soap and water.
The dust released by this collar is a cholinesterase inhibitor.

Note to Physician: Atropine and homatropine are antidotes.

When collar is first worn, observe neck area every few days.
Collar, when fastened too tightly, may cause skin irritation.
If first sign of irritation or adverse reaction, collar is to be removed.
Collar is an insecticide generator and is not to be taken internally.
Do not use on sick or convalescing animals. Do not use on cats
while collar is worn.

ZOECON CORPORATION
A Sandoz Company
12200 Denton Drive, Dallas, Texas

EPA Reg. No. 2724-275
U.S. Patent No. 3,852,416;+3,111,539
591-B,0200E

ACCEPTED
with COMMENTS
in EPA Letter 2/15/91

DEC 13 1991

2724-275