

Nancy Huebl Wellmark International 1501 East Woodfield Road Suite 200W Schaumburg, IL 60173

SEP 2 8 2010

Dear Ms. Huebl:

Subject:

Label Amendments to make revisions to label text per the Agency's Label Review Manual (LRM) and update the directions for use to be consistent with other Wellmark International products. Zoecon RF-372 Collar and Zoecon 9207 Collar EPA Reg. Nos.: 2724-426 and 2724-460 Your submissions dated July 1, 2010 Decision Numbers: 437215 and 437211

The amendments referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, have been received and reviewed, and the amendments are acceptable provided that you submit and/or cite all data required for registration/reregistration of your products under FIFRA section 3(c)(5) when the Agency requires all registrants of similar products to submit such data.

If these conditions are not complied with, the registrations will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the products bearing the amended labeling constitutes acceptance of these conditions. Please submit three (3) copies of your final printed labeling prior to shipment of your products. Should you have any questions, you may contact Mr. Colin Walsh directly at (703) 308-0298 or via email at walsh.colin@epa.gov.

Sincerely,

Linda A. Hollis, Chief Biochemical Pesticides Branch Biopesticides and Pollution

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PA Form 1320-1A (1/90)

Printed on Recycled Paper

{ } Indicates optional statements

ZOECON RF-372 COLLAR FOR {Dogs}{Puppies}

Unique buckle design

{With} Contains PRECOR[®] {vIGRen[®]} Insect Growth Regulator {IGR}

Kills {only} flea eggs {before they hatch}

Ovicidal

Prevents {Stops} flea eggs from hatching for 32 weeks {8 months}{224 days}

{Prevents flea infestations}{Halts flea infestations} by preventing flea egg hatch on your dog For dogs with necks to {insert size} inches

Pre-emergent flea control

No {unpleasant}{insecticidal} odor

Works gently for effective flea control

{Contains} biochemical flea control

May be used with other flea and tick control products

Step 2 Pet Protection Program

Part of the Zodiac 4 step guarantee program

Unique dating feature - snip notch at replacement month

ACTIVE INGREDIENT:

S-Methoprene	
OTHER INGREDIENTS:	
Total	100%

DO NOT ALLOW CHILDREN TO PLAY WITH THIS COLLAR CAUTION

See Back Panel for Additional Precautionary Statements

EPA Reg. No. 2724-426 EPA Est. No.

ACCEPTED

SEP 2 8 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 77711 1171

7774-476

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Net Weight:

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Do not use on puppies under 12 weeks of age. Consult a veterinarian before using this product on debilitated, aged, pregnant, animals on medication, 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. If signs continue, consult a veterinarian immediately.

FIRST AID	
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
doctor or going for t	ontainer or label with you when calling a poison control center or reatment. You may also contact 1-800 [phone number] for I treatment information.

READ ENTIRE LABEL BEFORE EACH USE USE ONLY ON {DOGS}{PUPPIES]

Precor® is {This collar contains} an insect growth regulator and {not an adulticide} {will not kill adult fleas}; therefore, to control adult fleas on your pet, use {another}{insert brand name} flea control product {e.g., spray, shampoo, dip} in conjunction with this collar. Zoecon RF-372 Collar is specifically designed to kill {only} flea eggs before they hatch. This collar is a ring of protection against fleas in your home - since the collar kills flea eggs on your dog/puppy, the eggs won't hatch in your carpet.

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

Buckle collar around {dog's} {puppy'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 probability of neck irritation and buckle failure is reduced.} Fit collar snug enough to prevent placement of the dog's/puppy's leg or lower jaw through the collar, yet loose enough to be rotated about the neck. {Generally, two or three fingers should fit between the collar and dog's/puppy's neck.} Leave 1-2 extra inches on the length of the collar for adjustment, cut off excess, and dispose of in trash. Check periodically and adjust fit, if necessary, especially when puppies are rapidly growing. May be used in addition to regular collar. When collar is first worn, observe neck area every few days for irritation. Remove collar at the first sign of irritation or adverse reaction. {To release the collar, squeeze {sides of} buckle between thumb and finger and pull sharply.} Replace collar every 8 months if necessary.

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{To minimize flea infestation use appropriate [other {Brand Name} flea and tick] products to:

- 1. Treat the indoor environment, especially where pets spend time resting
- 2. Treat the outdoor environment when necessary
- 3. Only use EPA-registered products that are labeled for these uses.}

WHAT TO EXPECT:

This collar is designed to kill flea eggs over the entire pet; this collar does not kill adult fleas. This collar provides continuous protection against flea egg hatch for up to 8 months. Since flea eggs will not hatch, your dog's/puppy's flea population will gradually be eliminated. Replace collar every 8 months or sooner if needed.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store in original, unopened container, away from children. **PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Do not reuse container or used collar. Dispose of in trash. If collar is temporarily removed, wrap in paper or plastic, do not allow children to have access to collar.

WARRANTY AND CONDITIONS OF SALE: To the extent consistent with applicable law, Seller makes no warranty, express or implied, concerning the use and handling 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 information or in case of emergency, call 1-800-xxx-xxxx.

PRECOR[®] and vIGRen[®] Insect Growth Regulator are registered trademarks of Wellmark International.

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