

2724-493

8/28/2009

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



OFFICE OF  
PREVENTION, PESTICIDES,  
AND TOXIC SUBSTANCES

August 28, 2009

James McFadden  
Wellmark International  
1501 E. Woodland Rd., Suite 200W  
Schaumburg, IL 60173

Dear Dr. McFadden:

Subject: Label amendment  
RF-2007 Collar  
EPA Registration No. 2724-493  
EPA Decision No. 415982  
Submission Date: April 7, 2009

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

- On page 1, for the alternate brand name, correct the spelling of "PowerBand" to read, "PowerBrand."
- On page 2, under the marketing claims, please delete the following claim: "Kills Flea Eggs to [help prevent][flea][infestation][reinfestation][of your home] for up to [5 months][150 days]. Claims that imply protection of the home are not permissible.
- On page 2, under the marketing claims, please delete the following claim: "[Helps][stops] [prevents] major [primary][main] source of home infestation by killing [controlling] fleas and ticks on your pet." Claims that imply protection of the home are not permissible.
- On page 3, under the statement "To minimize flea infestation, use appropriate [other {Brand Name} flea and tick] products to...", add the following statement: "3. Only use EPA-registered products that are labeled for these uses."

- On page 3, revise the Storage and Disposal section to read as follows:

**STORAGE AND DISPOSAL**

**Storage:** Store in original unopened container, away from children.

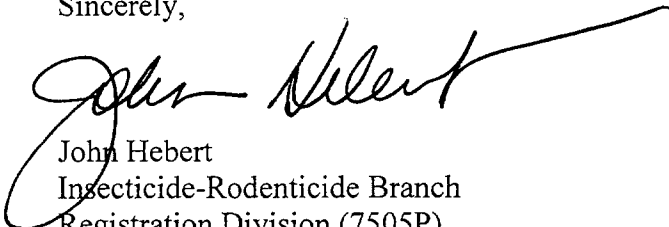
**Disposal:** Do not reuse container or collar. Wrap in paper and dispose of in trash. If collar is temporarily removed, wrap in paper or plastic; do not allow children to have access to collar.

For consistency with other products and to increase prominence, it is also highly recommended that you place the Storage and Disposal text in a box.

- On page 5, delete the reference to the Web site and optional “[internet address].” In order to add a Web site reference to your label, you must provide the URL so that the Agency can review the referenced Web site. Please note that should you wish to add/retain a reference to the company's website on your label, the website then becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act 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 FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list 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 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 the EPA's Office of Enforcement and Compliance Assurance.

A stamped copy is enclosed for your records. Please submit two copies of your final printed labeling before you release the product for shipment. Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please contact Julie Chao by phone at: (703) 308-8735, or by email at: [chao.julie@epa.gov](mailto:chao.julie@epa.gov).

Sincerely,



John Hebert  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

Enclosure

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[ ] indicates optional statements

### RF-2007 COLLAR

Alternate Brand Name: VetKem® PowerBand™ Flea & Tick Collar for Dogs

(FRONT OR BACK PANEL)

**ACTIVE INGREDIENTS:**

Propoxur (CAS #114-26-1) ..... 10.0%

(S)-Methoprene (CAS # 65733-16-6) ..... 2.1%

**OTHER INGREDIENTS:** ..... 87.9%

Total: ..... 100.0%

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

See back panel for [Ingredients and] additional Precautionary Statements

EPA Reg. No 2724-493

EPA Est. No.

Net Weight:

**ACCEPTED  
With COMMENTS  
In EPA Letter Dated:  
AUG 28 2009**

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

2724-493

MARKETING CLAIMS

For use only on dogs/puppies

[Contains][Plus] with PRECOR® [vIGRen®] Insect Growth Regulator [IGR]

Contains an Insect Growth Regulator (IGR) to prevent adult flea development

Kills Flea Eggs [to help prevent][flea][infestation][reinfestation][of your home] for up to [5 months][150 days]

[Controls][Kills] [adult] Fleas

[Controls][Kills][Lasts][Works] up to [150 days][5 months]

Contains an adulticide [to kill adult fleas and ticks]

Kills [adult fleas][ticks][flea eggs] & [flea larvae] for up to [5 months][150 days]

Effectively [controls] flea infestations on your pet

Kills [adult][fleas][on your pet] for up to [5 months][150 days]

Up to [150 days][5 months] protection [control of] against [immature and adult] fleas and flea eggs

Up to [150 days][5 months] protection [control of] against ticks

[Protection][Relief] up to [5 months][150 days]

PRECOR [vIGRen] breaks [stops] the flea life cycle

Works From Head to Tail

Kills fleas and ticks

100% Satisfaction Guaranteed or your money back

Temporary wetting will not impair effectiveness [Works even after temporary wetting]

[Ovicidal] - kills flea eggs [before they hatch] for up to [150 days][5 months]

[Helps][stops][prevents] major [primary][main] source of home infestation by killing [controlling] fleas and ticks on your pet

Kills [adult] fleas which may cause flea bite anemia

Kills [adult] fleas which may cause flea allergy dermatitis

Kills [adult] fleas which may transmit tapeworms

Controls flea reinfestation for up to (5 months)(150 days)

For use on [small][medium][large] dogs/puppies [with necks up to (#)][of all sizes]

Collar can be fitted for all dogs

[Unique one-piece buckle design][Integrated one-piece buckle]

[Integrated plastic buckle][Expandable Collar][Stretch Band]

Effective against ticks ]

Controls [Kills] Brown Dog Ticks (*Rhipicephalus sanguineus*), American Dog Tick (*Dermacentor variabilis*), Lone Star Tick (*Amblyomma americanum*)

Kills [ticks][Brown Dog Ticks][American Dog Tick][Lone Star Tick] for up to [5 months][150 days]

Controls flea and tick infestations on your pet for up to [5 months][150 days]

Up to [5 months][150 days] Dual Action [formula] Collar

[Kills][adult fleas] and stops adult flea emergence

Kills immature and adult fleas and flea eggs for up to [5 months][150 days]

Kills ticks for up to [150 days][5 months]

Collar gives up to [150 days][5 months] protection

[Descriptor] Blue/Green/Red/Black Collar

**READ ENTIRE LABEL BEFORE EACH USE****USE ONLY ON DOGS AND PUPPIES 12 WEEKS OF AGE AND OLDER**

[This collar is designed to fit 99% of all dogs. In rare instances (for example, well developed St. Bernards or Mastiffs), the collar may be too short. If found short for your dog, return to address on label for full purchase price refund.]

**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/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 possibility of neck irritation and buckle failure is reduced.] Collar should fit 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.
2. Leave 1-2 extra inches on the length of the collar for adjustment, cut off excess, and dispose of in trash.
3. Check periodically and adjust fit if necessary, especially when puppies are rapidly growing.
4. Replace in [150 days][5 months] or sooner if needed. [To release the collar, squeeze buckle between thumb and finger and pull sharply.] Collar does not need replacement if dog/puppy becomes temporarily wet.

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

**STORAGE and DISPOSAL: Storage:** Store in original unopened package away from children.

**Disposal:** Dispose of in trash. Collar should be left in place once fitted on dog/puppy. If collar is temporarily removed, wrap in paper or plastic; do not allow children to have access to collar.

**WHAT TO EXPECT:****For Fleas and Ticks:**

1. This [brand name] collar is designed to kill adult fleas, ticks, and flea eggs over the entire pet.
2. This collar will provide continuous protection against fleas, ticks, and flea eggs [hatch] for up to [5 months][150 days].
3. Dead ticks will fall off or may be easily removed.
4. Replace collar every [5 months][150 days] or sooner if needed

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**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS-**

**CAUTION:** Do not get dust or collar in mouth. Harmful if swallowed or absorbed through skin. Do not get dust in eyes, will cause temporary constriction of the pupils\*. The dust released by this collar is a cholinesterase inhibitor. Avoid contact with skin, eyes or clothing. **NOTICE: This product contains propoxur, a chemical known to the State of California to cause cancer. (in red bold)**

**Humans:** Do not open package until ready to use. Do not allow children to play with this collar. Pesticidal dust will form on this collar during storage. Wash hands thoroughly with soap and water after handling collar.

**Animals:** Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant, or nursing dogs. Do not use on puppies under 12 weeks of age. Do not use this product on dogs/puppies simultaneously or within 30 days before or after treatment with or exposure to cholinesterase inhibiting\*\* drugs or pesticides (e.g. carbaryl or tetrachlorvinphos, etc.). However, flea and tick collars may be immediately replaced. When collar is first worn, observe neck area every few days for irritation. Remove collar at the first sign of irritation or adverse reaction. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, remove collar and bathe your dog/puppy with mild soap and rinse with large amounts of water.

<b>FIRST AID</b>	
Call a poison control center or doctor immediately for treatment advice	
If swallowed	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
If on skin or clothing	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15-20 minutes.</li> </ul>
If in eyes	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> </ul>
<b>IN CASE OF EMERGENCY, CALL [PHONE NUMBER] OR A POISON CONTROL CENTER.</b> Have the product container or label with you when calling a poison control center or doctor or going for treatment.	
<b>NOTE TO PHYSICIAN/VETERINARIAN:</b> Contains an N-methyl carbamate that inhibits cholinesterase. *Atropine is antidotal only if symptoms of cholinesterase inhibition are present.	

To the extent consistent with applicable law, seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and handling of this material when such use and handling are contrary to label instructions.

Wellmark International  
1501 East Woodfield Road 200W  
Schaumburg, Illinois 60173  
[internet address]

100% Satisfaction guaranteed or your money back. Call [phone number] or visit our Web site [internet address] for additional product use information.

\*\*For information on cholinesterase inhibition please call our 800 number or consult your veterinarian.

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Made in USA