

DEC 04 1996

Combe, Inc.
c/o Dr. Robert R. Stewart
Technology Sciences Group Inc.
1101 17th Street NW, Suite 500
Washington, DC 20036

Subject: Revised Labeling--Additional Claim
Sulfodene Scratchex Flea & Tick Collar for Dogs
EPA Registration Number 4306-15
Your Application Dated September 6, 1996

Dear Dr. Stewart:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, is acceptable provided that you make the labeling changes indicated below before you release the product for shipment bearing the amended labeling:

1. On the front panel, immediately beneath the claim "GUARANTEED 12 MONTH FLEA COLLAR," revise the claim "KILLS FLEAS 7 MONTHS," to "KILLS TICKS 7 MONTHS."
2. Revise the claim "KILLS FLEA SO THEY CAN'T LAY EGGS!" to "KILLS FLEAS SO THEY CAN'T LAY EGGS!"
3. On the back side, in the boxed text beginning "ONE SIZE FITS ALL-TRIM TO SIZE," revise the last sentence to "If found short for your dog, return to address on top panel of box for full purchase price refund."

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

You should refer to PR Notice 96-6, dated October 1, 1996, which explains additional labeling requirements for pet care

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products. All requirements must be met on labeling of products released for shipment by registrants after October 1, 1998, but changes to your label can be made before that date.

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 (7505C)

Enclosure

3 9 5

Front Side

Sulfodene®
SCRATCHEX®
flea & tick collar for dogs

**GUARANTEED 12 MONTH FLEA COLLAR
KILLS FLEAS 7 MONTHS**

KILLS FLEA SO THEY CAN'T LAY EGGS!

Exclusive Deodorizing Formula
Fresh-scent action fights odor as it kills fleas

Fits all size dogs
(trim to size)

GUARANTEED WATERPROOF
even works after it's soaking wet

KEEP OUT OF REACH OF CHILDREN
CAUTION: See back panel for additional precautions

Contents: 1 collar
NET WT. 1.1 oz.

GUARANTEED OR YOUR MONEY BACK.
If not satisfied, send used collar and indication of purchase price paid to
COMBE Incorporated, White Plains, N.Y. 10604.

With long-lasting Dursban® Insecticide

Dursban® is a registered trademark of DowElanco

96 SEP -8 A9:14

End Flap

ECOD EPA/309/DPD

ACCEPTED
with COMMENTS
in EPA Letter Dated

DEC 04 1996

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
4306-15

Sulfodene® SCRATCHEX®

flea & tick collar for dogs

Exclusive Deodorizing Formula Fresh-scent action fights odor as it kills fleas

ONE SIZE FITS ALL- TRIM TO SIZE This collar is designed to fit 99% of all dogs. In rare instances (for example, well developed St. Bernard's or Mastiffs) the collar may be short. If found short for your dog, return to address on top panel for a box for full purchase price refund.

GUARANTEED 12 Month Flea Killer*
GUARANTEED 7 Month Tick Killer*

Aids in prevention of sarcoptic mange up to 5 months

Sulfodene® SCRATCHEX® Flea & Tick Collar for Dogs provides full season, 12 month flea killing powder (and 7 month protection against ticks). It's guaranteed!

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Do not open package until ready to use. This collar is intended for use as an insecticide generator and is not intended to be taken internally by man or animals. Not intended for use by humans. Do not allow children to play with this collar. Wash hands with soap and water after handling collar. Do not use on sick or debilitated animals or dogs under 12 weeks of age.

Do not use other cholinesterase inhibiting insecticides on your animals while wearing collar. Some dogs may be sensitive to this collar. Remove at first sign of irritation or adverse reaction (muscular tremor, salivation, vomiting and/or diarrhea).

The insecticide in this collar is a cholinesterase inhibitor.

NOTE to Physician/Veterinarian: Atropine only by injection is antidotal. Use only if symptoms of cholinesterase inhibition are present.

ACTIVE INGREDIENTS: Chlorpyrifos (0,0 diethyl 0-(3,5,6-trichloro-2-pyridyl) phosphorothioate) 8.0%
INERT INGREDIENTS 92.0%

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Sulfodene® SCRATCHEX® Flea & Tick Collar for Dogs contains chlorpyrifos insecticide, one of the longest lasting flea and tick killers available for use on dogs. This collar will reach its maximum effectiveness within 2 to 3 days after placing it on the dog and will continue to protect your dog against fleas for up to 12 months and ticks up to 7 months. Place the collar around the dog's neck, buckle and adjust for proper fit. Cut off close to buckle and dispose of excess length. The collar must be worn loosely so that two fingers may be placed between collar and dog's neck. If collar is worn too tightly, it may produce neck irritation. Fleas and ticks present in the dog's environment that may reappear on your pet will be killed by the action of this collar. Collar's effectiveness is not diminished by normal wetting such as rainfall. Use only one collar on an animal at a time.

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Back panel (continued)

STORAGE: store in original unopened container away from children.

DISPOSAL: Do not reuse empty box, pouch, or collar. Wrap in newspaper and put in trash collection.

*See top panel of box for details of unconditional guarantee.

COMBE Incorporated, White Plains, New York 10604

Made in U.S.A.

EPA Reg. No. 4306-15

EPA Est. No. 4306-IL-1