



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

SEP 24 2007

Mary McKinney Hunt
Pesticide Regulatory Manager
Bayer HealthCare LLC
Animal Health Division
P.O. Box 390
Shawnee Mission, KS 66201-0390

RE: Proposed Label Revision, to remove the word "only" from a proposed statement
EPA Reg. No.: 11556-116
Date of Submission: September 10, 2007

Dear Ms. Hunt:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated September 10, 2007, for the product Advantage 9 Topical Solution. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Joyce Edwards of my staff at 703-308-5479.

Sincerely,

for Rachel C. Halloran
Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs



United States
Environmental Protection Agency
 Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 11556-116	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Advantage 9 Topical Solution	PM# Team 1	
5. Name and Address of Applicant (Include ZIP Code) Bayer HealthCare LLC, Animal Health Division P.O. Box 390 Shawnee Mission, KS 66201-0390 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

NOTIFICATION

<input type="checkbox"/> Amendment - Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated _____ <input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____ <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
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SEP 24 2007

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Enclosed for Agency acceptance is the draft label for Advantage 9 Topical Solution (EPA Reg. No. 11556-116). The only label revision is the removal of the word, "only," in the following statement: Available "only" through licensed practicing veterinarians. The proposed statement is: "Available through licensed practicing veterinarians." Please see attachment for further detail.

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Package wgt No. per container	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted			
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	
5. Location of Label Directions <input type="checkbox"/> _____		6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Mary McKinney Hunt	Title Pesticides Regulatory Manager	Telephone No. (Include Area Code) (913) 268-2311
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Pesticide Regulatory Manager	
4. Typed Name Mary McKinney Hunt	5. Date Sept. 10, 2007	

SEP 24 2007

ATTACHMENT FOR OPP
APPLICATION FOR PESTICIDE NOTIFICATION
Page 1 of 1

**Advantage 9 Topical Solution, EPA Reg. No. 11556-116
September 10, 2007**

Enclosed for Agency acceptance is a draft label for Advantage 9 Topical Solution, EPA Reg. No. 11556-116.

The only proposed change is the removal of the word, "only."

from: Available only through licensed practicing veterinarians.

to: **Available through licensed practicing veterinarians.**

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46 and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

11556-116

NOTIFICATION

03/10/2006

SEP 24 2007

advantage

(imidacloprid)
Topical Solution

9

ACCEPTED

MAR 10 2006

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide Registered under EPA Reg. No. 11556-116

Once-a-month topical flea treatment for cats and kittens
8 weeks and older and 9 lbs. and under.

READ THE ENTIRE LABEL BEFORE EACH USE.

For the Prevention and Treatment of Flea Infestations on Cats

- Available only through licensed practicing veterinarians
- Kills 98-100% of the fleas on cats within 12 hours
- One treatment prevents further flea infestation for up to four weeks
- Kills fleas before they lay eggs

Active Ingredient	% By Weight
Imidacloprid; 1-[(6-Chloro-3-pyridinyl) methyl]-N-nitro-2-imidazolidinimine	9.1%
Other Ingredients	90.9%
Total	100.0%

KEEP OUT OF REACH OF CHILDREN
WARNING

See below for First Aid and Precautionary Statements.

Precautionary Statements

Hazards to Humans: Causes eye irritation. Harmful if swallowed. Do not get in eyes or on clothing. Avoid contact with skin. Wash hands thoroughly with soap and warm water after handling. Keep out of reach of children. Do not contaminate feed or food.

Hazards to Domestic Animals

For external use only. Do not use on kittens under eight weeks of age. As with any product, consult your veterinarian before using this product on debilitated, aged, pregnant or nursing animals. Individual sensitivities, while rare, may occur after using ANY pesticide product for pets. If signs persist, or become more severe, consult a veterinarian immediately. If your animal is on medication, consult your veterinarian before using this or any other product. For consumer questions call 1-800-255-6826. For medical emergencies call 1-877-258-2280.

First Aid

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

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.

If swallowed: Call poison control center or doctor immediately for treatment advice. 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: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor for treatment advice.

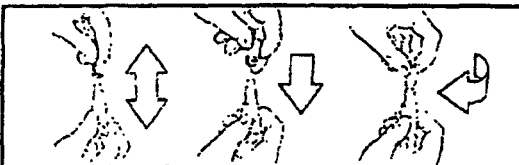
To Physician: Treat the patient symptomatically.

Directions for Use

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

How to Apply

1. Use only on cats. Do not use on other animals.
2. Remove one applicator tube from the package.



Bayer HealthCare

Manufactured for Bayer HealthCare LLC, Animal Health Division, Shawnee Mission, Kansas 66201 USA

Bayer, the Bayer Cross and Advantage are trademarks of Bayer

Advantage is protected by one or more of the following U.S. patents: 6,839,482, 6,613,783, 6,496,273, 6,379,374, 6,232,326, 6,426,032, 6,298,507, 6,204,360, 4,742,600

3. Hold applicator tube in an upright position. Pull cap off tube.
4. Turn the cap around and place other end of cap back on tube.
5. Twist cap to break seal, then remove cap from tube.



6. Part the hair on the neck at the base of the skull until the skin is visible. Place the tip of the tube on the skin and squeeze the tube twice to expel the entire contents of the tube directly on the skin. Do not get this product in your pet's eyes or mouth. The product is bitter tasting and salivation may occur for a short time if the cat licks the product immediately after treatment. Treatment at the base of the skull will minimize the opportunity for the cat to lick the product.
7. Discard empty tube as described in Storage and Disposal.

The successive feeding activity of fleas on pets may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of pets with Advantage rapidly kills fleas and may reduce the incidence of this condition.

Advantage kills 98-100% of the fleas on pets within 12 hours. Reinfesting fleas are killed within 2 hours with protection against further flea infestation lasting for up to four (4) weeks. Pre-existing pupae in the environment may continue to emerge for six (6) weeks or longer depending upon the climatic conditions.

Larval flea stages in the pet's surroundings are killed following contact with an Advantage treated pet.

Advantage remains efficacious following a shampoo treatment, swimming or after exposure to rain or sunlight.

Monthly treatments are required for optimal control and prevention of fleas.

If re-treatment becomes necessary earlier than four weeks, do not re-treat more than once weekly.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Storage: Store in a cool, dry place.

Disposal: If empty: Do not reuse container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or 1-877-258-2280 for disposal instructions. Never place unused product down any indoor or outdoor drain.

Limited Warranty and Limitation of Damages

Bayer HealthCare LLC, Animal Health Division warrants that this material conforms to the chemical description on the label. BAYER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY, and no agent of Bayer is authorized to do so except in writing with a specific reference to this warranty. Any damages arising from a breach of this warranty shall be limited to direct damages and shall not include consequential commercial damages such as loss of profits or values, etc.

© 2005 Bayer HealthCare LLC
01405654

00837869-0*2609/179198-053880, R.0

Made in Germany

EPA Est. 11556-DF-1

EPA Reg. No. 11556-115

To receive monthly email application reminders, go to www.no flea.com.

5/7

For Cats and Kittens
8 Weeks and Older
and 9 lbs and Under.

advantage

advantage



Once-A-Month
Topical Flea Treatment
for Cats and Kittens
8 Weeks and Older
and 9 lbs and Under.

Available only through licensed practicing veterinarians.
Kills 99-100% of fleas within 12 hours.
Prevents re-infestation for up to 6 weeks.
Convenient, easy to apply.

6 Pack

SDX 0.014 fl oz (0.4 ml) Tubes

Kills fleas
within 12 hours

Name: _____

advantage 9

For the Prevention and Treatment of Flea Infestations on Cats

- Available only through licensed practicing veterinarians
- Kills 99-100% of fleas on cats within 12 hours
- One treatment prevents further flea infestation for up to four weeks
- Kills fleas before they lay eggs

Active Ingredients: 1-(S)-Cyano-3-propylthio methyl-4-ethyl-2-imidazolidinone, 9.1%
 Other Ingredients: 88.9%
 Total: 98.0%

KEEP OUT OF REACH OF CHILDREN WARNING

See below for First Aid and Precautionary Statements.
 For Directions for Use and other labeling, see supplemental labeling sheets.

Precautionary Statements

Hazards to Humans: Causes eye irritation. Avoid contact with skin. Wash hands thoroughly with soap and warm water after handling. Keep out of reach of children. Do not contaminate food or feed.

Hazards to Domestic Animals: For external use only. Do not use on kittens under eight weeks of age. As with any product, consult your veterinarian before using this product on animals, reptiles, pregnant or nursing animals, individual animals, wild cats, may occur after using ANY pesticide product for pets, if signs persist, or become more severe, consult a veterinarian immediately. If your animal is an individual, consult your veterinarian before using this or any other product.

For consumer assistance call 1-800-352-8828.
 For medical emergencies call 1-877-259-2268.

First Aid


Have the product container or label with you when calling a poison control center or doctor or going for treatment. If in eyes hold eye open and flush slowly with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue flushing eye. Call a poison control center or doctor for treatment advice.

If inhaled: Call poison control center or doctor immediately for treatment advice. Move person to a place of fresh air if it is available. 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: Take off contaminated clothing. Wash skin immediately with plenty of water for 15-20 minutes. Call poison control center or doctor for treatment advice.

No Precautions: Feed the animal immediately.

SDX 0.014 fl oz (0.4 ml) Tubes
 6 Pack (1000-008-1) (EPA Reg. No. 10039-116)

 **Six 0.014 fl oz (0.4 ml) Tubes**

01791000-003000, NLS
 Manufactured by Bayer HealthCare LLC, Moundsville, WV
 Distributed by Bayer HealthCare LLC, 500 Main Street, New Haven, CT 06511
 Bayer, the Bayer Cross and Advantage are trademarks of Bayer.



Lot No.:

advantage 9

9.1% imidacloprid

0.014 fl oz (0.4 ml)

EPA Reg. No. 11556-116

WARNING

Keep out of reach
of children

Read The Entire
Label Before Use

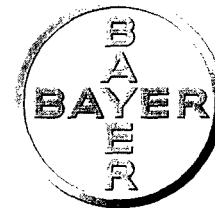
 Bayer

01223505 ■

LOT NO.

00837869101791668, R4

40



Bayer HealthCare
Animal Health Division

September 10, 1007

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1801 South Bell Street
Arlington, VA 22202

Attn: Venus Eagle, PM Team 1

SUBJECT: Notification of Label Revision to
Advantage 9 Topical Solution, EPA Reg. No. 11556-116
Advantage 10 Topical Solution, EPA Reg. No. 11556-118
Advantage 18 Topical Solution, EPA Reg. No. 11556-117
Advantage 20 Topical Solution, EPA Reg. No. 11556-119
Advantage 55 Topical Solution, EPA Reg. No. 11556-120
Advantage 100 Topical Solution, EPA Reg. No. 11556-122

Bayer HealthCare LLC
Animal Health Division
12707 Shawnee Mission Parkway
Shawnee Mission, KS 66216-1846

Dear Ms. Eagle:

Please find enclosed, for the Agency's acceptance, a Notification and draft label for each subject product.

The proposed revision to each label is to remove the word, "only," from the statement: *Available "only" through licensed practicing veterinarians.* The revised label will read: *Available through licensed practicing veterinarians.* This product poses no risk concern, is in compliance with reregistration requirements, and is not subject to a data call-in.

Thank you for your assistance with this notification process, and please contact me at 913-268-2311 or mary.hunt.b@bayer.com if you have any questions or need further information.

Respectfully,

BAYER HEALTHCARE LLC
ANIMAL HEALTH DIVISION

Mary McKinney Hunt
Regulatory Specialist

Encl: (6) 8570-1 Application for Pesticide Notification
(6) Attachment to Application for Pesticide Notification
(6) Draft Label (3 cc each)