

13799-17

03/28/2007

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

MAR 28 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Haley Birk
Four Paws Products
50 Wireless Blvd.
Hauppauge, NY 11788

Dear Sir or Madam:

Subject: Four Paws Flea and Tick Soap
EPA Reg. No. 13799-17
Submission dated 11/20/06
Decision No. 372599

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

Delete Healing Remedies. This is a drug claim that is regulated by the Food and Drug Administration.

Delete "mild" from the marketing claims. This is an implied safety claim and detracts from the Precautionary Statements.

Delete "long lasting." Pyrethrins are not long lasting.

Delete claims that the product "repels flies, mosquitoes and gnats." Pyrethrins have no repellent properties.

Revise the Precautionary Statements to read as follows:

Hazards to Humans

Caution

Keep out of Reach of children.

Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco.

Add to the emergency telephone number the following:
After 5 PM call your poison control center.

Place a subheading entitled "Use Restrictions" under the Directions for Use. Move the following revised statements under this subheading:

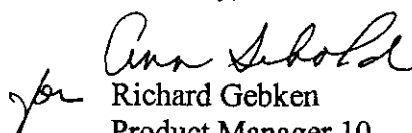
Do not apply to puppies less than 12 weeks old. Consult a veterinarian before using this product on medicated, debilitated, aged, pregnant, or nursing animals. Sensitivities may occur after using any pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

Please note that notices of availability of the EPA's reregistration eligibility documents (REDs) for products containing pyrethrins, piperonyl butoxide and N-Octyl Bicycloheptene Dicarboximide were published in the Federal Register on July 26, 2006. Copies of these REDs are available on the EPA website at:

http://www.epa.gov/pesticides/reregistration/status_page_p.htm.

Additional data and/or labeling changes may be required for products containing these ingredients.

Sincerely,


Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505P)

FRONT LABEL
 FOUR PAWS FLEA & TICK SOAP
 EPA REG. NO. 13799-17

ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAR 28 2007

Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.
13799-17

Four Paws®

Healing Remedies

Flea & Tick
 Soap

Kills Fleas, Ticks and Lice;
 Repels Flies, Mosquitoes & Gnats.
 Deodorizes & Cleans Coat Thoroughly.

Active Ingredients:

Pyrethrins.....	0.050%
*Piperonyl butoxide, technical.....	0.100%
**N-Octyl bicycloheptene dicarboximide.....	0.167%
Inert Ingredients:	<u>99.683%</u>
	100.000%

*Equivalent to 0.08% (butylcarbityl) (6-Propyl piperonyl) ether and 0.02%
 related compounds.

**MGK 264, Insecticide Synergist.

KEEP OUT OF REACH OF CHILDREN.
CAUTION
 SEE OTHER PRECAUTIONS ON BACK PANEL.

Net. Wt. 3 oz. (85.0 g)

BACK LABEL
FOUR PAWS FLEA & TICK SOAP
EPA REG. NO. 13799-17

**READ ENTIRE LABEL BEFORE EACH USE
USE ONLY ON DOGS AND PUPPIES**

Four Paws®
Healing Remedies
Flea & Tick
Soap

FOUR PAWS FLEA & TICK SOAP IS A LONG LASTING, MILD AND EFFECTIVE INSECTICIDE SOAP FOR YOUR PET. THIS SOAP KILLS FLEAS, TICKS, LICE; REPELS FLIES, MOSQUITOES, GNATS, AND BEAUTIFIES, DEODORIZES AND CLEANS YOUR PET'S COAT AND SKIN.

DIRECTIONS FOR USE

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

Wet animal's coat thoroughly and rub with soap. Work up a good lather all over, including legs and feet. Once animal is fully lathered with the soap, allow 3 minutes to kill fleas, ticks and lice before rinsing. Rinse with plain water. Allow to dry naturally or wipe with a clean towel. Use only as directed. Repeat weekly if necessary. Do not use on puppies under 12 weeks of age. Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals or animals on medication. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: KEEP OUT OF REACH OF CHILDREN. DO NOT SWALLOW.

Keep out of eyes and avoid contact with mucous membranes. Avoid contamination of feed or foodstuffs.

FIRST AID

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

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 a 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of emergency or for product use information, call (631) 434-1100 9AM-5PM EST, Monday through Friday.

STORAGE AND DISPOSAL

Storage: Store in a cool, dry area away from heat or open flame.

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

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

EPA Reg. No. 13799-17

EPA Est. No. 907-TN-1

Manufactured for:



Hauppauge, NY
11788-USA
Item No. 10580

Made in U.S.A.

UPC CODE