

MAR 8 1995

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Freeman-Alcor Research Ltd.
25 Kevin Lee Lane
Rancho Mirage, CA 92270

Attention: Mr. Daniel Freeman

Subject: Stop It! Dog and Cat Repellent
EPA Registration No. 20215-6
Your submissions of January 22, February 27, and
March 1, 1995

In your letter of February 27, 1995, you requested to change the name of this product to "Stop It!", which is acceptable and is reflected in our comments below. In addition, you offered to reduced the amount of active ingredient in this product. If you wish to pursue this request, you need to submit an amended application and revised Confidential Statement of Formula (CSF). As part of your submission, you should indicate why you wish to make this change and supply any data supporting it.

Since our most recent letter to you, dated December 7, 1994, we have received four different versions of your revised label. To clarify the disposition of each version, we have indicated the date sent, the sender, and the status, as follows:

<u>Date Sent</u>	<u>Sender</u>	<u>Status</u>
1. Jan. 3, 1995	Dan Freeman	superseded by 1/6/95 version
2. Jan. 6, 1995	Mark Byrum	superseded by 1/22/95 version
3. Jan. 22, 1995	Dan Freeman	reviewed in this letter
4. March 1, 1995	Dan Freeman	not readable enough to review

The labeling submitted on January 22, 1995, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you make the following changes:

1. Change your product name from "Repels Plus Dog and Cat Repellent" to "Stop It! Dog and Cat Repellent", as requested in your February 27 and March 1, 1995, submissions. Make this change throughout the label.

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2. Delete "We care about animals" and "No Spoken Words Required" anywhere on the label, as such statements do not add anything meaningful to the label text. See our November 14, 1994, 1995, letter.
3. Move the statements, "Store in garage or outbuilding only." and "For outdoor use only." directly under your product name. See our last accepted label of November 14, 1994.
4. Change the Front Panel statement directly under the illustration to:

Stop It! is used to reduce the frequency of defecation or urination by dogs on lawns, parking strips, and sidewalks and around hedges, trees, shrubs and vines. It is also used to reduce the frequency of digging by cats in flower gardens, lawns and under bushes.

5. As indicated in our August 9, 1994, letter, revise the Ingredient Statement as follows:

Active Ingredients:	<u>%</u>
Thiram (Tetramethylthiuramdisulfide)	6.25
Methyl Nonyl Ketone (2-Undecanone)	6.25
Castor Oil (USP)	5.50
Inert Ingredients:	<u>82.00</u>
Total	100.00

6. Change "See other Cautions" to "See other precautions" so that there is no confusion about the signal word, which is WARNING.
7. Note that your label or immediate package must have a proper establishment number. Your current number, "00000-0" is incorrect.
8. In your "Precautionary Statements", put the "*" after "eye injury". Delete "(*see below)".
9. Change "Statement of Practical Treatment" to "FIRST AID".
10. Change "If in eyes" to "IF IN EYES" to be consistent with the rest of your first aid statements.
11. Change "Instructions for Use" to "Directions for Use".
12. The following new claim, found on the March 1, 1995, version of your label, is unacceptable:

To absolutely perform better than any other similar dog & cat repellent.

13. Change the first sentence of the USE RESTRICTIONS" as follows:

Stop It! is used to reduce the frequency of defecation or urination by dogs on lawns, parking strips, and sidewalks and around hedges, trees, shrubs and vines. It is also used to reduce the frequency of digging by cats in flower gardens, lawns and under bushes.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,

Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H7504C)

Enclosures: 1. Stamped label
2. A-79 Enclosure

cc. 1. Registration Consulting Ass.
Att. Charles Yeager
FAX 916-268-2044

2. Cunningham and Ass.
Mark Byrum
FAX 9-548-5220

3. Dep. of Pesticide Regulation
1020 N. Street, Room 332
Sacramento, CA 95814-5604
Attention: Mr. Mark Mason

Peacock WP#5:A:20215-6.MAR:305-5407,-6600:1/8/95

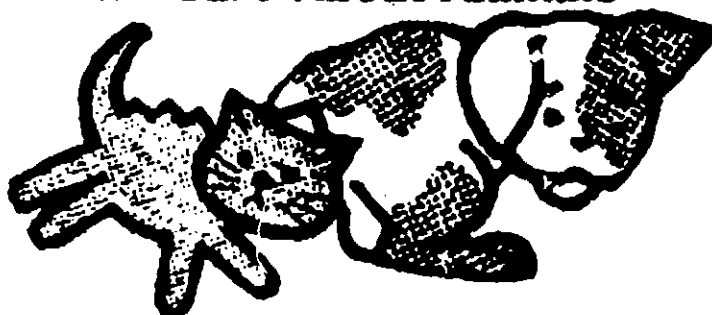
FREEMAN-ALCOR
RESEARCH LTD.

DIG-NO-MORE

NO
SPOKEN WORDS
REQUIRED

DOG & CAT
REPELLENT

We Care About Animals



DIG-NO-MORE is used to reduce the frequency of defecation or urination by DOGS on lawns, around hedges, trees, shrubs and vines and to reduce the frequency of digging by CATS in flower gardens, lawns and under bushes. Deters "messes" on parking, strips and sidewalks

Active Ingredients:	%
Thiram (Tetramethylthiuramdisulfide).....	6.25
Methyl Nonyl Ketone (2-Undecanone).....	6.25
Castor Oil (USP).....	5.50
Inert Ingredients.....	82.0
Total 100.00	

WARNING

Keep Out of Reach of Children
For outdoor use only.
Store in garage or outbuilding only.
See other Cautions on Side Panels
EPA Reg. No. 20215-6 EPA Est. No. 00000-0
Net Weight: 2 lbs. (0.907kg) Will Treat 110 to 220 sq. ft.

MAR 8 1993

DIG-NO-MORE

DOG & CAT
REPELLENT

We Care About Animals

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND
DOMESTIC ANIMALS

WARNING

*Causes substantial but temporary eye injury. Do not get in eyes, on skin or on clothing. Wear safety glasses. (*see below). Harmful if absorbed through skin. Wash any exposed body parts and clothing after use.

STATEMENT OF PRACTICAL TREATMENT

*If in eyes hold eyelids open and flush with a steady gentle stream of water for fifteen minutes. IF SWALLOWED: Drink promptly a large quantity of milk, egg whites, gelatin solution or, if these are not available, large quantities of water. Avoid alcohol. Get Medical attention. IF ON SKIN: Wash with plenty of soap and water. Get medical attention if condition persists

In case of emergency call (800) 000-0000.

ENVIRONMENTAL HAZARDS Do not apply directly to water.

Storage and Disposal

Do not contaminate food, feed, or water by storage or disposal. STORAGE: Store only in original container in a dry place of a garage or outbuilding inaccessible to children

and pets. Reclose partially emptied container and seal it in a plastic bag with a twist tie. DISPOSAL: Do not use empty container. Securely wrap in newspaper and discard in trash.



BEST COPY AVAILABLE

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We Care

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