

PM 14

20215-6

15

345 5-503692
17

May 6, 1996

300 5-504800
17

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 ✓
Stop It! Wild Animal Repellent
EPA Registration No. 20215-7
Your faxed letters of March 23 and 28, 1996

In the above letters, you requested a change in the grade of Castor Oil in these products and changes in your precautionary statement and use directions. The comments are as follows:

A. Change in Grade of Castor Oil

Originally, this product did not contain Castor Oil. Subsequently, we took the unusual step of allowing you to add this active ingredient to your product without requiring a new product number or requiring a new battery of six basic acute toxicity tests. The reason that we allowed the change to your existing products was that you agreed to use a USP Grade of Castor Oil, the same grade used as medicine and about which we did not have toxicity concerns. To allow a change to a lower grade of Castor Oil, one not used as a medicine, would violate the original basis for allowing the addition of Castor Oil in these products without additional data.

Although the specification sheets cited identical toxicity data for both grades of Castor Oil, the sheets did not indicate which grade was tested or contain the actual studies. We would have to review these data cited in the specification sheets before making a decision about changing the grade of the Castor Oil. The only other option is repeating the toxicity studies on your proposed formula with the lower grade of Castor Oil.

Since a principal reason for wanting the lower grade of Castor Oil is its availability in 5 gallon containers, perhaps you could work out something with your supplier to obtain the USP grade in such containers.

B. Change in the Precautionary Labeling

Since the product is in Toxicity II for eye irritation, you are concerned about the statement, "Causes substantial but temporary eye injury." You are concerned that the statement might frighten consumers. As a substitute, you suggested "Avoid getting in eyes which will cause temporary eye injury."

Basically, all of our toxicity statements use standard language, depending on the route of exposure and toxicity. All products in Category II for eye irritation would use the same statement as found on your product. Therefore, you would not be at a competitive disadvantage for other products having the same toxicity for eye.

We cannot change the text of this statement for your product unless we decided to change the text for all products.

C. Change in Use Directions

In the past, the label directions had specified certain rates of coverage (such as 1lb per 55 or 110 sq. ft., depending on the species). You wanted to drop these rates and just direct users "to sprinkle in a zigzag line the width of a garden hose" for two reasons.

1. You felt that expressing rates in terms of pound per sq. ft. was not very relevant to the household consumer.
2. You felt that your product would be at a competitive disadvantage if another product claimed higher coverage.

We have no objection to this change. However, since the rate for cats was double that for dogs, your revised directions should reflect this higher rate. In addition, as you gather effectiveness data in the future, you must still record rates in pounds 1) per sq. ft. or 2) per linear band of a specific width so that meaningful use directions can be developed for users.

We received a complete revised label for EPA Reg. No. 20215-6 but not for EPA Reg. No. 20215-7.

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that

3/5

you make the following changes and submit one (1) copy to us before your ship product:

1. Revise your dog and cat directions as follows:

DOGS: Remove all fecal matter present in area to be treated. Sprinkle STOP IT! in 1 inch zigzag lines, about 2 feet apart, over the area to be treated.

CATS: Remove all fecal matter present in area to be treated. Sprinkle STOP IT! in 2 inch zigzag lines, about 2 feet apart, over the area to be treated.

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.

D. Effectiveness Data in Support of Products

As indicated in our January 1995 letter, data submitted to support product effectiveness were not adequate to support the claims being made for this product. Therefore, you will need to ensure that you have in your files efficacy data consistent with the EPA Guidelines to support the uses on your label: dogs and cats. Since the Agency considers all of the pests to be non-public health uses, you do not need to submit these data to the Agency for review at the present time. However, we could call-in these data in the future if we received complaints or data showing ineffectiveness or if you proposed greatly elevated rates. In addition, if you failed to have such data on file to support your product claims, your product could be subject to enforcement action.

Sincerely yours,

Daniel B. Pearson for

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

- Enclosure: 1. Stamped Label
2. A-79 Enclosure

Peacock WP#8:A:20215-6.MAY:305-5407,-6600:5/6/96

MAY 05 1996

4/5
THIS IS
ARCE R

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, this product is
registered under EPA Reg. No.

20215-6

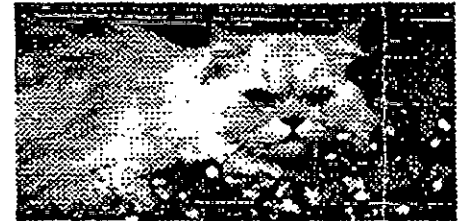
STOP IT!

STOP IT!

DOG & CAT REPELLENT

DOG & CAT REPELLENT

We Care About Your Animals



**GUARANTEED
TO REPEL
DOGS and
CATS**
Gently!

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. Harmful if absorbed through skin. Wash any exposed body parts and clothing after use.

FIRST AID

"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.

*** MONEY BACK GUARANTEED
TO ABSOLUTELY PERFORM !**

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.

FOR OUTDOOR USE ONLY

| Active Ingredients: | % |
|--|--------------|
| Indole-3-Butyric Acid | 1.878 |
| Thiram (Tetramethylthiuramdisulfide) | 3.07 |
| Methyl Nonyl Ketone (2-Undecanone) | 1.188 |
| Compounds Related to Methyl Nonyl Ketone | 0.064 |
| Castor Oil (USP) | 2.75 |
| Inert Ingredients | 91.05 |
| | Total 100.00 |

WARNING

**Keep Out of Reach of Children
For outdoor use only.**

Store in garage or outbuilding only.
See other Precautions on Side Panels
EPA Reg. No. 20215-6 EPA Est. No. 44641-CA-1
Net Weight: 2 lbs. (0.907kg)

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.



Alcor-Freeman Research Ltd.
Rancho Mirage, CA 92270

THIS IS WHAT WE
ARE REQUESTING BE
APPROVED

5/5



Care About Your Animals



CAUTIONARY STATEMENTS TO HUMANS AND DOMESTIC ANIMALS

WARNING

Substantial but temporary eye injury*. Do not
on skin or on clothing. Wear safety glass-
ul if absorbed through skin. Wash any
ody parts and clothing after use.

FIRST AID

hold eyelids open and flush with a steady
am of water for fifteen minutes. IF SWAL-
-drink promptly a large quantity of milk, egg
latin solution or, if these are not available,
utities of water. Avoid alcohol. Get Medical
IF ON SKIN: Wash with plenty of soap and
medical attention if condition persists.

IME AL HAZARDS Do not apply
o water.

e and Disposal
ontaminate food, feed,
oy storage or disposal.
E: Store only in original
in a dry place of a

r outbuilding inaccessible to children and
close partially emptied container and seal
astic bag with a twist tie. DISPOSAL: Do not
y container. Securely wrap in newspaper
and in trash.



Freeman Research Ltd.
Mirage, CA 92270



INSTRUCTIONS FOR USE

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

USE RESTRICTIONS

STOP IT! is used to reduce the frequency of defecation or uri-
nation 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 gar-
dens, lawns and under bushes.

USE ONLY OUTDOORS.

THIS PRODUCT MAY BE USED AROUND EDGES OF VEG-
ETABLE GARDENS. DO NOT APPLY DIRECTLY TO FOOD
CROPS. Do not apply this product directly on flowers, foliage, or
other portions of any plants other than lawn grasses and
weeds. Test small area before applying to unusual ground covers.

APPLICATION DIRECTIONS

When applying product, hold opened container at arm's length,
down and away from the body. If product becomes compacted,
it breaks apart easily by stirring. If area to be pro-
tected is a vegetable garden, sprinkle the product around the
edges of the garden.

DOGS: Remove all fecal matter present in area to be
treated. Sprinkle STOP IT! in zigzag lines the width of a
garden hose, about 2 feet apart, over the area to be treated.
CATS: Sprinkle STOP IT! in zigzag lines the width of a
garden hose, about 2 feet apart, over the area to be treated.

RETREATMENT

Retreat at least once per week until defecating, urinating or
digging no longer occurs in treated areas.

MONEY BACK GUARANTEED TO ABSOLUTELY PERFORM

*When used as directed.
Please return sales slip and front label of container.