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APR 21 1997

Mr. Barry J. Santerre
Unicorn Laboratories
13535 Feather Sound Drive
Suite 400
Clearwater, FL 34622-5587

Dear Mr. Santerre:

Subject: Amendment- amend Precautionary Statements/ Add Alternate Label with Brush Applicator
Unicorn 14 Day Flea & Tick Spray
EPA Registration Number 28293-147
Your submission dated June 20, 1995

This amendment referred to above, submitted in connection with registration under FIFRA section 3(c)(7)(a), is acceptable, provided that you:

1. Submit and/or cite all data or other material required for registration/reregistration of your product under FIFRA section 3(c)(5) or FIFRA section 4 when the Agency requires all registrants of similar products to submit such data.

2. Make the labeling changes listed below before you release the product for shipment bearing the amended labeling:

a. The revisions to the precautionary statements are acceptable. Please note that the labeling needs to be updated with respect to PR Notice 96-6 (Pet Product Label Statements).

b. The alternate label with brush applicator is not acceptable at this time. Please send us information on how this applicator works. Is efficacy data from use of the brush equivalent to the spray? How does the user know how much to apply (i.e. brush)? Do hair and pet body debris affect the distribution of the liquid over time?

3. Submit two (2) copies of your final printed labeling before you release the product for shipment. Refer to the A-79 enclosure for a further description of final printed labeling.

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 constitutes acceptance of these conditions.

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

Sincerely,

George T. LaRocca
Product Manager (13)
Insecticide-Rodenticide Branch
Registration Division (H7505C)

Enclosure

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UNICORN

14-DAY FLEA & TICK SPRAY

Pump Spray Residually Kills Ticks and Fleas
on Dogs and Cats.

ACTIVE INGREDIENTS:

Pyrethrins.....	0.056%
Permethrin [*3-Phenoxyphenyl) methyl (±) cis-trans- 3-(2,2-dichloroethenyl) 2,2- dimethylcyclopropanecarboxylate].....	0.050%
Related compounds.....	0.004%

INERT INGREDIENTS:..... 99.890%

100.000%

*Cis-trans isomer ratio: Min. 35% (±) cis
Max. 65% (±) trans

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Side/Back Panel for Additional Precautionary Statements.

NET WEIGHT: 12 OUNCES

MANUFACTURED BY:

Unicorn Laboratories
13535 Feather Sound Drive, Suite 400
Clearwater, Florida 34622-5587

EPA REG. NO. 28293-147-AA(E:3/8/90)
ACCEPTED
with COMMENTS Amend- 6/20/95
in EPA Letter Dated

EPA EST. NO. 62478-FL-1A
44616-MC-1B
Subscript used is first letter
of run code on container.

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

28293-147

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed. Avoid breathing vapors. Do not spray in eyes, face or on genitalia. Do not use on nursing puppies or kittens under three (3) months of age. Do not use this or any other pesticide on sick, old or debilitated pets.

Physical or Chemical Hazard

Do not use or store near heat or open flames.

Statement of Practical Treatment

- IF SWALLOWED:** Call a physician or Poison Control Center immediately.
- IF ON SKIN:** Wash with soap and warm water.
- IF IN EYES:** Flush eyes with plenty of water. Get medical attention if irritation persists.
- IF INHALED:** Remove victim to fresh air and call a physician if effects occur.

DIRECTIONS FOR USE

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

HOLD CONTAINER UPRIGHT. SHAKE WELL BEFORE USING.

On dogs this product will kill fleas up to 14 days and ticks up to 4 days. On cats this product will kill fleas up to 14 days and ticks up to 9 days.

Use protective gloves (mitts) to prevent contact with hands. Spray the animal from a distance of 8-12 inches. Start spraying at the tail, moving the dispenser rapidly and making sure the animal's entire body is covered, including the legs and under the body. Fluff the hair as you spray, so the spray will penetrate to the skin. The spray should wet the ticks thoroughly. Do not spray in face, eyes or on genitalia. Repeat as needed.

For cats apply at a rate of 1 second per pound of body weight. For dogs apply at the rate of 2 seconds per pound of body weight for thin or short-haired dogs and up to 8 seconds per pound of body weight for heavy or long-haired dogs.

Do not use this product in or on electrical equipment due to the possibility of shock hazard.

STORAGE AND DISPOSAL

STORAGE: Store in cool area away from heat and open flame.

DISPOSAL: Do not reuse empty container. Wrap original container in several layers of newspaper and discard in trash.