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28293-293

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1 of 7



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DEC 1 1999

Lee Tharrington
Unicorn Laboratories
12385 Automobile Blvd.
Clearwater, FL 33762

Dear Mr. Tharrington:

Subject: Labeling Amendment
Unicorn 30 Day Flea & Tick Treatment
EPA Reg. No. 28293-293
Your submission dated 19 August 1999

The labeling amendment referred to above submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide, Act, as amended, has been received, and reviewed, and the labeling is acceptable subject to the comments listed below. Please submit three (3) copies of your final printed labeling incorporating the changes prior to releasing your product for shipment. A stamped accepted with comments copy is enclosed for your records.

1. It is highly recommended that you update your "First Aid Statements" to read:

IF SWALLOWED:

- Call a poison control center or doctor immediately for treatment
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told by a poison control center.

IF ON SKIN:

- 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.
- Call a poison control center or doctor for treatment advice.

2. You should also include the following general information either near the first aid statement or emergency phone number: "Have the product container or label with you when calling a poison control center or doctor or going for treatment."

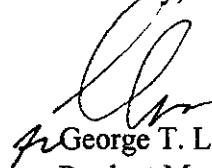
3. We have received several reports of incidents involving secondary exposure to

cats via permethrin treated dogs with these type concentrated products; therefore, we recommend addition of the following statements following "Do Not Use on Cats" under Precautionary Statements:

May be toxic if applied to or ingested by cats. Cats which actively groom or engage in close physical contact with recently treated dogs may be at risk of toxic exposure".

4. We recommend moving the statement (or adding) "Important! Do Not Use on Cats. This Product is For Use on Dogs Only" to the stop of the front panel.
5. We recommend you add the statement "Do not Use on Puppies Less Than Six Months Old" to the front panel since you identify use on puppies on the front panel.

Sincerely,



George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505C)

UNICORN 30 DAY Flea & Tick Treatment

[] Indicates alternate or optional wording to clarify packaging.

For Dogs and Puppies

Kills and Repels Fleas and Ticks for up to 30 Days.

Easy and convenient to use
Kills and repels the deer tick which may carry Lyme Disease
Kills fleas before they lay eggs

ACTIVE INGREDIENT:

Permethrin *..... 45%

INERT INGREDIENTS:..... 55%
100%

* CAS #52645-53-1

KEEP OUT OF REACH OF CHILDREN CAUTION

See side/back panel for Additional Precautionary Statements.

NET CONTENTS: 1 cc [0.03 oz] [1 mL]
2 cc [0.06 oz] [2 mL]

Manufactured by:

Unicorn Laboratories
12385 Automobile Blvd.
Clearwater, FL 33762
Phone: (727) 578-4545

EPA REG. NO. 28293-293 (8/19/99 AMD draft) 1

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

ACCEPTED
with COMMENTS
In EPA Letter Dated:
DEC 1 1999
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
28293-293

787

**SUGGESTED MINIMAL LABELING
FOR EACH INDIVIDUAL TUBE**

("")= According to outer container used.

**UNICORN
30 DAY Flea & Tick Treatment**

ACTIVE INGREDIENT:

Permethrin* **45%**

INERT INGREDIENTS..... **55%**

*CAS #52645-53-1 **100%**

CAUTION: KEEP OUT OF REACH OF CHILDREN

Refer to container ("box", "card") for full Precautionary Statements and Directions for Use.
[Read Label Before Use]

EPA Reg. No. 28293-293
EPA Est. No. 62478-FL-1