

45729-4

04/18/2006

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

APR 18 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Natural Chemistry, Inc.
Masuo Robinson, Agent
c/o Robinson Associates
583 Canyon Rd.
Redwood City, CA 94062

Dear Mr. Robinson:

Subject: DeFlea Pet Shampoo
EPA Reg. No. 45729-4
Submission dated March 23, 2006

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 the following comparative claims:

DeFlea Pet Shampoo works through different modes of action than pyrethrin-based pesticides...

Delete claims that the product kills mites on dogs and cats. You have not submitted efficacy data to support these claims.

The directions for use on surfaces and fabrics as a spray must be revised to make clear the product may only be used to spray dog and cat bedding.

If you have questions, please call Ann Sibold at 703 305-6502.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Sibold".

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

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NATURAL
Est. 1989
CHEMISTRY

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
APR 18 2006**

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
45729-4

DE FLEA PET SHAMPOO

Kills Fleas on Contact

For use only on Dogs, Cats, Puppies, Kittens & Reptiles

ACTIVE INGREDIENTS:

Dioctyl Sodium Sulfosuccinate	2.1%
Undecylenic Acid	0.5%
Other Ingredients:	97.4%
TOTAL	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

(see back panel for additional precautionary statements)

EPA Reg. No. 45729-4
EPA Est. No. 46270-NY-1

32 FL. OZ.
946 ML

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De Flea Pet Shampoo works through a different mode of action than pyrethrin-based pesticides to kill fleas and mites.

Do not use on animals under 12 weeks. Consult a veterinarian before using this product on debilitated, aged, medicated, 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.

See our full line of pet & home solutions at: www.naturalchemistry.com

Natural Chemistry Inc.
Stanford, CT 06502
1-800-668-7760
In Canada: Trent Hill, ON

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De Flea Pet Shampoo kills fleas. It can be used on all dogs, cats, puppies and kittens.

DIRECTIONS FOR USE:

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

**READ ENTIRE LABEL BEFORE EACH USE.
USE ONLY ON DOGS AND CATS.**

For Use on Dogs and Cats:

1. Apply *DeFlea Pet Shampoo* onto coat of pet. Work shampoo into pet's coat until a lather is formed. Be sure that entire pet is treated, including hard to reach areas such as between paws.
2. Rinse animal thoroughly, then dry.
3. Repeat as necessary, but not more often than at 3-day intervals.

NOTE: It is vital for young puppies and kittens to maintain a normal body temperature. Take precautions to provide a warm environment during and after bathing.

For Use as a Spray:

1. Spray entire animal, including legs and paws. Stroke the animal's coat against the lay while spraying to make sure the solution reaches the skin. Spray until entire coat is damp.
2. To help solution penetrate to the skin, spray and work into the coat.
3. Dry with towel if desired. (no rinsing is required).
4. In addition to pet, spray on surfaces and fabrics that may be infested, making sure adequate product is used to saturate areas where fleas may be hiding. Contacting fleas with product is required to achieve results.
5. Repeat as necessary, but not more often than at 3-day intervals.

For Use on Reptiles:

[Brand name] kills mites and other reptile parasites using a different mode of action than pyrethrin base pesticides.

1. Spray directly on reptile, but not to excess (runoff) and all areas where mites may hide. Avoid spraying eyes and facial areas. Alternatively, spray *[brand name]* onto a cloth and wipe onto reptile.
2. Reapply as often as necessary, but not more often than at 3-day intervals.
3. Do not treat snakes for at least 6 hours after shedding their skin.

[brand name] can be used to clean surfaces of terrariums and other habits. Spray surfaces with *[brand name]* and wipe with a clean cloth. Rinse and dry surfaces before reintroducing reptile to habit.

NOT FOR USE ON AMPHIBIANS SUCH AS FROGS AND/OR TOADS.

STORAGE AND 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.

Questions? email: answers@naturalchemistry.com