

Mr. Joe Blake  
Control Solutions, Inc.  
5903 Genoa Red Bluff  
Pasadena, Texas 77507-1041

JAN 18 2007

Dear Mr. Blake:

Subject: Amendment- add 14 day insect control claim and sweat resistant claim  
(MRID 46924901 and MRID 46924902)  
Cyper 1% Horse Spray  
EPA Registration Number 53883-150  
Your submission dated August 28, 2006

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. Increased duration (the current label states reapply every 5-7 days)

a. Claims of up to 14 days for fly control are acceptable provided you agree to perform an additional stable fly study. These data are required because the submitted study showed that the product was only marginally effective. We suggest that to complement the already submitted data you use lab reared stable flies that can be held against the horse in an enclosed container. Many replicates can be performed over time.

b. For horses and ponies (not a new claim) is acceptable.

c. Field tested and proven effective is acceptable.

d. Long-lasting repellency that protects and stays active for up to 14 days. Is acceptable.

e. 14-day protection is acceptable.

f. 24/7 (fly) (biting fly) [mosquito (*Culex* spp.) protection is not acceptable. You must state length of protection.

g. 24/14 fly control [protection]. is not acceptable. You must state length of protection.

h. Works day and night is acceptable.

i. For use on horses and ponies is acceptable.

2. Weather, water and sweat resistance (these types of claims were not acceptable in former submissions)

a. Weatherproof formula binds to the hair shaft to repel and protect from bugs, sun, sweat, water, dust, and dirt for up to 14 days is not acceptable

b. Sweat resistant fly spray is acceptable.

c. Sweat and water resistant fly repellent formula is not acceptable.

d. Won't sweat off is acceptable.

e. Sweat resistant fly spray is acceptable.

f. Sweat and water resistant fly repellent formula is not acceptable.

[PRIMARY LABEL PANEL]

CYPER 1% HORSE SPRAY

[Alt name: Martin's RELINQUISH Horse Spray]

- Protects against horseflies [Optional Marketing Language]
- Specially designed sponge applicator [Optional Marketing Language for use with sponge applicator bottle]
- For Use On Horses & Ponies [Optional Marketing Language]
- Repels & Kills Mosquitos that may transmit West Nile Virus [Optional Marketing Language]
- Water-Base Formula [Optional Marketing Language]
- For Horses and Ponies [Optional Marketing Language]
- Protects against Biting & Nuisance Flies, Gnats, Mosquitoes (culex spp)
- Provides repellency and quick knockdown from biting and nuisance flies, gnats and mosquitoes (culex spp.) that may transmit West Nile Virus. [Optional Marketing Language]
- Sweat Resistant Fly Spray [Optional Marketing Language]
- Sweat and water resistant fly repellent formula [Optional Marketing Language]
- Up to 14 days fly control [Optional Marketing Language]
- For Horses and ponies [Optional Marketing Language]
- Won't sweat off! [Optional Marketing Language]
- Unique formulation stays active [effective] and keeps working even in wet conditions and when the horse sweats. [Optional Marketing Language]
- Field tested and proven effective [Optional Marketing Language]
- Long-lasting repellency that protects and stays active for up to 14 days. [Optional Marketing Language]
- Weatherproof formula binds to the hair shaft to repel and protect from bugs, sun, sweat, water, dust and dirt for up to 14 days. [Optional Marketing Language]
- 14-day protection [Optional Marketing Language]
- 24/7 [fly] [biting fly] [mosquito (culex spp.)] protection. [Optional Marketing Language]
- 24/14 fly control [protection] [Optional Marketing Language]
- Works day and night. [Optional Marketing Language]
- For use on horses and ponies. [Optional Marketing Language]

Ready-to-use, Cyper 1% Horse Spray insecticide/repellent/ formula provides repellency, quick knockdown from flies, gnats and mosquitoes (culex spp).

ACTIVE INGREDIENTS:

Cypermethrin, CAS #52315-07-8	1.00%
INERT INGREDIENTS:	99.00%
Total:	100.00%

ACCEPTED with COMMENTS in EPA Label

JAN 18 2007

KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. Avoid contact with eyes, skin, or clothing. Avoid contamination of food. Wash hands with soap and water after use.

Net Contents: \_\_\_\_\_

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

53883-150

**ENVIRONMENTAL HAZARDS**

This product is toxic to fish. Do not apply to any body of water. Do not contaminate water when disposing of equipment washwaters.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Not for use on horses intended for human consumption.

Shake well before using. Avoid contact with eyes or mucous membranes. Harmful if swallowed. Avoid contamination of food. To protect horses and ponies from Horse Flies, House Flies, Stable Flies, Face Flies, Horn Flies, Deer Flies, Gnats, Mosquitoes (culex spp): Thoroughly brush the horse's coat prior to application to remove loose dirt and debris. For dirty horses, shampoo and rinse thoroughly. Wait until the coat is completely dry before applying this product. Cyper 1% Horse Spray's unique water resistant formula contains a special conditioner that binds to the hair shaft so it keeps working even in moist conditions or when the horse sweats.

[Sponge-On Application: Shake well before using. Apply Cyper 1% Horse Spray with the specially designed sponge applicator attached to the bottle. For horse's face, **avoid getting spray into horse's eyes, nose or mouth.** Apply to horse's entire body, sponging against the lay of the coat to ensure adequate coverage. *Optional text to be used when product is packed in sponge applicator bottle.*]

Spray or Wipe Application: Application should be liberal for best results. For horse's face, **always apply as a wipe** using a piece of clean, absorbent cloth, toweling (Turkish) or sponge. **Avoid getting spray into horse's eyes, nose or mouth.** Wear rubber glove or mitt when applying as a wipe. Spray or wipe horse's entire body while brushing against the lay of the coat to insure adequate coverage.

Reapply every 14 days as needed. Also, reapply each time animal is washed or exposed to heavy rain if nuisance pests are present.

**STORAGE AND DISPOSAL**

STORAGE: Store in a cool, dry place.

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 call 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

**NOTE:** Buyer assumes all risk of use, storage or handling of this product not in strict accordance with directions given herein. *[Optional Marketing Language]*

**NOTE:** CONTROL SOLUTIONS, INC. WARRANTS THAT THIS PRODUCT CONFORMS TO THE CHEMICAL DESCRIPTION ON THE LABEL AND IS REASONABLY FIT FOR THE PURPOSES STATED ON THE LABEL WHEN USED IN ACCORDANCE WITH THE DIRECTIONS FOR USE. IT IS IMPOSSIBLE TO ELIMINATE ALL RISKS INHERENTLY ASSOCIATED WITH THE USE OF THIS PRODUCT. INEFFECTIVENESS OR OTHER UNINTENDED CONSEQUENCES MAY RESULT BECAUSE OF SUCH FACTORS AS WEATHER CONDITIONS, PRESENCE OF OTHER MATERIALS, OR THE MANNER OR APPLICATION, ALL OF WHICH ARE BEYOND THE CONTROL OF CONTROL SOLUTIONS, INC. TO THE FULLEST EXTENT PERMITTED BY LAW CONTROL SOLUTIONS, INC. SHALL NOT BE LIABLE FOR CONSEQUENTIAL, SPECIAL OR INDIRECT DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT. ALL SUCH RISKS SHALL BE ASSUMED BY THE BUYER.

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Money back guarantee: If you, the consumer, are not satisfied with this product for any reason, please send your request for a refund, along with a legible copy of the original dated sales receipt showing your purchase price to the address below. Please allow 6-8 weeks for your refund.  
*[Optional marketing language]*

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EPA EST. NO. 53883-TX-002

*(EPA amend 07-18-06)*