



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

April 11, 2016

Georgia Anastasiou
Combat Insect Control Systems
c/o Lewis & Harrison, LLC
112 C Street, Suite 505
Washington, DC 20001

Subject: Label Amendment – Add Optional Marketing Claims and Use Recommendations
Product Name: COMBAT GOLD
EPA Registration Number: 64240-32
Application Date: October 15, 2015
Decision Number: 510551

Dear Ms. Anastasiou:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Maggie Rudick by phone at 703-347-0257, or via email at rudick.maggie@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to be 'KBD', enclosed within a hand-drawn oval.

Kable Bo Davis, Product Manager 3
Invertebrate and Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***
[Bracketed information is optional text]

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COMBAT[®] GOLD

Approved Alternate Brand Names:

- [Combat 12 Month 1]
- [Combat Source Kill Max Roach Killing Bait]
- [Combat Platinum^{Brand} Roach Killing Bait]
- [Combat Max 12-Month]
- [Combat Max 12-Month Roach Killing Bait]

Note to reviewer: Optional image that may appear on front panel

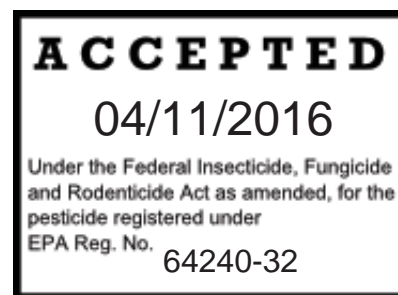


[KILLS UP TO ONE YEAR]
[WORKS UP TO 12 MONTHS]

[ROACH]

ACTIVE INGREDIENT: Fipronil[†] 0.05%
OTHER INGREDIENTS:..... 99.95%
TOTAL:.....100.00%

[†] CAS No. 120068-37-3



DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS.

CAUTION:

See [full] [complete] precautionary statements on [back] [side] panel.

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[FOR] SMALL ROACH[ES]

[CONTAINS] [6] [12] [18]

Child-resistant bait stations [for] [small roaches]

[TOTAL] NET WT _____

[Manufactured for] [Distributed by] [&] © [Year] Combat Insect Control Systems
[7201 E. Henkel Way] Scottsdale, [AZ] [ARIZONA] 85255
MADE IN [USA][KOREA]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

STORAGE AND DISPOSAL:

PESTICIDE STORAGE: Store in cool, dry area out of reach of children.

CONTAINER HANDLING: If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. If recycling is not available, place in trash. **If partially filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[U.S. Patent Nos. _____ and others pending.]

[[Combat®] [Guaranteed to work or your money back!]

[EFFECTIVENESS GUARANTEED: To the extent consistent with applicable law, COMBAT® [Insect Control Systems] stands behind this [insect killing system] [product] with a full [Satisfaction] Guarantee.] [Should you have any questions regarding COMBAT® [baits] [products], please call 1-800-426-6228.] [For information,] [C]call the Combat® [Labs] [Information] Helpline at 1-800-426-6228 [for information]. **-or-** [For questions or comments, [please] call the Combat® [Labs] [Information] Helpline at 1-800-426-6228 [for information]].

Optional Henkel statement for front or back or side panel:



[[The paperboard in this] [C]carton [contains] [is made from] _____% Recycled fiber [minimum _____% post consumer content]] [Please Recycle Empty Carton.]

[The distinctive design and elements of this package are proprietary and owned by The Dial Corporation, A Henkel Company.]

{Note to Reviewer: Per PR-Notice 2007-4, this product will receive a batch code. The batch code will be printed on each bait station.

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***
[Bracketed information is optional text]

[THIS IS] [HOW] [THIS] [Combat] [*Alternate Brand Name*] WORKS:

Roaches enter the bait station and eat the bait.
Roaches take the bait back to the nest
Roaches share the bait, killing other roaches and destroying the nest

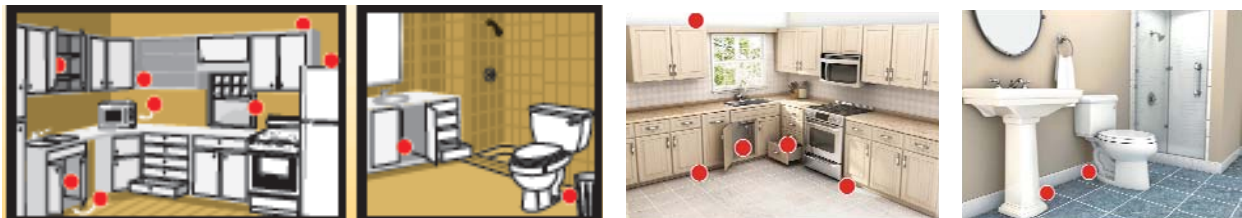
[Results may be affected by the number of roaches, the cleanliness of the area and the use of other roach control measures throughout the structure]

DIRECTIONS FOR USE

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

1. Use all [6] [12] [18] baits. Break baits apart. Place all baits where roaches are found as shown in the diagram[s][to the [right] [left] [above] [below.]] [Use enclosed stickers as needed.] Do not use in beehives.
2. Do not use sprays around baits. Sprays contaminate baits and reduce effectiveness.
3. Replace all [6] [12] [18] baits every 12 months or sooner if roaches return.

Note to reviewer: Label may include these graphic depictions of recommended placement locations.



Note to reviewer: Label may include the following optional image



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Claims for front or back

- Kills up to one year
 - Works up to 12 months
 - [Roach]
 - Kills non-stop for up to 12 months
 - Kills in hours
 - [Destroys] [kills] the nest
 - Kills fast
 - No vapor, fumes, or odor
 - Easy to use
 - Nothing to activate
 - No [mess] [or] [and no] objectionable odor
 - No [mess] [or] [and no] bad odor
 - With [a blend of] [multiple] foods roaches eat
 - With multiple foods to kill roaches [and the nest]
 - With foods roaches prefer
 - Better bait formula [for improved control]*
 - Increased feeding [for improved control]*
 - Improved [bait] [formula]*
 - Increased feeding [for improved control]*
 - Starts working as soon as roaches feed on bait
 - Starts killing overnight
 - Kills roaches 24/7 for up to 12 months
 - Kills quickly [and keeps on killing] [[for] up to 12 months]
 - [Kills] [Starts Killing] in hours – up to 12 months
 - Kills non-stop [for] [up to 12 months]
 - Kills fast – up to 12 months
 - Kills in hours, [Non-stop] [for] up to 12 months
 - [Fast Acting] [and] [effective] killing [[for] up to 12 months]
 - Kills [with][in] 24 hours [and [for] [Lasts] up to 12 months]
 - Kill the ones you see and the ones you don't [see]
 - Kill[s] [the] [entire] nest
 - [Your] Secret weapon [against roaches]
- *vs. previous [bait] formula
*vs. previous [bait] formula
*vs. previous [bait] formula
*vs. previous [bait] formula



Promo Claims

Note: ***Bold, Italicized text is information for the reader and is not part of the label.***
[Bracketed information is optional text]

- [x] [x [Bait]] [[x%] More^{††} [With Purchase]
 - [x%] for free^{††} [With Purchase]
 - [X][Extra] [Free] [Bonus] [Bait(s)]^{††} [With Purchase]^{††} [for free]
 - More Baits [- Better Value]
 - Value Pack [- More Baits]
 - Value Size [- More Baits]
 - Bonus Pack
 - Better Value
 - SUPER VALUE
 - INSTITUTIONAL SIZE
 - ECONOMY SIZE
 - ECONOMY PACK
 - GREAT VALUE [X] number [more] [extra] bait stations]
 - Double Pack
- ^{††}vs. [standard] [x] [count] [ct.][package] [pkg.] [of this product]

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[Bracketed information is optional text]

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BAIT STATION UNIT LABEL

Actual size of unit label is approximately 2.125 in. x 2.125 in.

COMBAT[®] GOLD
[Combat 12 Month 1]
[Combat Source Kill Max Roach Killing Bait]
[Combat Platinum^{Brand} Roach Killing Bait]
[Combat Max 12-Month]
[Combat Max 12-Month Roach Killing Bait]

THIS SIDE DOWN OR AGAINST SURFACE

Note: Do not remove or puncture this label

ACTIVE INGREDIENT: Fipronil[†] 0.05%
OTHER INGREDIENTS:..... 99.95%
TOTAL:..... 100.00%

[†] CAS No. 120068-37-3

DO NOT ALLOW CHILDREN OR PETS TO PLAY WITH THE BAIT STATIONS.

CAUTION: Wash hands thoroughly with soap and water after handling bait stations.

CONTAINER HANDLING: If empty: Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available. If recycling is not available, place in trash. **If partially filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[For questions, comments or information about COMBAT, call toll free 1-800-426-6228]
[Questions or Comments? Call 1-800-426-6228]

Distributed by & © [Year] Combat Insect Control Systems
[Manufactured for] [Distributed by] [&] © [Year] Combat Insect Control Systems
[7201 E. Henkel Way] Scottsdale, [AZ] [ARIZONA] 85255
MADE IN [USA][KOREA]

EPA Reg. No. 64240-32 EPA Est. No. _____

SEE OUTER [CARTON] [BAG] FOR [FULL] [COMPLETE] DIRECTIONS AND PRECAUTIONS

[Total] NET WT. 0.035 oz (1g)