

DEC 22 1999

Ms. J. Evelyn Lawson, Regulatory Compliance Specialist  
Combat Insect Control Systems  
c/o PS & RC  
P.O. Box 493  
Pleasanton, CA 94566-0803

Dear Ms. Lawson:

Subject: Amendment to add Efficacy Claims per Data submitted  
Combat Small Roach Bait F.03  
EPA Reg. No. 64240-33  
Submission dated June 30, 1999

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.

1. The Agency has determined that all references to kill and/or control claims exceeding 3 months must be qualified by stating "up to" prior to the portrayal of efficacy duration on the label. Therefore, claims that exceed 3 months such as "kills for 1-6 months" should read "kills for up to 1-6 months". Additionally, a label advisory should be added to the label to qualify the variables affecting the success of the cockroach bait applications. The Agency is recommending the following advisory: "**The success of Combat Small Roach Bait F.03 to kill/control small cockroaches can be affected by cockroach population size, sanitary conditions, and the extent to which other residents apply cockroach control methods.**" Any other advisory depicted on the label will negate the provisions by which this product labeling is conditionally approved.

2. Remove "Long term control in just 3 days [guaranteed] for 1-6 months" and "Controls in 3 days for 1-6 months" from the labeling.

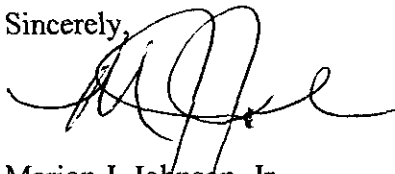
3. Either delete the following claims or have them qualified by adding a respective claim of duration such as "for up to 6 months".

a) non-stop roach control

- b) works day after day -or- works day and night
  - c) kills over night and keeps on killing
  - d) kills roaches 24 hours a day, 7 days a week
- 4) Delete the claim "the clean way to kill roaches", and "... destroys (kills)(roaches) by contact" from the labeling.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Marion J. Johnson, Jr.  
Product Manager  
Insecticide Branch  
Registration Division

Note: [Bracketed information is optional text.] Underlined text is new.

64240-33

# COMBAT

## SMALL ROACH BAIT F.03

ACCEPTED  
with COMMENTS  
in EPA Letter Dated:

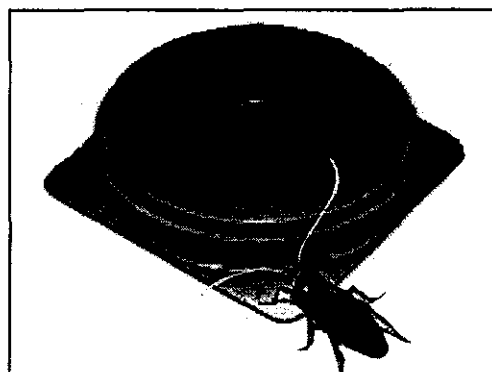
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Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.

67240-33

- Kills for 1-6 months
- Kills roaches overnight
- Kills roaches quickly
- Kills roaches in hours
- See visible results overnight
- Quick kill formula
- Starts killing [roaches] in hours
- Kills roaches where they hide -or- breed -or- live or- at the source
- Non-stop roach control
- 24 hour roach killing action
- The clean way to kill roaches
- Roach control in just [1-3] days
- Satisfaction -or- Quality Guaranteed

- Kills roaches - so you don't see them
- Kills roaches you see and [even] those you don't
- Powerful results in just [1-3] days
- Works day after day -or- works day and night
- Preventative maintenance against roaches
- Keeps roaches out of sight
- Breaks the roach life cycle
- Protects -or- defends your home against roaches
- For a clean roach free home
- Rids your home of roaches



**For Small Roaches**  
Overnight Action  
Action Formula  
Kills Overnight and Keeps on Killing

- Guaranteed to work or your money back
- Kills roaches 24 hours a day, 7 days a week
- [Eliminates] [kills] roaches [while you sleep] [when you are away]
- Child resistant bait stations
- Destroys [kills] [roaches] by contact or ingestion
- Value Pack
- Continuous roach control for 1-6 months
- Kills non-stop for 1-6 months
- Kills roaches and keeps on killing for 1-6 months
- Long term control in just 3 days [guaranteed] for 1-6 months
- Works [a]round the clock for 1-6 months
- Provides maximum roach control for 1-6 months
- Works within hours and up to 1-6 months
- Starts working -or- killing in hours, doesn't stop working for 1-6 months
- Keeps killing for 1-6 months
- Controls in 3 days for 1-6 months



ACTIVE INGREDIENT: Fipronil ..... 0.03%  
OTHER INGREDIENTS: ..... 99.97%  
CAS No. 120063-37-3

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

**CAUTION:**

SEE PRECAUTIONARY STATEMENTS ON BACK -OR- SIDE PANEL.

CONTAINS 12 -or- 18 CHILD RESISTANT BAIT STATIONS [for small roaches]

TOTAL NET WT 0.42 to 0.88 oz (12 to 25g)



EPA Reg. No. 64240-33  
EPA Est. No. 5813-MS-01  
U.S. Patent Nos. \_\_\_\_\_ and other patents pending.



[The paperboard in this] [Carton] [contains] [is made from] \_\_\_\_\_ % recycled fiber (minimum \_\_\_\_\_ % post-consumer content).

Distributed by & © 1996 Combat Insect Control Systems  
1221 Broadway, Oakland, CA 94612  
MADE IN U.S.A.

R-10122-11

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Note: [Bracketed information is optional text.] Underlined text is new.

64240-33

# COMBAT

## SMALL ROACH BAIT F.03

**EFFECTIVENESS GUARANTEED:**

COMBAT Insect Control Systems stands behind this insect killing system with a full Satisfaction Guarantee.

Should you have any questions regarding Combat baits, please call 1-800-426-6228.



For more information, call the Combat Labs Information Helpline at 1-800-426-6228. -or- [For questions or comments, please call the Combat Labs [Information] Helpline at 1-800-426-6228 [for more information].]

**DIRECTIONS FOR USE**

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

1. Remove wrapper. Break baits apart. Do not remove or puncture the label on bait station. Now the baits are ready to use. For best results use all 12 baits [at one time.]
2. Place baits wherever you see or have seen roaches -or- signs of roaches -or- where roaches are found. Then place additional baits about 1 1/2 feet away. [Some of the most likely locations -or- hiding places for roaches are shown in the diagram to the right. **TIP:** For best results, place baits about 1 1/2 feet away from each other.]
3. Put out all 12 baits. If you have fewer than 12 places where you have seen roaches, place the extra baits about 1 1/2 feet away from the other baits that you have just placed. Roaches find the bait faster when all bait stations -or- baits are placed out.
4. Place baits properly so that they are touching walls or corners. [**TIP:** Place properly. Bait stations -or- baits work best on horizontal surfaces when touching walls or corners. Only use enclosed stickers when placing baits on walls or upside down. It is not necessary to use stickers on all baits.]
5. Replace all baits every 3 -or- 6 months, or sooner if roaches return [because roaches have probably eaten all of the bait inside]. Need to replace baits since the roaches have probably eaten off the bait inside.

[**TIP:**] Do not use sprays or foggers around bait stations: they can contaminate bait stations and reduce effectiveness. [Use enclosed stickers for vertical surfaces.]

**PRECAUTIONARY STATEMENTS**

Hazard to Humans and Domestic Animals

**CAUTION**

Wash thoroughly with soap and water after handling bait stations.

**THIS IS HOW THIS PRODUCT WORKS:**

- |  |  |   |
|--|--|---|
| <b>1</b> Roaches enter the bait station and eat the bait.              | <b>2</b> Roaches return to their nest and die.   | <b>3</b> Other roaches eat them and die, creating a chain reaction.             |
| -or-   |  |   |
| <b>1</b> Roaches enter the bait station and eat -or- feed on the bait. | <b>2</b> Roaches take the bait back to the nest. | <b>3</b> Roaches share the bait, killing other roaches and destroying the nest. |



• THIS PRODUCT CONTAINS A TOTALLY UNIQUE INSECTICIDE INGREDIENT TO KILL ROACHES.

• LABORATORY AND HOME USE TESTS PROVE COMBAT PROVIDES 1-6 MONTHS OF EFFECTIVE ROACH CONTROL.

• EASY TO USE-NOTHING TO ACTIVATE • NO VAPOR, FUMES, ODOR OR MESS

**MOST LIKELY PLACES TO FIND ROACHES**

[Place bait stations wherever you see roaches.] [Here are the areas where roaches are commonly found.] [Use 12 bait stations at one time.] Replace bait stations every 3 -or- 6 months.]

**Kitchen:**

Under/around sink	On counters	Near doors
Under refrigerator	In cupboards/drawers	On floor/in corners
Under stove	Near garbage cans	

**Bathroom:**

Behind toilet	Near shower/bathtub	On floor/in corners
Under/around sink	Inside cabinets/drawers	

-or-

The kitchen, bathroom and other points of entry (garage, basement, attic, doors, windows) are the most important locations.

-or-

The kitchen and bathrooms are the most important locations, but use COMBAT bait stations wherever roaches have been found (laundry room, garage, bedrooms, attic, living room).

-or-

Normal infestation requires 12 bait stations.

**STORAGE AND DISPOSAL**

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

**DISPOSAL:** Wrap bait stations in several layers of newspaper and discard in trash.



*This product is specially designed for small roaches.*

Small, 1/2" Cockroach

Habits: Primarily live and breed in moist areas like kitchens and bathrooms. For effective control, bait stations should be placed wherever roaches have been seen in your home.

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Unit Label

The artwork shown below is approximately 200% of actual size.

# COMBAT

## SMALL ROACH BAIT F.03

THIS SIDE DOWN OR AGAINST SURFACE

Note: Do not remove or puncture this label

ACTIVE INGREDIENT: Fipronil\* ..... 0.03%  
OTHER INGREDIENTS: ..... 99.97%  
\* CAS No. 120068-37-3

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

### CAUTION:

Wash thoroughly with soap and water after handling.

DISPOSAL: Wrap used station in several layers of newspaper and discard in trash.

For questions, comments or information about COMBAT, call toll free 1-800-426-6228

Distributed by & © 1996:  
Combat Insect Control Systems  
1221 Broadway  
Oakland, CA 94612

EPA Reg. No. 64240-33  
EPA Est. No. 5813-MS-01

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS

Net Weight 0.035 -or- 0.05 oz (1 -or- 1.4g)

RU-10122-5