



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 LARGE ROACH BAIT F.03
EPA Registration Number: 64240-34
Application Date: October 15, 2015
Decision Number: 510547

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 large, 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.]
Underlined or Highlighted text is new.

Master Label, March 10, 2016
EPA Reg. No. 64240-34
Combat Large Roach Bait F.03
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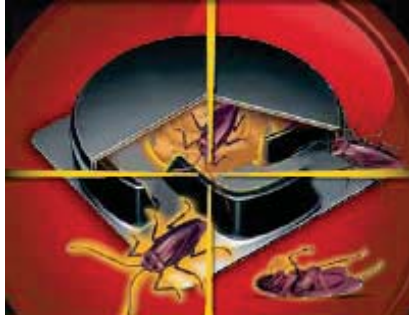
MASTER LABEL

COMBAT®

Large Roach Bait F.03

Approved ABNs: [Combat Quick Kill Formula 2], [Combat Source Kill Max R2],
[Combat Max Roach Killing Bait L]

Optional image



[For Large Roaches [, Waterbugs & [and] Palmetto Bugs]]
[Large Roach]

ACTIVE INGREDIENT: Fipronil†0.03%
OTHER INGREDIENTS:99.97%
TOTAL.....100.00%
†CAS No. 120068-37-3

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

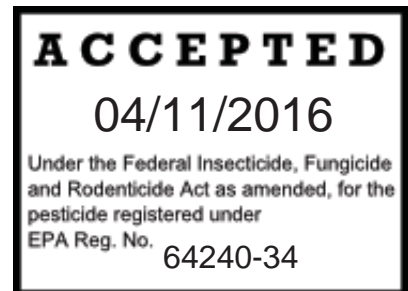
CAUTION:

See precautionary statements on back – or – side panel.

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

EPA Reg. No. 64240-34
EPA Est. No. _____

[CONTAINS] 8 CHILD-RESISTANT BAIT STATIONS
TOTAL NET WT _____



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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.

{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.}

[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.]

[[Satisfaction guaranteed] [Combat] [Guaranteed to work] or your money back[!]]

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

Optional Henkel Quality 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]

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[PRODUCT INFORMATION] [USE INFORMATION]

[THIS IS] [HOW] [Alternate Brand Name] [THIS PRODUCT] WORKS:

1. Roaches enter [the] bait station and eat the bait.
2. Roaches take bait back to the nest.
3. Roaches share the bait, killing other roaches and destroying the nest.

-or-

THIS IS HOW COMBAT[®] [Alternate Brand Name] WORKS:

1. Roaches enter [the] bait station and eat the bait.
2. Roaches return to their nest and die.
3. Other roaches eat them and die creating a chain reaction.

DIRECTIONS FOR USE

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

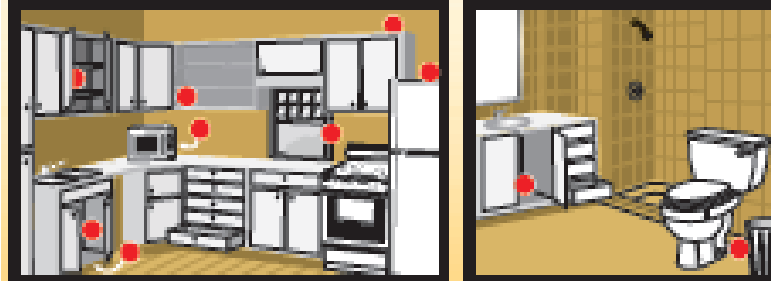
1. Use all 8 baits [at one time].
Break baits apart from plastic frame – or - Remove wrapper and separate bait stations from plastic frame.
Do not remove or puncture the labels on bait stations.
Place baits wherever you see or have seen roaches [or signs of roaches].
[TIP:] Place baits about 1 ½ feet away from each other.
Place any remaining baits in likely roach hiding places (as shown in diagrams above – or – to the right – or – left).
2. [Baits work best when] Place[ed] [baits] properly so that they are touching walls or corners.
Do not use sprays or foggers around bait stations [: they can contaminate bait stations and reduce effectiveness.]
3. Replace all [8] baits every 3 months, or sooner if roaches return [because roaches have probably eaten all of the bait inside.]

[Now the baits are ready to use.] [For best results, use all 8 bait stations at one time.] – or – [Put out all 8 baits. If you have fewer than 8 places where you have seen roaches, place the extra baits about 1 ½ feet away from the other baits that you have just placed.] [Some of the most likely locations for roaches are shown in the diagram to the right.]

[TIP:] [Roaches find the bait faster when more bait stations – or – baits are placed out.] [Use enclosed adhesive squares when placing baits on walls or upside down.] [Use enclosed stickers as needed. It is not necessary to use stickers on all baits.] [Bait stations work best on horizontal surfaces touching corners and next to walls.] [Use enclosed stickers as needed for vertical surfaces.]

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



Optional images



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[Most likely places to find roaches]

[Place bait stations wherever you see roaches.] [Here are the areas where roaches are commonly found.] [Use 8 bait stations at one time.]

[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).]

[FOR LARGE ROACHES[, WATERBUGS & PALMETTO BUGS:]]

[This product is specifically designed for large roaches, waterbugs & palmetto bugs.

Large, 1” to 1 1/2 “ Cockroach Habits:]

[Primarily live and breed outdoors and enter homes in search of food. For effective control, bait stations should be placed where roaches can enter your home.]

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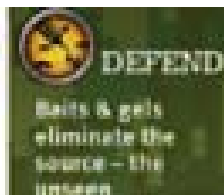
Optional Claims for front or back

- EASY TO USE
- NOTHING TO ACTIVATE
- NO VAPOR, FUMES, [MESS] OR ODOR
- Kills [large] roaches[,] [waterbugs] [and] [Palmetto bugs]
- Kills [roaches] [quickly] [fast]
- Starts killing [roaches] in hours
- [See] visible results in 2 days
- Quick kill formula
- Kills roaches within 2 days
- Kills roaches where they hide ***-or-*** breed ***-or-*** live
- Kills roaches at the source
- [Destroys] [kill(s)] the nest
- Kills roaches continuously for 3 months
- Continuous roach control for 3 months
- Protects ***-or-*** Defends your home against roaches
- Kills non-stop for 3 months
- Long lasting power ***-or-*** control for 3 months
- Ongoing [roach] control ***-or-*** action
- Non-stop roach control
- 24 hour roach killing action
- Effectively kills roaches without a trace – no fumes, no mess, no odor
- Ideal for kitchen use
- Easy to use, no clean-up [, no odor]
- Guaranteed to kill roaches for 3 months
- Guaranteed day and night roach control for 3 months
- Guaranteed to rid ***-or-*** protect your home of roaches for 3 months
- Guaranteed to solve your roach problem for 3 months
- Satisfaction ***-or-*** Quality Guaranteed
- Kills roaches where you can't see them
- Kills roaches – [so] you don't see [them]
- See dead roaches in 48 hours ***-or-*** [2-3] days
- Powerful results in just [2-3] days
- See visible results within ***-or-*** in 48 hours
- 48 hour kill ***-or-*** action
- Fast acting ***-or-*** action formula
- [Delivers] fast killing results
- Provides maximum roach control for 3 months
- Starts working within hours and continues working
- Starts working in hours
- Kills roaches fast before they multiply for long-term control
- Continuous action for [a]round the clock protection
- Works continuously, [24 hours a day] [, 7 days a week]
- Works day after day ***-or-*** works day and night

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- Works [a]round the clock
- Preventative maintenance against roaches
- Keeps roaches out of sight
- Stops **-or-** kills roaches before they become a problem
- Protects **-or-** defends your home against roaches
- Patented [action] formula **-or-** Ingredient
- Special formula
- Rids your home of roaches
- Gets rid of roaches [in your home]
- Eliminates [kills] large cockroaches [quickly]
- Destroys [kills] [roaches] on contact or ingestion
- Kills by contact 24 hours a day, 7 days a week
- Kills by touch
- Destroys roaches just by touching
- The lethal [roach] killer
- Kills [large] roaches
- Virtually eliminates roaches
- Faster than before*
- Improved formula*
- Improved control*
- Starts working as soon as roaches feed on bait
- Starts killing overnight
- Kills roaches 24/7 for up to 3 months
- Kills quickly [and keeps on killing] [[for] up to 3 months]
- [Kills] [Starts Killing] in hours – up to 3 months
- Kills non-stop [for] [up to 3 months]
- Kills fast – up to 3 months
- Kills in hours, [Non-stop] [for] up to 3 months
- [Fast Acting] [and] [effective] killing [[for] up to 3 months]
- Kills [with][in] 24 hours [and [for] [Lasts] up to 3 months]
- Kill the ones you see and the ones you don't [see]
- Kill[s] [the] [entire] nest
- [Your] Secret weapon [against roaches]

*[versus] Combat Roach Killing System [or other alternate brand names]



Promo Claims

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- [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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SUBLABEL A: UNIT LABEL

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

COMBAT®

[THIS SIDE DOWN OR AGAINST SURFACE]

[THIS SIDE DOWN: This side should be placed against surface]

Note: Do not remove or puncture this label.

ACTIVE INGREDIENT: Fipronil†0.03%
OTHER INGREDIENTS:99.97%
TOTAL.....100.00%
†CAS No. 120068-37-3

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

CAUTION:

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 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].
[Questions or Comments? Call [toll free] 1-800-426-6228.]

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

EPA Reg. No. 64240-34
EPA Est. No. _____

[[For] Large Roach[es]]

SEE OUTER CARTON FOR COMPLETE DIRECTIONS AND PRECAUTIONS

[Total] NET WT 0.06 oz (1.75g)