



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460**

**OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION**

September 6, 2023

Georgia Anastasiou, Agent
Combat Insect Control Systems
c/o Lewis & Harrison, LLC
2461 S. Clark St., Suite 710
Arlington, VA 22202

Subject: Label and CSF Amendment – Revising Alternate CSF #4; Removing Carpenter Ants from the Product Label; Adding Exclusionary Ant Species Language to the Product Label
Product Name: Combat ABF7
EPA Registration Number: 64240-42
Application Date: January 5, 2023
Decision Number(s): 592603, 592604

Dear Ms. Anastasiou:

The amended label and Confidential Statement(s) of Formula (CSF) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are 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 labeling, provided to the Agency on August 19, 2023, for 5 months from the date of this letter. **After 5 months from the date of this EPA letter, you may only distribute or sell under the new revised labeling enclosed with this letter. You may not distribute or sell under any label pre-dating the August 19, 2023, label.** “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Please note that the record for this product currently contains the following CSF(s):

- Basic CSF dated 08/24/2013
- Alternate CSF 1 dated 08/24/2013
- Alternate CSF 2 dated 08/24/2013
- Alternate CSF 3 dated 08/24/2013
- Alternate CSF 4 dated 01/05/2023

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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 FIFRA 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) lists 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 with FIFRA section 6.

If you have any questions, please contact Linda Boccuzzo at 202-566-1121 or at boccuzzo.linda@epa.gov.

Sincerely,



Michael Walsh
Product Manager 11
Invertebrate & Vertebrate Branch 2
Registration Division
Office of Pesticide Programs

Attachment

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

Master Label, July 31, 2023
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COMBAT® ABF7
Approved Alternate Brand Names:
[Combat Ant Killing Gel]
[Combat Source Kill Max A2]
[Combat Max Ant Killing Gel]



[ANT]

ACTIVE INGREDIENT: Fipronil†.....0.001%
OTHER INGREDIENTS:99.999%
†CAS No. 120068-37-3

USE ONLY IN AREAS NOT EASILY ACCESSIBLE TO CHILDREN AND PETS

KEEP OUT OF REACH OF CHILDREN

CAUTION

[Avoid contact with textiles and clothing as bait may stain.]
[Product may stain textiles and clothing.]

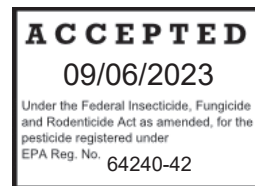
SEE PRECAUTIONARY STATEMENTS ON [END] [SIDE] [BACK] [BOTTOM] [PANEL].

[Manufactured for] [Distributed by] [&] ©[Year] Combat Insect Control Systems
[One Henkel Way], Rocky Hill, [CT] [Connecticut] 06067
MADE IN [USA][KOREA]

EPA Reg. No. 64240-42
EPA Est. No. _____

Contains 1 [reservoir] [syringe]

[TOTAL] NET WT _____



The label may include illustrations of suggested application placement sites.

[U.S. PATENT NOS. _____]

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PRECAUTIONARY STATEMENTS:

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes, and clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

PHYSICAL OR CHEMICAL HAZARDS:

Do not use this product in or on electrical equipment where a possibility of shock hazard exists.

FIRST AID:

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-426-6228 for emergency medical treatment information.

[[HOT LINE NUMBER:] Combat [information] Helpline: 1-800-426-6228]

STORAGE AND DISPOSAL: PESTICIDE STORAGE: Store in [a] cool, dry area [below] [80°F] [100°F] out of reach of children.

CONTAINER HANDLING: If empty: Nonrefillable container. Do not reuse or refill this container. Recap [syringe] [reservoir] and offer for recycling if available. If recycling is not available, place in trash. **If partially filled:** Recap [syringe] [reservoir] and 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 syringe.}

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

[Bracketed information is optional text.]

Highlighted text is new.

For front or back or side panel:

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

[EFFECTIVENESS GUARANTEED: 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, call the Combat® [Labs] [Information] Helpline at 1-800-426-6228.]

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

For questions or comments about COMBAT, call 1-800-426-6228.

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

[[] [[The] [Paperboard in this] Carton [contains] [is made from] _____% Recycled fiber [minimum _____% post consumer content].] [PLEASE RECYCLE EMPTY CARTON]

Optional Henkel Quality statement for front or back or side panel:



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[PRODUCT INFORMATION] [USE INFORMATION]

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

[This product provides FAST CONTROL of Ants* in 3-5 days.]

[This product is formulated to effectively control Ants*. That's because this product contains Fipronil, a fast-acting active ingredient. Its speed is still slow enough, however, for foraging ants to return to the colony and feed the bait to larvae and queen(s) so that the entire colony is killed through the Domino Effect™.]

*Excluding/Except carpenter, pharaoh, fire and harvester ants. *{The qualifier language will appear in close proximity to the claim.}*

[FOR CONSUMER USE ONLY]

[SPANISH INSTRUCTIONS INSIDE BOX]

DIRECTIONS FOR USE

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

Application rate is dependent on level of infestation and species to be controlled. Bait should be applied as spots.

Keep exposed gel away from open foods and food contact surfaces.

1. Inspect for ants: Place gel in areas of suspected ant activity, next to ant trails and near ant nests. Avoid applying gel in direct sunlight. Gel can be placed in cracks, crevices, corners, and areas such as under and behind kitchen appliances, along baseboards, under sinks, in pantry, around pipes and water heater and in the garage and attic.

-or-

1. To apply gel: [Remove cap from tip] [Break tip off], touch tip to surface and depress plunger. Recap tube after use.

2. Apply gel in spots in cracks and crevices. For best results, [make] [place] many spots or dabs of gel where you see ants foraging and entering the structure.

3. Do not apply gel to areas which have been recently sprayed with insecticide or contaminated with foggers, and do not spray insecticide over gel as this may cause the bait to become repellent.

4. Inspect placements and reapply as needed.

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For indoor use: Visually inspect for ants and place gel in areas where you see ants. Do not place bait in locations that are [routinely] [frequently] washed, as bait will be removed by washing. Do not treat food preparation surfaces. Do not use this product in or on electrical equipment where a possibility of shock hazard exists.

For outdoor use: Place gel into or on adjacent to structures where you see ants, next to ant trails and suspected areas of ant activity.

[You will notice fewer ants in days] [Pest population reduction will be apparent within a week]

[Gel placements should be near ant trails, next to ant nests or in areas of suspected ant activity.]

[This product's gel may be used as a spot or crack and crevice treatment for the indoor and outdoor control of ants.]

Optional Claims for front or back

- Fast killing formula
- Kills [quickly] [fast]
- First specially formulated Ant gel
- Elimination [Control] within 3-5 days*
- Kills Ants and the colony*
- Gain control of your Ant* problem
- Works within hours and up to 1 month
- Unique Ant formula
- Visible results overnight
- Starts killing [Ants] in hours*
- Fast acting formula that quickly kills Ants*
- Provides control of Ants*
- Preferred food form for Ants*
- Kills Ants in the colony*
- Effective against Argentine, Ghost, Acrobat, Big-Headed, Cornfield, Field, Odorous House, Thief, Pavement, White Footed, Little Black Ants
- Satisfaction or Quality guaranteed
- Kills Ants* at the source
- With Fipronil
- Store below [80°F] [100°F]
- [Destroys] [kill[s]] the [nest] [colony] *
- Kill the ones you see and the ones you don't [see] *
- Kill[s] [the] [entire] nest*
- [Your] secret weapon [against ants] *
- [Combat®] [*Alternate Brand Name*] formula attracts ants* with the food and water they need.
- This ant-killing gel starts killing ants* within a matter of hours.
- [Use] near doorways
- [Use] near windows
- [Use] near cracks and crevices
- [For] Indoor[s] & outdoor[s] [use]
- [Combat®] [*Alternate Brand Name*] contains a blend of undetectable insecticide and a food matrix that attracts ants* in search of food and water.
- [Combat®] [*Alternate Brand Name*] [gel] [bait] can be applied in hard to reach places where other baits won't work.
- Ants share the blend of food and insecticide with other ants in the colony [to kill the ones you see and the ones you don't [see]] *.
- [Ant] [killing] [Gel] [bait] *
- For hard-to-reach places [such as cracks and crevices]
- Starts working as soon as ants feed on bait
- Starts killing overnight
- Kills ants 24/7 for up to 1 month

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- Kills quickly [and keeps on killing] [[for] up to 1 month]
- [Kills] [Starts Killing] in hours – up to 1 month
- Kills non-stop [for] [up to 1 month]
- Kills fast – up to 1 month
- Kills in hours, [Non-stop] [for] up to 1 month
- [Fast Acting] [and] [effective] killing [[for] up to 1 month]
- Kills [with][in] 24 hours [and [for] [Lasts] up to 1 month]
- Kill the ones you see and the ones you don't [see]*
- Kill[s] [the] [entire] nest [colony]*
- [Your] Secret weapon [against ants]*



*Excluding/Except carpenter, pharaoh, fire and harvester ants. *{The qualifier language will appear in close proximity to the claim.}*

Promo Claims

- [[x%] More^{††} [With Purchase]
- [x%] for free^{††} [With Purchase]
- [X%][Extra] [Free] [Bonus] ^{††} [With Purchase] ^{††} [for free]
- Value [Pack] [Size]
- Bonus Pack
- Better Value
- SUPER VALUE
- INSTITUTIONAL SIZE
- ECONOMY SIZE
- ECONOMY PACK
- Double Pack

^{††}vs. [standard] [x] [count] [ct.][package] [pkg.] [of this product]

Optional Claims



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Optional Graphics

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



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UNIT (Syringe) LABEL [Not shown actual size] **COMBAT[®] ABF7**
[ANT]

Note: Do not remove this label.

ACTIVE INGREDIENT: Fipronil†.....0.001%
OTHER INGREDIENTS:99.999%
†CAS No. 120068-37-3

KEEP OUT OF REACH OF CHILDREN
USE ONLY IN AREAS INACCESSIBLE TO CHILDREN AND PETS.

PRECAUTIONARY STATEMENTS:

Hazards to Humans and Domestic Animals

CAUTION: Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes, and clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

[PHYSICAL OR CHEMICAL HAZARDS:

Do not use this product in or on electrical equipment where a possibility of shock hazard exists.]

[FIRST AID:]

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. **IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-426-6228 for emergency medical treatment information.]

[HOT LINE NUMBER:] Combat [information] Helpline: **1-800-426-6228**

[STORAGE AND DISPOSAL]

[PESTICIDE STORAGE: Store in cool, dry area **-or-**below 80°F **-or-**100°F out of reach of children.]

CONTAINER HANDLING: If empty: Nonrefillable container. Do not reuse or refill this container. Recap syringe[s] **-or-** reservoir[s] and offer for recycling if available. If recycling is not available, place in trash. **If partially filled:** Recap syringe[s] **-or-** reservoir[s] and call your local solid waste agency [or toll free number] for disposal instructions. Never place unused product down any indoor or outdoor drain.

[If the gel inside the tube is darker than this color ____, do not apply.]

Product may stain textiles and clothing.

[For] Questions or [C]omments [?] [about Combat,] [call toll free] 1-800-426-6228.

[Manufactured for] [Distributed by] [&] © [year] Combat Insect Control Systems

[One Henkel Way], Rocky Hill, [CT] [Connecticut] 06067

MADE IN [USA][KOREA]

EPA Reg. No. 64240-42 EPA Est. No. _____

[U.S. Patent Nos. _____]

SEE CARTON [INSERT] FOR COMPLETE DIRECTIONS AND PRECAUTIONS

[Total] NET WT 0.95 oz (27g)