

# U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7505P) Ariel Rios Building 1200 Pennsylvania Ave., NW Washington, D.C. 20460

EPA I	Reg
Numb	er:

Date of Issuance:

64240-47

JUN 23 2008

NOTICE OF PESTICIDE:

x Registration

\_\_ Reregistration (under FIFRA, as amended)

Name of Pesticide Product:

Term of Issuance: Unconditional

Combat Small Roach Deco Bait

Name and Address of Registrant (include ZIP Code):

Combat Insect Control Systems c/o Henkel Consumer Goods Inc.

Ana Rodriguez-Koster, Agent

Lewis and Harrison

122 C Street NW, Suite 740

Washington, DC 20001

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is unconditionally registered provided you make the label changes listed below. Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3)(c)(2)(B).

Make the following label changes:

Change the EPA Reg. No. to 64240-47.

Weight must be expressed in US customary units of measure. Metric measures are optional.

Delete "tips", "for best results", "baits work best" from the directions for use as they make compliance with the directions for use optional.

Signature of Approving Official:

Date:

JUN 23 2008

Richard Gebken

Product Manager 10

Insecticide Branch

Registration Division (7505P)

EPA Form 8570-6

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Because the bait is not packaged in child resistant packaging, revise Precautionary statements and the First Aid statements in accordance with the attached Tox review.

To prevent misuse, statements regarding placement of bait stations must be qualified as follows: "wherever you see roaches in the following places:", "wherever roaches have been found in the following places:", "wherever roaches have been seen in your home in the following places:", "wherever you see or have seen roaches or signs of roaches or where roaches are found in the following places:" "where you have seen roaches in the following places".

The cited product provided a calendar to in the statements to replace bait stations every 3/6 months. Similarly, revise the label to provide a calendar in the directions to replace bait stations every 3/6 months.

The following comparative claims are acceptable only if revised to compare specifically to Combat products:

25% more free 50% more free 25% 50% more baits More Baits – Better value Value pack – More baits.

Claims that the product is new or the design is new are limited to six months after registration or first release of the product from the warehouse, whichever is later.

Because an increase in net weight of the package as sold at retail could trigger child resistant packaging requirements, any increase in net weight in the product as sold or distributed at retail must be submitted as an amendment.

The confidential statement of formula dated 7 March 2008 is acceptable.

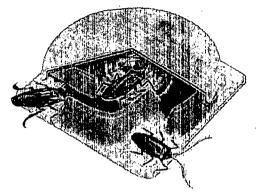
Submit two copies of the revised final printed label for the record.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.

# **COMBAT®** Small Roach Deco Bait

[Alternate Brand Name (to be determined)]



ACCEPTED
with COMMENTS
In EPA Letter Dated:

JUN 2 3 2009
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the posticide
registered under EPA Reg. No.

# [For Small Roaches]

[Overnight [Action] Formula]
[Kills Overnight & Keeps on Killing for up to 6 Months]

#### [ROACH]

ACTIVE INGREDIENTS: Fipron OTHER INGREDIENTS: † CAS No. 120068-37-3		
KEEP OUT OF REACH OF	CHILDREN AND PETS	e e e c
<b>CAUTION:</b>		6 6 C 6 6 C 6 6 C
	[back] panel for additional precautionary statements.]	εε c
<i>-or-</i> [See precautionary statements o	on side [back] panel.]	ς ( ( ς ς ε ι ε ς
EPA Reg. No. 64240 EPA Est. No	-	(0 ( (0 ( (0 (
Distributed by & ©2008 Combat I [15101 N. Scottsdale Rd.,] Scottsd [MADE IN U.S.A.]	•	( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( ( (
[Contains] [2] [4] [6] [8] [12] [18] [1.4g]]	[24] [30] Bait[s] [Stations] [For Small Roaches] [each con	taining 1.0g
[0.21 oz. (6g)] [0.28 oz. (8g)] [0.3	[2g)] [0.1 oz (2.8g)] [0.14 oz. (4g)] [0.2 oz. (5.6g)] 3 oz (8.4g)] [0.4 oz. (11.2g)] [0.42 oz. (12g)] [0.6 oz (16.8g) 5.2g)] [1.06 oz (30g)] [1.2 oz. (33.6g)] [1.5 oz. (42g)]	] [0.63 oz.
III S Patent Nos and	others pending 1	

Master Label, March 2008

EPA Reg. No. 64240-\_\_

Combat Small Roach Deco Bait

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#### PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

**CAUTION:** Wash [hands] thoroughly with soap and water after handling bait stations. Pets may be attracted to the smell of the bait. Place bait in areas inaccessible to pets.

STORAGE AND DISPOSAL: [Do not contaminate water, food or feed by storage or disposal.] STORAGE: Store in cool, dry area out of reach of children.

**DISPOSAL:** 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 partly filled: Call your local solid waste agency or [toll free number] 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

## For front or back or side panel:

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

[ [The] [P]aperboard in this] [C]carton [contains] [is made from] \_\_\_\_\_\_% Recycled fiber [minimum \_\_\_\_\_\_% post consumer content].] [PLEASE RECYCLE EMPTY CARTON]

{<u>Note to Reviewer</u>: Per PR-Notice 2007-4, this product will receive a batch code. The number will be laser-coded on each primary package of the product after the container is sealed.}

### **DIRECTIONS FOR USE**

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

#### **GENERAL INFORMATION**

[THIS IS] [HOW] [THIS] [Combat<sup>®</sup>] [Small Roach Deco Bait] [Alternate Brand Name (to be determined)] [PRODUCT] WORKS:

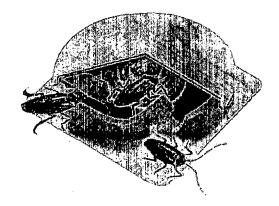
- 1. Roaches enter the bait station and eat the bait.
- 2. Roaches return to their nest and die.
- 3. Other roaches eat them and die, creating a chain reaction.

#### -or-

- 1. Roaches enter the bait station and eat -or- feed on the bait.
- 2. Roaches take the bait back to the nest.
- 3. Roaches share the bait, killing other roaches and destroying the nest.



and/or



### **DIRECTIONS FOR USE, continued**

### MOST LIKELY PLACES TO FIND ROACHES

[Place bait stations wherever you see roaches.] [Here are the areas where roaches are commonly found.] [Use all 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 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).

[This product is specifically designed for small roaches.]

[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.]

### **DIRECTIONS FOR USE, continued**

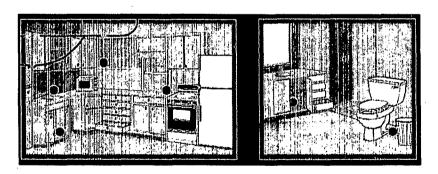
#### GENERAL RESTRICTIONS

Do not remove or puncture label on bait stations.

#### APPLICATION INSTRUCTIONS

- 1. [Remove wrapper.] [For best results] [U]use all [2] [4] [6] [8] [12] [18] [24] [30] baits [at one time]. Break baits apart. Do not remove or puncture [the] label[s] on bait station[s]. [Now the baits are ready to use.]
- 2.[1.] Place baits wherever you see or have seen roaches -or- signs of roaches -or- where roaches are found. Then place additional baits about 1 ½ feet away. [Put any remaining baits as] -or- [Some of the most likely locations] -or- [Roach hiding places] [Hiding places for roaches] are shown in the diagram[s] to the right -or- left -or- above -or- below. [TIP:] For best results, place baits about 1 ½ feet away from each other.]
- 3. Put out all baits. If you have fewer than [2] [4] [6] [8] [12] [18] [24] [30] places where you have seen roaches, place the extra baits about 1 ½ 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.[2.] Place baits properly so that they are touching walls or corners. [TIP:] Place properly. Bait stations -or- Baits work best [when] on horizontal surfaces [and] [when] touching walls or corners.
- 5.[3.] Replace all [2] [4] [6] [8] [12] [18] [24] [30] baits every [3] [6] months, or sooner if roaches return [because roaches have probably eaten all of the bait inside]. [Baits will need to be replaced since [because] [the] roaches have probably eaten all 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.]



#### Claims for front or back

#### Performance claims:

- Kills [for] up to 1-6 months
- Kills roaches quickly
- Kills [roaches] in hours
- Quick kill formula
- Kills roaches where they hide -or- breed -or- live -or- at the source
- Non-stop roach control for up to 6 months
- Satisfaction -or- Quality Guaranteed
- Kills roaches you see and [even] those you don't
- Protects -or- Defends your home against roaches
- Guaranteed to work or your money back
- Continuous roach control for up to 1-6 months
- Kills non-stop for up to 1-6 months
- Kills roaches and keeps on killing for up to 1-6 months
- Provides maximum roach control for up to 1-6 months
- Works within hours and for up to 1-6 months
- Starts working -or- killing in hours, [doesn't stop] [keeps] working for 1-6 months
- Laboratory [and home use] tests prove Combat® provides up to 1-6 months of effective roach control
- Keeps killing for up to 1-6 months
- Better bait formula [for improved control]\*\*

\*\* vs. previous formula

- With foods roaches prefer
- With [a blend of] [multiple] foods roaches eat
- With multiple foods to kill roaches [and the nest]
- Easy to use nothing to activate
- No [mess] [or] [and no] objectionable odor
- No [mess] [or] [and no] bad odor

#### Value claims:

#### Value claims are only for packs with net contents greater than 4 baits, not to exceed 30:

- Bonus Pack
- 25% More [Free]
- 50% More [Free]
- [25%] [50%] More Baits
- [2] [4] [6] [12] Bonus Baits With Purchase
- More Baits —. Better Value
- Value Pack More Baits

### Claims for front or back (continued)

#### Appearance claims:

- New [design][look]
- Decorative design blends discreetly into [the] [your] [home] [decor]
- [Decorative][wood grain][design] Blends discreetly [into] [your home's decor] [your decor] [the surrounding area]
- A [roach] bait station you will hardly notice
- No need to worry about unsightly bait stations
- Roach baits [with [decorative] design] [that] [to] blend[s] [discreetly] [with] [into] [the] [your] [home] [decor] [the surrounding area]
- Roach baits [with] [discreet] [decorative] design [that] [to] blend[s] [discreetly] [with] [into] your [home] [decor] [the surrounding area]
- Decorative design [roach bait] [baits] [to] blend[s] [discreetly] [with] [into] [the] [your] [home] [decor] [the surrounding area]
- Discreet [decorative] design [to] blend[s] [with] [into] [for] [the] [your] [home] [decor]
- Decorative [Decorator] design [so it] [to] blend[s] [discreetly] [with] [into] [the] [your] [home] [decor] [the surrounding area]
- Designed to blend discreetly [with] [into] [the] [your] [home] [decor] [the surrounding area]
- Decorator [Decorative] design [roach baits] [to kill roaches discreetly]
- Discreet [design] [roach baits]
- For discreet roach control
- Designed to kill roaches discreetly
- Kills roaches discreetly
- Decorator [Decorative] design for discreet placement
- Decorator [Decorative] design for discreet roach control

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#### UNIT LABEL

# **COMBAT®** Small Roach Deco Bait

[Alternate Brand Name (to be determined)]

# THIS SIDE DOWN OR AGAINST SURFACE Note: Do not remove or puncture this label.

#### KEEP OUT OF REACH OF CHILDREN AND PETS

### **CAUTION:**

Wash [hands] thoroughly with soap and water after handling bait stations.

**DISPOSAL:** 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 water agency or [toll free number] 1-800-CLEANUP 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.]

EPA Reg. No. 64240-\_\_\_\_ EPA Est. No. \_\_\_\_\_ Distributed by & ©2008 Combat Insect Control Systems [15101 N. Scottsdale Rd.,] Scottsdale, [AZ] [ARIZONA] 85254

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

NET WT [0.035 oz (1g)] -or- [0.05 oz (1.4g)]