

#### U.S. ENVIRONMENTAL PROTECTION **AGENCY**

Office of Pesticide Programs Registration Division (7505P) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460

**EPA Registration** No.

64240-67

Date of Issuance:

DEC 2 8 2010

#### **NOTICE OF PESTICIDE:** ✓ Registration

☐ Reregistration

(under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

COMBAT® Flik R

Name and Address of Registrant (include ZIP Code): Georgia Anastasiou, Agent **Combat Insect Control Systems** c/o Lewis & Harrison 122 C Street, N.W., 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 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 conditionally registered in accordance with FIFRA sec. 3(c)(7)(a) provided that you:

(See comments on page 2)

A copy of your label stamped "Accepted with Comments" is enclosed for your records.

Signature of Approving Official:

Date:

Refer to Page 2

DEC 2 8 2010

Richard J. Gebken, Product Manager Registration Division, Insecticide Branch

EPA Form 8570-6

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable subject to the comments listed below.

- 1. Make the following label changes:
  - a. Revise the EPA Registration Number to read, "EPA Reg. No. 64240-67".
  - b. Revise the Hazards to Humans and Domestic Animals statement on page 2 to coincide with that of the cited parent product, by adding the following statement: "Keep [gel] bait strips away from foods and food contact surfaces."
  - c. Revise the restriction on use in beehives on page 4 by removing the brackets around the text, which would indicate optional language. This restriction is a mandatory statement and must read as follows without brackets or parentheses: "Do not use in beehives."
- 2. Submit and/or cite all data required for registration/reregistration of your product when the Agency requires all registrants of similar products to submit such data.

Two copies of the finished labeling must be submitted prior to releasing the product for shipment. 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. If you have any questions, you may contact Clayton Myers, at (703) 347-8874, or via email at myers.clayton@epa.gov.

Sincerely,

Richard Gebken

Product Manager

Insecticide Branch

Registration Division (7505P)

Enclosures Stamped Label

## Combat® Flik R

Place holder for an illustration of the product

Place holder for an illustration of small and/or large roaches - may be on front or back or side panels

# USE ONLY IN AREAS INACESSABLE TO CHILDREN AND PETS KEEP OUT OF REACH OF CHILDREN

#### **CAUTION:**

See [side] [and][or] [back] panel for additional precautionary statements and directions

Contains: 6 [to] [-] 24 [Gel] [Bait] [Strips,] [Each Containing][:] [0.07 oz. (2.0 g) [to][-] 0.14 oz. (4.0 g)] [TOTAL] NET WT[:] 0.42 oz (12.0 g) [to][-] 3.39 oz (96.0 g)

EPA Reg. No: 64240-\_\_ EPA Est. No.

[Manufactured for] [Distributed by] & ©2010 Combat Insect Control Systems [19001] [N. Scottsdale Rd.], Scottsdale, [AZ] [ARIZONA] 85255 MADE IN [USA][KOREA]

ACCEPTED
With COMMENTS
In EPA Letter Dated:
DEC 2 8 2010
Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No:



Note: Bold, Italicized text is information for the reader and is not part of the label. [Bracketed information is optional text.] Page 2 of 9

Combat Flik R EPA Reg. No. 64240-

Master Label, 9-22-10

#### PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

CAUTION: Harmful if absorbed through 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, or using tobacco.

#### FIRST AID:

If on Skin or Clothing: Take off contaminated clothing. Rinse skin immediately with plenty of soap and water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

If in Eyes: Hold eye open, rinse slowly and gently with water for 15 to 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.

PHYSICAL OR CHEMICAL HAZARDS: Do not use this product in or on electrical equipment due to the possibility of a shock hazard.

STORAGE AND DISPOSAL: Do not contaminate water, food or feed by storage or disposal.

STORAGE: Store in a 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 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 number will be laser-coded on each primary package of the product after the container is sealed.}

#### For front or back or side panel:

[Satisfaction guaranteed] [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, please call the Combat<sup>®</sup> [Labs] [Information] Helpline at 1-800-426-6228 [for information].

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





Note: Bold, Italicized text is information for the reader and is not part of the label. [Bracketed information is optional text.] Page 3 of 9

Combat Flik R EPA Reg. No. 64240-Master Label, 9-22-10

#### **DIRECTIONS FOR USE:**

It is a violation of federal law to use this product in a manner inconsistent with its labeling. Do not use for control of insects other than those listed on this label.

[[Combat Flik R] [This product] may be used for the indoor and outdoor (adjacent to homes & structures) control of cockroaches in residential areas.

#### [GENERAL INFORMATION]

[[This product] [Combat Flik R] provides fast control of roaches.]

[[This product] [Combat Flik R] is formulated to effectively control roaches.]

[[That's because] [This product] [Combat Flik R] [has] [contains] Fipronil, [a [fast-acting] [fast-killing] active ingredient]][.] [[Its speed is] [That's] [[still] slow enough for [exposed] [foraging] [roaches] [the roaches you seel to return to the nest [where] [so] [that] [[roach] nestmates] [other roaches] [roaches in the nest] are [also] exposed to the insecticide [and] [so] [that] the entire nest is [killed] [destroyed] [through] [by] [the Domino Effect<sup>TM</sup>].]

[[This is] [How] [This Product] [Combat Flik R] Works:]

- [•][1] [Roaches (visit] [find] the [gel] [bait][s] [strips] and [eat] [feed on] the [gel] bait]
- [•][1] [This product attracts [foraging] roaches [to the [insecticide] [gel] bait strip][s][.][and] [the] [Roaches] [feed on] [eat] [are exposed to] the [gel] [bait][s] [strips]]
- [•][2] [[Exposed] Roaches carry [the] [gel] [bait] [insecticide] back [on and in their bodies] to [the] [nest] [where] [so] [that] [[roach] nestmates] [other roaches] [roaches in the nest] are exposed to the insecticide [and] [so] [that] the entire nest is [killed] [destroyed]]
- [\[ \] Do not interfere with [the] roaches or [the] [product] [gel] [bait][s] [strips] during use]
- [ | [Replace | [Place more | [gel] [bait] [s] [strips] if roaches return]
- [\[ ] [Do not use sprays on or around [the] [product] [gel] [bait][s] [strips] [placements]]
- [ on tuse strong cleaners around [the] [product] [gel] [bait][s] [strips] [placements]
- [\[ ] [Do not use sprays or strong cleaners on or around [the] [product] [gel] [bait][s] [strips] [placements]]
- [ ] [Place [the] [product] [gel] [bait][s] [strips] out of reach of children and pets]

#### **DIRECTIONS FOR USE (continued):**

#### For indoor and outdoor (adjacent to [the home][homes & structures]) use:

[1.] [To] place [a] [gel] bait[s] [strip[s] [securely] [in a chosen location] indoors or outdoors (adjacent to the home), peel off [protective] [covering][tape][film] [on the bottom of the strip] marked "Step 1 [Peel & Stick to Clean Surface]" and stick [it] [the exposed side] [the strip] to [a] clean surface.

[[The] [D][d]iagram[s] [above] [below] [at right] [at left] show[s] recommended placement locations.]

[See [Illustration A] [Picture A] [Figure [1][A]] [of] [for] [showing] [gel] [bait] strip before peeling off [covering] [tape] [film].

Discard [the] [removed] [covering] [tape] [film] in the trash.

Use all bait strips [at one time].

[Do not use in beehives.]

[2.] To activate [a] [gel] [bait] strip [already stuck to a clean surface], peel off the [protective] [covering] [tape] [film] [on top of the strip] marked "Step 2 [Activate]".

[See [Illustration B] [Picture B] [Figure [2][B]] [of] [for] [showing] [shows] [a] strip ready to be activated.]

[See [Illustration C] [Picture C] [Figure [3][C]] [of] [for] [showing] [shows] [a] strip being activated.]

[Discard [the] [removed] [covering] [tape] [film] in the trash.]

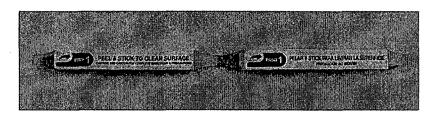
[Once activated, the bait strip may be left in place for up to 3 months.]

- [3.] [Do not spray insecticide on or around [the] [bait][s] [strip][s][,] as sprays will contaminate [bait][s] [strip][s] and reduce effectiveness.]
- [4.] Replace [strips] after 3 months.

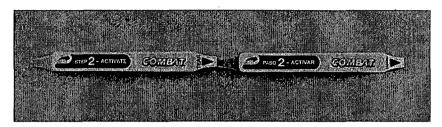
[Discard [used] [old] [replaced] strips [to be replaced] [by placing] in [the] trash.]

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#### **DIRECTIONS FOR USE (continued):**



[Illustration A] [Picture A] [Figure [1][A]]

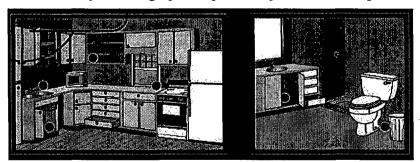


[Illustration B] [Picture B] [Figure [2][B]]



[Illustration C] [Picture C] [Figure [3][C]]

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



Example illustration of suggested bait strip placement sites.

# 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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#### Optional claims for front or back or side panel of label

- 1. [Easy to use] [Easy-to-use]
- 2. Easy to apply [anywhere]
- 3. [Leaves] no [messy] [residue] [or] [messy clean up]
- 4. [There's] no [residue] [or] [mess to clean up]
- 5. Convenient
- 6. [Mess free] [Mess-free]
- 7. No mess
- 8. No [vapors][,] [fumes] [or] [mess]
- 9. [Kills] [Stops] [Eliminates] roaches [without] [messy] [residue] [and] [without insecticide] odors [and] [or] [fumes]
- 10. Works [without] [messy] [residue] [and] without [insecticide] odors [or fumes]
- 11. [This] [product is] [gel] [bait] [strip][s] [are] easy to use [and [has] [have] no insecticide odor]
- 12. No insecticide odor
- 13. [It's] [the] [clean][,] [easy] way to solve your [roach] problem
- 14. [Thin][,] [clear][,] adhesive strips
- 15. COMBAT® [Combat Flik R] [killing] [gel] [bait] [strips] for roaches
- 16. COMBAT® [Combat Flik R] [roach killing] [gel] [bait] [strips]
- 17. COMBAT® [Combat Flik R] [roach killing] [gel] [bait][s] [strips] [aren't] [are not] [tape] [or] [glue] [or sticky] [traps] [that] roaches stick to
- 18. [Inconspicuous] [and] [Discreet] [and easy to apply [anywhere] [where] [roaches [are] [may be] [a problem] [found]]
- 19. [Roach] [insecticide] [Gel] [bait] [in] [convenient][,] [easy-to-use] [form] [strip][s]
- 20. [Roach killing] [gel] [bait] in [convenient][,] [easy-to-use] [form] [strip][s]
- 21. Goes where bait stations can't
- 22. COMBAT® [Combat Flik R] [roach killing] [gel] [bait] [strips] go where bait stations can't
- 23. [The convenient] roach killing [bait] [gel] [form] [strip][s] [that] go[es] where bait stations can't
- 24. [Small Roach] [Large Roach] [ROACH]
- 25. [For [Kills] [both] [Small and Large] Roaches]
- 26. Gain control of your roach problem
- 27. Food [&l[and][+] water [formulation][formula] attracts roaches to the [insecticide] [gel] [bait] [strips]
- 28. What roaches are looking for
- 29. With fipronil
- 30. COMBAT®'s [potent] [roach killing] [insecticide] [gel] [bait][s] [strip][s] [with Fipronil]
- 31. Advanced [food] formula \* [versus][vs] the previous COMBAT® bait formula
- 32. COMBAT® [Combat Flik R] has [a] [specific] [combination of] roach food attractants and a [fast] [fast-killing] [fast-acting] [active ingredient] [insecticide] [to create] [and is] [making it] [a highly effective tool] [in the fight against roaches] [to kill roaches] [to fight your roach problem]
- 33. The [insecticide] [gel] [bait] attracts roaches in search of food and water [to the bait] [to the strip]
- 34. [COMBAT®] [insecticide] [Bait][s] [gel] [strips] [contain][s] [food and water] [for roaches] [roaches seek] [but] do not spill
- 35. Fast killing formula
- 36. Visible results overnight
- 37. Fast control of [even large] roaches
- 38. Starts [working] [killing] [roaches] in hours
- 39. COMBAT® [Combat Flik R] [roach killing] [gel] [bait] [strips] kill[s] roaches fast

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#### Optional claims for front or back or side panel of label

- 40. Kills roaches continuously
- 41. Kills [roaches] non-stop
- 42. [Ongoing] [Non-stop] roach control
- 43. Keeps [killing [roaches]] [working] until [it's] [the bait is] gone
- 44. Long residual action [for up to 3 months]
- 45. Keeps [working] [killing roaches] [for] up to 3 months
- 46. Provides round the clock protection [for up to 3 months]
- 47. Kill roaches 24/7 [for up to 3 months]
- 48. Provides 24/7 [roach] protection [for up to 3 months]
- 49. Kills roaches while you sleep
- 50. Kills roaches for up to 3 months
- 51. [The] Domino Effect™
- 52. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Get][s] [to] [the nest] [,] [the source of [the] [your] [roach] problem]
- 53. [COMBAT®] [G[g]el] [bait][s] [strips] Kill[s] [roaches] [in hard-to-reach] [and] [inaccessible] [areas] [places]
- 54. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches where they [hide] [breed] [live] [nest]
- 55. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches you don't see
- 56. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches [where] you can't see them
- 57. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches you see and [those] [ones] you don't [see]
- 58. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] [the roach] [roaches at the] source
- 59. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] roaches in the nest
- 60. [COMBAT®] [G[g]el] [bait][s] [strips] [Kills] [Stop][s] [Eliminate][s] [Destroy][s] the roach nest
- 61. [COMBAT®] [G[g]el] [bait][s] [strips] Lets roaches [Kill] [Stop] [Eliminate] [Destroy] [other] roaches
- 62. Roaches [take] [share] [it] [COMBAT®] ['s ingredients] [the] [insecticide] [gel] [bait] [back to] [back at] [with] [in] the nest
- 63. Roaches share the [insecticide] [gel] [bait] [where they breed] [where they nest] [in the nest][,] [killing other roaches] [and] [destroying the nest]
- 64. Roaches share the [insecticide] [gel] [bait] [where they breed] [where they nest] [in the nest][,] [killing other roaches] [and] [destroying [the] [local] [your] [roach] population]
- 65. Roaches eat the [insecticide] [gel] [bait] and die in the nest
- 66. Roaches are attracted to the [insecticide] [bait] [gel] and take it back to their nest
- 67. Roaches ingest the [insecticide] [gell [bait] and return to die in their nest
- 68. [Fast acting] formula [that] quickly kills roaches [in the nest]
- 69. Kills quickly and keeps on killing [roaches] [back at the nest]
- 70. Kills roaches [at their source] [in the nest]
- 71. Prevents roach reproduction
- 72. As [The] [Domino Effect™] [insecticide] [bait] [gel] spreads through the roach population, [most] roaches are killed [, and [still] others lose their ability to reproduce ]

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

Combat Flik R EPA Reg. No. 64240-\_\_ Master Label, 9-22-10 Page 8 of 9

#### Optional claims for front or back or side panel of label

- 73. This product['s patented action formula] kills roaches
- 74. This product provides complete roach control
- 75. This product disrupts the reproductive cycle of roaches
- 76. Kills roaches while you sleep
- 77. Kills roaches for 3 months
- 78. [Kills] [Stops] [Eliminates] [indoor and outdoor (adjacent to the home)] roaches
- 79. [Kills] [Stops] large roaches outdoors (adjacent to the home) before they come indoors [so that they don't] [and] [invade your home]
- 80. [Indoor and] Outdoor (adjacent to the home) [roach] control
- 81. [Ideal for] use with COMBAT® [another Combat product name]
- 82. [COMBAT®] [G[g]el] [bait] [strips] [are] [ideal for] use [in combination] with [other] COMBAT® roach bait [station][s] products [for maximum control]
- 83. [COMBAT®] [G[g]el] [bait] [strips] [are] [ideal for] use [in combination] with [other] COMBAT® roach gel[s] [products] [in syringe form] [for maximum control]
- 84. [Ideal for] use [in combination] with other COMBAT® roach [bait][s] [products] [for maximum control]

#### Value claims:

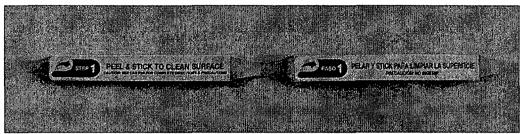
Value claims below are only for packs with net contents greater than 6 baits but not to exceed 24:

- Bonus Pack
- Value Pack
- [x][More]<sup>††</sup> [Free] [Bonus] Baits<sup>††</sup> [With Purchase]
- [x%] More<sup>††</sup> [Free] [Bonus] Bait(s)<sup>††</sup> [With Purchase]
- More Baits Better Value<sup>††</sup>
- Value Pack More Baits<sup>††</sup>
- Better Value<sup>††</sup>
- More Baits<sup>††</sup>

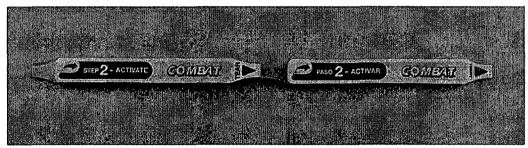
<sup>††</sup>vs. [standard] [x] [count][ct.][package][pkg.][of this product]

**BAIT STRIP UNIT LABEL** 

### Combat® Flik R

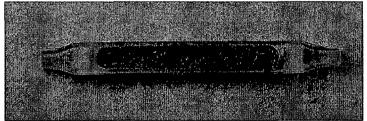


Step 1 Peel & Stick to Clean Surface
CAUTION: See Outer Carton for Complete Directions & Precautions
BOTTOM VIEW - AS IT APPEARS BEFORE ACTIVATION



Step 2-Activate Combat® [Combat Flik R]

TOP VIEW - AS IT APPEARS AFTER PLACEMENT BUT NOT YET ACTIVATED



TOP VIEW - AS IT APPEARS AFTER PLACEMENT AND ACTIVATION

[NOTE to reviewer: Due to very limited available space for unit labeling, and also because Directions for Use require to "Use all bait strips [at one time]," bait strip units are labeled prior to placement and activation with removable and disposable coverings (film) that show only the Brand Name, basic (2-step) placement & opening (activating) directions, and "CAUTION: See Outer Carton for Complete Directions & Precautions."]