64240-67

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

4/16/2012

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

NOTICICATION

APR 1 6 2012

Christina M. Swick Agent for Combat Insect Control Systems c/o Lewis and Harrison, LLC 122 C Street, NW, Suite 740 Washington, DC 20001

Subject: Application for Pesticide Notification EPA Registration Number: 64240-67 Date of Submission: April 2, 2012

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration (PRN) 98-10 dated April 2, 2012, for the abovementioned product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions regarding this letter, please contact Clayton Myers at (703) 347-8874, or via email at <u>myers.clayton@epa.gov</u>.

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Sincerely,

for

Richard Gebken Product Manager Insecticide Branch Registration Division (7505P)

Enclosures:

Copy of Label Stamped "Notification"

	United Stat vironmental Prote Washington, DC	ection Agency	Regist	ved, OMB No. 2070 tration dment	OPP Ide	entifier Number	
	Appli	cation for Pe	sticide - Sectio	on I			
. Company/Product Number			Product Manager		3. Proposed C	lassification	
4240-67			Gebken		None	Restricted	
. Company/Product (Name)		PM#	S. S. S. S. Sake				
Combat Flik R		10					
5. Name and Address of Applicant (Include ZIP Code) c/o Henkel Consumer Goods Inc. 19001 N. Scottsdale Rd. Scottsdale, AZ 85255 NOTE: PLEASE SEND ALL CORRESPONDENCE TO "CONTACT POINT" LISTED BELOW		(b)(l), m to: EPA R					
Check if this is a new ad	ddress		et Name				
		Sectio	on - II				
Amendment - Explain below.			Final printed la	abels in response to	o Agency letter da	ted	
Resubmission in response to A	Agency letter dated		"Me Too" Application				
Notification - Explain below. Explanation: Use additional			Other - Explain				
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telephone 202.393.3903 fax 202.393.3906

April 2, 2012

HAND-DELIVERED

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Document Processing Desk [NOTIF] Office of Pesticide Programs (7504P) U. S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202-4501

ATTENTION: Richard Gebken Product Manager, Team 10

SUBJECT: Combat Insect Control Systems Combat® Flik R (EPA Reg. No. 64240-67) Notification per PR Notice 98-10

Dear Mr. Gebken:

On behalf of Combat Insect Control Systems, I am submitting a notification in accordance with PR Notice 98-10 for the product Combat® Flik R (EPA Reg. No. 64240-67). The purpose of this notification is to propose minor language revisions and revise the Directions for Use to include alternate language for how the adhesive is placed on the bait strip.

Enclosed please find the following documents in support of this submission:

- A) Application for Pesticide Notification;
- B) One (1) copy of the label with changes highlighted; and,
- C) Owe (1) copies of the revised label.

If you have any questions about this submission, please call me at 202-393-3903 ext. 16 or e-mail me at cswick@lewisharrison.com. ccce

Sincerely,

Christing M. Swick

Christina M. Swick Agent for, Combat Insect Control Systems

cc: Pat McFadden, Combat Insect Control Systems

APR 1 6 2012

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 INACCESSABLE TO CHILDREN AND PETS KEEP OUT OF REACH OF CHILDREN CAUTION:

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

ACTIVE INGREDIENT: Fipronil[†].....0.01% OTHER INGREDIENTS:.....99.99% TOTAL.....100.00% [†]CAS No. 120068-37-3

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: 64240-67 EPA Est. No.

[Manufactured for] [Distributed by] & ©2012 Combat Insect Control Systems [19001] [N. Scottsdale Rd.], Scottsdale, [AZ] [ARIZONA] 85255 MADE IN [USA][KOREA]

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GCCC

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS.

CAUTION: Keep [gel] bait strips away from foods and food contact surfaces. 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[®] [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]



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 see] 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 EffectTM].]

[[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]]
- [] [Do not use 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]]

0000 0000 0000

[] [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.] Break [bait] strips apart. [See] [Illustration A] [Picture A] [Figure [1][A]]
- [2.] [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] ["Remove to Adhere"]. [See] [Illustration B] [Picture B] [Figure [2][B]]
- [3.] [Stick][Adhere] [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 C] [Picture C] [Figure [3][C]] [of] [for] [showing] [gel] [bait] strip before peeling off [covering] [tape] [film].

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

Use all bait strips [at one time].

[4.] 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] ["Peel Here"].

[See [Illustration C] [Picture C] [Figure [3][C]] [of] [for] [showing] [gel] [bait] strip ready to be activated.]

[See [Illustration D] [Picture D] [Figure [4][D]] [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.]

Do not use in beehives.

[TIPS]

[Do not spray insecticide on or around [the] [bait][s] [strip][s][,] as sprays will contaminate [bait][s] [strip][s] and reduce effectiveness.]

Replace [strips] after 3 months.

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

[Note to reviewer: Label may include alternate usage instructions outlined below instead of those listed above. The only difference is how the adhesive is placed on the strip.]

- [1.] Break [bait] strips apart. [See] [Illustration A] [Picture A] [Figure [1][A]]
- [2.] [To] place [a] [gel] bait[s] [strip[s]] [securely] [in a chosen location] indoors or outdoors (adjacent to the home), remove adhesive tab from pouch and adhere to [bottom of] strip [marked "Place Sticker Here"]. [See] [Illustration B alt] [Picture B alt] [Figure [2 alt][B alt]]. Peel off [protective] [covering][tape][film] [on the bottom of the strip] [marked] ["Remove to Adhere"]. [See] [Illustration B] [Picture B] [Figure [2][B]]

[3.] [Stick][Adhere] [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.]

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. 64240-67 Master Label, Amended 4-2-12 Page 5 of 12

[See [Illustration C] [Picture C] [Figure [3][C]] [of] [for] [showing] [gel] [bait] strip before peeling off [covering] [tape] [film].

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

Use all bait strips [at one time].

- [4.] 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] ["Peel Here"].
- [See [Illustration C] [Picture C] [Figure [3][C]] [of] [for] [showing] [gel] [bait] strip ready to be activated.]

[See [Illustration D] [Picture D] [Figure [4][D]] [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.]

Do not use in beehives.

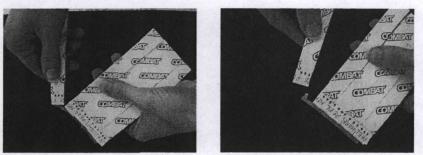
[TIPS]

[Do not spray insecticide on or around [the] [bait][s] [strip][s][,] as sprays will contaminate [bait][s] [strip][s] and reduce effectiveness.]

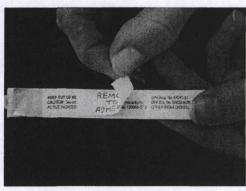
Replace [strips] after 3 months.

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

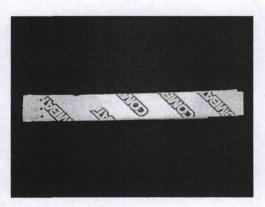
DIRECTIONS FOR USE (continued):



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



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



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

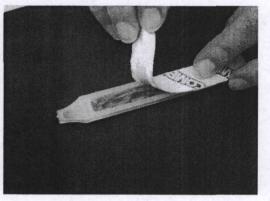


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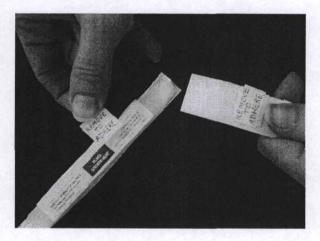
Note: Bold, Italicized text is information for the reader and is not part of the label. [Bracketed information is optional text.] Combat Flik R EPA Reg. No. 64240-67 Master Label, Amended 4-2-12 Page 7 of 12 10/15

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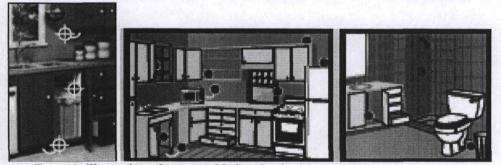


[Illustration D] [Picture D] [Figure [4][D]]



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

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



Example illustration of suggested bait strip placement sites.

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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 <u>bait[s] [stations] [can't] [cannot]</u>
- 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 [&][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

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] [j [c] [killing other roaches] [and] [destroying the nest]
- 64. Roaches share the [insecticide] [gel] [bait] [where they breed] [where they nest] [in the nest] [b] c [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] [gel] [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]

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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]^{††} [Free] [Bonus] Baits^{††} [With Purchase]
- [x%] More^{††} [Free] [Bonus] Bait(s)^{††} [With Purchase]
- More Baits Better Value^{††}
- Value Pack More Baits^{††}
- Better Value^{††}
- More Baits^{††}

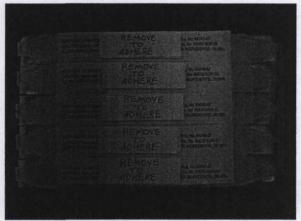
^{t†}vs. [standard] [x] [count][ct.][package][pkg.][of this product]

BAIT STRIP UNIT LABEL

Combat[®] Flik R



Text below is what will appear on strip. Combat brand logo Peel Here TOP VIEW - AS IT APPEARS BEFORE STRIPS ARE BROKEN APART



Text below is what will appear on strip.

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KEEP OUT OF REACH OF CHILDREN. CAUTION: See Outer Carton for Complete **Directions & Precautions** Remove to Adhere (before removed) EPA Reg. No. 64240-67 EPA Est. No. 85632-KOR-001 **ACTIVE INGREDIENT: Fipronil 0.01% BOTTOM VIEW – AS IT APPEARS BEFORE adhesive is removed**



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. 64240-67 Master Label, Amended 4-2-12 Page 12 of 12 15/15

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Combat logo 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."]