

64240-67

11/14/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

November 14, 2012

Ms. Georgia Anastasiou  
Authorized Agent for  
Combat Insect Control System  
c/o Lewis & Harrison, LLC  
122 C Street, N.W., Suite 740  
Washington, DC 20001-2109

**Subject: Amended Labeling; Addition of New Marketing Language  
COMBAT® Flik R, EPA Reg. No. 64240-67  
Your Submission Dated August 28, 2012**

Dear Ms. Anastasiou:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable.

A copy of your label stamped "Accepted" is enclosed for your records. If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at [Rodia.Carmen@epa.gov](mailto:Rodia.Carmen@epa.gov).

Sincerely yours,

*FJP*

Richard J. Gebken  
Product Manager (10)  
Insecticide Branch  
Registration Division (7504P)

Enclosure: Label Stamped "Accepted," dated November 14, 2012  
064240-00067 D470208

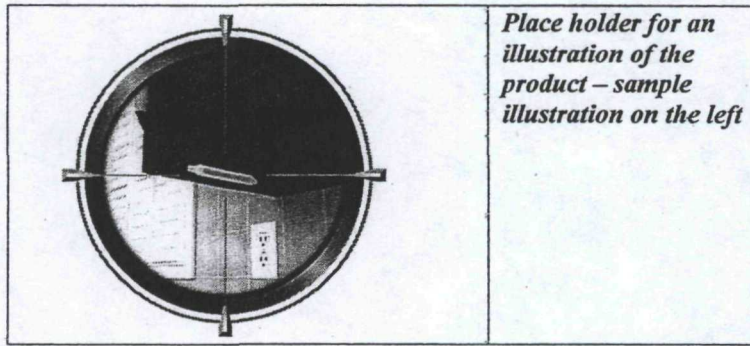


Note: Bold, Italicized text is information for the reader and is not part of the label.

[Bracketed information is optional text.]

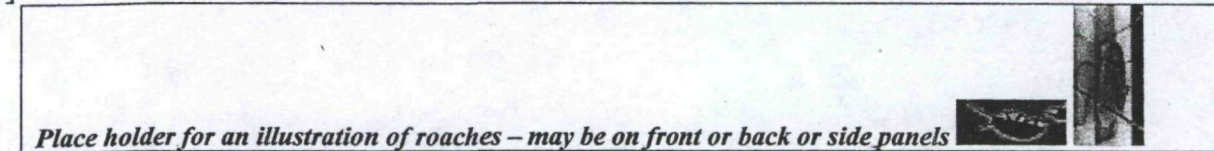
# Combat® Flik R

Previously Approved Alternate Brand Name:  
**[Combat Roach Killing Bait Strips]**  
**[Combat Max Roach Killing Bait Strips]**



ACCEPTED  
November 14, 2012  
Under the Federal Insecticide, Fungicide,  
and Rodenticide Act, as amended, for the  
pesticide registered under:

EPA. Reg. No: 64240-67



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

### CAUTION:

See [side] [and][or] [back] [panel] [of pouch] 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] [10] [Gel] [Bait] [Strips,]  
[Each Containing][:] [0.068 oz. (2.0 g) [to][-] 0.136 oz. (4.0 g)] [0.068 oz. (2.0 g)]  
[TOTAL] NET WT[:] [0.408 oz (12.0 g) [to][-] 3.264 oz (96.0 g)] [0.680 oz. (20 g)]

EPA Reg. No: 64240-67  
EPA Est. No. \_\_\_\_\_ [85632-KOR-001]

[Manufactured for] [Distributed by] [&] ©[2012] [2013] [2014] Combat Insect Control Systems  
[19001] [N. Scottsdale Rd.], Scottsdale, [AZ] [ARIZONA] 85255  
MADE IN [USA][KOREA]

[The distinctive design and elements of this package are proprietary and owned by The Dial Corporation, A Henkel Company.]  
[Combat® Information Helpline: 1-800-426-6228]  
[Patent Pending] [Patent Number]



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

[Bracketed information is optional text.]

**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, using tobacco, or using the toilet.

**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 appear on each bait strip.}*

**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]





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

[Bracketed information is optional text.]

[GENERAL INFORMATION]

[[This product] **Combat Flick R or alternate brand name** provides fast control of roaches.]

[[This product] **Combat Flick R or alternate brand name** is formulated to effectively control roaches.]

[[That's because] [This product] **Combat Flick R or alternate brand name** [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 Effect™].]

[[This is] [How] [This Product] **Combat Flick R or alternate brand name** Work[s]:]

[•][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]]

[♦] [Place [the] [product] [gel] [bait][s] [strips] out of reach of children and pets]



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

[Bracketed information is optional text.]

**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 Flick R or alternate brand name]** [This product] may be used for the indoor and outdoor (adjacent to homes & structures) control of cockroaches in residential areas.]

**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.]

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

[Bracketed information is optional text.]

**DIRECTIONS FOR USE (continued):**

**[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] [Picture] [Figure] [2 alt] [B alt]. Peel off [protective] [covering][tape][film] [on the bottom of the strip] [marked] ["Remove to Adhere"]. [See] [Illustration] [Picture] [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] [Picture] [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] [Picture] [Figure] [3] [C] [of] [for] [showing] [gel] [bait] strip ready to be activated.] [See] [Illustration] [Picture] [Figure] [4] [D] [of] [for] [showing] [shows] [a] strip being activated.] [Discard [the] [removed] [covering] [tape] [film] in the trash.]

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.]



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[Bracketed information is optional text.]

{Note: All photos below are optional. These or similar photos may be added to the directions for use.}



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



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



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



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



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

[Bracketed information is optional text.]

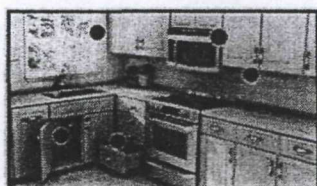
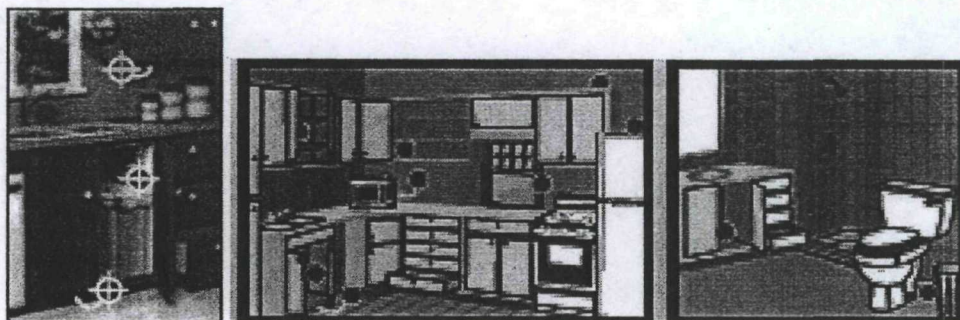
Combat Flik R

EPA Reg. No. 64240-67 Master Label, Amendment 8-28-2012

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

[Recommended [Bait] Strip Placement [Locations]:]



*Example illustration of suggested bait strip placement sites.*



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[Bracketed information is optional text.]

**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 Flick R or alternate brand name**] [killing] [gel] [bait] [strips] for roaches
16. [COMBAT®] [**Combat Flick R or alternate brand name**] [roach killing] [gel] [bait] [strips]
17. [COMBAT®] [**Combat Flick R or alternate brand name**] [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[s] [stations] [can't] [cannot]
22. COMBAT® [**Combat Flick R or alternate brand name**] [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. [Large] [and] [+] [Small] [Roach]es]
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 Flick R or alternate brand name**] 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]



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[Bracketed information is optional text.]

**Optional claims for front or back or side panel of label - continued**

- 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 or alternate brand name**] [roach killing] [gel] [bait] [strips] kill[s] roaches fast
- 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



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**Optional claims for front or back or side panel of label - continued**

- 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] [entire] [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] [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. As [The] [Domino Effect™] [insecticide] [bait] [gel] spreads through the roach population, [most] roaches are killed]
- 72. This product[’s patented action formula] kills roaches
- 73. This product provides complete roach control
- 74. Kills roaches while you sleep
- 75. Kills roaches for 3 months
- 76. [Kills] [Stops] [Eliminates] [indoor and outdoor (adjacent to the home)] roaches
- 77. [Kills] [Stops] large roaches outdoors (adjacent to the home) before they come indoors [so that they don't] [and] [invade your home]
- 78. [Indoor and] Outdoor (adjacent to the home) [roach] control
- 79. [Ideal for] use with COMBAT® [***another Combat product name***]

**Optional claims for front or back or side panel of label - continued**



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

- 80. [COMBAT®] [G[g]el] [bait] [strips] [are] [ideal for] use [in combination] with [other] COMBAT® roach bait [station][s] products [for maximum control]
- 81. [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]
- 82. [Ideal for] use [in combination] with other COMBAT® roach [bait][s] [products] [for maximum control]
- 83. Kills fast [!]
- 84. Works fast [!]
- 85. Leaves no mess [!]
- 86. Kills the entire nest [!]
- 87. New discreet design!

**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>

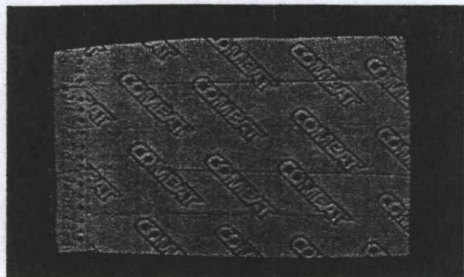
<sup>††</sup>vs. [standard] [x] [count][ct.][package][pkg.][of this product]



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

[Bracketed information is optional text.]

**Bait Strip Unit Label for Combat® Flik R**

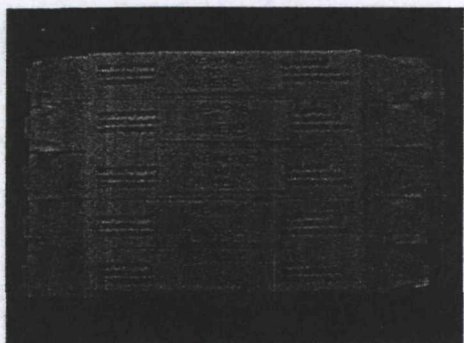


**TOP VIEW - AS IT APPEARS BEFORE STRIPS ARE BROKEN APART**

*Text below is what will appear on strip.*

Combat brand logo {as it appears in the photo or similar graphics}

Peel Here



**BOTTOM VIEW – AS IT APPEARS BEFORE adhesive is removed**

*Text below is what will appear on strip. Batch code will be added to the label or to the bait strip.*

KEEP OUT OF REACH OF CHILDREN.

CAUTION: See [Outer Carton] [Pouch] for Complete Directions & Precautions

Remove to Adhere {on small sticker before it is removed}

EPA Reg. No. 64240-67

EPA Est. No. 85632-KOR-001

ACTIVE INGREDIENT: Fipronil 0.01%



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

Combat logo {as it appears in the photo or similar graphics}



**TOP VIEW - AS IT APPEARS AFTER PLACEMENT AND ACTIVATION**