



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 4, 2015

Combat Insect Control Systems
c/o Georgia Anastasiou, Agent
Lewis & Harrison, LLC
122 C St., Suite 505
Washington, DC 20001

Subject: Label Notification per PRN 98-10 – Addition of marketing claims for a new adhesive to be used on the back of the strips
Product Name: Combat® Flik R
EPA Registration Number: 64240-67
Application Date: January 9, 2015
Decision Number: 499460

Dear Ms. Anastasiou:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls 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, you may contact Jennifer Gaines at 703-305-5967 or via email at gaines.jennifer@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Gaines" followed by a small mark that appears to be "br".

Kable Bo Davis, Product Manager 03
Invertebrate-Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

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]

NOTIFICATION

64240-67
The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

02/04/2015



Place holder for an illustration of the product – sample illustration on the left

Place holder for an illustration of roaches – may be on front or back or side panels



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[:] _____

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

[Manufactured for] [Distributed by] [&] © [year] Combat Insect Control Systems
[7201] [E. Henkel Way], 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]

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]



[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]

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 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.]

TIPS

Do not use in beehives.

[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):

[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.]

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

[Bracketed information is optional text.]

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



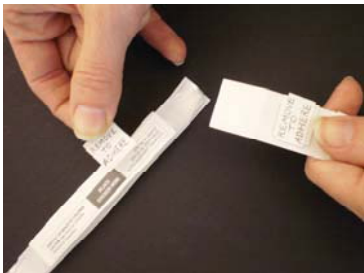
[Illustration] [Picture] [Figure] [1] [A]



[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.]

[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.

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]

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 Flick 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

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

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. Discreet design

Optional 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^{††}

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

Adhesive Claims:

- [New] [Improved] [More] adhesive [strength][**]
- [Better] [Improved] [More] adhesion power[**]
- [Now] [3x] [longer] [more] [adhesive][**]

{*Note: This footnote applies to all ** above.*}

[**vs. previous adhesive]

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.

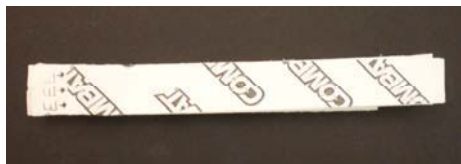
CAUTION: See [Outer Carton] [Pouch] for Complete Directions & Precautions

Remove to Adhere

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