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U.S. ENVIRONMENTAL PROTECTION **AGENCY**

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

EPA Registration No.

64240-68

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 A

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. 64240-68".
 - 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: "Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals."
 - c. Revise the Directions for placement of bait strips on pages 3-4 to coincide with Directions for the cited parent product, by adding the following statement: "Keep [gel] bait strips away from open food and food contact surfaces. Do not apply [gel] bait strip[s] on food/feed preparation surfaces."
- 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)

Hubd

Enclosures Stamped Label

COMBAT® Flik A

Place holder for an illustration of the product

[Place holder for a graphic depiction of 1 or more generic ants, e.g.



ACTIVE INGREDIENT: Fipronil [†] 0.001%
OTHER INGREDIENTS:99.999%
[†] CAS No. 120068-37-3
KEEP OUT OF REACH OF CHILDREN
CAUTION: See precautionary statements on back -or- side panel.
Contains: 2 [to] [-] 24 [Gel] [Bait] [Strips,]
[Each Containing][:] [0.07 oz (2.0 g) [to][-] 0.14 oz (4.0 g)]
[TOTAL] NET WT[:] 0.14 oz (4.0 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:

64240 - 68

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Combat Flik A

EPA Reg. No. 64240-____

Master Label, 9/22/10

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art of the label.

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[®] [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]



Worldwide, for more than 130 years, our brands have combined quality with respect for people and the environment. This is what Henkel stands for - today and tomorrow.

-or-



50f /

Note: Bold, Italic d text is information for the reader and is n art of the label.

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Combat Flik A EPA Reg. No. 64240-___ Master Label, 9/22/10 Page 3 of 9

DIRECTIONS FOR USE

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

[GENERAL INFORMATION]

[This product] [Combat Flik A] provides fast control of ants* in as little as 3-5 days.]

[This product] [Combat Flik A] is formulated to effectively control ants*.]

[That's because] [this product] [Combat Flik A] contains Fipronil, a fast-acting active ingredient][.] [Its speed is] [That's] [[still] slow enough for foraging ants* to] [return to the [colony] [nest] [and] [feed the bait to larvae and queen[s]] [so that the entire [colony] [nest] is killed [through] [by] the Domino EffectTM.]

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

- [•][1] [Ants* [visit] [find] the [gel] bait [strips] and [eat] [feed on] the [gel] bait]
- [•][1] [This product attracts [foraging] [worker] ants* [to the bait strip][s][.][and] [The] [Ants*] feed on the [gel] bait]
- [•][2] [Ants* carry [the] [gel] bait back to [the] [colony] [nest] [so] [that] it [can] kill[s] the queen and [other ants] [the nest] [the colony]]
- [•][2] Worker ants* take [some of] the [gel] bait back to the [nest] [colony] [and] [where they] [pass it on to] [feed it to] [kill] [destroy] the queen and entire [colony] [nest]
- [] [Do not interfere with the ants or [gel] bait strips during use]
- [\[] [[Replace] [Place more] [gel] bait strips] if ants 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]]
- [\[Delta] [Place [the] [product] [gel] [bait][s] [strips] out of reach of children and pets]

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art of the label.

DIRECTIONS FOR USE (continued)

For indoor and outdoor (adjacent to the home) use:

[1.] [Inspect for ants.] Place [gel] bait strip[s] near [an] ant trail[s] [or where] [you frequently see ant[s][activity]] [ants may enter your home][;] [near cracks, crevices, [and] along sills][.] [under and behind kitchen appliances][,] [along baseboards, under sinks, in pantry][,] [around pipes and water heater and in the garage.]

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

[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.

[See [Illustration A] [Picture A] [Figure [1][A]] [of] [for] [showing] [shows] [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].

[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 opened, the [gel] [bait] strip may be left in place [for] up to 1 month.]

[3.] [Replace [gel] [bait][s] [strips] after 1 month [to keep ants* from returning.]]

[You will notice fewer ants* [in days] [within a week].] [Ant* population reduction will be apparent [in days]]within a week].] [Ant* population will be reduced [in days] [within a week].] [Discard [used] [old] [replaced] strips [to be replaced] [by placing] in [the] trash.]

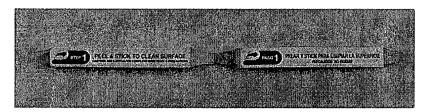
*Except for carpenter, fire, pharaoh and harvester ants.

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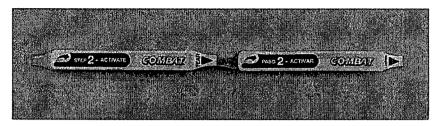
Note: Bold, Italic d text is information for the reader and is n art of the label. [Bracketed information is optional text.]

Combat Flik A EPA Reg. No. 64240-__ Master Label, 9/22/10

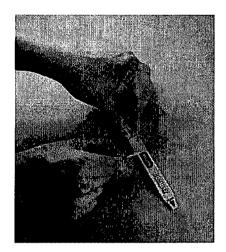
DIRECTIONS FOR USE (continued)



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

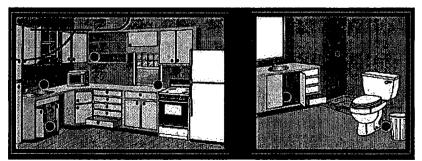


[Illustration B] [Picture B] [Figure [2][B]]



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

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



Example illustration of suggested bait strip placement sites indoors.

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Combat Flik A EPA Reg. No. 64240-__ Master Label, 9/22/10

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art of the label.

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] ants* [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 [ant] problem
- 14. [Thin][,] [clear][,] [adhesive] strips
- 15. COMBAT® [Combat Flik A] [killing] [gel] [bait] [strip][s] for ants*
- 16. COMBAT® [Combat Flik A] [ant* killing] [gel] [bait] [strips]
- 17. COMBAT® [Combat Flik A] [Ant Killing] [gel] [bait][s] [strips] [aren't] [are not] [tape] [or] [glue] [or sticky] [traps] [that] ants* stick to
- 18. [Inconspicuous] [and] [discreet] [and easy to apply [anywhere] [where] [ants* [are] [may be] [a problem] [found]]
- 19. [Ant] [insecticide] [Gel] [bait] [in] [convenient][,] [easy-to-use] [form] [strip][s]
- 20. [Ant killing] [gel] [bait] in [convenient][,] [easy-to-use] [form] [strip][s]
- 21. Goes where bait stations can't
- 22. COMBAT® [Combat Flik A] [ant* killing] [gel] [bait] [strips] go where bait stations can't
- 23. [The convenient] Ant* killing [bait] [gel] [form] [strip][s] [that] go[es] where bait stations can't
- 24. ANT*
- 25. [For] [Provides control of] ants*
- 26. Gain control of your ant* problem
- 27. Effective against Argentine, Ghost, Acrobat, Big-Headed, Cornfield, Field, Odorous House, Thief, Pavement, White Footed, [and] Little Black Ants
- 28. Effective against common household ants
- 29. Food [&][and][+] water [formulation] [formula] attracts [worker] [foraging] ants* to the [insecticide] [gel] [bait] [strips]
- 30. What ants* are looking for
- 31. With fipronil
- 32. COMBAT®'s [potent] [ant killing] [insecticide] [gel] [bait][s] [strip][s] [with Fipronil]
- 33. COMBAT® [Combat Flik A] has [a] [specific] [combination of] ant 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 ants*] [to kill ants*] [to fight your ant* problem]
- 34. The [insecticide] [gel] [bait] attracts ants* in search of food and water [to the bait] [to the strip]
- 35. [COMBAT[®]] [insecticide] [Bait][s] [gel] [strips] [contain][s] [food and water] [for ants*] [ants* seek] [but] do not spill

*Except for carpenter, fire, pharaoh and harvester ants

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[Bracketed information is optional text.]

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Optional claims for front or back or side panel of label

- 36. Fast killing formula
- 37. Fast control [of ants*] [in] [as little as] [3-5 days]
- 38. Starts [working] [killing] [ants*] in hours
- 39. COMBAT® [Combat Flik A] [ant killing] [gel] [bait] [strips] kill[s] ants* fast
- 40. Visible results overnight
- 41. Kills ants* while you sleep
- 42. [Ant*] [colony] [nest] [elimination] [control] in as little as 3-5 days
- 43. [Fast acting] formula [that] quickly kills ants* [and] [the colony] [the nest]
- 44. Kills quickly and keeps on killing [ants*] [back at the [nest][colony]]
- 45. Works in [as little as] hours and [for] up to 1 month
- 46. Long residual action [for up to 1 month]
- 47. Keeps [working] [killing ants*] [for] up to 1 month
- 48. Provides round the clock protection [for up to 1 month]
- 49. Kill ants* 24/7 [for up to 1 month]
- 50. Provides 24/7 [ant*] protection [for up to 1 month]
- 51. Kills ants* for up to 1 months
- 52. Kills ants* continuously
- 53. Kills [ants*] non-stop
- 54. [Ongoing] [Non-stop] ant* control
- 55. Keeps [killing [ants*]] [working] until [it's] [the bait is] gone
- 56. [The] Domino Effect™
- 57. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Get][s] [to] [the nest] [the colony] [,] [the source of [the] [your] [ant] problem]
- 58. [COMBAT®] [G[g]el] [bait][s] [strips] Kill[s] [ants] [in hard-to-reach] [and] [inaccessible] [areas] [places]
- 59. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] ants where they [hide] [breed] [live] [nest]
- 60. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] ants* you don't see
- 61. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] ants* [where] you can't see them
- 62. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] ants you see and [those] [ones] you don't [see]
- 63. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] [the ant*] [ants* at the] source
- 64. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] ants* in the [nest] [colony]
- 65. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] the ant* [nest] [colony]
- 66. [COMBAT®] [G[g]el] [bait][s] [strips] Lets ants* [Kill] [Stop] [Eliminate] [Destroy] [other] ants*
- 67. [COMBAT®] [G[g]el] [bait][s] [strips] [Kill][s] [Stop][s] [Eliminate][s] [Destroy][s] [the] [queen and] [the] [entire] [ant*] [colony] [nest]
- 68. [Worker] [Forager] Ants* [take] [share] [it] [COMBAT®] ['s ingredients] [the] [insecticide] [gel] [bait] [back to] [back at] [with] [in] the [colony] [nest] [queen*]
- 69. Ants* share the [insecticide] [gel] [bait] [where they breed] [where they nest] [in the [nest][colony]][,] [killing other ants*] [and] [destroying the [nest] [colony]]
- 70. Ants* share the [insecticide] [gel] [bait] [where they breed] [where they nest] [in the [nest] [colony]][,] [killing other ants] [and] [destroying [the] [local] [your] [ant] population]
- 71. Ants* eat the [insecticide] [gel] [bait] and die in the [nest] [colony]
- 72. Ants* are attracted to the [insecticide] [bait] [gel] and take it back to their [nest] [colony]

Note: Bold, Italia d text is information for the reader and is no part of the label.

[Bracketed information is optional text.]

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Optional claims for front or back or side panel of label

- 73. Kills ants* [&][and] the [colony] [nest]
- 74. Kills ants* in the [colony] [nest]
- 75. Destroys [the] queen* [and] [the] [entire] [ant*] [colony] [nest]
- 76. [This product is effective because] ants* carry [gel] [insecticide] [bait] back [to where they live] [to the colony] [to the nest] to [destroy] [stop] [kill] [the] queen [and entire colony]
- 77. [Worker] [Forager] ants are attracted to the [insecticide] [bait] [gel] and take it back to their [colony] [nest], [ultimately] killing the queen [and the whole [colony] [nest]]
- 78. Ants* carry [COMBAT®] [insecticide] [bait] [gel] [ingredients] [back] to the [colony] [nest] to [stop] [kill] the queen [and other ants*] [[before they] [so they don't] invade your home [kitchen]]
- 79. Kills ants* [at their source] [in the nest] [in the colony]
- 80. Prevents ant* reproduction
- 81. This product['s patented action formula] kills ants
- 82. This product provides complete ant control
- 83. This product disrupts the reproductive cycle of ants*
- 84. Kills ants* while you sleep
- 85. Kills ants* for 1 month
- 86. [Kills] [Stops] [Eliminates] [indoor and outdoor (adjacent to the home)] ants*
- 87. [Kills] [Stops] ants* outdoors (adjacent to the home) before they come indoors [so that they don't] [and] [invade your home]
- 88. [It even] kills ants* [you don't see] [outside (adjacent to the home)] [to prevent more ants* from coming inside] [invading your home]]
- 89. [Indoor and] Outdoor (adjacent to the home) [ant*] control
- 90. [Ideal for] use with COMBAT® [another Combat product name]
- 91. [COMBAT®] [G[g]el] [bait] [strips] [are] [ideal for] use [in combination] with [other] COMBAT® ant bait [station][s] products [for maximum control]
- 92. [COMBAT®] [G[g]el] [bait] [strips] [are] [ideal for] use [in combination] with [other] COMBAT® ant gel[s] [products] [in syringe form] [for maximum control]
- 93. [Ideal for] use [in combination] with other COMBAT® ant [bait][s] [products] [for maximum control]

*Except for carpenter, fire, pharaoh and harvester ants

Value claims:

Value claims below are only for packs with net contents greater than 2 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^{††}

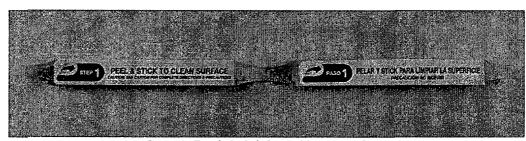
^{††}vs. [standard] [x] [count] [ct.][package] [pkg.] [of this product]

Master Label, 9/22/10

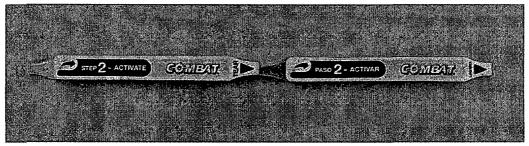
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BAIT STRIP UNIT LABEL

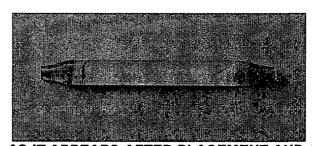
Combat® Flik A



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 A] 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."