

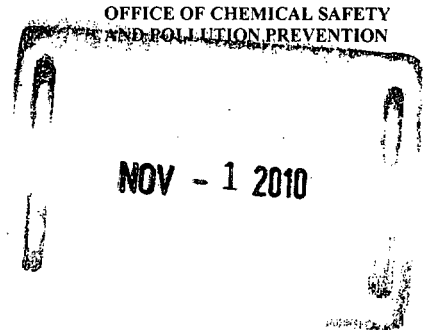
67505-3

11-01-2010

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



Mr. Joseph E. Dyer  
ECTO Development Corporation  
1229 Jesse James Road  
Excelsior Springs, MO 64024-1186

Dear Mr. Dyer:

Subject: Amendment- me-too based on EPA Reg. Number 75844-8  
Ecto Flea & Tick Insecticide with IGR  
EPA Registration Number 67505-3  
Your submission dated September 27, 2010

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. Wherever "Vector of LYME DISEASE" appears on the label change to "'which may carry Lyme disease'".
2. Update your label in accordance with PR Notice 2007-4 for Storage and Disposal.

A copy of a stamped label is enclosed for your records.

If you have any questions regarding this action, please contact Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Linda A. DeLuise".

Richard Gebken  
Product Manager (13)  
Insecticide Branch  
Registration Division (7504P)

Enclosure

FRONT PANEL  
ECTO FLEA & TICK INSECTICIDE WITH IGR

[CAT ICON IN CIRCLE  
WITH SLASH THROUGH IT]

PLEASANT CITRUS SCENT  
FLEA & TICK CONTROL FOR DOGS AND PUPPIES OVER 12 WEEKS OF AGE  
BIO SPOT FLEA & TICK CONTROL FOR DOGS  
[15 lbs and Under] [Between 15 & 33 lbs] [Between 33 & 66 lbs] [66lbs & Over]  
DO NOT USE ON CATS

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated**  
**NOV - 1 2010**  
Under the Fungicide, and Rodenticide Act  
as amended, for the pesticide  
Registration No. EPA Reg. No.  
67505-3

- BREAKS FLEA LIFE CYCLE!
- KILLS & REPELS FLEAS UP TO 3 TO 4 WEEKS!
- KILLS FLEA EGGS AND LARVAE FOR UP TO 123 DAYS!
- PREVENTS FLEA EGGS FROM DEVELOPING INTO BITING ADULTS FOR UP TO 123 DAYS!
- KILLS AND REPELS MOSQUITOES!
- PROTECTS AGAINST BLOOD FEEDING BY MOSQUITOES (vector of HEAVY METAL) FOR UP TO 4 WEEKS!
- KILLS & REPELS TICKS FOR UP TO 4 WEEKS!
- KILLS & REPELS DEER TICKS (vector of LYME DISEASE) FOR UP TO 4 WEEKS!
- KILLS & REPELS BROWN DOG TICKS (Rhipicephalus sanguineus) FOR UP TO 3 TO 4 WEEKS!
- KILLS & REPELS AMERICAN DOG TICKS (Dermacentor variabilis) FOR UP TO 3 TO 4 WEEKS!
- MONTHLY APPLICATION!
- MONTHLY FLEA, TICK AND MOSQUITO TREATMENT!
- KILLS AND REPELS FLEAS AND TICKS FOR UP TO A MONTH!
- KILLS AND REPELS ADULT FLEAS FOR UP TO 3 TO 4 WEEKS!
- KILLS FLEA EGGS AND LARVAE [FOR UP TO 4 MONTHS] [FOR 123 DAYS]
- KILLS AND REPELS TICKS FOR UP TO [4 WEEKS] [3 TO 4 WEEKS] INCLUDING DEER TICKS (vector of LYME DISEASE), BROWN DOG TICKS & AMERICAN DOG TICKS!
- KILLS AND REPELS [ADULT FLEAS] FOR UP TO 3 TO 4 WEEKS!

ACTIVE INGREDIENTS

*Permethrin: (CAS #52645-53-1).....	45.0%
Pyriproxyfen: (CAS #95737-68-1) (Nylar**)	5.0%
OTHER INGREDIENTS.....	50.0%
	TOTAL 100.0%

\* cis/trans ratio: Max 55% (+) cis and min 45% (+) trans

U.S. Patent No. 5,942,525  
(Nylar\*\*) is a Registered Trademark of McLaughlin Gormley King and Company

KEEP OUT OF THE REACH OF CHILDREN  
DO NOT USE ON CATS

CAUTION

SEE SIDE/BACK PANEL FOR ADDITIONAL PRECAUTIONARY STATEMENTS

Net Contents: [0.03 fl. oz. (1 mL)] [0.05 fl. oz. (1.5mL)] [1 fl.oz (3.0 mL)]  
[4.5 mL] Applicator

EPA Reg. No.: 67505-3 EPA Est. No.:

Manufactured For: Ecto Development Corporation  
Excelsior Springs, MO 64024

67505-3 (lot number statement as needed) Mfg. & Printed in U.S.A.

Page 1 of 8 (label revision number) (product number)

SIDE/BACK PANEL  
FLEA & TICK INSECTICIDE WITH IGR

READ ENTIRE LABEL BEFORE EACH USE  
USE ONLY ON DOGS OVER 12 WEEKS OF AGE  
DO NOT USE ON CATS

PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
CAUTION

**Hazards to Humans:** Harmful if swallowed. Avoid contact with eyes or clothing. Causes moderate eye irritation. Wash thoroughly with soap and water after handling.

**Hazards to Domestic Animals:** FOR EXTERNAL USE ON DOGS ONLY. Do not use on puppies under 12 weeks of age. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant, or nursing dogs. Consult a veterinarian before using on dogs with known organ dysfunction. DO NOT USE ON CATS or animals other than dogs. Cats which actively groom or engage in close physical contact with treated dogs may be at risk of serious harmful effect. Certain medications can interact with pesticides. It is advisable to consult a veterinarian before using this product with any other pesticide or drug.

FIRST AID

**If Swallowed**

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

**If In Eyes**

- Hold eyes open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eyes.
- Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-858-7378 for emergency medical treatment information.

**Adverse Reactions:** Some animals may be sensitive to ingredients in this product. Reactions in dogs may include skin sensitivity. Dogs may show lethargy, increased pruritis (itchiness), erythema (redness), rash and hair discoloration or hair loss at the application site. Observe the dog following treatment. Sensitivity may occur after using ANY pesticide product on pets. If signs of sensitivity occur bathe your dog with a mild, non-insecticidal shampoo and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

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SIDE/BACK PANEL  
ECTO FLEA & TICK INSECTICIDE WITH IGR

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish. Do not add directly to water. Do not contaminate water when disposing of product or packaging.

DIRECTIONS FOR USE

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

DO NOT USE ON CATS or animals other than dogs. May be toxic and potentially fatal if applied to or ingested by cats. Do not get this product in your dog's eyes or mouth. Repeat applications may be made if necessary, but do not apply more often than once every 3 weeks, except to reapply after shampooing the dog.

[For Dogs Weighing 15 lbs and Under: (1.0 mL applicator tubes) Apply one tube (1.0 mL) of product solution as a spot or stripe to the dog's back between the shoulder blades.]

[For Dogs Weighing Between 15 and 33 lbs: (1.5 mL applicator tubes) Apply one tube (1.5 mL) of product solution as a spot or stripe to the dog's back between the shoulder blades.]

[For Dogs Weighing Between 33 to 66 lbs: (1.5mL applicator tubes) Apply one tube (1.5 mL) of product solution as a spot or stripe to the dog's back between the shoulder blades and apply a second tube (1.5 mL) as a spot or strip to the dog's back directly in front of the base of the tail.] OR

[(3 mL applicator tubes) Apply approximately half of the tube (1.5 mL) of product solution as a spot or stripe to the dog's back between the shoulder blades and apply the rest of the tube's contents (1.5 mL) as a spot or strip to the dog's back directly in front of the base of the tail.] OR

[(3 mL applicator tube) Apply the entire tube (3.0 mL) as a continuous stripe on the dog's back starting between the shoulder blades and ending directly in front of the base of the tail.]

[For Dogs Weighing 66 lbs and Over: (1.5mL applicator tubes) Apply one tube (1.5 mL) of product solution as a stripe to the dog's back between the shoulder blades and apply a second tube (1.5 mL) continuing the stripe down the center of the dog's back and apply a third tube (1.5 mL) to the dog's back directly in front of the base of the tail.] OR

[(4.5 mL applicator tubes) Apply approximately half of the tube (2.25mL) of product solution as a spot or stripe to the dog's back between the shoulder blades and apply the rest of the tube's contents (2.25 mL) as a spot or strip to the dog's back directly in front of the base of the tail.] OR

[(4.5 mL applicator tube) Apply the entire tube (4.5 mL) as a continuous stripe on the dog's back starting between the shoulder blades and ending directly in front of the base of the tail.]

SIDE/BACK PANEL

ECTO FLEA & TICK INSECTICIDE WITH IGR

DIRECTIONS FOR USE (Continued)

HOW TO APPLY:

FOR SARAN TUBES IN BLISTER CARD: Remove product tube from package. Holding tube with notched end pointing up and away from face and body, snap or cut off narrow end at notches. Invert tube over dog and use open end to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin. Wrap tube and put in trash.

FOR FLAT CARD (doubled) UNIT-DOSE PACKAGING: Separate cards along the perforated line. Holding separated card by its wide end with narrow end pointed up and away from face and body, cut along dotted line. Invert card over dog and use narrow end of the card to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin. Wrap card and put in trash.

FOR FLAT CARD UNIT DOSE PACKAGING: [For push pin type applicator] Remove one product tube from card. With cap end pointed up and away from face and body, depress cap to pierce tube end. Carefully remove cap, invert tube over dog, and with tube in close to dogs skin, squeeze tube to apply product. Wrap empty tube and put in trash.

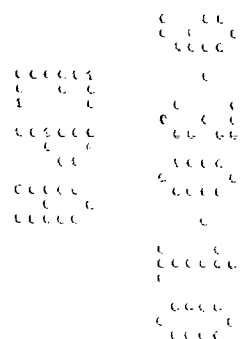
FOR FOLDING CARD OR TABBED CARD UNIT-DOSE PACKAGING: Remove product tab by tearing along perforation. Holding tab with tube end pointed up and away from face and body, cut along dotted line. Invert tab over dog and use narrow end of card to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin. Wrap tab and put in trash.

BLISTER CARD WITH TRI-LAYER TUBES: Remove product tube(s) from package. Fold along perforation between tubes and tear off one tube. {Return unused tubes to package.} Holding tube with notched end pointing up and away from face and body, snap off narrow end at notches. Invert tube over dog and use open end to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin. Wrap tube and put in trash.

FOR MULTI-DOSE PACKAGING: Withdraw 1.0 mL (1.5 mL) (3.0 mL) (4.5 mL) of solution at a time. Apply entire given dose directly to the skin at the indicated locations.

FOR DROPPER BOTTLE MULTI-DOSE PACKAGING: Insert dropper tube into insecticide solution, squeeze bulb and then release to fill tube barrel to 1.0 mL (1.5 mL) (3.0 mL) (4.5 mL) line. Position dropper tube end in dog's hair next to skin and squeeze bulb to apply all of the solution to the dog's skin as indicated for dog's size.

FOR SALE TO VETERINARIANS ONLY





TUBE LABEL (folding card and flat card packaging designs)

ECTO FLEA & TICK INSECTICIDE WITH IGR

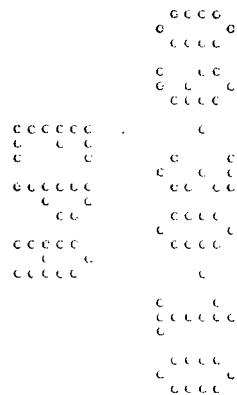
PERMETHRIN 45% W/W  
PYRIPROXYFEN 5% W/W

KEEP OUT OF THE REACH OF CHILDREN

DO NOT USE ON CATS  
OR  
[CAT ICON IN CIRCLE  
WITH SLASH THROUGH IT]

READ DIRECTIONS AND  
PRECAUTIONS BEFORE USING

EPA Reg. No. 67505-3



TAB LABEL (folding card and tabbed card packaging designs)

ECTO FLEA & TICK INSECTICIDE WITH IGR

ACTIVE INGREDIENTS

- \* Permethrin: (CAS #52645-53-1)..... 45.0%
- Pyriproxyfen: (CAS #95737-68-1) ..... 5.0%

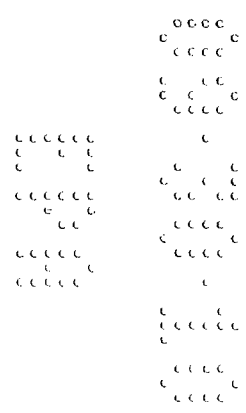
\* cis/trans ratio: Max 55% (+) cis and min 45% (+) trans

KEEP OUT OF THE REACH OF CHILDREN

DO NOT USE ON CATS  
 OR  
 [CAT ICON IN CIRCLE  
 WITH SLASH THROUGH IT]

SEE MAIN LABEL FOR ADDITIONAL PRECAUTIONS AND INSTRUCTIONS FOR USE

EPA Reg. No. 67505-3





OUTER BOX LABEL (Contains the following labeling plus full product label)

**ECTO FLEA & TICK INSECTICIDE WITH IGR**

BIOLAR (NYLAR) inhibits development of the immature stages of the flea for up to 4 months preventing them from reaching the biting adult stage.

(Nylar) Registered Trademark of McLaughlin Gormley King and Company

PICTURE OF FLEA LIFE CYCLE HERE

As Part of a complete flea control program  
USE Bio Flea Halt! Outdoor Yard Spray Concentrate, and Bio Flea Halt! Carpet Powder or Carpet Spray with Biolar Insect Growth Regulator, along with on-animal flea & tick products.

**4 STEPS FOR COMPLETE FLEA CONTROL**

- Step 1 - Shampoo or dip your dog
- Step 2 - Treat indoor and outdoor premise with Bio Flea Halt! indoor and outdoor sprays, foggers and powders
- Step 3 - Apply Bio Spot-On for up tp four weeks adult flea and tick control
- Step 4 - Maintenance treatments with on-animal sprays and powders

