



69061-4

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OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

May 2, 2006

Mr. Rob R. Adams, Jr., Agent
SIVAD Manufacturing & Packaging, Inc.
Adams Technology Systems
5145 Forest Run Trace Suite B
Alpharetta, GA 30022-4504

SUBJECT: Submission of a label amendment by notification on February 10, 2006 (forwarded to the Insecticide Branch for review as an amendment – Agency letter dated April 17, 2006)
EPA Reg. No. 69061-4
Product Name: Davis Triple Pyrethrins Flea & Tick Shampoo
Date of submission: February 10, 2006

Dear Mr. Adams;

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. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. The Trade name "Davis Triple Pyrethrins Flea and Tick Shampoo" is unacceptable for use, as the term "Triple" is false and misleading and implies heightened efficacy. The word "Triple" may be deleted, or Adams Technology Systems must replace this trade name with an acceptable alternative.
2. Remove the word "Natural" from the statement "Contains Natural soothing Aloe". This term is false and misleading as described in 40 CFR 156.10.
3. The marketing claim "3X Pyrethrin formula with Oatmeal Coat Conditioner" is unacceptable for use and implies heightened efficacy.
4. Within the "Hazards to Humans and Domestic Animals" section, revise the section for "Humans:" as follows:
"Humans: Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Harmful if swallowed. Causes skin irritation. Do not get on skin or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse."
5. Within the FIRST AID Section, add the following statements in accordance with PR Notice 2001-1.
 - a. If in Eyes: add the statement "Call a poison control center or doctor for treatment advice."
 - b. If Swallowed: Replace all statements with the following statements:
 - "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.”
- c. If on Skin or Clothing: add the following statement: “Call a poison control center or doctor for treatment advice.”
- d. The International Poison Center Phone Number of 1-888-740-8712 should be verified. A search of the internet lists the phone number as 1-800-222-1222.
6. Within the directions for use, revise the statement for the Horses: subsection from “Not for use on horses to be used for food.” To “Do not use on horses destined for slaughter.”
7. A review of the www.davismfg.com web site lists the following marketing claims for the aforementioned product: “Our concentrated formula kills fleas and ticks with natural, organic Pyrethrins. Special conditioners, Aloe, Lanolin and Coconut Extract protect skin and hair from outdoor elements while providing manageability, luster and sheen. Its pleasant fragrance lasts for days! Contains .15% Pyrethrins and 1.0% Piperonyl Butoxide. For dogs, cats, puppies and kittens over 12 weeks. Makes up to 3 gallons.”

The claim that this product contains “natural organic pyrethrins” is false and misleading in accordance with 40 CFR 156.10. Claims other than those approved on the label cannot be made. Davis Manufacturing may refer to the Label Review Manual at the following web site for specifics on marketing claims:
<http://www.epa.gov/oppfead1/labeling/lrm/chap-12.htm>

If you have any questions, you may contact Richard Gebken at (703) 305-6701.

Sincerely,



Richard J. Gebken
 Product Manager 10
 Insecticide Branch
 Registration Division (7505C)

Enclosure
 069061-00004.doc

Davis Triple Pyrethrins Flea & Tick Shampoo is a concentrated, lathering shampoo enriched with coconut extract, lanolin and aloe. Removes loose dandruff, dirt and scales. Leaves the coat soft and shining.

PRECAUTIONARY STATEMENT

Hazards to Humans and Domestic Animals

WARNING

Humans: Causes eye and skin irritation. Do not get in eyes or on skin or on clothing. Harmful if swallowed. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash before reuse.

Animals: Do not use on pets and foals under 12 weeks. Consult a veterinarian before using this product on debilitated, aged, pregnant, nursing animals or animals on medication. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

Environmental Hazards: This product is toxic to fish. Keep out of lakes, streams, ponds, tidal marshes and estuaries. Do not wash animal where runoff is likely to occur.

FIRST AID

IF IN EYES

- Flush eyes with plenty of water for at least 15 minutes.
- Remove contact lenses, if present, after the first flush and continue flushing.

IF SWALLOWED

- Do not induce vomiting unless instructed by a healthcare professional.
- If not breathing, give artificial respiration.
- If breathing is difficult, give oxygen.

IF ON SKIN OR CLOTHING

- Wash thoroughly with soap and water.
- Remove contaminated clothing and launder separately.

For more information, call 1-888-740-8712. See side panels for complete first aid instructions.

DAVIS

VETERINARY PRODUCTS

*Triple Pyrethrins
Flea & Tick Shampoo*

With Natural Soothing Aloe

FOR DOGS, CATS, PUPPIES AND KITTENS

Kills fleas, lice & ticks

Repels gnats, flies & mosquitoes for 2-3 days

3X Pyrethrin Formula with Oatmeal Coat Conditioner

ACTIVE INGREDIENTS:

Pyrethrins	0.15%
Piperonyl Butoxide, Technical	1.00%
N-Octyl Bicycloheptene Dicarboximide	0.50%
Di-n-Propyl isocinchomerate	0.50%

OTHER INGREDIENTS:

TOTAL 97.85%

TOTAL 100.00%

*Equivalent to 0.80% of (butylcarbityl) (6-propylpiperonyl) ether and 0.20% of related compounds.

KEEP OUT OF REACH OF CHILDREN

WARNING

See Side Panels For Precautionary Statements

EPA Reg. No. 69061-4

EPA Est. No. 69091-GA-1

1 Gallon (3.785 Liters)

DIRECTIONS FOR USE

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

READ ENTIRE LABEL BEFORE EACH USE.

USE ONLY ON DOGS, CATS, PUPPIES, KITTENS, HORSES AND FOALS.

May be used full strength or diluted with 2 parts water.

Thoroughly soak animal with warm water taking 2-3 minutes to wet hair. Do not apply shampoo around eyes. Apply shampoo on head and ears, then lather; repeat procedure with neck, chest, middle and hind quarter, finishing legs last. Let animal stand 3-5 minutes (this is an important part of the grooming procedure), then rinse animal thoroughly. Do not repeat treatment for 7 days.

Horses: Controls stable flies, horse flies, deer flies, face flies, gnats and mosquitoes. Follow above procedure. Do not repeat treatment for 7 days. Not for use on horses to be used for food.

STORAGE AND DISPOSAL

Storage: Store in a cool area.

If empty: Do not reuse this container. Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Manufactured by:
Davis Manufacturing
541 Proctor Avenue
Atlanta/Scottsdale, GA 30079

ACCEPTED

with **COMMENTS**

In EPA Letter Dated:

May 2, 2006

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, this product is registered under FIFRA Reg. No.

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