

72969-1

12/12/2002

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DEC 12 2002

Ivan Weatherston, Ph.D.
Senior Regulatory Consultant
Pesticide Program
TECHNOLOGY SCIENCES GROUP INC.
ARIZONA: REGULATORY DIVISION
4061 North 156th Drive
Goodyear, Arizona 85338

Dear Dr. Weatherston:

SUBJECT: Amendment - Add Claims for Ticks and Mosquitoes
Freedom Spot-On for Horses
EPA Registration Number: 72969-1
SHP-2002 (Celebration - additional brand name)
EPA Registration Number: 72969-2
Your Letters Dated September 18 and December 5, 2002

The amendment referred to above, submitted in connection with registration under section 3(c) (7) (B) of the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), is acceptable since you have agreed in writing to submit the following data:

1. Product Performance data listed below, conducted in accordance with the 40 CFR Part 158 test guidelines referred to below:

<u>Guidelines Reference</u> <u>Number</u>	<u>Title of Study</u>	<u>Date Due</u>
810.3200	Southwest BioLabs. Efficacy against biting flies, gnats, mosquitoes	January 31, 2003
810.3200	Southwest BioLabs. Efficacy against stable flies.	June 30, 2003

and provided you agree to:

2. Submit/cite all data required for registration/reregistration of your product under FIFRA section 3(c) (5) or 4 (a) when the Agency requires all registrants of similar products to submit such data.
3. Make the labeling changed listed below before you release the product for shipment bearing the amended labeling:
 - a. Delete ticks from the bulleted items associated with a kill and repel claim for two weeks. There are no data or labeling supporting this duration of control. You may retain this pest claim though in the bullets without the residual claim.
4. Submit three (3) copies of your final printed labeling before you release the product for shipment.

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

If you have any questions please contact me at 703/308-6100

Sincerely yours,

George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division 7505C

Enclosure: as stated

FREEDOM SPOT ON

A SPOT ON FOR BITING FLY PROTECTION

- KILLS AND REPELS HORN FLIES, FACE FLIES, STABLE FLIES, HORSE FLIES, DEER FLIES, BLACK FLIES, HOUSEFLIES, GNATS, MOSQUITOES AND TICKS FOR UP TO TWO WEEKS.
- KILLS AND REPELS HORN FLIES, FACE FLIES, STABLE FLIES AND HOUSE FLIES FOR UP TO TWO WEEKS.
- KILLS AND REPELS TICKS AND MOSQUITOES FOR UP TO TWO WEEKS
- KILLS AND REPELS HORN FLIES, FACE FLIES, STABLE FLIES, HORSE FLIES, DEER FLIES, BLACK FLIES, HOUSEFLIES, GNATS, MOSQUITOES AND TICKS ON HORSES
- PROTECTS HORSES FROM HORN FLIES, FACE FLIES, STABLE FLIES, HORSE FLIES, DEER FLIES, BLACK FLIES, HOUSEFLIES, GNATS, MOSQUITOES AND TICKS FOR UP TO TWO WEEKS.
- PROTECTS HORSES FROM HORN FLIES, FACE FLIES, STABLE FLIES, HORSE FLIES, DEER FLIES, BLACK FLIES, HOUSEFLIES, GNATS, MOSQUITOES AND TICKS.
- AIDS IN THE CONTROL OF HORSE FLIES, DEER FLIES, MOSQUITOES AND BLACK FLIES ON HORSES.

FOR USE ON HORSES ONLY

ACTIVE INGREDIENT

PERMETHRIN* [CAS# 52645-53-1]	65.00%
INERT INGREDIENT	35.00%
TOTAL	100.00% [w/w]

* Cis/trans ratio: max 55%[±] cis and min 45%[±] trans

KEEP OUT OF REACH OF CHILDREN

CAUTION

SEE BACK PANEL FOR PRECAUTIONARY STATEMENTS

READ ALL DIRECTIONS BEFORE USING THIS PRODUCT

Star Horse Products, Inc.
5315 Avenida Encinas #232
Carlsbad, CA 92008

EPA Registration No. 72969-1
EPA Establishment No. 6175-LA-1

Each vial provides 14 days protection
Package contains 4 week supply

NET CONTENTS: 2 x 6 cc applicators

ACCEPTED
with COMMENTS
in EPA Letter Dated

DEC 12 2002

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the product
registered under EPA Reg.

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**PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION

Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling. Sensitivities can occur after using ANY pesticide product for animals. If signs of sensitivity occur wash area with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

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.

IF ON SKIN OR CLOTHING:

Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 to 20 minutes. Call a poison control center or doctor for treatment advice.

IF IN EYES:

Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. Remove contact lenses, if present, after first 5 minutes, then continue rinsing eyes. Call a poison control center 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 the Rocky Mountain Poison Control Center at 1-303-595-4869

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish. Do not apply directly to water, or areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when cleaning equipment or disposing of equipment washwaters.

STORAGE AND DISPOSAL STATEMENTS

Do not contaminate water, food or feed by storage or disposal

PESTICIDE STORAGE: Store in a cool, dry place. Protect from freezing.

PESTICIDE DISPOSAL: Call your local solid waste agency or [1-800-CLEANUP or equivalent organization] for disposal instructions. Unless otherwise instructed place in trash. Never pour unused product down the drain or on the ground.

CONTAINER DISPOSAL: Do not reuse empty container. Place in trash.

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 horses intended for food use
Not for use on foals under three [3] months old

Ready to use, no dilution necessary

Hold card in upright position. Point tip of tube up and away from user's face and body, then cut along the dotted line, using the cc marks on the body of the applicator as a guide apply the Freedom Spot-On as follows by gently squeezing the applicator:

One 14 day supply [this should be printed on the card at the top of each vial]

- 1] streak 1 cc on top of the croup.
- 2] streak 1 cc on the forehead under the forelock; take care to keep away from eyes and mucous membranes.
- 3] spot 1 cc to the back of each front leg below the elbow [2 cc total]
- 4] spot 1 cc above each hock, on the gaskin muscle [2 cc in total]

Place empty applicator in trash

Do not reapply for 14 days.

WARRANTY

Star B.P. Inc., warrants that this product conforms to the chemical description on the label. Star B.P. Inc., neither makes nor authorizes any agent or representative to make, any other warranty of fitness or of merchantability, guarantee or representation, express or implied, concerning this material. Star B.P. Inc.'s maximum liability for breach of this warranty shall not exceed the purchase price of this product. Buyer and user acknowledge and assume all risks and liabilities resulting from the handling, storage and use of this material which extend beyond the use of the product under normal conditions in accord with statements made on this label.