



75257-1

9-10-2004

11/11

Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060



United States  
Environmental Protection Agency  
Washington, DC 20460

<input type="checkbox"/>	Registration
<input type="checkbox"/>	Amendment
<input checked="" type="checkbox"/>	Other

OPP Identifier Number

### Application for Pesticide - Section I

1. Company/Product Number 75257-1	2. EPA Product Manager George LaRocca	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Star Business Products, Inc./Freedom 45 Spot-On for Dogs	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Star Business Products, Inc. 115 Greens View Drive Madison MI 39110 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

### Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____	<b>NOTIFICATION</b> SEP 10 2004
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.	
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.	

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

"Notification to make two verbiage changes to the label as per PRN 98-10. This notification is consistent with the provisions of PRN 98-10 and EPA regulations at 40 CFR 152.46 and no other changes have been made to the labeling or confidential statement of the product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to wilfully make a false statement to EPA. I further understand that if this notification is not consistent with the terms of PRN 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

### Section - III

1. Material This Product Will Be Packaged In:						2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____			
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container			If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>			
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper glued Stenciled				<input type="checkbox"/> Other _____			

### Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Iain Weatherston	Title Senior Regulatory Consultant	Telephone No. (Include Area Code) 623-535-4060
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Senior Regulatory Consultant	
4. Typed Name Iain Weatherston	5. Date August 29, 2004	

2/11

NOTIFICATION

SEP 10 2004

5.5"



**SMALL  
DOGS**



**33 LBS AND UNDER**

# Freedom

  
**SPOT-ON FOR DOGS** 45

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

**CAUTION**

**Hazards to Humans:** Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

**Hazards to Domestic Animals:** Consult a veterinarian before using this product on debilitated, aged or medicated animals. Consult a veterinarian before using on dogs with known organ dysfunction. Sensitivities can occur after using ANY pesticide product for animals. If signs of sensitivity occur, discontinue use, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

**Do not use on cats.**

May be toxic and potentially fatal if applied to or ingested by cats. Cats which actively groom or engage in close physical contact with treated dogs may be at risk of serious harmful effects.

**FIRST AID**

**IF ON SKIN OR CLOTHING:**

- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15 – 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 – 20 minutes. Remove contact lenses, if present, after 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 the Rocky Mountain Poison Control at 1-303-595-4869.

**ENVIRONMENTAL HAZARDS**

This product is extremely toxic to fish and other aquatic organisms. Do not apply directly to water.

**CHEMICAL HAZARDS**

Do not use or store near heat or open flame.

**STORAGE AND DISPOSAL STATEMENTS**

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

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

**CONTAINER DISPOSAL:**

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

**If partially filled.** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.



**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**

Ready to use, no dilution necessary.



- Hold tube in upright position pointing away from user's face and body. Break off tip or cut with scissors. Using the cc marks on the body of the applicator as a guide apply FREEDOM 45 SPOT-ON FOR DOGS™ as follows by gently squeezing the applicator.
- Part dog's hair between the shoulder blades.
- Apply the recommended amount of solution to the skin on the dog's back between the shoulder blades. For large and extra-large dogs, application of the solution to the skin directly in front of the base of the dog's tail is also required. SEE RECOMMENDED DOSING GUIDELINES BELOW.



Apply 1.5 cc of FREEDOM 45 SPOT-ON FOR DOGS™ to the skin of the dog's back between the shoulder blades.



Distributed by:  
STAR Horse Products NV Inc.  
Carson City, NV 89701  
© 2004 STAR Horse Products, NV Inc.

**WARRANTY**

STAR Horse Products NV, Inc., warrants that this product conforms to the chemical description on the label. STAR Horse Products NV, 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 Horse Products NV, 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 the label.

EPA Registration No. 75257-1-81021  
EPA Establishment No. 75844-CA-02



7.5"



3/11

5.5"

NOTIFICATION

SEP 10 2004

SMALL  
DOGS



33 LBS AND UNDER

# Freedom 45

SPOT-ON

## KILLS FLEAS, TICKS, MOSQUITOES, LICE and MITES on DOGS

- Kills, repels and prevents re-infestation of fleas for up to 5 weeks.
- Kills, repels and prevents re-infestation of ticks for up to 6 weeks.
- Kills and repels mosquitoes and biting flies for up to 4 weeks.



**DO NOT USE  
ON CATS**

**FOR USE  
ON DOGS  
AND PUPPIES  
OVER TWELVE  
WEEKS OF AGE**

**ACTIVE INGREDIENT**  
Permethrin\* (CAS# 52645-53-1) ... 45%  
**OTHER INGREDIENT** ... 55%  
Total 100%

\*Cis/trans ratio: max 35% (+) cis  
and min 45% (+) trans

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**  
SEE BACK PANEL FOR  
PRECAUTIONARY STATEMENTS

**NET CONTENTS:**  
3x 1/2 cc applicators

7.5"

5.5"



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

**CAUTION**

**Hazards to Humans:** Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

**Hazards to Domestic Animals:** Consult a veterinarian before using this product on debilitated, aged or medicated animals. Consult a veterinarian before using on dogs with known organ dysfunction. Sensitivities can occur after using ANY pesticide product for animals. If signs of sensitivity occur, discontinue use, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

**Do not use on cats.**  
May be toxic and potentially fatal if applied to or ingested by cats. **Cats which actively groom or engage in close physical contact with treated dogs may be at risk of serious harmful effects.**

**FIRST AID**

**IF ON SKIN OR CLOTHING:**

- Take off contaminated clothing.
- Rinse skin immediately with plenty and water for 15 - 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 - 20 minutes. Remove contact lenses, if present, after 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 the Rocky Mountain Poison Control at 1-303-595-4869.

**ENVIRONMENTAL HAZARDS**

This product is extremely toxic to fish and other aquatic organisms. Do not apply directly to water.

**CHEMICAL HAZARDS**

Do not use or store near heat or open flame.

**STORAGE AND DISPOSAL STATEMENTS**

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

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

**CONTAINER DISPOSAL:**

If empty. Do not reuse empty container. Place in trash or offer for recycling if available. If partially filled. Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.



**LARGE DOGS**



**33 LBS TO 65 LBS**

**DIRECTIONS FOR USE**

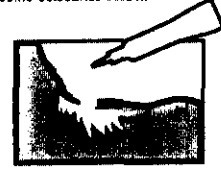
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**DO NOT USE ON CATS**

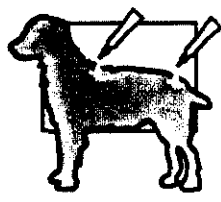
Ready to use, no dilution necessary.



- Hold tube in upright position pointing away from user's face and body. Break off tip or cut with scissors. Using the cc marks on the body of the applicator as a guide apply FREEDOM 45 SPOT-ON FOR DOGS™ as follows by gently squeezing the applicator.
- Part dog's hair between the shoulder blades.
- Apply the recommended amount of solution to the skin on the dog's back between the shoulder blades. For large and extra-large dogs, application of the solution to the skin directly in front of the base of the dog's tail is also required. SEE RECOMMENDED DOSING GUIDELINES BELOW.



Apply 1.5 cc of 45 SPOT-ON FOR DOGS™ to the skin of the dog's back between the shoulder blades and 1.5 cc to the skin directly in front of the base of the dog's tail.



Distributed by:  
STAR Horse Products NV Inc.  
Carson City, NV 89701  
© 2004 STAR Horse Products, NV Inc.

**WARRANTY**

STAR Horse Products NV, Inc., warrants that this product conforms to the chemical description on the label. STAR Horse Products NV, 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 Horse Products NV, 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 the label.

EPA Registration No. 75257-1-81021  
EPA Establishment No. 75844-CA-02



7.5"

5/11

NOTIFICATION

SEP 10 2004

5.5"



LARGE DOGS



# Freedom 45

SPOT-ON FOR DOGS

## KILLS FLEAS, TICKS, MOSQUITOES, LICE and MITES on DOGS

- Kills, repels and prevents re-infestation of fleas for up to 5 weeks.
- Kills, repels and prevents re-infestation of ticks for up to 6 weeks.
- Kills, repels and prevents re-infestation of mosquitoes for up to 4 weeks.



**DO NOT USE ON CATS**

FOR USE ON DOGS AND PUPPIES OVER TWELVE WEEKS OF AGE

ACTIVE INGREDIENT  
 Permethrin\* (CAS# 52643-39-1) 45%  
 OTHER INGREDIENT 55%  
 Total 100%

\*Chloroform ester: max 35% (4+) ch and min 45% (4+) trans

KEEP OUT OF REACH OF CHILDREN  
**CAUTION**  
 SEE BACK PANEL FOR PRECAUTIONARY STATEMENTS

NET CONTENTS 1 x 3 oz. application

7.5"



5.5"

# Freedom 45

SPOT-ON FOR DOGS

X-LARGE DOGS



### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

#### CAUTION

**Hazards to Humans:** Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.

**Hazards to Domestic Animals:** Consult a veterinarian before using this product on debilitated, aged or medicated animals. Consult a veterinarian before using on dogs with known organ dysfunction. Sensitivities can occur after using ANY pesticide product for animals. If signs of sensitivity occur, discontinue use, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

**Do not use on cats.**  
May be toxic and potentially fatal if applied to or ingested by cats. Cats which actively groom or engage in close physical contact with treated dogs may be at risk of serious harmful effects.

#### FIRST AID

##### IF ON SKIN OR CLOTHING:

- Take off contaminated clothing.
- Rinse skin immediately with plenty and water for 15 - 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 - 20 minutes. Remove contact lenses, if present, after 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 the Rocky Mountain Poison Control at 1-303-595-4869.

##### ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and other aquatic organisms. Do not apply directly to water.

##### CHEMICAL HAZARDS

Do not use or store near heat or open flame.

##### STORAGE AND DISPOSAL STATEMENTS

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

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

##### CONTAINER DISPOSAL:

**If empty.** Do not reuse empty container. Place in trash or offer for recycling if available.  
**If partially filled.** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

### 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

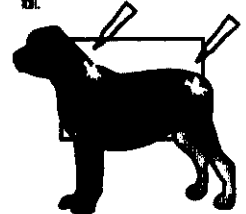
Ready to use, no dilution necessary.



- Hold tube in upright position pointing away from user's face and body. Break off tip or cut with scissors. Using the cc marks on the body of the applicator as a guide apply FREEDOM 45 SPOT-ON FOR DOGS™ as follows by gently squeezing the applicator.
- Part dog's hair between the shoulder blades.
- Apply the recommended amount of solution to the skin on the dog's back between the shoulder blades. For large and extra-large dogs, application of the solution to the skin directly in front of the base of the dog's tail is also required. SEE RECOMMENDED DOSING GUIDELINES BELOW.



Apply 3 cc of FREEDOM 45 SPOT-ON FOR DOGS™ to the skin of the dog's back between the shoulder blades and 3 cc to the skin directly in front of the base of the dog's tail.



Distributed by:  
STAR Horse Products NV Inc.  
Carson City, NV 89701  
© 2004 STAR Horse Products, NV Inc.

##### WARRANTY

STAR Horse Products NV, Inc., warrants that this product conforms to the chemical description on the label. STAR Horse Products NV, 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 Horse Products NV, 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 the label.

EPA Registration No. 75257-1-81021  
EPA Establishment No. 75844-CA-02



7.5"

7/11  
NOTIFICATION

SEP 10 2004

5.5"

X-LARGE  
DOGS

Freedom<sup>®</sup> 45  
SPOT-ON FOR DOGS

**KILLS FLEAS, TICKS, MOSQUITOES,  
LICE and MITES on DOGS**

- Kills, repels and prevents re-infestation of fleas for up to 5 weeks.
- Kills, repels and prevents re-infestation of ticks for up to 6 weeks.
- Kills, repels and prevents mosquitoes for up to 4 weeks.



**FOR USE  
ON DOGS  
AND PUPPIES  
OVER TWELVE  
WEEKS OF AGE**

**ACTIVE INGREDIENT**  
Permethrin<sup>®</sup> [CAS# 52645-53-1]...45%  
**OTHER INGREDIENT** .....55%  
Total 100%  
\*Cis/trans ratio: max 53% (+) cis  
and min 46% (+) trans

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**  
SEE BACK PANEL FOR  
PRECAUTIONARY STATEMENTS

**NET CONTENTS:**  
2x 6cc Applicators

7.5"

**Hazards to Humans:** Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before reuse.  
**Hazards to Domestic Animals:** Consult a veterinarian before using this product on debilitated, aged or medicated animals. Consult a veterinarian before using on dogs with known organ dysfunction. Sensitivities can occur after using ANY pesticide product for animals. If signs of sensitivity occur, discontinue use, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

**DO NOT USE ON CATS**  
 May be toxic and potentially fatal if applied to or ingested by cats. Cats which actively groom or engage in close physical contact with treated dogs may be at risk of serious harmful effects.

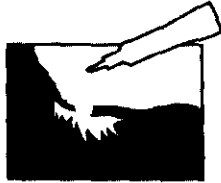
**DIRECTIONS FOR USE**  
 It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

- Ready to use, no dilution necessary.
- Hold tube in upright position pointing away from user's face and body. Break off tip or cut with scissors. Apply **FREEDOM 45 SPOT-ON FOR DOGS™** as follows by gently squeezing the applicator.



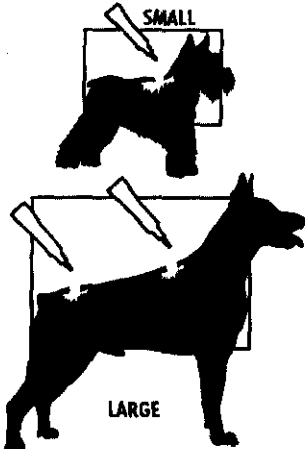
**DO NOT USE ON CATS**

- Part dog's hair between shoulder blades.



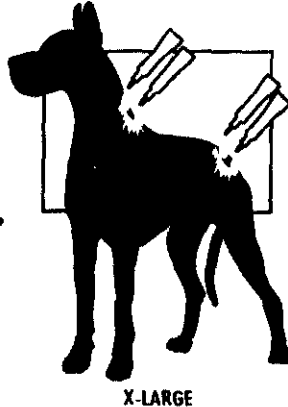
- Apply the recommended amount of solution to the skin on the dog's back between the shoulder blades. For larger and extra large dogs, application of the solution to the skin directly in front of the base of the dog's tail is also required. SEE RECOMMENDED DOSING GUIDELINES BELOW.

For dogs weighing 33lbs or less  
 Apply 1.5 cc of **FREEDOM 45 SPOT-ON FOR DOGS™** (1 tube) to the skin of the dog's back between the shoulder blades.



**SMALL**

For dogs weighing 33- 66lbs  
 Apply 1.5 cc of **FREEDOM 45 SPOT-ON FOR DOGS™** (1 tube) to the skin of the dog's back between the shoulder blades and 1.5 cc (a second tube) to the skin directly in front of the base of the dog's tail.



**X-LARGE**

For dogs weighing more than 66lbs  
 Apply 3.0 cc of **FREEDOM 45 SPOT-ON FOR DOGS™** (2 tubes) to the skin of the dog's back between the shoulder blades and 3.0 cc (another 2 tubes) to the skin directly in front of the base of the dog's tail.

**FIRST AID**

- IF ON SKIN OR CLOTHING:**
- Take off contaminated clothing.
  - Rinse skin immediately with plenty soap and 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 or doctor for treatment advice.

**POISON 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.

This product is extremely toxic to fish and other aquatic organisms. Do not apply directly to water.

Do not use or store near heat or open flame.

**STORAGE AND DISPOSAL STATEMENTS**

Do not contaminate water, food or feed by storage or disposal.  
**PESTICIDE STORAGE:** Store in cool, dry place. Protect from freezing.  
**CONTAINER DISPOSAL: If empty:** Do not reuse this container. Place in trash or offer for recycling if available. **If partially filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**WARRANTY**

STAR Horse Products NV, Inc., warrants that this product conforms to the chemical description on the label. STAR Horse Products NV, 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 Horse Products NV, 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 product which extend beyond the use of the product under normal conditions and in accord with statements made on the label.



Distributed By:  
 Star Horse Products NV, Inc.,  
 Carson City, NV 89701  
 ©2004 STAR Horse Products, NV Inc.  
 1.601.853.3811



©2003 Star business Products, Inc.



9/11

**Kills, Repels and Prevents Re-infestation\***

# Freedom<sup>45</sup>

**SPOT-ON FOR DOGS**

over twelve weeks of age



**Kills, repels and prevents re-infestation of:**

- Fleas for up to 5 weeks
- Ticks for up to 6 weeks

**Kills and repels mosquitoes for up to 4 weeks**

**Kills Lice and Mites for up to 4 weeks**

ACTIVE INGREDIENT  
 Permethrin (0.45-0.45-5.1%) 45.00%  
 OTHER INGREDIENTS 55.00%  
 TOTAL 100.00%  
 \*Kills fleas for up to 5 weeks, ticks for up to 6 weeks, mosquitoes for up to 4 weeks, and lice and mites for up to 4 weeks.

Package contains:  
 [12] month supply for puppies & small dogs or  
 [6] month for supply large dogs or  
 [3] month supply for extra-large dogs.

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**  
 SEE BACK PANEL FOR PRECAUTIONARY STATEMENTS  
 READ ALL DIRECTIONS BEFORE USING THIS PRODUCT



**STAR HORSE**  
 Star Horse Products NV, Inc.  
 Carson City, NV 89701  
 ©2004 STAR Horse Products, NV Inc.

Technology Sciences Group Inc.  
Arizona: Regulatory Division  
4061 North 156<sup>th</sup> Drive  
Goodyear, AZ 85338  
Phone: (623) 535-4060  
FAX (623) 535-4061  
E-Mail: jazkatz@qwest.net

10/11



Iain Weatherston, Ph.D.  
Senior Regulatory Consultant  
Pesticide Division

Ms. Sherada Hobgood  
Team Leader - Notification Team  
EPA - OPP - RD  
Crystal Mall Building #2  
1801 Bell Street  
Arlington, VA 22202

August 29, 2004

**SUBJECT:** Notification of verbiage changes the label of Freedom 45 Spot-On for Dogs

**COMPANY** Star Business Products Inc.,  
115 Greens View Drive  
Madison, MS 39110

**CONTACT:** Iain Weatherston  
Technology Sciences Group Inc.  
[Contact information as per letterhead]

**PRODUCT:** FREEDOM 45 SPOT-ON FOR DOGS [EPARN 75257-1-81021]

Dear Ms. Hobgood:

As agent for, and on behalf of Star Business Products, Inc. I wish to submit this letter of notification to change label verbiage, as described below, for the subject product.

As previously described [April 5, 2004 letter to George LaRocca] accompanying final product labels, this product although registered to Star Business Products is marketed solely as a distributor product sub-registered to Star Horse Products NV Inc., of Carson City, Nevada, 89701 hence the labels submitted as part of this notification carry that designation.

With this letter of notification we are making two verbiage changes to the label:

- 1] The claim relative to mosquitoes is changed from "kills mosquitoes ... on dogs for up to four weeks" to kills and repels mosquitoes on dogs for up to four weeks."
- 2] The container disposal statement for the empty container which was in error on the finished product labels submitted to you on April 5, 2004 has been corrected to match the statement on the March 15 stamped approved label.

The change in regard to mosquitoes is made under PRN 98-10 Section N since it involves no change in the ingredients statement, signal word, use classification, precautionary statements, First Aid statements, physical/chemical/biological properties, storage and disposal or directions for use. In previous iterations of the label the word "repel" was inadvertently omitted. This was not discovered until last week when it was noticed that the claims on the multi-pack version of the product differed from those on the product sold for use of animals within single weight ranges. The data

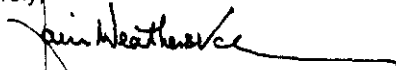
submitted in support of the claims on this label [MRID 46062801\*] and reviewed by Kevin Sweeney substantiate the repellency claim.

\* The actual data referenced for this claim is at pp 57 - 66 of this MRID.

This notification, in addition to this letter, contains a fully executed EPA Form 8570-1, the March 15, 2004 stamped approved label and one copy each of the labels for the four current product iterations.

If you have any questions or require further information please do not hesitate to contact me by e-mail at [jazkatz@qwest.net](mailto:jazkatz@qwest.net) or by telephone at 623-535-4060.

Sincerely,



Iain Weatherston

enclosures:\ EPA Form 8570-1  
Current SAL dated March 15, 2004  
FPL for multi-pack (complete label)  
FPL for extra-large dog package (complete label)  
FPL for large dog package (complete label)  
FPL for small dog package (complete label)

cc:(w/o) Cliff Miller (Star Horse Products NV. Inc.)  
Oleta Melnicoe (TSG Davis)