

75257-1

08/22/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

8-22-13

Ian Weatherson
J&T Associates LLC
4061 N. 156th Drive
Goodyear, AZ 85395

Subject: Amended Reregistration Label
Product Name: Freedom 45 Spot On For Dogs
EPA Registration Number: 75257-1

Dear Mr. Weatherson:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the reregistration of the above referenced product in connection with the permethrin RED(s), and has concluded that your submission is acceptable.

NOTE: This product is not being reregistered under sections 3(c)5 and 4(g) of FIFRA at this time.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label or durably marked on the container itself, and can be added by non-notification per PRN 98-10.

Please note that the record for this product currently contains the Confidential Statements of Formulation (CSFs) listed below. Any previously dated CSFs are superseded.

- Basic CSF and Alternate CSF dated 3-9-9

A copy of your label stamped "Accepted" is enclosed for the subject product. Products shipped after 12 months from the date of this amendment or the next printing of the label whichever occurs first, must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e).

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If you have any questions about this letter, please contact either Erik Kraft at (703-308-9358) or via email at Kraft.Erik@epa.gov or Richard J. Gebken at (703) 305-6701 or via e-mail at Gebken.Richard@epa.gov.

Sincerely yours,



Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Front panel

FREEDOM 45 SPOT ON FOR DOGS

(Cat/slash icon)

[] alternative or optional verbiage

For use on dogs and puppies over twelve weeks of age

DO NOT USE ON CATS

- [Kills, repels and prevents re-infestation of fleas for up to 5 weeks]
- [Kills, repels and prevents re-infestation for fleas for up to 4 weeks]
- [Kills, repels and prevents re-infestation of ticks for up to 6 weeks]
- [Kills, repels and prevents re-infestation of ticks for up to 4 weeks]
- [Kills or repels mosquitoes, lice and mites on dogs for up to 4 weeks]

ACTIVE INGREDIENT	
Permethrin*[CAS# 52645-53-1]	45.00%
OTHER INGREDIENTS	55.00%
TOTAL	100.00%

* Cis/trans ration: 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 Business Products
115 Green View Drive, Madison, MS 39110

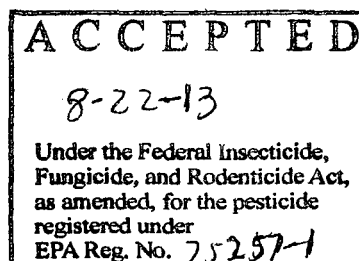
EPA Registration No. 75257-1
EPA Establishment No. 75844-CA-02

Package contains a two [2], three [3], four [4], twelve [12] month supply (as applicable)

Net Contents

3 x 0.5 fl oz applicators and 12 x 0.050 fl oz applicators.
3 x 0.1 fl oz applicators, 3 x 0.2 fl oz applicators.

3 x 1.5 cc applicators and 12 x 1.5 cc applicators
3 x 2.70 cc applicators, 3 x 6.0 cc applicators.



PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Hazards to Humans: 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 and before eating, drinking, chewing gum or using tobacco. Remove and wash contaminated clothing before re-use. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

Hazards to Domestic Animals: For external use on dogs only. Do not use on cats or animals other than dogs. Do not use on puppies under 8 weeks of age or < 5 lbs. Consult a veterinarian before using this product on debilitated, aged or medicated animals, pregnant or nursing pups. Consult a veterinarian before using on dogs with known organ dysfunction. Sensitivities can occur after 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. Signs of sensitivity include skin sensitivity, increased itchiness, redness, rash, hair discoloration or hair loss at the application site and lethargy.

DO NOT USE ON CATS.
May be toxic or potentially fatal if applied to or ingested by cats.
Accidental application to cats and/or grooming a recently treated dog may result in tremors and/or unconditional muscle movements. If this occurs, immediate veterinary care should be provided.

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 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 - 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 after the first 5 minutes, then continue rinsing.
- 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 for medical treatment advice.

SIDE EFFECTS

Monitor your dog after application. Side effects that rarely occur may include skin irritation such as redness, scratching or other signs of discomfort. If ingested, gastrointestinal signs of vomiting or diarrhea

have also been reported. If these or other side effects occur, consult your veterinarian or call 1-601-942-4869.

ENVIRONMENTAL HAZARDS

This product is extremely toxic to fish and other aquatic organisms. Do not allow treated dogs to go swimming for 12 hours following treatment.

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 and disposal.

PESTICIDE STORAGE: Store on 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 HANDLING (tubes): If empty: Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available.
If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

CONTAINER HANDLING (bottle): Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available
 If partly 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. Apply FREEDOM 45 Spot On For Dogs as follows by gently squeezing the applicator. Part dog's hair between shoulder blades. Apply specified 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 DIRECTED DOSING GUIDELINES BELOW.

Package for dogs weighing 33 lbs or less
 Apply 1.50 cc of FREEDOM 45 Spot On For Dogs to the skin of the dog's back between the shoulder blades.

Package for dogs weighing 33 - 66 lbs
 Apply 1.50 cc of FREEDOM 45 Spot On For Dogs to the skin of the dog's back between the shoulder blades and 1.50 cc to the skin directly in front of the base of the dog's tail.

Package for dogs weighing more than 66 lbs

Apply 3.00 cc of FREEDOM Spot On For Dogs to the skin of the dog's back between the shoulder blades and 3.00 cc to the skin directly in front of the base of the dog's tail.

Multi package

For dogs weighing 33 lbs or less

Apply 1.50 cc of FREEDOM 45 Spot On For Dogs (1 tube) to the skin of the dog's back between the shoulder blades.

For dogs weighing 33 - 66 lbs

Apply 1.50 cc of FREEDOM 45 Spot On For Dogs (1 tube) to the skin of the dog's back between the shoulder blades and 1.50 cc (a second tube) to the skin directly in front of the base of the dog's tail.

For dogs weighing more than 66 lbs

Apply 3.00 cc of FREEDOM 45 Spot On For Dogs (2 tubes) to the skin of the dog's back between the shoulder blades and 3.00 cc (another 2 tubes) to the skin directly in front of the base of the dog's tail.

Dosing Gun (For use only with the 240 and 480 cc bottles in kennels, shelters and boarding and grooming establishments)

Use the FREEDOM PRE-FIXED 1.50 cc dosing gun in the same manner as the individual tubes To mount the bottle on to the gun hold the gun upside down, slide bottle collar onto the bottle, insert puncture barb into bottle and then tighten the collar to the gun. Dose animals as specified above for individual tubes.

WARRANTY

Andrew M. Martin Co., NV Inc., warrants that this product conforms to the chemical description on the label. Andrew M. Martin Co., NV Inc., neither makes nor authorizes any agent or representative to make any other warranty or fitness or merchantability, guarantee or representation, express or implied, concerning this material. To the extent consistent with applicable law Andrew M. Martin Co., NV Inc.'s maximum liability for breach of this warranty shall not exceed the purchase price of this product. To the extent consistent with applicable law 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.

APPLICATOR TUBE

Front tube panel text: FREEDOM 45 SPOT ON FOR DOGS
PERMETHRIN INSECTICIDE 45%
EPA Reg # 75257-1

Back tube panel text: KEEP OUT OF REACH OF CHILDREN
CAUTION
DO NOT USE ON CATS or CAT/SLASH ICON

Read directions and precautions before use.

ALTERNATIVE MARKETING CLAIMS

[Kills five different kinds of pests on dogs] or [Kills 5 different kinds of pests on dogs]

[Kills five different canine pests] or [Kills 5 different canine pests]

Nylar® (IGR) kills flea eggs/larvae/pupae

Nylar® is a registered trademark of McLaughlin, Gormley, King Company

IGR - Insect Growth Regulator