



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

March 11, 2016

Mary M. Hunt  
Authorized Representative  
TruRx, LLC  
500 East Shore Drive  
Eagle, ID 83616

Subject: Notification per PRN 98-10 – adding two collar pack and marketing claims  
Product Name: PetAction Six Month Collar  
EPA Registration Number: 89609-2  
Application Date: 3/3/2016  
Decision Number: 514779

Dear Ms. Hunt:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped “Notification” and will be placed in our records.

Should you wish to add/retain a reference to the company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA’s Office of Enforcement and Compliance.

If you have any questions, you may contact Angela Hollis at 703-347-0216 or via email at [hollis.angela@epa.gov](mailto:hollis.angela@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", enclosed within a hand-drawn oval.

Kable Bo Davis, Product Manager 3  
Invertebrate and Vertebrate Branch 1  
Registration Division (7505P)  
Office of Pesticide Programs

[Note to Reviewer: [brackets] and/or (parenthesis) indicate optional text that may or may not appear on final printed labeling]

# PetAction Six Month Collar

## NOTIFICATION

89609-2

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

03/11/2016

**ABNs:**       **PetAction 6 Month Collar**  
                  **PetLock Six Month Collar**  
                  **PetLock 6 Month Collar**

[For Extruded Collars] **ONE SIZE FITS ALL**

[For Injection Molded Collars – Specified] **[ONE SIZE FITS ALL] [LARGE DOGS] [MEDIUM DOGS] [SMALL DOGS] [SMALL BREEDS] [PUPPIES 12 WEEKS & OLDER]**

[Flea & Tick Collar for [Large Dogs][Large/Medium Dogs][Medium Dogs][Medium/Small Dogs][Small Dogs]]

**DO NOT USE ON CATS**

### ACTIVE INGREDIENT

Deltamethrin ..... 4.0%

**OTHER INGREDIENTS** ..... 96.0%

Total ..... 100.0%

## **DO NOT ALLOW CHILDREN TO PLAY WITH COLLAR CAUTION**

See [Back][Insert] [or] [Side] Label [Panel(s)] for Additional Precautionary Statements

<b>FIRST AID</b>	
<b>If swallowed</b>	<ul style="list-style-type: none"> <li>• Call poison control center or doctor immediately for treatment advice.</li> <li>• Have person sip a glass of water if able to swallow.</li> <li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li> <li>• Do not give anything by mouth to an unconscious person.</li> </ul>
<b>If on skin or clothing</b>	<ul style="list-style-type: none"> <li>• Take off contaminated clothing.</li> <li>• Rinse skin immediately with plenty of water for 15 – 20 minutes.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>If in eyes</b>	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 - 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a poison control center or doctor for treatment advice.</li> </ul>
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may contact 1-855-844-4375 for human or animal emergency medical treatment information.	

**Net Contents:**

[For Extruded Collars] 0.9 oz. [each] (25.5 g) [(One Collar)(1 Collar)(Two Collars)(2 Collars)]  
[ADJUSTABLE - ONE SIZE FITS ALL]

[For Injection Molded Collars][One Collar][1 Collar][Two Collars][2 Collars] [each] 0.97 oz. (27.5 g) [One Size Fits All] (or) 0.65 oz. (18.4 g) [Small] (or) 0.85 oz. (24.1 g) [Medium] (or) 0.97 oz. (27.5 g) [Large] XX oz (XX g) [Multi Packs]

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

Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

**Use Restrictions**

Do not open package containing collar until ready to use. Do not use on puppies under 12 weeks. Do not use on cats. Consult a veterinarian before using this product on debilitated; aged, pregnant, medicated, or nursing animals. Sensitivities may occur after using ANY pesticide products for pets. If signs of sensitivity occur, remove collar and bathe your dog with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

**[PRODUCT INFORMATION]**

[PETACTION SIX MONTH COLLAR provides full season, up to 6 months protection against fleas and ticks.]

[Use PETACTION SIX MONTH COLLAR year round for [optimum][most effective][continuous] control.]

[Replace every 6 months or sooner if needed.]

[PETACTION SIX MONTH COLLAR contains deltamethrin insecticide and has been specially formulated in a polymer matrix to provide effective control of fleas and ticks for up to 6 months.]

[Maximum effectiveness may not occur for 2-3 weeks after collar placement.]

[Consider bathing your dog with an EPA registered flea and tick shampoo if your dog is infested to provide immediate relief from itching and biting before applying PETACTION SIX MONTH COLLAR [collar]].

[Fleas (*Ctenocephalides sp.*) on the dog will be killed.]

[Fleas which are present in the dog's environment that may infest your dog will be killed.]

[Ticks on the dog will be killed, including Brown dog tick (*Rhipicephalu sanguineus*), American dog tick (*Dermacentor variabilis*), and deer ticks (*Ixodes scapularis* and *Ixodes pacificus*) [which may transmit Lyme disease.]]

[Collar protects dogs from fleas and tick up to 6 months when worn continuously.]

[Apply new collar on dog every 6 months.]

**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 12 WEEKS AND OLDER**

**[Directions for Extruded Collars]**

Do not open (package)(tin)(carton) until ready to use. Dust forms on collar during storage. Do not get dust in mouth or eyes. Wipe collar with a damp paper towel or disposable cloth prior to applying, to remove dust on collar. Place collar around dog's neck, adjust for fit, and buckle in place. Leave 2 or 3 inches for extra adjustment. Cut off and dispose of any excess length by wrapping in newspaper and placing in trash. Wash hands after placing collar on dog.

**(OR)**

**[Directions for Injection Molded Collars]**

Do not open (package)(tin)(carton) until ready to use. Dust forms on collar during storage. Do not get dust in mouth or eyes. Remove collar from package and stretch to full length. [The tabs that held the collar in place will fall off when stretching; pull on any remaining tabs to remove them.] Wipe collar with a damp paper towel or disposable cloth prior to applying, to remove dust on collar. Place collar around dog's neck; adjust for fit by sliding the collar through the buckle and restraining loops. Cut off and dispose of any excess length by wrapping in newspaper and placing in trash. Wash hands after placing collar on dog.

**[Directions Continued for Extruded or Injection Molded Collars]**

The collar must be worn loosely to allow for growth of the dog and to permit the collar to move about the neck. Generally, a properly fitted collar is one that when fastened, will snugly slide over the dog's head. Maximum effectiveness may not occur for 2-3 weeks after collar placement. Water does not affect the collar's effectiveness or the pet's protection. If the dog goes swimming or is out in the rain, it is not necessary to remove the collar. PetAction Six Month Collar may be used in addition to a lead or constraint collar. Use only one PetAction Six Month Collar at a time. Collar should be worn continuously. Apply a new collar every 6 months.

**STORAGE AND DISPOSAL**

**Pesticide Storage:** Store this product in a cool, dry place away from children and pets.

**Pesticide Disposal and Container Handling:** Do not reuse container or used collar. Dispose of in trash.

**[WARRANTY]**

Read the entire Directions for Use and Warranty before using this product. By using this product, user or buyer accepts the following warranty. The directions for use of this product are believed to be adequate and must be followed carefully. It is impossible to eliminate all risks associated with the use of this product. Unintended consequences may result because of unknown factors. To the extent consistent with applicable law, the user or buyer shall assume all such risks. TruRx, LLC is committed to providing high quality products. To the extent consistent with applicable law, TruRx, LLC makes no warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise that extend beyond statements on this label. To the extent consistent with applicable law, TruRx, LLC, the manufacturer, or the Seller shall not be liable for indirect, special, incidental or consequential damages. To the extent consistent with applicable law, the exclusive remedy of the user or buyer shall not exceed the purchase price paid.]

**[The following claims/text are optional and may or may not appear anywhere on the final printed labeling:]**

**Fleas**

Kills Fleas [for up to 6 months]

Kills fleas that may (cause)(transmit) [anemia][bartonellosis][tapeworms][Flea Allergy Dermatitis (FAD)][flea bite dermatitis][flea bite anemia]

Kills fleas and may reduce the incidence of Flea Allergy Dermatitis (FAD)

Kills fleas which may be a source of flea allergy dermatitis] [(and) flea bite anemia][(and)tapeworm]

Prevents new flea infestations

Kills adult fleas [before they lay eggs]

Flea (control) (prevention) for dogs [& puppies 12 weeks and older]

**Ticks**

Kills Ticks [for up to 6 months]

Kills ticks that may (carry)(transmit) [Rocky Mountain Spotted Fever][babesiosis][anaplasmosis][Lyme disease]

Kills ticks for 6 months, including Deer ticks (vector of Lyme disease and anaplasmosis),

American dog ticks (vector of Rocky Mountain spotted fever and ehrlichiosis), and Brown dog ticks (vector of ehrlichiosis, anaplasmosis, bartonellosis, canine hemoplasmosis, babesiosis)]

Kills ticks that may transmit disease

Tick (control)(prevention) for dogs [& puppies 12 weeks and older]

Kills ticks (including deer ticks which may carry Lyme disease)]

Kills Fleas and Ticks [for up to 6 Months]  
Provides [long lasting] up to 6 months (control)(protection) [from fleas and ticks]  
Provides up to 6 months control [against fleas and ticks]  
Provides season long control of [fleas][and][ticks]

**Collar Fit Claims**

Collar Lock Design  
Perfect Fit [Design]  
Comfortable Collar Design  
Perfect [Fit] Design  
Perfect Adjust [Design]  
Lock in Place Design  
Won't Slide [Design]  
Slide [to] [and] Fit  
[New] Firm Buckle Design  
Slide [and] Stay Design  
Right Size [Design]  
Right Size Fit [Design]  
Fits neck up to [26"] [or 23"]  
Fits Neck to [specific inch size]  
Adjustable Collar Design  
Fits dogs of all sizes  
Comfort (fit)(design)  
Pressure release design  
Secure fit [design][for all size dogs]  
Adjusts for perfect fit  
[PetAction][PetLock] 6 month collar

**Other**

New [only for use up to 6 months after first release of shipment]  
6 Month Protection  
Six Month Protection  
Slow Release Formula  
Sustained release formula  
Full effect reaches at 2 to 3 weeks  
All weather collar  
Water does not affect (collar) (flea and tick control)  
Water does not affect collar or dog's protection  
Water resistant  
Waterproof  
Weatherproof  
All season collar  
Long Lasting [Protection][Control] [for up to 6 months]  
Continuous protection  
For [Dogs] [Large Dogs] [Medium Dogs] [Small Dogs][& Puppies 12 weeks & older] [Small Breeds]  
Convenient  
Easy to (use)(apply)(attach)  
Apply new collar every 6 months  
For dogs (and puppies) 12 weeks of age and older  
(gray)(red)(pink)(yellow)(white)(black) [collar] color  
Fits right over [existing] lead collar  
Multi[-]Pack  
For multiple dog [and puppy 12 weeks & older] households  
(Packaging)(Package)(Tin)(Carton)

Reliable alternative to flea and tick spot on treatment

**[other optional package claims]**

2 (two) collars (in) (1) (one) (per) (tin) (pack)

2 (two) (pack)

Dual pack

Value pack

Mega Pack

Twin Pack

Double Pack

Super Value (Pack)

Bonus (collar)

Pair

2 (two) (6 month) (Collars) (Pieces)

Perfect for 2 (two) dog households

Buy (x) get (x) free

2 (two) for the price of 1 (one)

(2) (Two) (Collars) (=) (provides) up to (12) (twelve month[s]) (365 days) (1 [one] year) Protection

Same active ingredient as Scalibor Protector Band for Dogs made by Merck Animal Health.

Contains [deltamethrin][the] same active ingredient as Scalibor Protector Band for Dogs [made by Merck Animal Health]"

Compare to Scalibor Protector Band for Dogs, contains deltamethrin, the same active ingredient

[PetAction][PetLock] Six Month Collar is not manufactured by or distributed by Merck Animal Health. Scalibor is a registered trademark of Merck Animal Health.

Recycle Logo

[MADE IN THE USA]

