

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

September 18, 2018

Maryanne Geisbush Regulatory Consultant Promika, LLC c/o Pyxis Regulatory Consulting Inc. 4110 136th St. Ct. NW Gig Harbor, WA 98332

Subject: Notification per PRN 98-10 – Minor label changes and marketing claims

Product Name: SALVO FLEA & TICK COLLAR FOR DOGS

EPA Registration Number: 91300-4

Application Date: 7/5/2018 Decision Number: 542847

Dear Ms. Geisbush:

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

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Sincerely,

Product Manager 03

Invertebrate & Vertebrate Branch 1

Registration Division (7505P) Office of Pesticide Programs

Primary brand name: SALVO™ FLEA & TICK COLLAR FOR DOGS

[ABN: ShieldTec Flea & Tick Collar for Dogs]

SALVO™ FLEA & TICK COLLAR FOR DOGS [ABN: ShieldTec Flea & Tick Collar for Dogs]

NOTIFICATION

91300-4

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:

09/18/2018

EPA Reg. No. 91300-4

{Sublabel 1: SALVO™ FLEA & TICK COLLAR FOR DOGS [ABN: ShieldTec Flea & Tick Collar for Dogs]}

[text in [] denotes optional language or notes to reviewer]

{text in {} denotes location of text on packaging, notes to reviewer, text that will not be on final label}

(text in () appears on label) {Front of Tin Container}

SALVO™ FLEA & TICK COLLAR FOR DOGS [ABN: ShieldTec Flea & Tick Collar for Dogs]

For use on Dogs 12 weeks of age and older
One collar provides 6-month flea and tick protection
Two collars provide up to a total of 12-month flea and tick protection

{When used, all three optional statements below will appear together on the same panel.}

[[Brand Name] [This product] contains deltamethrin, the active ingredient used in Scalibor® Protector Band for Dogs [Tick and Flea Collar for Dogs].]

Scalibor® is a registered trademark of [Merck Animal Health] [Intervet International].

[Brand Name] is not manufactured or by distributed by [Merck Animal Health][Intervet International].

Salvo™ [Product Name] is a trademark of Promika, LLC.

{Optional Marketing Claims}

ACTIVE INGREDIENT:

Deltamethrin	4.0%
OTHER INGREDIENTS	96.0%
Total	100.0%

This product contains the toxic inert ingredient Bis(2-ethylhexyl) adipate (DEHA) at 18.0%

DO NOT ALLOW CHILDREN TO PLAY WITH COLLAR CAUTION

[See Label Booklet on back of Tin] [See Label on back of Tin and Label Insert inside of Tin] for Additional Precautionary Statements, Directions for Use and First Aid Net Weight:

{Note to reviewer: for Injection molded Collars only:} [[Small/Medium][Two collars] 1.86 oz (52.6 g)[Two 0.93 oz. (26.3 g) Collars]]

[[Large/Extra Large] 2.31 oz (65.6 g) [Two 1.16 oz (32.8 g) Collars]]

{Note to reviewer: for Extruded Collars only; only one collar per tin}: [One size fits all.][0.97 oz. (27.5 g) One 0.97 oz. (27.5 g) Collar]]

{Note to Reviewer: option for up to two collars per package} [One][Two] Collar[s]][Multi Packs] [[XX oz](XX g)]

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{Booklet Label, Page 1: the part of label that is adhered to the back of the round tin container and is visible before accordion-style label is opened or Insert Label, Page 1: the part of the label that is printed on the back of the round tin container and included on the label insert inside the container}

SALVO™ FLEA & TICK COLLAR FOR DOGS [ABN: ShieldTec Flea & Tick Collar for Dogs]

READ ENTIRE LABEL BEFORE EACH USE
USE ONLY ON [DOGS] [MEDIUM DOGS] [SMALL DOGS]
[SMALL BREEDS] [PUPPIES]
[DO NOT USE ON CATS]

[PRODUCT INFORMATION]

[[Product Name] [This collar kills fleas and ticks for up to [[6][six] months] [180 days].] Collar is a [double layer] sustained-release system [containing deltamethrin] combining the insecticidal actions of vapors and powders [working in [two] [three] ways to provide head to tail protection]. Thus, the collar has the effect of simultaneous usage of a spray and powder [in the control of fleas and ticks, including ticks that may carry Rocky Mountain spotted fever]. Use [Product Name] year-round for most effective control. [Replace every 6 months.]]

[Maximum effectiveness may not occur for 2-3 weeks after collar placement.] [If your dog is infested, you may consider shampooing your dog with an EPA registered [brand name] [flea and tick shampoo] to provide immediate relief from itching and biting before applying the [collar][product name]. Fleas (Ctenocephalides sp.) on the dog will be killed and ones which are present in the dog's environment that may appear on your dog will be killed. Collar will also kill ticks for up to [6 months] [180 days]. Collar will kill ticks including Brown dog tick (Rhipicephalu sanguineus), American dog tick (Dermacentor variabilis), and deer ticks (Ixodes scaplilaris and Ixodes pacificus), which may carry the Lyme disease. This collar should be worn continuously.] [Reapply a new collar every [6] months.]

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.

Do not open protective [pouch][package] inside of the tin until ready to use. Do not let children play with this collar

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 dogs. Sensitivities may occur after using ANY pesticide products for dogs. 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.

This collar is intended for use only as an insecticide and is not to be taken internally by humans or animals.

Manufactured for:

Promika, LLC

501 Cascade Pointe Lane 5000 Centre Green Way, Suite 102100

Cary, NC 27513 [BAR CODE AREA] EPA Reg. No. 91300-4

EPA Est. No.

[Manufactured in USA]
[Manufactured in France]
DO NOT USE ON CATS

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{Booklet label, Page 2: Accordion-style Booklet Label that is attached to the back of the round tin container or Insert Label, Page 2: included on the label insert inside the container}

Container of insert Laber, Fage 2. Included on the insert inside the Container		
FIRST AID		
 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 the poison control center or doctor. 		
	 Do not give anything by mouth to an unconscious person. 	
IF ON SKIN OR	Take off contaminated clothing.	
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 the first 5 minutes, then continue 	
	rinsing eye.	
	Call a poison control center or doctor for treatment advice.	
HOTH ME MUMBED		

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical treatment information, you may contact SafetyCall at 1-844-685-9173, twenty-four (24) hours a day, seven (7) days a week.

DIRECTIONS FOR USE

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

Do not open until ready to use. [Dust [will][may] form on collar during storage. Do not get dust in mouth or eyes.]

Only one collar is to be worn by your dog at any one time.

{Booklet Label, Pages 3 and 4 (if 4th page needed): Accordion-style Booklet Label that is attached to the back of the round tin container or Insert Label, Pages 3 and 4 (if 4th page needed): the part of the label included on the label insert inside the container}

[Option #1 for Extruded collars]

Place collar around dog's neck, adjust for fit, and buckle in place. 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. Leave 2 or 3 inches for extra adjustment. Cut off and dispose of excess length. Wash hands after [installing] [placing] collar on dog. Replace collar every [6][six] months.

[Option #2 for Injection molded collars]

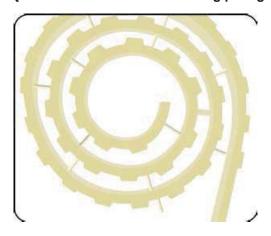
[Remove the collar from its packaging, separate the Peel-Away Comfort Strip and place in the trash.] Place collar around dog's neck and buckle in place [with the main clasp. Feed excess collar through the remaining two clasps for extra hold and a clean fit]. Adjust the collar for a snug fit to create contact between the collar and the dog's hair/coat for better product release and diffusion. A properly fitted collar will allow two fingers to be placed between the collar and dog's neck. The elasticity of the collar is designed to stretch in the event that the dog becomes entangled. Leave an excess of 1-2 notches (1/4 to $\frac{1}{2}$ inch) past the last clasp. Adjust periodically for growing dogs. Cut off and dispose of excess length. Wash hands after [installing] [placing] collar on dog. Replace collar every [6][six] months.

[Option #3 for Injection molded collars]

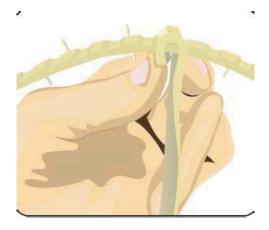
[[1.] Do not open until ready to use. Dust [will] form on collar during storage. Do not get dust in mouth or eyes. Take the collar out of the packaging and stretch to full length. [The tabs that held the collar in place [should][will] fall off when stretching; pull on any remaining tabs to remove them.]

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{Note to Reviewer: the following pictograms will appear only for Option #3 for Injection molded collars}



[[2.]-Bend the buckle in half between the holes in the buckle, so that you can easily pass the end of the collar through both holes.]



[[3.] Place the collar around your dog's neck. Feed the collar through both holes [[ridges][notches] facing out]. Fit to the neck of the dog. Generally, a properly fitted collar is one that, when fastened, will snugly slide over dog's head and two fingers can be placed between the collar and dog's neck. Leave [2 or 3] [1 or 2] extra inches for collar adjustment, cut off remaining excess collar and dispose of in the trash.]



[4.]-Wash hands after [installing] [placing] collar on dog. Replace collar every 6 months.]

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[OPTIONAL IMAGES FOR DIRECTIONS FOR USE FOR INJECTION MOLDED COLLAR]







Peel-Away Comfort Strip





STORAGE AND DISPOSAL

Do not contaminate water, food or feed by 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

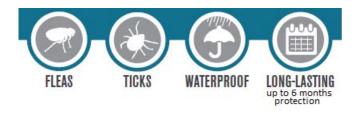
Read the entire Directions for Use and Warranty before using this Product. By using this product, user or buyer accepts the following warranty. The directions for use of this product are believed to be adequate and must be followed carefully. It is impossible to eliminate all risks associated with the use of this product. Unintended consequences may result because of unknown factors. All such risks shall be assumed by the user or buyer. Promika, LLC is committed to providing high quality products. To the extent consistent with applicable law, Promika, 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, Promika, 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.]

[Satisfaction guaranteed. If you are not satisfied, we will make it right with a replacement or refund.]

[In Case of Emergency, call 1-844-685-9173]

{END - Booklet Label or END - Insert Label}

[Optional images:





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{Optional Marketing Claims}

Fleas

- 1. [Kills Fleas [for up to 6 months]]
- 2. [Kills fleas that may cause anemia]
- 3. [Kills fleas that may cause bartonellosis]
- 4. [Kills fleas that may transmit tapeworms.]
- 5. [Kills [adult] fleas that may cause [Flea Allergy Dermatitis (FAD)][and][flea bite dermatitis]]
- 6. [Kills fleas and may reduce the incidence of FAD]
- 7. [Kills fleas that may cause anaplasmosis]
- 8. [Kills [adult] fleas which may cause flea bite anemia]
- 9. [Kills [adult] fleas which may transmit tapeworms]
- 10. [Kills Fleas for up to [6] [six] [months] [180 days] [!]]
- 11. [Kills fleas which may be a source of flea allergy dermatitis] [(and) flea bite anemia] [(and) tapeworm]
- 12. [Prevents new flea infestations]
- 13. [Kills adult fleas [before they lay eggs]]
- 14. [Flea [control][prevention] for dogs [& puppies]]
- 15. [Provides [long lasting 180 days] protection against fleas]
- 16. [Provides [long lasting 6 [six] month[s]] protection against fleas]

Ticks

- 1. [Kills Ticks[for up to 6 months]]
- 2. [Kills ticks for up to [6][six][months] [180 days][!]]
- 3. [Kills the Ticks that may carry Rocky Mountain Spotted Fever]
- 4. [Kills ticks that may cause babesiosis]
- 5. [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)]
- 6. [Tick [control][prevention] for dogs [& puppies]]
- 7. [Kills ticks [including deer ticks which may carry Lyme disease]]
- 8. [Provides [long lasting 6 month] protection against ticks]
- 9. [Provides [long lasting 180 days] protection against ticks]

Multiple Pests

- 1. [Kills Fleas and Ticks [for up to [6 Months] [180 days]]]
- 2. [Provides [up to] [6] [six] [months] control [of fleas [and] [&] ticks]
- 3. [Kills Fleas [and] [&] Ticks]
- 4. [Kills Fleas and Ticks* for up to 6 months per collar][*including Brown dog tick, American dog tick & deer ticks which may carry the Lyme disease]

Multiple Package Claims

- 1. [[2][Two] Collars = a total of [12][twelve] month[s] protection]
- 2. [Up to a total of [12][twelve] month[s] protection [against ticks and fleas] with [2][Two] collars][in][1][one][per][package]
- 3. [12 Month Protection: apply 1 collar every 6 months]

Collar Fit Claims

- 1. [Lock and Stay Design]
- 2. [Click and Stay Design]
- 3. [Click to Fit Design]
- 4. [Fits Just Right [Design]]
- 5. [Comfort Fit [Design]]
- 6. [Designed for Comfort]
- 7. [Rugged][and][weatherproof]
- 8. [Time Release formula]
- 9. [Modern Click to Fit Design]
- 10. [Pull and Click]
- 11. [Best Fitting Flea Collar]
- 12. [Stay in Place design]
- 13. [Clicks into place]
- 14. [Won't slide and stretch]

- 15. [Won't be too loose or too tight]
- 16. [Won't be too loose or too tight [...fits just right [!]]]
- 17. [Fits just right [Design]
- 18. [Fits just right ... won't be too loose or too tight]
- 19. [Right Size Collar [Design]]
- 20. [[New] Lock and Fit Design]
- 21. [Slide [to] [and] Fit [Design]]
- 22. [Fits securely] [Stays in place]
- 23. [Fit] [-] [and] Stay [Design]]
- 24. [Slide Fit [and] Stay Design]
- 25. [Right Fit [Design]]
- 26. [Right fit [Design]]
- 27. [Just Right Fit [Design]]
- 28. {For Extruded collars the following claims will be used}

[Fits All Size Dogs]

[Right Size Fit]

29. {For Injection molded collars the following claims will be used. These collars are offered separately for small/medium dogs and for Large/Extra-large dogs.}

[Small / Medium options: Fits Necks up to 20 inches]

[Large / X-Large: Fits Necks up to 25 inches]

[Large / X-Large: One size fits all dogs]

[Large / X-Large: One size fits all]

[Large / X-Large: Fits all size dogs]

- 30. [Grreat Fit]
- 31. [GRR...eat FIT]
- 32. [Grr.eat [Fit]]
- 33. [Adjustable]
- 34. [Cut to size]
- 35. [Size to fit]
- 36. [Fit to size]

All Other

- 1. [Long Lasting Protection for up to 6 months]
- 2. [Provides up to 6 months control of fleas and ticks]
- 3. [Continuous protection]
- 4. [For [Dogs], [Large Dogs], [Medium Dogs] [Small Dogs & Puppies] [Small Breeds]]
- 5. [[Features] insecticide-release technology]
- 6. [Wetting will not impair the collar's effectiveness or the dog's protection]
- 7. [Not affected by water] [Water resistant] [Waterproof]
- 8. [All Weather Collar]
- [Convenient]
- 10. [Easy to [use][apply][attach]]
- 11. [Apply new collar every 6 months]
- 12. [For dogs [and puppies] 12 weeks of age and older]
- 13. [Pup-cessory]
- 14. [Fits right over existing dog collar]
- 15. [Proprietary Triple Clasp System]
- 16. [With Peel-Away Comfort Strip][Value Pack]
- 17. [Multi[[-][Pack]
- 18. [Buy More and Save]
- 19. [Buy [X] Get [X] Free]
- 20. [Buy [X] and Save]
- 21. [Bonus Pack]
- 22. [For multiple dog [and puppy] households]
- 23. [Peel Here] [image of an arrow]
- 24. [Salvo® is a registered trademark of Promika, LLC]

EPA Reg. No. 91300-4