PRODUCT PERFORMANCE / EFFICACY REVIEW
Mark Suarez, Entomologist - IB

DATE: 21 December 2005
EPA REG. NUMBER: 2517-IO
PRODUCT NAME: Squeeze-On Flea & Tick Control for Dogs & Puppies
REGISTRANT: Sergeant’s Pet Care Products, Inc.
PM: George LaRocca, PM 13
REVIEWER: BeWanda Alexander
DECISION #: 351711
DP BARCODE: 318485
ACTION: R31
ACTIVE INGREDIENT(S): 109701, Permethrin.............................45.0%
129032, Pyriproxyfen............................1.9%
TYPE: Squeeze-On for Dogs/Puppies
OPPTS GUIDELINE(S): 810.1000
810.3000
810.3300
MRID: 46346601
46039501
46281101
GLP ?: No.
SITES: Dogs/Puppies
PESTS: Fleas, Ticks, Mosquitoes
STUDY APPLICATION RATE: variable.
LABEL APPLICATION RATE: 1.5 mL (dogs <33 lbs)
3.0 mL (dogs >33 lbs)
ENTOMOLOGIST’S COMMENTS AND RECOMMENDATIONS:

The registrant has cited data in support of the desired registration that were found to support previous registrations. In particular the data originally submitted in connection with EPA Reg. # 2517-87 provide support for the current registration action. Comments specific to the desired registration are provided below.

Recommendations:

1. Remove the following marketing claims:
   a. Mosquitoes are Vectors of Heartworm Disease
   b. Mosquitoes are carriers of West Nile Virus
   c. Mosquitoes are carriers of Heartworm and West Nile Virus
   d. Any and all claims associated with West Nile Virus
   e. Control claims
   f. 5 Way Protection, Kills Fleas, Ticks, Mosquitoes, Flea Eggs and Larvae

2. Revise the following:
   a. Marketing claims:
      i. Kills and repels fleas & ticks for up to a month – replace with up to 3 to 4 weeks.
      ii. Kills and repels fleas for up to 1 month – replace with up to 3 to 4 weeks.
   b. Directions for use:
      i. The current label has only 2 weight classes of dogs. Those >33 lbs are to receive 1.5 mL; those >33 lbs are to receive 3.0mL.
      ii. Replace the two weight classes, including all directions for application, with the approved rate application rates per EPA Reg. # 2517-87:
          1. <15 lbs – 1.0mL
          2. 15-33 lbs – 1.5 mL
          3. 33-66 lbs – 3.0 mL
          4. >66 lbs – 4.5 mL