

## HARTZ STATEMENT

\*While Hartz is the leader in flea and tick retail sales, Hartz flea and tick drops accounted for **only four percent of all adverse effects** reported to the EPA in 2009 for topical dog and cat flea and tick treatments – the lowest reported of all major manufacturers. In addition, from 2008 to 2009, Hartz reduced the amount of adverse effects reported per total Hartz doses sold by over 36 percent. During this same time frame, Hartz increased doses sold by almost three percent. Per the EPA, most reported incidents were classified as minor, meaning effects were minimally bothersome and rapidly resolved.

\* We are confident in the quality and safety of our products, and will continue to work with the EPA on labeling and other matters to make sure our consumers better understand the proper use of these products and use them with confidence. Hartz agrees with the EPA on the importance of carefully following label directions when applying topical flea and tick control products to pets.

\* The Hartz Mountain Corporation believes that all pets deserve the best care possible. Safety is our number-one priority. We want to help families use our products properly to ensure the safety of their pets.

\* We are confident in the quality of our topical flea and tick products, including Hartz® UltraGuard® and Hartz® InControl® brands for dogs and cats, all of which are held to the same safety and efficacy testing standards and labeling direction as all EPA-registered flea and tick products.

\* Because safety is our number-one priority, we undertake rigorous clinical tests on all our products. All EPA-approved topical flea and tick products sold through retail channels are held to the same safety and efficacy testing standards as those brands purchased from veterinarians. Labeling direction mandated by the EPA is also consistent for all flea and tick prevention products sold through retail channels or veterinarian offices.

\* Customers who would like more facts about Hartz can visit [www.hartzultraguard.com](http://www.hartzultraguard.com).

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## BAYER STATEMENT

On April 16th, 2009 the EPA issued a Public Advisory regarding an increase in pet adverse effects from the use of spot-on flea and tick products. The notice also included guidance regarding the proper use of these products and instructions on how to report any adverse effects. All spot-on flea and tick products registered by the EPA were involved in this review.

During the period under review by the EPA, there was not an increase in the number of reported adverse events for Bayer's spot-on products in relation to the number of pets treated. Those rates have remained constant at very low levels since the products launched.

The EPA Analysis and Mitigation Plan announced on March 17<sup>th</sup>, 2010 was fully analyzed by Bayer. At that registrant meeting, Bayer and EPA agreed that Bayer spot on products had a very

low rate of adverse events, and that there was no increase in rates during the period in question. Bayer has and will continue to work with EPA regarding further analysis and outcomes.

Bayer firmly supports efforts by EPA to increase consumer education regarding the responsible and proper use of flea and tick products.

Bayer Animal Health strongly encourages consumers to seek guidance regarding the proper use of all products administered to their pets. The division is committed to ensuring that its products are used correctly, according to label directions.

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### **MERIAL STATEMENT**

The EPA flea and tick products initiative was prompted by what it characterized as a 'sharp increase' it had noted from 2007 to 2008 in the number of reported adverse events related to the use of these products. Merial's data indicate that this is not the case for FRONTLINE. In fact, the number of adverse events reported for FRONTLINE has remained consistently low since the product's introduction in 1996.

The EPA's analysis also shows that the overall numbers of adverse events reported for FRONTLINE products are extremely low and the vast majority are minor, for example, skin irritation at the application site. Furthermore, the analysis showed that many adverse events were due to misuse of products.

Over one billion doses of FRONTLINE have been sold, so there is extensive experience with the product in marketed use. FRONTLINE remains the number one flea and tick product recommended by veterinarians. We are currently working cooperatively with the EPA to help pet owners continue to use our products properly.

FRONTLINE brand products are applied on the pet's skin, between the shoulder blades. Following application, the product spreads over the pet's body by a process called translocation and is gradually dispersed by the pet's natural oils, collecting in the oil glands in the skin. It is then "wicked" onto the hair over the next 30 days. The translocation process can take up to 24 hours to complete.