## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

March 19, 2013

Ms. Deborah Chadbourne Sergeant's Pet Care Products, Inc. 10077 South 134<sup>th</sup> Street Omaha, NE 68138-3710

Subject:

Amended label to revise efficacy claims for ticks on cats, and to add marketing

claims related to an alternate collar production method

Product Name: Sergeant's Dual Action Flea & Tick Collar (with d-phenothrin)

EPA Registration No. 2517-61 EPA Decision No. 467903

Dear Ms. Chadbourne:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable. A stamped copy of the label is enclosed for your records. Please submit one copy of your final printed labeling before you release the product for shipment. Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please contact Julie Chao at (703) 308-8735 or chao.julie@epa.gov.

Regards,

John Hebert, Product Manager (07) Insecticide-Rodenticide Branch Registration Division (7505P)

Enclosure

## geant's Master Label

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### FRONT PANEL

[27] [Fits neck up to [XX"]]

[28] [Fits Neck to [specific inch size]]

# DUAL ACTION FLEA & TICK COLLAR (with D-PHENOTHRIN)

### Sergeant's Dual Action Flea & Tick Collar (with d-phenothrin)

(ABN)	[Bansect Flea & Tick Collar for Dogs]	
` .	[Bansect Flea & Tick Collar for Cats over twelve [12	weeks of age
(ABN)	[Bansect Flea & Tick Collar for Cats *]	
	[Sergeant's Triple Protection Flea & Tick Collar]	
	[Sergeant's Dual Action Flea & Tick Collar for Cats	
	Sergeant's Dual Action Flea & Tick Collar for Cats	
	[Sergeant's Dual Action Flea & Tick Collar for Smal	
	[Sergeant's Dual Action Flea & Tick Collar for Smal	
	[Sergeant's Dual Action Flea & Tick Collar for Dogs	
	[Sergeant's Dual Action Flea & Tick Collar for Larg	
	[Sentry PurrScriptions Dual Action Flea & Tick Coll	
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	[Sentry Dual Action Flea & Tick Collar for Small Do	
	[Sentry Dual Action Flea & Tick Collar for Small Do [Sentry Dual Action Flea & Tick Collar for Dogs]	igs & ruppies"]
	[Sentry Dual Action Flea & Tick Collar for Large Do	ogs]
(MADIA)	Schilly Dual Action Flea & Flex Conai for Large De	<sup>,</sup> 601
Ontio	nal Claims for Collars Labeled for DOGS OR CA	TSı
	[Lock and Stay Design]	\
	[Click and Stay Design]	
	[Click to Fit Design]	
	[Fits Just Right] [Design]	
	[Comfort Fit] [Design]	ACCEPTED
	[Designed for Comfort]	MAR 1 9 2013
	[Rugged]	Under the Federal Insecticide, Fungicide,
[8]	[Time Release formula]	and Rodenticide Act, as amended, for the
[9]	[Modern Click to Fit Design]	pesticide registered under:
[10	)] [Pull and Click]	•
	[Best Fitting Flea Collar]	EPA. Reg. No: 2517-61
_	2] [Stay in Place design]	EPA. Rey. IVO.
	B] [Clicks into place]	
_	[Won't slide and stretch]	
-	[Won't be too loose or too tight]	
	[!]] [Won't be too loose or too tight [ fits just right [!]]]	
~	7] [Fits just right [Design]]	
-	3] [Fits just right won't be too loose or too tight]	
	9] [Right Size Collar [Design]]	
	)] [New Lock and Fit Design]	
	[] [Slide [to] [and] Fit [Design]]	
	[2] [Fit] [-] [and] [-] Stay [Design]]	
_	3] [Slide Fit [and] Stay Design]	
	4] [Right Fit [Design]] 5] [Just Right Fit [Design]]	•
_	[Just Right Pit [Design]]	
140	1 Leight in [Dough]]	

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- [29] [Kills [adult] fleas which may cause flea bite anemia.]
- [30] [Kills [adult] fleas which may cause flea allergy dermatitis.]
- [31] [Kills [adult] fleas which may transmit tapeworms.]
- [32] [[Fresh] [Powdery] [Clean] Scent]]
- [33] [Deodorizes]
- [34] [Deodorizing]

### [Optional Claims for Collars labeled for DOGS:]

- [1] [For [Dogs], [Large Dogs], [Medium Dogs] [Small Dogs & Puppies over twelve [12] weeks of age] [small breeds]
- [2] [Works in as little as twenty-four hours]
- [3] [Fits Neck to [12.5"][14"] [20"] [26"]]
- [4] [Long Lasting [Flea] [and] [Tick] Protection for up to [3] [three] [90 days] [4] [four] [120 days] [5] [five] [150 days] [6] [six] 180 days][ months]]
- [5] [Up to [3] [three] [90 days] [4] [four] [120 days] [5] [five] [150 days] [6] [six] 180 days] [month's protection against [fleas] [and] [ticks] [!]]
- [6] [Fast-Acting]
- [7] [Quick Kill]
- [8] [Kills Fleas and Ticks for up to [3] [three] [90 days] [4] [four] [120 days] [5] [five] [150 days] [6] [six] 180 days]
- [9] [Kills the Ticks that may carry [Lyme Disease] [Rocky Mountain Spotted Fever]]
- [10] [Notched to fit securely on any size dog]
- [11] [Fits securely on any size dog]
- [12] [Grrreat Fit]
- [13] [GRR...eat FIT]
- [14] [Grr.eat[ Fit]]

### [Optional Claims for Collars labeled for CATS:]

- [1] [For cats over twelve [12] weeks of age]
- [2] [Works in as little as twenty-four hours against fleas]
- [3] [Works in as little as forty-eight hours against [Dermacentor variabilis] [American dog] [Wood] ticks]
- [4] [Fits Neck [up] to [12.5"][14"] [XX"]]
- [5] [Fits Cats of All Sizes]
- [6] [Up to [3] [three] [90 days] [4] [four] [120 days] [5] [five] [150 days] [6] [six] 180 days][ month's protection against fleas[!]]
- [7] [Long Lasting Flea Protection for up to [3] [three] [90 days] [4] [four] [120 days] [5] [five] [150 days] [6] [six] 180 days][ months]]
- [8] [Long Lasting Tick Protection for up to [3] [three] [90 days] [months]]
- [9] [Long Lasting Flea and Tick Protection for up to [3] [three] [months] [90 days]
- [10][Controls fleas for up to [6] [six] months [180 days]]
- [11] [Fast-Acting against Fleas]
- [12] [Kills Fleas for up to [3] [three] [90 days] [4] [four] [120 days] [5] [five] [150 days] [6] [six] [180 days] [months]]
- [13] [Kills Ticks for up to [3] [three] months]
- [14] Kills Fleas and Ticks for up to [3] [three] months]
- [15] [Kills the Ticks that may carry Rocky Mountain Spotted Fever for up to [3] [three] months]
- [16] [Kills [Dermacentor variabilis], [Ambloyomma americanum], [Rhipicephalus sanguines] and [Ixodes sacpularis] ticks]
- [17] [Kills [American dog ticks], [lone star ticks], [brown dog ticks], and [deer] ticks]
- [18] [Kills the ticks that may carry Lyme Disease for up to [3] [three] [months] [90 days]]
- [19] [Kills the ticks that may carry Rocky Mountain Spotted Fever and Lyme Disease for up to [3] [three] [months] [90 days]]
- [20] [Purrrfect Fit]
- [21] [Purrfect Fit]

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{for use with ABNs as indicated by asterisk}

[\*over twelve [12] weeks of age]

### **ACTIVE INGREDIENTS:**

Propoxur [o-Isopropoxyphenyl methylcarbamate] [CAS #114-26-1]	9.00%
[d-(cis,trans)] phenothrin* [CAS #26002-80-2]	3.00%
N-Octyl bicycloheptene dicarboximide [CAS #113-48-4]	3.00%
OTHER INGREDIENTS:	
TOTAL	100.00%

<sup>\*</sup>cis/trans isomer ratio: Max. 25% (+/-)cis Min. 75% (+/-) trans

## DO NOT ALLOW CHILDREN TO PLAY WITH COLLAR CAUTION

See [Back][or][Side] [Label] [Panel(s)] for Additional Precautionary Statements Net Weight: XX

## rgeant's Master Label

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**BACK/SIDE PANEL** 

DUAL ACTION FLEA & TICK COLLAR (with D-PHENOTHRIN)

### {Product Name}

READ ENTIRE LABEL BEFORE EACH USE.

USE ONLY ON [DOGS] [MEDIUM DOGS] [SMALL DOGS] [SMALL DOGS] [SMALL BREEDS] [PUPPIES over twelve [12] weeks of age] [CATS over twelve [12] weeks of age]

[KITTENS over twelve [12] weeks of age]

### [PRODUCT INFORMATION]

[[[Product Name] [{FOR DOG COLLAR}] [This collar] kills fleas and ticks for up to 6 months.] [{FOR CAT COLLAR}] [This collar] kills fleas and ticks for up to 3 months.] [Collar] is a [double layer] sustained-release system [containing three active agents] combining the insecticidal actions of vapors and powders [working in [two] [three] ways to provide fast acting quick kill and head to tail protection]. [[Thus,] 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] [Lyme Disease]]. Use [this product] [Product Name] year round for most effective control. [Replace every 6 months or sooner if needed.]]

# PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

HAZARDS TO HUMANS: Harmful if swallowed. Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

HAZARDS TO DOMESTIC ANIMALS: Collar is for external use only, not to be taken internally. Some animals may become irritated by any collar. If this occurs, remove collar. If condition persists, consult a veterinarian. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant or nursing animals. Do not use on pets under 12 weeks of age. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur remove collar and bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

[Notice: This product contains a chemical (o-Isopropoxyphenyl methylcarbamate) known to the State of California to cause cancer.]

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FIRST AID		
IF SWALLOWED:	<ul> <li>Call a poison control center or doctor immediately for treatment advice.</li> <li>Have person sip of glass of water if able to swallow.</li> </ul>	
	<ul> <li>Do not induce vomiting unless told to do so by the poison control center or doctor.</li> </ul>	
	• 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.	
	<ul> <li>Call a poison control center or doctor for treatment advice.</li> </ul>	
IF IN EYES:	<ul> <li>Hold eye open and rinse slowly and gently with water for 15-20 minutes.</li> </ul>	
	• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.	
	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 1-800-781-4738 for emergency medical treatment information.

#### NOTE TO PHYSICIAN/VETERINARIAN:

Dust released by this collar is a cholinesterease inhibitor. Atropine is antidotal. Do not use this product on animals simultaneously or within 30 days or after treatment with or exposure to cholinesterease inhibiting drugs, pesticides or chemicals. However, flea and tick collars may be immediately replaced.

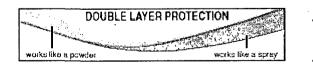
#### **DIRECTIONS FOR USE**

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

{NOTE: One of the following alternate directions for use will be included on the label as appropriate for the production process.}

### [OPTIONAL ALTERNATE DIRECTIONS FOR USE FOR EXTRUDED COLLARS]

Do not open until ready to use. Dust will form on collar during storage. Do not get dust in mouth or eyes. Place collar around pet's neck, adjust for fit, and buckle in place. The collar must be worn loosely to allow for growth of the pet and to permit the collar to move about the neck. Generally, a properly fitted collar is one that when fastened, will snugly slide over pet's head. Leave 2 or 3 inches for extra adjustment. Cut off and dispose of excess length. Wash hands after installing collar on pet. Replace collar every six months, or sooner if needed.



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## ∟geant's Master Labe

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### [OPTIONAL ALTERNATE DIRECTIONS FOR USE 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.]]

[[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 pet's neck. Feed the collar through both holes [[ridges][notches] facing out]. Fit to the neck of the [pet] [dog] [cat]. The collar must be worn loosely to allow for growth of the pet and to permit the collar to move about the neck. Generally, a properly fitted collar is one that, when fastened, will snugly slide over pet's head[, and two fingers can be placed between the collar and pet'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.]





[NOTE: optional dog image for dog collar, cat image for cat collar.]

[[4.] Wash hands after installing collar on pet. Replace collar every 6 months, or sooner if needed.]

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### STORAGE AND DISPOSAL

**PESTICIDE STORAGE:** Store only in original container in a cool, dry area inaccessible to children and pets. Protect from freezing.

**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Nonrefillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Dispose of expired collar 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.] Sergeant's is committed to providing high quality products. To the extent consistent with applicable law, Sergeant's 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, Sergeant's, 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.]

[Sergeant's Pet Care Products, Inc. is committed to providing high quality products.] [If you have questions or comments about this product, please write: Sergeant's Consumer Response, P.O. Box 540399, Omaha, NE 68154-0399.]

In Case of Emergency, call: 1-800-781-4738 Non-Emergency call 1-800-224-PETS (7387)

[PRODUCT COUPONS]
[Made in USA] {lot, date & label code}

Distributed by: Sergeant's Pet Care Products, Inc. Omaha, NE 68138-3710 [BAR CODE AREA] EPA Reg. No. 2517-61 EPA Est. No. XXXXX-XX-XXX

END - BACK/SIDE PANEL

DUAL ACTION FLEA & TICK COLLAR (with D-PHENOTHRIN)