

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAY 2 3 2007

Ana Rodriquez-Koster Agent for Sergeant's Pet Care Products Inc. Lewis & Harrison 122 C Street, N.W., Suite 740 Washington, DC 20001

Subject:

Amendment - Revise First Aid Statement

Sergeant's Cyphenothrin + IGR Squeeze-On for Dogs

EPA Reg. No. 2517-80

Application Dated: May 22, 2007

Dear Ms. Rodriquez-Koster:

The labeling referred to above, submitted in connection with registration under the Federal, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy of the label is enclosed for your records.

If you have any questions in this regard please feel free to contact me at (703) 305-6100.

Sincerely,

George T. LaRocca Product Manager 13 Insecticide Branch

Registration Division (7505P)

Under the Federal Insections, Fungiolds, and Rodenticide Act, se amended, for the pestloide registered under EPA has Hu. 2517-80

[CARTON LABEL - DRAFT MASTER LABEL COPY]

Sergeant's Cyphenothrin+IGR Squeeze-On for Dogs (ABN) Sergeant's Gold Flea and Tick Squeeze-On for Dogs [(ABN) Sergeant's Gold Squeeze-On for Dogs]

[(ABN SentryPro XFC Squeeze-On for Dogs] [(ABN) SentryPro XFC Flea and Tick Squeeze-On for Dogs]

• DO NOT USE ON CATS [Box/Icon with Cat Image and Cross-Out]

[• Flea & Tick Control for Dogs & Puppies 12 weeks old and older]

[• [12 week],[16],[20], [24][28] [32] [52] Week Supply For Dogs weighing [more than 9]

lbs],[9 to 20 lbs], [21 to 39 lbs] [40 to 60 lbs] [61 lbs and over]*

[Works up to [4] [four] Weeks!]

[Protects for up to [4] [Four] Weeks']

[Kills fleas, ticks, mosquitoes, flea eggs, and flea larvae]

[• [Five] [5] Way Protection [Kills fleas, ticks, mosquitoes, flea eggs & flea larvae]]*

[• Five Way Protection! Kills ticks, mosquitoes fleas, flea eggs & flea larvae]*

[• 5 Way Protection! Kills ticks, mosquitoes, fleas, flea eggs & flea larvae]*

[• [4 Week] [Flea Tick & Treatment]*

[• [Four (4) Week] [Flea and Tick Control]*

[• With Nylar 8 Insect Growth Regulator which Breaks the Flea Life Cycle]*

[With Nylang to Break Flea Life Cycle]*

[• With Insect Growth Regulator to Break Flea Life Cycle]*

[• Dual Action [!]: Cyphenothrin with Nylar & IGR Effectively Breaks the Flea Life Cycle]*

[• Dual Action [!]: Effectively Breaks the Flea Life Cycle[!]]*

J. For Dogs & Puppies (Over 12 Weeks of Age) and greater than 9 lbs.]

[• For Dogs & Puppies (Over 12 Weeks of Age) 9 to 20 lbs.]

[• For Dogs & Puppies (Over 12 Weeks of Age) 21 to 39 lbs.]

[• For Dogs & Puppies (Over 12 Weeks of Age) 40 to 60 lbs.]

[• For Dogs & Puppies (Over 12 Weeks of Age) 61 lbs and Over]

[• Three Applications (for cartons with 3 applicators)] and/or [3 Month Supply] or [12] Week Supply]

[• For Dogs [more than 9 lbs.] or [9 lbs. to 20 lbs.] or [21 lbs. to 39 lbs.] or [40 lbs. to 60 lbs.] or [61 lbs. and Over]]

[• Breaks Flea Life Cycle!]*for up to 9 weeks]

[Controls reinfestation for up to 9 weeks!]

[• Best if used year round!]

[• Kills & Repels Fleas Up to [4 weeks]!]*

- Kills [& Repels] fleas in as little as I hour!]
- Kills [& Repels] ticks in as little as 3 hours!]
- [Kills fleas [in as little as I hour], ticks [in as little as 3 hours], [mosquitoes]. [flea eggs & flea larvae]
- [Kills [and Repels]]

- Fleas [in as little as 1 hour]
- Ticks [in as little as 3 hours]
- [Mosquitoes]
- [Kills for [9 weeks] [63 days]]
 - [flea eggs]
 - [flea larvae]
- [(ICON Showing 4 Week Protection)]
- [4 Week Dose!]
- [1 Month Dose!]
- [Prevents ticks from attaching and feeding in as little as 3 hours after application]
- [Kills and Detaches Ticks]
- [Easy to Use Application]
- [Specially Formulated for Dogs and Puppies]
- [4 Week Protection!]
- [[Free] Calendar Stickers Inside!]
- [[Free] Brochure Inside!]
- [[Free] Brochure and Calendar Stickers Inside]
- [Patented Technology]
- [• Kills Flea Eggs & Flea Larvae for more than [63 days], [9 weeks]!]*
- [Prevents Flea Eggs From Developing Into Biting Adults] *
- [• Kills & Repels Ticks for Up to [4 weeks]!]*
- [• Kills & Repels Deer Ticks (vector of Lyme Disease) for up to 4 weeks]
- [• Kills & Repels Ticks (Including Deer Ticks) for up to 4 weeks]
- [• Kills & Repels Brown Dog Ticks [(Rhipicephalus sanguineus)] for up to 4 weeks!]

[CARTON LABEL - MASTER LABEL COPY]

- [• Kills & Repels American Dog Ticks [(Dermacentor variabelis)] for up to 4 weeks!]
- [• Apply once every [4 weeks]!]
- [• 4 week Flea and Tick Treatment!]

[One Month Flea and Tick Treatment]

- [• Kills & Repels Fleas and Ticks for up to 4 weeks!]
- J. Kills all stages of the flea life cycle]
- [• Kills Fleas, Ticks, Flea Eggs & Flea Larvae for up to 4 Weeks]
- [Kills [and Repels] mosquitoes]

[Dogs can be bathed 24 hours after squeeze-on is applied]

[• May contain graphics illustrating product use, e.g., dog with a drop falling onto its neck from a vial on front, side, or back carton label and/or applicator labeling.]

[] - Denotes Optional Statements and/or Images that May be Used on Front, Back or Side Label Panels

<u>*Note:</u> Underscored Claims To Be Based on New as well as Existing Product Performance (Efficacy) Data

[Ingredient Statement may be on front or back label]

ACTIVE INGREDIENTS:

Cyphenothrin (CAS# 39515-40-7)	40,0%
Pyriproxyfen (CAS# 95737-68-1)	$2.0^{\rm o}$ o
OTHER INGREDIENTS:	<u>58.0%</u>
TOTAL:	$^{60.001}_{0}$

Nylar® is a registered trademark of McLaughlin Gormley King Company. U.S. Patent No. 5,942,525

KEEP OUT OF REACH OF CHILDREN CAUTION

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

NET CONTENTS: [THREE] [FOUR] [SIX][TWELVE] 1.5 ml (0.05 fl. oz.) Tubes [THREE][FOUR][SIX][TWELVE] 3.0 ml (0.10 fl. oz.) Tubes [THREE][FOUR][SIX][TWELVE] 4.5 ml (0.15 fl. oz.) Tubes [THREE][FOUR][SIX][TWELVE] 6.0 ml (0.20 fl. oz.) Tubes

[BACK/SIDE CARTON LABEL - MASTER LABEL]

READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS AND PUPPIES OVER 12 WEEKS OF AGE. DO NOT USE ON CATS

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

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

FIRST AID	
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.
If on skin or clothing	Take off contaminated clothing.
	• Rinse skin immediately with plenty of water to 15 - 20 minutes.
	Call a poison control center or doctor for treatment advice.
If swallowed	Immediately call a poison control center or doctor.
	• Do not induce vomiting unless told to do so by a poison control center or doctor.
	• Have person sip a glass of water if able to do so.
	• Do not give anything by mouth to an unconscious person.
	HOTLINE NUMBER at container or label with you when calling a poison control center or doctor, or ent. You may also contact 1-800-781-4738 for emergency medical treatment
	NOTE TO PHYSICIAN OR VETERINARIAN Treat patient symptomatically

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. DO NOT USE ON CATS. May be toxic and potentially fatal if applied to or ingested by cats.

FOR EXTERNAL USE ON DOGS ONLY. Do not use on puppies under 12 weeks of age. Best if used year round. Consult a veterinarian before using this product on debilitated, aged, medicated, pregnant, or nursing dogs. Consult a veterinarian before using on dogs with known organ dysfunction. DO NOT USE ON CATS or animals other than dogs. Cats that actively groom or engage in close physical contact with treated dogs may be at risk of serious harmful effects. Sensitivities may occur after using ANY pesticide product on pets. If signs of sensitivity occur bathe your dog with a mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

How to apply: Remove product tube from package. Holding tube with top end pointing up and away from face and body, [snap or] cut off top end. Invert tube over dog and use open end to part dog's hair. Squeeze tube firmly to apply all of the solution to the dog's skin, as directed below. Repeat application may be made if necessary, but do not apply more often than once every 4 weeks.

[BACK/SIDE CARTON LABEL - MASTER LABEL]

For Dogs Weighing Between 9 and 20 lbs.: {For cartons containing 1.5 ml (0.05 fl. oz.) applicator tubes}

Apply one tube (1.5 ml)(0.05 fl. oz.) [as a spot to the dog's back between the shoulder blades] [from the back of the neck to a point midway between the neck and tail].

For Dogs Weighing Between 21 and 39 lbs. {For cartons containing at least two 1.5 ml (0.05 fl. oz.) applicator tubes, or at least one 3.0 ml (0.10 fl. oz.) applicator tube} [Apply two tubes (1.5 ml)(0.05 fl. oz.) as a spot on the dog's back between the shoulder blades] or [Apply one tube (3.0 ml)(0.10 fl. oz.) as a spot to the dog's back between the shoulder blades.] [Apply one tube (3.0 ml)(0.10 fl. oz.) from the back of the neck to a point midway between the neck and tail.]

For Dogs Weighing Between 40 and 60 lbs. {For cartons containing at least three 1.5 ml (0.05 fl. oz.) applicator tubes, or at least one 4.5 ml (0.15 fl. oz.) applicator tube} [Apply two tubes (1.5 ml)(0.05 fl. oz.) as a spot to the dog's back between the shoulder blades and apply the third tube from the back of the neck to a point midway between the neck and tail}. - or - [Apply one tube (4.5 ml)(0.15 fl. oz.) from the back of the neck to a point midway between the neck and tail}.

For Dogs Weighing 61 lbs. and Over: {For cartons containing at least two 3.0 ml (0.10 fl. oz.) applicator tubes, or at least one 6.0 ml (0.20 fl. oz.) applicator tube} [Apply the first tube (3.0 ml)(0.10 fl. oz.) as a spot to the dog's back between the shoulder blades and apply the contents of the other tube (3.0 ml each)(0.10 fl. oz.) from the back of the neck to a point midway between the neck and tail.] - or - [Apply one tube (6.0 ml)(0.20 fl. oz.) from the back of the neck to a point midway between the neck and tail.]

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

STORAGE: Do not remove tube from the pack until ready to use. Store in a cool (below 25°C) dry place inaccessible to children and pets. Do not refrigerate. Protect from direct sunlight.

DISPOSAL: If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

[Sergeant's Squeeze-On Flea & Tick Control with Nylar® Insect Growth Regulator is an effective and easy to use product.] [Sergeant's Squeeze-On Flea & Tick Control with Nylar® Insect Growth Regulator prevents eggs from fleas on treated dogs from developing into biting adults for 63 days.] [9 weeks][As with all flea and tick control products, [Sergeant's Squeeze-On Flea and Tick Control with Nylar® Insect Growth Regulator] should be used as part of a program aimed at reducing flea populations in the dog's environment (bedding, carpets, kennel, yard).] [Consult your retailer for program recommendations.]

[BACK/SIDE CARTON LABEL - MASTER LABEL]

Visit us at www.sergeants.com

MADE IN THE USA

Sergeant's 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.

[Satisfaction Guaranteed!] [Please return for a refund if not completely satisfied!]

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

[WARRANTY: SERGEANT'S PET CARE, INC. MAKES NO WARRANTY OF MERCHANTABILITY, FITNESS FOR ANY PARTICULAR PURPOSE, OR OTHERWISE, EXPRESSED OR IMPLIED, CONCERNING THIS PRODUCT OR ITS USES WHICH EXTEND BEYOND THE USE OF THE PRODUCT UNDER NORMAL CONDITIONS IN ACCORDANCE WITH THE STATEMENTS MADE ON THIS LABEL.]

[Made in the USA For:] [Manufactured by:] Sergeant's Pet Care Products, Inc. Omaha, NE 68130 EPA Reg. No. 2517-80 EPA Est. No. 2517-TN-1

[BAR CODE AREA]

[TUBE/APPLICATOR LABEL]

FRONT PANEL -

Sergeant's Squeeze-On Flea & Tick Control with Nylar® Insect Growth Regulator, [Box/Icon with Cat Image and Cross-Out], [1.5 ml][0.05 fl. oz.] or [3.0 ml][0.10 fl. oz.] or [4.5 ml][0.15 fl. oz.] or [6.0 ml][0.20 fl. oz.], Cyphenothrin 40.0% W/W, Pyriproxyfen 2.0% W/W

BACK PANEL-

READ DIRECTIONS/PRECAUTIONS BEFORE USING.

CAUTION: KEEP OUT OF REACH OF CHILDREN

EPA REG. NO. 2517-80