

2517-134

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

Kelly R. Hoskins
Director of Regulatory Affairs
Sergeant's Pet Care Products, Inc.
2625 South 158th Plaza
Omaha, NE 68130-1770

SEP 11 2013

Subject: Sergeant's submissions implementing label changes to pet spot-on products
EPA Decision Nos. 478139, 478335, 478142, and 478144

- Sergeant's Fipronil Squeeze-On for Dogs
EPA Reg. No 2517-134
- Sergeant's Fipronil + Methoprene Spot-On for Cats
EPA Reg. No. 2517-135
- Sergeant's Fipronil + Methoprene Squeeze-on for Dogs
EPA Reg. No. 2517-136
- Sergeant's Fipronil Spot-On for Cats
EPA Reg. No. 2517-137

Dear Mr. Hoskins,

The labeling referred to above submitted in connection with the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is **acceptable**. With this letter, the label requirements listed in the EPA letter "Implementation of Label Changes to Pet Spot-On Products" dated September 30, 2011, are fulfilled. Please submit final printed labels to the Agency within 30 days of the date of this letter. If EPA determines that future mitigation measures are necessary for all pet spot-ons, the Agency will inform registrants and may take regulatory action.

EPA also received your December 21 2012 request to replace the conditional time-limited registrations with unconditional registrations. At this time, EPA does not have enough information to warrant the removal of these conditions of registration. If Sergeant's wishes to remove the time limitations altogether, please submit to the Product Manager an amendment application for each product to change the terms and conditions of the registration. Please include with your submission a written rationale for the removal of the time limitation. As you may remember, the Agency included this time limitation as a condition of registration for your products to allow for the post-market surveillance of these products. Therefore, we recommend that you include in your rationale the following information, along with any additional information or analyses you think would be helpful to the Agency (e.g.; tables, charts, information on stewardship activities, etc...):

- A summary and analysis of the incidents received associated with these products, including information on the following:

- A comprehensive analysis of incident rates per doses distributed;
- An analysis of historical incident trends since the products' release into the marketplace;
- An analysis of historical incident trends by weight range of animal, breed, weight range of product, etc...
- If these products are also registered in the European Union or Canada, information on incident rates per doses distributed and trends in those countries.

Please also note that requests to remove the expiration date condition are not subject to PRIA fees and do not have to be submitted under PRIA. However, these would also not be considered 90-day, fast-track submission in order to allow the EPA enough time to fully evaluate the information provided. After receiving these submissions, the EPA will consider the incidents received since the initial registration; review the information and rationale provided; and make a decision on the request.

In the interim, the time-limited registrations for these products are extended two years from the date of this letter. If registration extension requests are not received prior to that date, the registration of these products will expire. If a review of the previously submitted enhanced incident data indicates that there is a concern with any of these products, EPA may choose to take further regulatory action at that time.

Per the additional requirements of September 30, 2011 letter, you must continue to submit quarterly enhanced incident reports and quarterly sales information in doses sold for this product, along with an analysis of the incidents reported. The quarterly reports are due two months after the quarter ends. Please flag any Confidential Business Information as such. Enhanced incident reporting should be submitted to the Product Manager. Quarterly sales information should be submitted to the attention of Kaitlin Keller, Pesticide Reevaluation Division, Mail Code 7508P.

The following is a list of information that must be included in the quarterly reports for each incident:

- EPA Registration Number
- Product name (brand name)
- Lot #
- Where purchased: internet, store, veterinarian
- Active Ingredient(s)
- Weight range for product

- Date on which incident occurred. (mm/dd/yyyy)
- State in which the incident occurred. (standard 2 letter abbreviation)
- Registrant case #

- Species: dog, cat, other (specify)
- Breed: (as reported by pet owner)
- Age: months or years
- Sex: M, F, or neutered

Weight: pounds

Primary Route of Exposure: dermal, oral, other animal, inhalation, other

Body System: neurological, dermatological, GI, respiratory, ocular, other

Major signs noted with separate column for each sign, using standard terminology

Time to Onset: (hours, days)

Treated by veterinarian: yes or no

First time product used: yes or no

Misuse: use on incorrect species, overdose, too frequent dosing, other (describe)

Any known precondition

EPA Severity Code: death, major, moderate, minor

Outcome: died, recovered, still treated, unknown

Along with the enhanced incident reporting, you must submit an analysis of the incidents seen, to include the following details:

- All incidents should be reported including all minor dermal and ocular irritation reports.
- Summary table for dogs showing number of incidents of each severity code for each route of exposure. Each incident should only be reported once. If one incident has several routes of exposure, the order should be ocular > oral > dermal. In other words, an incident with both oral and dermal exposure would be reported as oral exposure, and an incident with both ocular and oral exposure would be reported as ocular exposure.
- A similar summary table for cats (misuse or secondary exposure) showing number of incidents of each severity code for each route of exposure.
- Summary table for dogs and table for cats showing number of incidents that are believed due to secondary exposure (e.g., multi-pet households).
- A summary table for dogs showing number of incidents for each severity code for these age ranges: <3 months, 3-6 months, 6-9 months, 9-12 months, 1 yr, 2 yr, 3 yr, 4 yr, 5 yr, 6 yr, 7 yr, 8 yr, 9 yr, 10 yr, 11 yr, 12 yr, 13 yr, 14 yr, 15 yr, >15 yr.
- A summary table showing the number of dog incidents for each severity code for each pet weight range on the product label.
- A summary table for dog weight showing number of incidents for each product weight range. This table should show number of incidents in dogs weighing less than that product weight range, number of incidents in dogs in lower half of weight range, number of incidents in dogs in upper half of weight range, and dogs weighing more than the product weight range.
- Table showing number of incidents for each dog breed.
- Table showing number of incidents in dogs for each clinical sign.

- Table showing number of incidents in dogs for each organ system.
- Report aggregate incidents, but do not combine moderate and minor incidents.

Stamped copies of the labels are enclosed for your records. If you have any questions regarding this label, please contact Kaitlin Keller at (703) 308-8172 via email at keller.kaitlin@epa.gov.

Sincerely,



Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7504P)

Enclosure: Labels stamped "Accepted"

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FRONT PANEL

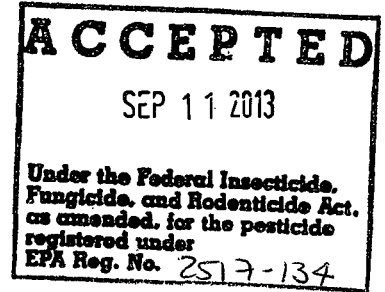
**DOG SQUEEZE ON
FIPRONIL + METHOPRENE**

[Optional text appears in brackets – the final product label may include some or all of the optional text on front, back, side or folded label panels. The CRP required text will not change.]

Sergeant's Fipronil + Methoprene Squeeze-On for Dogs

[ABNs:]

- [Sergeant's® FRONTIER GOLD (Spot On) for Dogs]
- [Sergeant's® Ectoadvance (Spot On) for Dogs]
- [Sergeant's® AdvanSpot Plus (Spot On) for Dogs]
- [Sergeant's® PRONYL OTCT™ PLUS for Dogs]
- [SentryProline (Spot On) for Dogs]
- [SENTRY® FIPROGUARD™ PLUS for Dogs]
- [SENTRY® AdvanSpot Plus (Spot On) for Dogs]
- [Sentry® FRONTIER GOLD (Spot On) for Dogs]
- [Sentry® Ectoadvance (Spot On) for Dogs]



[1.5cm x 1.5cm on final or as indicated]

- [Apply to puppies over 8 weeks old]
- [Apply to puppies 8 weeks or older]



- [For use ONLY on dogs [23[-] [to] 44 lbs] [45[-] [to] 88 lbs] [89[-] [to] 132 lbs]]
- [For use ONLY on dogs [[&][and] puppies 4[-] [to] 22 lbs and over 8 weeks of age]
- OR
- [ONLY For Dogs [23[-][to] 44 lbs] [45[-][to] 88 lbs] [89[-] [to] 132 lbs]]
- [ONLY For Dogs & Puppies 8 weeks or older [&][and] 4[-][to] 22 lbs]

[Mosquitoes]

[Kills mosquitoes] [within 24 hours for up to 7 days] [and within 48 hours for up to 28 days]

[Chewing Lice]

- [Kills chewing lice]
- [Rapid elimination of chewing lice infestation]
- [[A once monthly application required][Apply monthly to control] [for] chewing lice]

[Adult Fleas]

- [[Kills [adult] Fleas [for up to three months]]
- [Kills newly emerged adult Fleas before they lay eggs]
- [Kills Adult Fleas, which may be a source of [flea allergy dermatitis] [, flea bite anemia]]
- [Kills Fleas Up to [4 weeks] [1 month] [30 days]!]
- [If dog is a high risk for flea reinfestation a once month application may be needed]

[Multiple Infestations]

- [Kills chewing lice [and controls mites that may cause sarcoptic mange]]
- [Flea [&] [and] Tick Control for Dogs [&] [and] Puppies 8 weeks old [&] [and] older]
- [Kills fleas, flea eggs, ticks, chewing lice [&] [and] [mosquitoes]]
- [Kills fleas, ticks, [mosquitoes], chewing lice, flea eggs, flea larvae [&] [and] [prevents the development of flea pupae]]
- [Kills Fleas, Ticks [&] [and] [Mosquitoes]]
- [Breaks the Flea Life Cycle [for up to three months]]

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[Monthly flea, tick, [mosquito], chewing lice and flea egg protection]
 [Monthly flea, tick, [mosquito] and chewing lice protection]
 [Kills fleas, ticks, [mosquitoes], flea eggs, and chewing lice]
 [[Seven] [7] [Six] [6][Five][5] Way [Action] [Effectiveness] [Control] to kill fleas, ticks, [mosquitoes,] chewing lice, flea eggs, [&][and]flea larvae [&] [and] prevent the development of flea pupae]]
 [[Six] [6] [Five] [5][Four][4] Way [Action] [Effectiveness] [Control] to kill fleas, ticks, [mosquitoes,] chewing lice, [&][and]flea eggs [&] [and] flea larvae]
 [[4 week] [1 month] [30 day] Flea [and] [&] Tick [Application] [Treatment]!]
 [[Four (4) Week] [1 month] [30 day] [Flea, Tick, and Chewing Lice Control]
 [[Four [4] Week] [1 month] [Flea, Tick, [Mosquito] and Chewing Lice Control]
 [Use [Brand Name][This product] monthly to break the flea life cycle.]
 [Use [Brand Name][This product] monthly to control ticks and chewing lice]
 [Monthly flea, tick, [mosquito,] flea egg, flea larvae and chewing lice protection.]
 [Once A Month Flea, Tick, [Mosquitoes] [and] [Chewing Lice][Application] [Treatment]]
 [Kills Fleas, [and] [&] Ticks for up to [4 weeks] [1 month] [30 days]!]
 [Kills Fleas, [and] [&] Ticks [and Mosquitoes] for up to [4 weeks] [1 month]!]
 [Kills Fleas, Ticks, Flea Eggs [and] [&] Flea Larvae for up to [4 Weeks] [1 month] [30 days]]

[Ticks]

[Kills Ticks including those that may transmit Lyme disease]
 [Kills Ticks for Up to [4 weeks] [1 month] [30 days]!]
 [Kills [all stages of] deer ticks [including those that may transmit Lyme disease,] [for up to [4 weeks] [1 month] [30 days] [per application]]
 [Kills Ticks (Including Deer Ticks) for up to [4 weeks] [1 month] [30 days]]
 [Kills [brown dog ticks], [(*Rhipicephalus sanguineus*)] [American dog ticks,] [and] [lone star ticks][,][and deer ticks] [for up to [4 weeks] [1 month] [30 days]]
 [Kills American Dog Ticks [(*Dermacentor variabilis*)] for up to [4 weeks] [1 month] [30 days]!]

[Flea Eggs and Larvae]

[Controls flea reinfestation for up to [12 weeks] [3 months]]
 [Kills adult fleas, flea eggs, flea larvae, and prevents the development of pupae for up to [three months] [12 weeks].]
 [Effectively controls all stages of the flea (including adult fleas, flea eggs, flea larvae and prevents the development of flea pupae)]
 [Effective against all stages of the flea (including adult fleas, flea eggs, flea larvae and prevents the development of flea pupae)]
 [If dog is a high risk for flea reinfestation a once month application may be needed]
 [Prevents from developing, flea eggs [larvae] [pupae] for up to [3 months] [12 weeks]]
 [With (S)-methoprene Insect Growth Regulator [IGR] which Breaks the Flea Life Cycle]
 [With (S)-methoprene to Break Flea Life Cycle]
 [With Insect Growth Regulator [IGR] to Break Flea Life Cycle]
 [Dual Action [!]: Fipronil with (S)-methoprene IGR [insect growth regulator] Effectively Breaks the Flea Life Cycle]
 [Dual Action [!]: Effectively Breaks the Flea Life Cycle [!]]
 [Kills Flea Eggs & Flea Larvae for [up to 3 months] [up to 12 weeks]!]
 [Prevents Flea Eggs From Developing Into Biting Adults]
 [Prevents all stages of the flea life cycle from developing]
 [Controls reinfestation of fleas for up to 3 months]
 [Effective against all stages of the flea life cycle]
 [Effectively controls all stages of the flea life cycle]

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[All Others]

[For Dogs and Puppies 8 weeks of age or older]
 [Can be used on puppies 8 weeks of age and older]
 [Specially Formulated for Dogs and Puppies 8 weeks of age or older]
 [For Dogs [4-22 lbs.], [23-44 lbs.], [45-88 lbs.], [89-132 lbs.]
 [Fast Acting] [Long Lasting]
 [Convenient spot treatment]
 [Easy to Use [Application]]
 [Best if used year round!]
 [For year-round protection, apply [Brand Name] monthly]
 [(ICON Showing [4 week] [1 month] [30 day] Protection)]
 [Apply monthly]
 [Prevents reinfestation of listed pests for [4 weeks] [1 month]]
 [Apply once every [4 weeks] [month] [30 days]!
 [4 Week Dose!] [1 Month Dose!] [30 Day Dose!]
 [One Application][Two Applications][Three Applications][Four Applications][Five Applications][Six Applications][12 Applications][24 Applications] and/or [1 Month Supply][2 Month Supply][3 Month Supply][4 Month Supply][5 Month Supply][6 Month Supply][12 Month Supply][24 Month Supply] or [4 Week Supply][8 Week Supply][12 Week Supply][16 Week Supply][20 Week Supply][24 Week Supply][48 Week Supply][52 Week Supply][104 Week Supply]
 [Controls mites that may cause sarcoptic mange]
 [Waterproof]
 [Effective after bathing and exposure to water and sunlight]
 [Can be used on breeding, pregnant, and lactating [bitches] [female] [dogs]]
 [[Free] Calendar Stickers Inside!]
 [[Free with purchase] [Free inside] Monthly Application Reminder [Magnet][inside]]
 [Fipronil (9.8%) + (S)-methoprene (8.8%)]
 [Contains [the] [same] active ingredient(s) used in [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products].*]
 [Compare to [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products], contains [the] [same] active ingredient(s).*]
 [Compare to [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products], contains [the] [an] [same] active ingredient fipronil.*]
 [Compare to [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products], contains [the] [an] [same] active ingredient (S)-Methoprene.*]
 [Compare to [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products], contains [the] [same] active ingredients fipronil and (S)-Methoprene.*]
 [[Brand Name] [products] [This product] contain(s) fipronil, [the] [an] [same] active ingredient used in [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products].*]
 [[Brand Name] [products] [This product] contain(s) fipronil, compared to [the] [an] [same] active ingredient(s) used in [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products].*]
 [[Brand Name] [products] [This product] contain(s) fipronil and (S)-Methoprene, [the] [same] active ingredients used in [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products].*]
 [[Brand Name] [products] [This product] contain(s) fipronil and (S)-Methoprene, compared to [the] [same] active ingredient(s) used in [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products].*]
 [[*][Brand Name][This product] is not manufactured or distributed by [Merial®] [Company name], the makers of [FRONTLINE® Top Spot® for Dogs (or any ABN)] [FRONTLINE® Plus for Dogs (or any ABN)] [FRONTLINE® brand products].]

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[[Brand Name][This product][Frontline®] [Frontline® TopSpot®] is a registered trademark of [Merial®]
[Company name].]
[[Brand Name] is a registered trademark of Sergeant's Pet Care Products, Inc.]
[[1][2][3][4][5][6][12][24] Applications]
[Stops and prevents infestation of listed pests for [4 weeks][1 month]]
[Stops existing infestation and prevents establishment of additional infestation of listed pests]
[Lift [here] for more information]

ACTIVE INGREDIENTS:

Fipronil.....	9.80%
(S)-methoprene.....	8.80%
OTHER INGREDIENT:	81.40%
TOTAL	100.00%

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

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

Net Contents: X fl oz [Y – 0.0xx fl oz (x mL) applicators]
[1][One][2][Two][3][Three][4][Four][5][Five][6][Six][12][Twelve][24][Twenty-Four]
[0.023 fl oz (0.67 mL) applicators] [0.045 fl oz (1.34 mL) applicators]
[0.091 fl oz (2.68 mL) applicators] [0.136 fl oz (4.02 mL) applicators]

{END - FRONT PANEL}

BACK/SIDE PANEL

**DOG SQUEEZE ON
FIPRONIL + METHOPRENE**

[[Brand Name][This product] contains Fipronil and S-Methoprene (insect growth regulator) (IGR) to effectively kill fleas and ticks [(including those that may transmit Lyme disease).] [The active ingredients in [Brand Name][This product] feature a sustained release formula developed for fast acting [and long lasting] control of fleas, ticks, [mosquitoes] and chewing lice for up to [1 month] [[4][four] weeks] on dogs.]

**READ ENTIRE LABEL BEFORE EACH USE.
USE ONLY ON DOGS AND PUPPIES OVER 8 WEEKS OF AGE.**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS. CAUTION. Harmful if swallowed. Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

HAZARDS TO DOMESTIC ANIMALS. For external use on dogs only. Individual sensitivities, while rare, may occur after using any pesticide product on dogs. Certain medications can interact with pesticides. Do not treat your dog with more than one pesticide product at a time. Over dosing your dog can result in serious illness and even death. Consult a veterinarian before using on medicated, debilitated, aged, pregnant or nursing dogs. Consult a veterinarian before using on dogs with known organ dysfunction. If your dog is exhibiting signs of and/or is being treated for skin dermatitis, talk to your veterinarian before applying any topical flea and tick control product.

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FIRST AID

If swallowed:	Call a poison control center or a 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If in eyes:	Flush eyes with plenty of water. Call a doctor if irritation persists.
If on skin:	Wash with plenty of soap and water. Get medical attention if irritation persists.

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.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **DO NOT ALLOW CHILDREN TO APPLY PRODUCT.** TO PREVENT HARM TO YOU AND YOUR DOG, READ ENTIRE LABEL BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. Do not use on cats, rabbits or animals other than dogs. Do not allow your dog to ingest this product. Do not use on puppies under 8 weeks of age or less than [4][23][45][89] lbs. Use entire contents of tube vial on each dog. [Do not split one tube between dogs.] Do not use multiple tubes on one dog. Weigh your dog to be sure you are applying the right dose formulated for the weight of your dog. Separate the treated dog from all other dogs and cats for 24 hours after treatment has been applied.

Side Effects: Monitor your dog after application. [Some dogs may experience temporary startle effects when any product is applied.] Dogs may experience some temporary irritation at the site of product application such as redness, scratching or other signs of discomfort. If signs of sensitivity occur, bathe your dog with a mild soap and rinse with large amounts of water. If these or other side effects occur, consult your veterinarian or call 1-800-781-4738. If your dog has an unusual reaction to the initial application, consult a veterinarian before repeating application. The most common signs of incidental ingestion are excessive salivation and foaming at the mouth. If these symptoms occur, immediately feed your dog and continue to monitor your dog for the next 24 hours.

[1.5cm x 1.5cm on final or as indicated]



DO NOT USE ON CATS. Keep cats away from treated dogs for 24 hours. If applied to a cat or ingested by a cat, contact your veterinarian.

{Outer Packaging}

How to open: Remove product tubes [vial] from the package. [Separate one tube from the others.] Hold the tube [vial] with notched end pointing up and away from the face and body. Use scissors to cut off the narrow end at the notches along the lines.

How to apply: 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. Do not apply more often than once every 4 weeks.

{For cartons containing 0.67 mL (0.023 fl oz) applicator tubes}

Only For Dogs Weighing 4 [-] [to] 22 lbs. Do not apply to dogs weighing less than 4 lbs.

[including small dogs and puppies, 8 weeks or older]:

Apply one tube (0.67 mL)(0.023 fl oz) [from the back of the neck to a point midway between the neck and tail.] [as a spot [on] [to] the dog's back between the shoulder blades.]

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{For cartons containing 1.34 mL (0.045 fl oz) applicator tube}

Only For Dogs Weighing 23 [-] [to] 44 lbs.

Apply one tube (1.34 mL)(0.045 fl oz) [from the back of the neck to a point midway between the neck and tail.] [as a spot [on] [to] the dog's back between the shoulder blades.]

{For cartons containing 2.68 mL (0.091 fl oz) applicator tube}

Only For Dogs Weighing 45 [-] [to] 88 lbs.

Apply one tube (2.68 mL)(0.091 fl oz) [from the back of the neck to a point midway between the neck and tail.] [as a spot [on] [to] the dog's back between the shoulder blades.]

{For cartons containing 4.02 mL (0.136 fl oz) applicator tube}

Only For Dogs Weighing 89 [-] [to] 132 lbs. Do not use two tubes on dogs greater than 132 lbs

Apply one tube (4.02 mL)(0.136 fl oz) [from the back of the neck to a point midway between the neck and tail.] [as a spot [on] [to] the dog's back between the shoulder blades.]

FREQUENCY OF APPLICATION

Use [Brand Name] [this product] monthly for complete control of flea, tick, [and] chewing lice, [and mosquito] infestations. [Studies show that] [Brand Name] [this product] kills adult fleas for up to three months. Apply monthly if your dog is at high risk for flea reinfestation [, or in a highly infested environment]. Apply monthly to control ticks[,] [mosquitoes] and chewing lice. [Brand Name] [This product] remains effective even after bathing, water immersion, or exposure to sunlight. Allow treated area to dry thoroughly. Do not reapply for [30 days] [4 weeks].

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not remove tube from the pack until ready to use. Store in a cool (below 77°F [/][25°C]) dry place inaccessible to children and pets. Do not refrigerate. Protect from direct sunlight.

CONTAINER DISPOSAL: **If empty:** Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[**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 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.]

[If you have questions or comments about this product, please write: [Sergeant's] [SENTRY] Consumer Response, P.O. Box 540399, Omaha, NE 68154-0399.]

In Case of Emergency, call: 1-800-781-4738 [Coupon(s) inside or on outside of box]
Non-Emergency, call: 1-800-224-PETS (7387) [Made in USA] [U.S. Patent No. 5,567,429]

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[Distributed by:] [Manufactured by:]
Sergeant's Pet Care Products, Inc.
Omaha, NE 68138-3710

[BAR CODE AREA][Lot code]
EPA Reg. No. 2517-134
EPA Est. No. [XXX-XX-XXX]

{END - BACK / SIDE PANEL}

**OUTER PACKAGING OR FOLDED PANEL/FLAP OF FRONT OF PACKAGE DOG SQUEEZE-ON
FIPRONIL+METHOPRENE**

[How to Apply - 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.]

[Application Instructions] [Directions for Use]

How to Open

1. Remove product tubes [vial] from the package.
2. [Separate one tube from the others.] Hold the tube [vial] with notched end pointing up and away from the face and body. Use scissors to cut off the narrow end at the notches along the line.

How to Apply

1. Invert tube over dog and use open end to part dog's hair.
2. Squeeze tube firmly to apply all of the solution to the dog's skin [as a spot [on] [to] the dog's back between the shoulder blades.] [or] [from the back of the neck to a point midway between the neck and tail.]

[Look at the Label (Look at the Label icon) [Easy]

6 Step [Easy] [Spot On] [Squeeze-On] [Topical] Checklist]

- [1] Read the label completely and follow directions
- [2] Weigh your dog
- [3] Do NOT use dog products on cats
- [4] Do NOT treat with more than one pesticide product at a time
- [5] Separate animals after [treatment] [application] to avoid chance of ingestion
- [6] Do NOT split tubes between pets][and use the ENTIRE tube contents]

[Brand Name]

[1][2][3][4][5][6][12][24][Month [Application] Tracker]

[For year-round protection, apply [Brand Name][This Product] monthly.]

[Dog's Name (Empty blank for owner to fill in name)]

[First][1st][Second][2nd][Third][3rd][Fourth][4th][Fifth][5th][Sixth][6th][Seventh][7th][Eighth][8th][Ninth][9th][Tenth][10th][Eleventh][11th][Twelfth][12th]

[Dose] [Treatment] [Application](Empty blank for owner to fill in date)(Date: MM/DD/YY)

[calendar stickers with [Brand Name] [This Product] [Place stickers on your calendar as a reminder to reapply [Brand Name] [This Product] in 30 days.]

[Monthly Application Reminder Magnet (image of reminder magnet)]

[Enclosed for your convenience is an application reminder magnet. Push the (reset) button, and the reminder light will blink twice. The reminder tag is now set for 30 days. At the end of 30 days the reminder light will blink, reminding you to reapply [Brand Name][This Product]. Press the button once and the blinking light will stop. Press the button again and this will reset the timer for another 30 days.]



























Sergeant's Master Label

29 Aug 2013 Mitigation
Information in [] is optional.

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EPA SAL 21 Feb 2012
Supersedes EPA Pending 27 Dec 2012

[Optional graphics below may or may not appear anywhere on finished label]

	Adult Flea	
	Fleas	
	Flea eggs	
	Flea Larvae	
	Flea Pupae	
	Ticks	
	Brown Dog Tick	
	Deer Tick	
	American Dog Tick	
	Chewing Lice	
	Lone Star Tick	
	Mosquitoes	
	Mite	



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Sergeant's Master Label

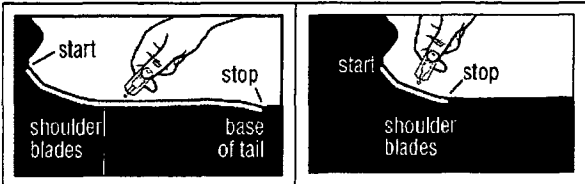
29 Aug 2013 Mitigation
Information in [] is optional.

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[Flea life cycle diagram] [Flea Life Cycle]



{END - PACKAGE COPY}

TUBE/VIAL LABEL	DOG SQUEEZE ON FIPRONIL + METHOPRENE
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{Front Label}

{Back Label}

<p>{Brand Name} For Dogs [X-Y] lbs ≥8 wks fipronil 9.8%, s-methoprene 8.8% 0.023 fl oz (or) 0.045 fl oz (or) 0.091 fl oz (or) 0.136 fl oz {label code}</p>		<p>KEEP OUT OF REACH OF CHILDREN CAUTION: Read directions and precautions before using. Use scissors to open. EPA REG. No. 2517-134 {label code}</p>
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{END - TUBE/VIAL LABEL}