

# U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7504P) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460 EPA Registration No.

Date of Issuance:

2517-135

January 28, 2011

#### NOTICE OF PESTICIDE:

☑ Registration ☐ Reregistration

(under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended)

Term of Issuance:

**Conditional Registration** 

Time-limited: see conditions below

Name of Pesticide Product:

Sergeant's Fipronil + Methoprene Spoton for Cats

Name and Address of Registrant (include ZIP Code):

Sergeant's Pet Care Products, Inc. c/o Exponent, Inc. 2625 South 158<sup>th</sup> Plaza Omaha, NE 68130

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA §3(c)(7)(a) provided that:

- 1. This registration is time-limited and expires two years from the date this product is first released for shipment.
  - You must provide the Agency with a projected release for shipment date within 30 days of the date of this Notice of Registration. The Agency will calculate the expiration date based on the projected release for shipment date until an actual release for shipment date is provided in writing.
- 2. Consider limiting the formulations of each product to one basic confidential statement of formula. The Agency may require this in the future. It is possible that no additional alternate formulations or minor formulation amendments will be approved for this product in the future.
- 3. As a condition of registration for this product, within one year from the date of this registration, you must submit the results of Storage Stability and Corrosion Characteristics studies, corresponding to OCSPP Guidelines 830.6317 and 830.6320, respectively, including interim reports made at 0, 3, 6, 9, and 12 month intervals.

- 4. The approval of this registration is contingent on the Agency's review to determine that the study submitted on June 15, 2010, to fulfill OCSPP Guideline 830.1800 Enforcement Analytical Method, is acceptable to support the registration.
- 5. Within one year of the date on this Notice of Registration, and prior to formulating this product, you must provide the Agency the following:
  - a. The registration number and establishment number of the manufacturing or technical product(s) from which the active ingredient is derived.
  - b. The name and address of the entity from which the manufacturing product(s) was obtained; and
  - c. A copy of the bill of sale for this manufacturing product(s).
- 6. Within 30 days from the date of this registration, in accordance with FIFRA §3(c)(1)(F) and 3(c)(2)(B), you must submit a copy of all offers to pay compensation and evidence of their delivery, used to support the data required for this product.
- 7. You must submit quarterly enhanced incident reports and quarterly sales information in doses sold for this product for the quarter that begins on April 1, 2011. The quarterly reports are due two months after each 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 Registration Division (7504P), Immediate Office (attn: Ms. Kimberly Nesci).

# 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

8. 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 cats 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 dogs (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 cats 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 cat incidents for each severity code for each pet weight range on the product label (if applicable).
- A summary table for cat weight showing number of incidents for each product weight range. This table should show number of incidents in cats weighing less than that product weight range, number of incidents in cats in lower half of weight range, number of incidents in cats in upper half of weight range, and cats weighing more than the product weight range (if applicable).
- Table showing number of incidents for each cat breed, where provided.
- Table showing number of incidents in cats for each clinical sign.
- Table showing number of incidents in cats for each organ system.
- Report aggregate incidents, but do not combine moderate and minor incidents.
- 9. You must submit and/or cite all data required for registration of your product under FIFRA §3(c)(5) when the Agency requires all registrants of similar products to submit such data, and submit acceptable responses required for reregistration of your product under FIFRA §4.

All labeling comments below are in reference to the proposed master label, dated January 20, 2011. These comments apply to all submitted draft labeling, including the master label, the color mock-up labels, and the proposed text and graphics for the stickers and magnet:

- 10. On page 1 under Multiple Infestations, revise the claims per our discussion (delete struck-out text and/or add underlined words) to read as follows:
  - "Kills chewing lice and controls mites that may cause sarcoptic mange]"
  - "[Kills fleas, ticks, mosquitoes, chewing lice, flea eggs, [and] flea larvae [and prevents the development of flea pupae]]"
  - "[Breaks the Flea Life cycle [for up to three months]]"
  - "[Seven][7] Way [Action] [Control] Protection, [kills fleas, ticks, mosquitoes, chewing lice, flea eggs, flea larvae and prevents the development of flea pupae]]"
  - "[6][Six] Way-Protection, [Action] [Control] [kills fleas, ticks, mosquitoes, chewing lice, flea eggs, flea eggs & larvae]]"
  - "[Four (4) Week] [1 month] [30 day] [Flea, Tick, Mosquito, and Chewing Lice Control]"
- 11. On page 2 under Ticks, revise the claims (delete struck-out text and/or add underlined words) to read as follows:
  - "[Kills [all stages of] Deer Ticks (vector of that may carry Lyme disease) for up to [4 weeks][1 month][30 days]]"
  - "[Kills [all stages of (deer) ticks [before they can] [that] [transmit Lyme disease,] [for up to [4 weeks] [1 month] [30 days] per application]]]"
- 12. On page 2 under Flea Eggs and Larvae, revise the claims (delete struck-out text and/or add underlined words) to read as follows:
  - "[Kills adult fleas, flea eggs, flea larvae and prevents the development of pupae [for up to six weeks]]"
  - "[Kills all stages of the flea (adult fleas, flea eggs, flea larvae and prevents the development of flea pupae)]"
  - "[Kills flea eggs [larvae] [and prevents the development of pupae] for up to six weeks]"
  - "Kills Flea Eggs & Flea Larvae for [(up to six weeks)]!]"
  - "Kills all stages of the flea life cycle"
- 13. On page 3 under All Others, delete struck-out text in the claims to read as follows:
  - "[Controls mites that may cause sarcoptic mange [infestations]]"
  - "ff3] applications]"
- 14. On page 5 under Back Panel, replace "30 days" from the second claim with "[1 month] [4 weeks]" because the data does not support mosquito control for up to 30 days.
- 15. On page 6, delete "[and enclosed directions]" from the Directions for Use because this insert has not been submitted to the Agency for review.
- 16. On pages 6 and 8 under How to Apply, delete "[0.017 fl oz] [0.50 mL]" so that the use directions are more clear by stating "one tube..." per application.
- 17. On page 7 under the Warranty, delete the optional brackets between "All such risks shall be

50f24

assumed by the user or buyer" and "Sergeant's is committed to providing..." so that the warranty is presented (along with the user's/purchaser's rights) in its entirety.

- 18. On page 8, modify the word "insert" to indicate that this text is part of the outer packaging, instead of a separate insert to accompany the product.
- 19. For the text on the front of the tube, the net weight must be expressed in English units, i.e., "0.017 fl oz." Metric units may be expressed in addition to (adjacent) to the English unit weight expression.
- 20. Revise the EPA Registration Number to read: "EPA Registration No. 2517-135."

If the Agency determines that future mitigation measures are necessary for all pet spot-on products, you will be informed, and be expected to comply. If mitigation measures are necessary, the Agency may take appropriate regulatory actions. Two copies of the finished labeling must be submitted prior to releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please contact Rosanna Louie-Juzwiak at (703) 308-0037 with any questions.

Enclosure: Sergeant's Fipronil + Methoprene Spot-on for Cats Label, Stamped Accepted with Comments

Signature of Approving Official:

Date:

for

Richard Gebken, Product Manager (10) Registration Division, Insecticide Branch 28 JANUARY 2011

EPA Form 8570-6

60f24

# Sergeant's Master Label

20 January 2011

Version 10.1

EPA No. 2517-RGL

Information in [ ] is optional.

Page 1 of 9

#### FRONT PANCE

CAMBROMON Heibromidæviche Obrieni

[Optional text appears in brackets – the final label may include some or all of the optional text on front, back or side label panels]

## Sergeant's Fipronil + Methoprene Spot-On for Cats

#### [ABNs]

[(Sergeant's®) (Sentry®) Frontier Gold (Spot On) for cats]

[(Sergeant's®) (Sentry®) Ectoadvance (Spot On) for cats]

[SentryProline (Spot On) for cats]

[[SENTRY®] FIPROGUARD™ PLUS for cats]

[[Sergeant's] PRONYL OTCTM PLUS for cats]

ACCEPTED with COMMENTS
In EPA Letter Dated:

JAN 28 2011 Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 2517-135

[For use ONLY on cats OF ALL WEIGHTS over 8 weeks of age]

[Apply to kittens over 8 weeks old]

[Apply to kittens 8 weeks or older]

### [Mosquitoes]

[• [Kills mosquitoes within 24 hours for up to 14 days] [and within 48 hours for up to 28 days]

#### [Adult Fleas]

- [• [Kills adult fleas [for up to six weeks]]
- [• Kills Fleas [Up to [4] [6] weeks]!]
- [• Kills fleas which may be a source of flea allergy dermatitis] [or flea bite anemia]

### [Multiple Infestations]

- [•Kills chewing lice and controls mites that may cause sarcoptic mange]
- [• Flea [&] [and] Tick Control for Cats [&] [and] Kittens 8 weeks old and older]
- [•Kills fleas, flea eggs, ticks, chewing lice [&] [and] mosquitoes]
- [•Kills fleas, ticks, mosquitoes, chewing lice, flea eggs, [and] flea larvae [and prevents flea pupae]]
- [•Breaks the Flea Life Cycle [for up to three months]]
- [•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] Way Protection, kills fleas, ticks, mosquitoes, chewing lice, flea eggs, flea larvae and prevents flea pupae]]
- [• 6 [Six] Way Protection, kills fleas, ticks, mosquitoes, chewing lice, flea eggs & flea larvae]
- [• [4 Week] [1 month] [30 day] [Flea and Tick [&] [and] Treatment]
- [• [Four (4) Week] [1 month] [30 day] [Flea, Tick, Mosquito and Chewing Lice Control]
- [•Use [brand name] monthly to break the flea life cycle.]

# Sergeant's Master Label

20 January 2011 Information in [ ] is optional.

Version 10.1 Page 2 of 9 EPA No. 2517-RGL

#### ERONTEPANIEL

### CATESPOT ON STREETS OF THE CONTRACTION OF THE

[•Use [brand name] monthly to control ticks and chewing lice]

[•Monthly flea, tick, mosquito, flea egg, flea larvae and chewing lice protection.]

[• [4 week] [1 month] [30 day] Flea and Tick Treatment!]

[Once A Month Flea and Tick Treatment]

[• Kills Fleas and Ticks for up to [4 weeks] [1 month] [30 days]!]

[• Kills Fleas, Ticks, Flea Eggs & Flea Larvae for up to [4 Weeks] [1 month] [30 days]]

[• (Brand Name) provides convenient and effective flea, tick, chewing lice and mosquito control for cats and kittens over 8 weeks of age.]

[• Controls reinfestation of fleas for up to six weeks]

### [Ticks]

[•Kills ticks including those that may transmit Lyme disease]

[• Kills Ticks for Up to [4 weeks]!]

[• Kills [all stages of] Deer Ticks (vector of Lyme disease) for up to [4 weeks] [1 month] [30 days]]

[\* [Kills [all stages of] (deer) ticks [before they can] [that] [transmit Lyme disease,] [for up to [4 weeks] [1 month] [30 days] [per application]]]

[• Kills [brown dog ticks], [American dog ticks,] [and lone star ticks] [(Rhipicephalus sanguineus)] [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 six weeks]]

[• Kills adult fleas, flea eggs, flea larvae and prevents pupae [for up to six weeks]]

[•Kills all stages of the flea (adult fleas, flea eggs, flea larvae and prevents flea pupae)]

[• If cat is at high risk for flea reinfestation apply once a month]

[•Kills flea eggs [larvae] [and prevents pupae] for up to six 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 [insect growth regulator] [IGR] Effectively Breaks the Flea Life Cycle]

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

[• Kills Flea Eggs & Flea Larvae for [(six weeks)]!]

[• Prevents Flea Eggs From Developing Into Biting Adults]

[\* Kills all stages of the flea life cycle]

80f24

## Sergeant's Master Label

20 January 2011 Information in [ ] is optional.

Version 10.1 Page 3 of 9

EPA No. 2517-RGL

### FRONTPANEL

CATISETORICA INPROPILEMENTO PRIMI

#### [All Others]

- [•Controls mites that may cause sarcoptic mange [infestations]]
- [•Stops and prevents infestations of listed pests]
- [•For Cats and Kittens 8 weeks of age or older]
- [•Fast Acting]
- [•Effective even after bathing]
- [•Long Lasting]
- [•Once a month treatment]
- [•Fast Action against chewing lice infestations]
- [• [Three] [3] Applications] and/or [3 Month Supply] or [12 Week Supply]
- [• Best if used year round!]
- [• (ICON Showing [4 Week] [1 month] [30 day] Protection)]
- [• [4 Week] [1 month] [30 day] Dose!]
- [• 1 Month Dose!]
- [• Easy to Use [Application]]
- [ Specially Formulated for Cats and Kittens Over 8 Weeks Old]
- [• [Free] Calendar Stickers Inside!]
- [• Apply once every [4 weeks] [month] [30 days]!]
- [•Waterproof]
- [•Can be used on breeding, pregnant and lactating [queens], [female] [cats]]
- [• [Free with purchase] [Free inside] Monthly Application Reminder [Magnet] [clip][inside]]
- [•Can be used on kittens 8 weeks of age and older]
- [•Monthly application reminder inside]
- [• Fipronil (9.8%) + (S)-methoprene (11.8%)]
- [• Lift [here] for more information]
- [•Contains Fipronil[,][-] and (S)-methoprene the active ingredients used in Frontline Plus®\*]
- [\* [Brand Name] is not manufactured by or distributed by Merial. Frontline Plus® is a registered trademark of Merial.]

[<del>[</del>3] applications]

[Rapid elimination of chewing lice infestation]

[Effective after bathing and exposure to water and sunlight]

# Sergeant's Master Label

20 January 2011

Version 10.1

EPA No. 2517-RGL

Information in [ ] is optional.

Page 4 of 9

#### PRONT PANEL

CAT SPOT ON EIPRONILEMENTOPRIENC

[For use ONLY on cats]
[of ALL weights]
[over 8 weeks of age]

**ACTIVE INGREDIENTS:** 

Fipronil......9.80%

(S)-methoprene. .....11.80%

OTHER INGREDIENT\*\* ....... 78.40 %

TOTAL 100.00%

[\*\*diethylene glycol monoethyl ether]

# KEEP OUT OF REACH OF CHILDREN CAUTION

See [Side] [Back] Panel For Additional Precautionary Statement

#### **NET CONTENTS:**

[Three] [3][three] 0.017 fl oz (0.50 mL) applicators

{END - FRONT PANEL}

100f24

# Sergeant's Master Label

20 January 2011 Information in [ ] is optional.

Version 10.1 Page 5 of 9 EPA No. 2517-RGL

#### BACKPANEL

CAT SPOTON TRANSCOPILEMENTACOSSIE

[[brand name] contains Fipronil and S-Methoprene (insect growth regulator) (IGR) to effectively kill fleas (all stages) and ticks [(including those that may transmit Lyme Disease)].

[The active ingredients in [brand name] feature a sustained release formula developed for fast acting [and long lasting] control of fleas, ticks, mosquitoes and chewing lice for 30 days on cats.]

# READ ENTIRE LABEL BEFORE EACH USE USE ONLY ON CATS AND KITTENS 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 only. Do not use on kittens under 8 weeks of age. Individual sensitivities, while rare, may occur after using any pesticide product. [Some cats may experience temporary startle effects when any product is applied.] Cats may experience some temporary irritation at the site of product application. If signs persist, or become more severe within a few days of application, consult a veterinarian immediately. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated, debilitated or aged cats. Call 1-800-781-4738 for 24-hour assistance

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.				
	HOTI INF NUMBED				

#### **HOTLINE 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.

## Sergeant's Master Label

20 January 2011

Version 10.1

EPA No. 2517-RGL

Information in [ ] is optional.

Page 6 of 9

#### BACKPANEL

ACTEST OF THE CONTROL OF THE CONTROL

#### **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 CAT, READ ENTIRE LABEL [AND ENCLOSED DIRECTIONS] BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. FOR EXTERNAL USE ON CATS ONLY. DO NOT USE ON RABBITS. DO NOT USE ON OTHER ANIMALS.

Do not use on kittens under 8 weeks of age. [Do not split one tube between cats.] [Do not use multiple tubes on one cat.] Consult a veterinarian before using this product on debilitated, aged, medicated cats. Can be used on breeding, pregnant, or lactating [cats] [female cats] [queens]. Consult a veterinarian before using on cats with known organ dysfunction. Cats may experience some temporary irritation at the site of product application. Certain medications can interact with pesticides. Sensitivities may occur after using ANY pesticide product on cats. If signs of sensitivity occur bathe your cat with a mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

# (INSERT DIAGRAM THAT DEPICTS APPLICATION OF PRODUCT ON THE CAT)

[Optional diagram may or may not appear on the finished label]



### [{Outer Packaging}]

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

How to apply: While holding the cat with one hand, use the other hand to apply the solution. Invert the tube [vial] and use the narrow end to part the cat's hair. Apply contents of one [0.017-fl oz] [0.50 mL] tube [vial] of {Product Name} [as a stripe, starting high on the back of the cat's neck to in front of the shoulder blades] [as a spot between the shoulder blades]. Hold the cat for a few seconds to give the solution time to be absorbed into the cat's coat. When finished, wrap the tube [vial] in paper and put into the trash. Only one applicator per treatment is needed.

#### FREQUENCY OF APPLICATION

Use [brand name] monthly for complete control of flea, tick [and] chewing lice [and mosquito] infestations. [Studies show that] [brand name] kills adult fleas for up

# Sergeant's Master Label

20 January 2011 Information in [ ] is optional.

Version 10.1 Page 7 of 9

EPA No. 2517-RGL

#### BACKPANEL

CAT SPOT ON FIPRONILLEMETHOPRENE

to six weeks. Apply monthly if your cat is at high risk for flea reinfestation[, or in a highly infested environment]. Apply monthly to control ticks, mosquitoes and chewing lice. [Brand name] remains effective, even after bathing, water immersion, or exposure to sunlight. Allow treated area to dry thoroughly. Do not reapply for 30 days.

[(Brand Name) can be used on breeding, pregnant and lactating (queens) (female cats).]

#### 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 Non-Emergency call 1-800-224-PETS (7387) [Made in USA] [US Patent 5,567,429]

Distributed by:

Sergeant's Pet Care Products, Inc. P.O. Box 540399 Omaha, NE 68154-0399 EPA Reg. No. 2517-RGL EPA Est. No. XXXXX-XXX [BAR CODE AREA]

**{END - BACK / SIDE PANEL}** 

## Sergeant's Master Label

20 January 2011 Information in [ ] is optional.

Version 10.1 Page 8 of 9

EPA No. 2517-RGL

## **{START - OPTIONAL INSERT OR PACKAGE COPY}**

[ How to Apply - May contain graphics illustrating product use, e.g., cat 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. Holding the tube [vial] with notched end pointing up and away from the face and body, cut off the narrow end at the notches with scissors.

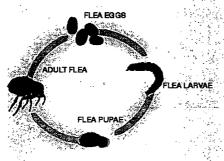
### How to Apply:

[Optional diagram may or may not appear on finished label]



- 1. Invert tube over cat and use open end to part cat's hair.
- 2. Apply contents of one [0.017 fl oz] [0.50 mL] tube [vial] of {Product Name} [as a stripe, starting high on the back of the cat's neck to in front of the shoulder blades] [as a spot between the shoulder blades]. Squeeze tube firmly to apply all of the solution to the cat's skin.]

## [Flea life cycle diagram] [Flea Life Cycle]



[Look at the Label (Look at the Label icon) [Easy] 6 Step [Easy] [Spot On] [Squeeze-On] [Topical] Checklist

- Read the label completely and follow directions
- Weigh your pet
- Do NOT use dog products on cats
- Do NOT treat with more than one pesticide product at a time
- Separate animals after treatment to avoid chance of ingestion
- Do NOT split tubes between pets]

## Sergeant's Master Label

20 January 2011 Information in [ ] is optional.

Version 10.1 Page 9 of 9

EPA No. 2517-RGL

[Brand Name]

[Monthly reminder card]

[3] [Month Treatment Tracker]

[3] [Month Application Tracker][For year round protection apply [Brand Name] monthly.]

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

[First] [1st] [Second] [2nd] [Third] [3rd]

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

MM/DD/YY)]

[calendar stickers with brand name] [Place stickers on your calendar as a reminder to reapply [brand name] 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]. Press the button once and the blinking light will stop. Press the button again and this will reset the timer for another 30 days.]

### {END - OPTIONAL INSERT OR PACKAGE COPY}

## TUBE/VIALLABEE

Front Label	Back Label			
{Brand Name} [For use only on cats/kittens	KEEP OUT OF REACH OF CHILDREN			
8 weeks or older]	CAUTION: Read directions and precautions			
Fipronil 9.8% w/w, (S)-methoprene 11.8% w/w	before using. Use scissors to open.			
0.50 mL {label code}	EPA REG. No. 2517-RGL {label code}			

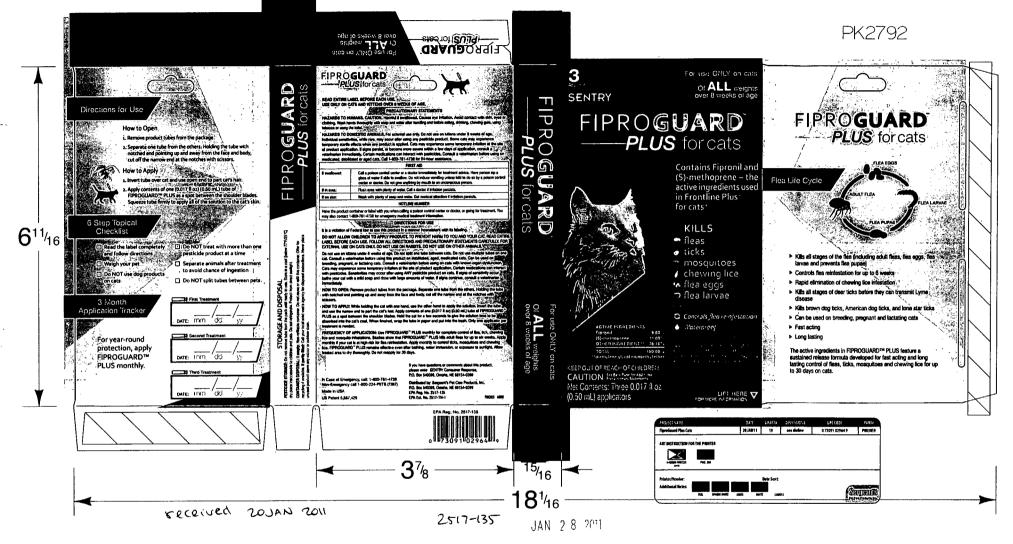


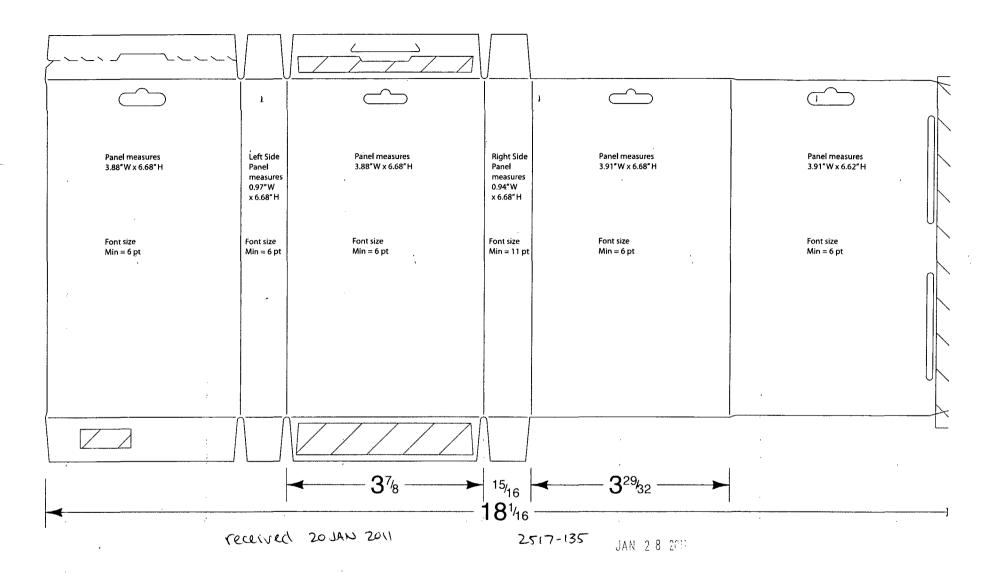
received 20 JAN 2011

2517-135

JAN 28 2011

# STYLE A

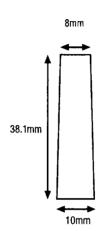




18,0424 2517-135 JAN 28 201' received 20 JAN 201

Front Tube Labels

HPROGUARD™ PLUS for cats
For use only on cats/kittens 8 weeks or older
Fipronii 9.8% w/w, [S]-methoprene
11.8% w/w 0.50 mL P003174



# FIPROGUARD™ PLUS

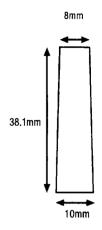
PROJECT NAME & PROJECT NUMBER FiproGuard Plus Cat Tube Label	DATE 17DEC10	DRAFT#	DIMENSIONS	UPC CODE	PART#
ART INSTRUCTION FOR THE PRINTER  BLACK PMS 260	1	1	Printer/Vendor: Additional Notes:	Date sent	
Labels adhere to White Tubes					

JAN 28 2011

Front

White tube / Black text on a white label / Colored Strip

PRONYL OTC™ PLUS for cats
For use only on cats/kittens 8 weeks or older
Fipronil 9.8% w/w, (S)-methoprene
11.8% w/w 0.50 mL P003179



# PRONYL OTC™ PLUS

PROJECT NAME & PROJECT NUMBER Pronyl OTC Plus for Cats Front Tube Label	DATE 17DEC10	DRAFT#	DIMENSIONS	UPC CODE UPC 0 73091 XXXXX X	PART# P003179
ART INSTRUCTION FOR THE PRINTER  BLACK PMS 260	RUCTION FOR THE PRINTER		Printer/Vendor:	Date sent:	
Labels adhere to White Tubes					IHIIS Products, inc.

received 20 JAN 2011

10mm

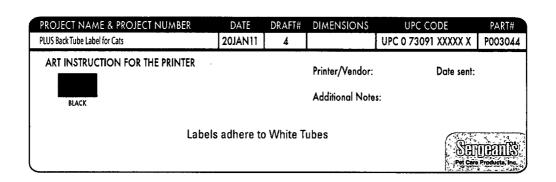
JAN 28 2011

Back

White tube / Black text on a white paper label

KEEP OUT OF REACH OF CHILDREN
CAUTION: Read directions and precautions before using. Use scissors to open.
EPA REG. No. 2517-135 P003044

38.1mm



2517-135

JAN 28 2011

Fleas



Ticks



Mosquitoes



Chewing Lice

received 20 YAN 2011

JAN 28 2011

**Fleas** 

Ticks

>> Mosquitoes

Chewing Lice

received 20 JAN 2011

2517-135 JAN 28 2011



PROJECT NAME & PROJECT NUMBER Pawprint Sticker	DATE 02NOV10	DRAFT#	DIMENSIONS	UPC CODE UPC 0 73091 XXXXX X	PART# POOXXX
ART INSTRUCTION FOR THE PRINTER  BLACK PMS 2738			Printer/Vendor: Additional Note	Date sent:	
				Sur Cari	IPIIIS Products, Inc.

240f24 2517-135

JAN 28 2011



received 20 Muzor