

## 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:

2517-136

NOV - A 2010

#### **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 Squeeze-on for Dogs

Name and Address of Registrant (include ZIP Code):

Sergeant's Pet Care Products, 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 land 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 from which the active ingredient is derived.
  - b. The name and address of the entity from which the manufacturing product was obtained; and
  - c. A copy of the bill of sale for this manufacturing product.
- 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 January 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: 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 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.
- 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 November 3, 2010. These comments apply to all submitted draft labeling, including the master label, the submitted color mock-up labels, and the proposed text and graphics for the stickers and magnet:

- 10. On page 2, delete "VetSpot," "For use/sale only to veterinary market," and "SentryVet" from the list of alternate brand names, because unqualified and misleading terms are not permitted.
- 11. On page 2 under the header Multiple Bugs, revise the first claim containing "controls mites and aids in the control of sarcoptic mange" to read "controls mites that may cause sarcoptic mange."
- 12. On page 3 under the header All Others, revise the 11<sup>th</sup> claim "controls sarcoptic mange [infestations]" to "controls mites that may cause sarcoptic mange."
- 13. On page 3 under the header All Others, add the qualifier "8 weeks of age or older" at the end of the statement after "puppies."

- 14. On page 4 under the list of claims, revise or delete the following claims because the Agency has not received or approved the proposed text or graphics on these inserts with the product package:
  - Delete "clip" and "card" in the "Free with purchase" claim
  - "Monthly application reminder card inside"
- 15. On page 4 in the last section of dog weights, delete the brackets between "puppies" and "8 weeks or older" because the qualifier "8 weeks of age or older" must accompany any reference to "puppies."
- 16. On page 4 above the ingredient statement, delete "ingredient statement may be on front or back label" because the ingredient statement must be clearly printed on the front panel of the label, and EPA has not received any request or rationale from Sergeant's to consider an exception to this requirement, per 40 CFR 156.10(g)(2)(i).
- 17. On page 5 under the End Front Panel section, delete the brackets around "for 30 days" and revise the following statement to read as follows:
  - "[The active ingredient in [brand name] features a sustained release formula developed for fast acting [and long lasting] control of fleas, ticks, mosquitoes and chewing lice for up to 30 days on dogs.]"
- 18. On page 5 under the Read Entire Label Before Each Use section, revise the claim "controls mites and aids in the control of sarcoptic mange" to read as "controls mites that may cause sarcoptic mange."
- 19. On page 6 under the Directions for Use section, update the statement "do not allow children to apply product" in all bold text.
- 20. On page 6 under the Directions for Use section, delete "Insert Copy" as an option because all language under the Directions for Use must remain together on the labeled package.
- 21. On page 7 under the Frequency of Application section for flea efficacy, you must revise the second statement to read as follows:
  - "[Studies show that] [brand name] kills adult fleas for up to three months."
- 22. On page 9 in the list of claims starting with Brand Name, delete "monthly reminder card" because the Agency has not received or approved the proposed text or graphics.
- 23. Revise the EPA Registration Number to read: "EPA Registration No. 2517-136" on page 10 of the label.

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 Squeeze-on for Dogs Label, Stamped Accepted with Comments

Signature of Approving Official:	Date: NOV - 4 2010
Richard Gebken, Product Manager (10) Registration Division, Insecticide Branch	

EPA Form 8570-6

## Sergeant's Master Label

3 November 2010

EPA No. 2517-RGA

Information in [ ] is optional.

Page 1 of 10

The following pages contain the master label, including optional label text that may be found on final printed product labels. The CRP required text will not change.

ACCEPTED with COMMENTS In EPA Letter Dated:

NOV - 4 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 2517-136

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Information in [ ] is optional.

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# ERONT PANEL SAME AND DOGSQUEEZE ON EIPRONIL

[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 Squeeze-On for Dogs

#### [ABNs]

[(Sergeant's®) (Sentry®) VetSpot™ (Spot On) for dogs][FOR USE/SALE ONLY TO VETERINARY MARKET]

[(Sergeant's®) (Sentry®) FRONTIER GOLD (Spot On) for dogs]

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

[SentryProline (Spot On) for dogs]

[SentryVet (Spot On) for dogs]

[[SENTRY®] FIPROGUARD<sup>TM</sup> for dogs]

[Sergeant's®] PRONYL OTC<sup>TM</sup> for dogs]

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



#### [Mosquitoes]

- [• [Kills [and] [&] [Repels] mosquitoes] [within 24 hours]
- [• Kills ([and] [&] repels) mosquitoes that may transmit heartworm]

#### [Adult Fleas]

- [•[Kills [and repels] [adult] Fleas [for up to three months].]
- [•Kills newly emerged adult Fleas before they lay eggs]
- [•Kills [and repels] fleas, source of flea allergy dermatitis] [, flea bite anemia] and tapeworm infestations]
- [• Kills [&] [and] Repels 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 Bugs]

- [•Kills [chewing] lice [and controls mites and aids in the control of sarcoptic mange infestations]]
- [• Flea [&] [and] Tick Control for Dogs [&] [and] Puppies 8 weeks old and older]
- [•Kills [and] [&] [repels] fleas, ticks, [mosquitoes] [&] [and] [chewing] [lice]]
- [•Kills ([and] [&] Repels) Fleas, Ticks and Mosquitoes]
- [•Kills [and] [&] [repels] fleas, ticks, mosquitoes [and] [chewing lice]]
- [•Monthly flea, tick, mosquito, and lice treatment]
- /[• [Four] [4] Way Protection [Kills fleas, ticks, mosquitoes, and lice]]

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Information in [ ] is optional.

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- [• [4 Week] [1 month] [30 day] [Flea and Tick & Treatment]
- [• [Four (4) Week] [1 month] [30 day] [Flea Tick, Mosquito and Lice Control]
- [• Kills [&] [and] Repels Fleas and Ticks for up to [4 weeks] [1 month] [30 days]!]

#### FRONT PANEL

[Once A Month Flea and Tick Treatment]

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

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

#### [Ticks]

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

[• Kills [and] [&] [repels] Ticks [for Up to] [4 weeks] [1 month] [30 days]!]

[• Kills [and] [&] [repels] [all stages of] deer ticks [before they can] [that] [transmit Lyme Disease,] [for up to [4 weeks] [1 month] [30 days]]]

[• Kills [and] [&] [repels] Ticks (Including Deer Ticks) for up to [4 weeks] [1 month] [30 days]]

[• Kills [and] [&] [repels] [brown dog ticks], [American dog ticks,] [and lone star ticks] [(Rhipicephalus sanguineus)] [for up to [4 weeks] [1 month] [30 days]]]

[• Kills [&] [and] [Repels] American Dog Ticks [(Dermacentor variabilis)] for up to [4 weeks] [1 month] [30 days]!]

#### All Others

[•For Dogs and Puppies 8 weeks of age or older]

[•For Dogs [up to 22 lbs.], [23-44 lbs.], [45-88 lbs.], [89-132 lbs.]

[•Fast Acting]

[•Dogs can be bathed 24 hours after treatment]

[•Long Lasting]

[•Prevents reinfestation]

[•Convenient spot treatment]

[•Once month treatment recommended]

[•A once monthly application is recommended for chewing lice.]

[•Fast Action against chewing lice infestations]

[•Controls sarcoptic mange [infestations]]

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

[• Best if used year round!]

[• (ICON Showing 4 Week Protection)]

[• 4 Week Dose!]

[• 1 Month Dose!]

[• Easy to Use [Application]]

[• Specially Formulated for Dogs and Puppies]

[• [Free] Calendar Stickers Inside!]

[• Apply once every [4 weeks] [month] [30 days]!]

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Information in [ ] is optional.

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

[• Waterproof]

[•Can be used on breeding, pregnant and lactating [bitches] [female] [dogs]]

[• [Free with purchase] [Free inside] Monthly Application Reminder [Magnet] [clip] [card][inside]]

[•Can be used on puppies 8 weeks of age and older]

[•Monthly application reminder card inside]

[•Images of the different kinds of bugs killed with a line drawn through]

[• Fipronil (9.7%)]

[Contains Fipronil[,] [-] the active ingredient used in Frontline Top Spot®\*]

[\*[Brand Name] is not manufactured by or distributed by Merial. Frontline Top Spot® is a registered trademark of Merial.]

[[3] applications]

#### [For use ONLY on dogs

[Up to 22 lbs]

[23-44 lbs]

[45-88 lbs]

[89-132 lbs]

[over 8 weeks of age]]

#### [For Dogs & Puppies] [8 weeks or older and] [up to 22 lbs.]

[For Dogs 23-44 lbs.]

[For Dogs 45-88 lbs.]

[For Dogs 89-132 lbs.]

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

[Ingredient Statement may be on front or back label]

#### **ACTIVE INGREDIENT:**

[\*\*diethylene glycol monoethyl ether]

KEEP OUT OF REACH OF CHILDREN
CAUTION

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Information in [ ] is optional.

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

# NO ENSEMPERODE CONTROL LENGER STATE ON A STATE OF THE STATE ON A STATE OF THE STATE

#### **NET CONTENTS:**

- [3] [three] 0.023 fl oz (0.67 mL) applicators
- [3] [three] 0.045 fl oz (1.34 mL) applicators
- [3] [three] 0.091 fl oz (2.68 mL) applicators
- [3] [three] 0.136 fl oz (4.02 mL) applicators

#### **(END - FRONT PANEL)**

[[brand name] contains Fipronil to effectively kill [and repel] fleas and ticks [(including those that may transmit Lyme Disease)].

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



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

[[Brand Name] for dogs provides four way protection that kills fleas, ticks, mosquitoes and [chewing] lice. Controls mites and aids in the control of sarcoptic mange. Kills deer ticks that transmit Lyme disease. Kills brown dog ticks, American dog ticks, and lone star ticks. Prevents flea reinfestation.]

#### 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.

Weeks of age. Individual sensitivities, while rare, may occur after using any pesticide product. [Some dogs may experience temporary startle effects when any product is applied.] Dogs 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. If your dog has an unusual reaction to the initial application, consult a veterinarian before repeating treatment. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated, debilitated or aged dogs. Call 1-800-781-4738 for 24-hour assistance.

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# BACKPANTEL DOGSOWEFAE ON FIPRONIL

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:	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:	Wash with plenty of soap and water. Get medical attention if irritation persists.	
	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.

#### **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 [AND ENCLOSED DIRECTIONS] BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. FOR EXTERNAL USE ON DOGS ONLY. DO NOT USE ON RABBITS. DO NOT USE ON OTHER ANIMALS.

Do not use on puppies under 8 weeks of age. [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. Consult a veterinarian before using this product on debilitated, aged, medicated dogs. Can be used on breeding, pregnant, or lactating dogs. Consult a veterinarian before using on dogs with known organ dysfunction. Dogs 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 dogs. 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.

#### [{Outer Packaging or Insert Copy}]

**How to open:** Remove product tubes [vial] from the package. 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.

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#### NO ENTEUDOS DODI HIMORIGIEJ

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.

[Optional drawings that may or may not appear on finished label]

#### 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 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] remains effective, even after bathing, water immersion, or exposure to sunlight. Allow treated area to dry thoroughly. Do not reapply for 30 days.

## For Dogs Weighing up to 22 lbs. [including small dogs and puppies, 8 weeks or older]: {For cartons containing 0.67 mL (0.023 fl oz) applicator tubes}

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 the dog's back between the shoulder blades.]

#### For Dogs Weighing 23 - 44 lbs.

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

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 the dog's back between the shoulder blades.]

#### For Dogs Weighing 45 – 88 lbs.

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

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 the dog's back between the shoulder blades.]

#### For Dogs Weighing 89-132 lbs

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

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 the dog's back between the shoulder blades.]

#### STORAGE AND DISPOSAL

**PESTICIDE STORAGE:** Do not remove tube from the pack until ready to use. Store in a cool (below

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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]

Distributed by: Sergeant's Pet Care Products, Inc. P.O. Box 540399 Omaha, NE 68154-0399 EPA Reg. No. 2517-XX EPA Est. No. XXXXX -XX -XXX

[BAR CODE AREA]

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

[Optional Insert or package copy]
[Coupon(s) inside or on outside of box]

[{Outer Packaging or Insert Copy}]

[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.]

# 140+15

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## [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 drawings that may or may not appear on finished label]



- 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 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.]

#### [Flea life cycle diagram]

[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]

#### [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

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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}

Front Label	Back Label	
{Brand Name}[cat graphic with line through]	KEEP OUT OF REACH OF CHILDREN	
For dogs [up to X] [X-Y] lbs	CAUTION: Read directions and precautions	
Fipronil 9.7% w/w	before using. Use scissors to open.	
0.67 mL (or) 1.34 mL (or) 2.68 mL (or) 4.02	EPA REG. No. 2517-XX {label code}	
mL {label code}		