

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

November 20, 2017

Prince Bamaze Regulatory Affairs Sergeant's Pet Care Products Inc. 10077 South 134th St Omaha, NE 68138

Subject: Label Amendment – Agency Initiated Master Label amendment to address safety

mitigation

Product Name: Sergeant's Fipronil Squeeze-On For Dogs

EPA Registration Number: 2517-136

Application Date: 10/02/2017 Decision Number: 534910

Dear Mr. Bamaze:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

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with FIFRA section 6. If you have any questions, please contact Helen Hull-Sanders by phone at 703-347-0243, or via email at hull-sanders.helen@epa.gov.

Sincerely,

Elizabeth Fertich Product Manager 4

Invertebrate & Vertebrate Branch 1 Registration Division (7505P) Office of Pesticide Programs

Enclosure

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FRONT PANEL

DOG SOUEEZE ON FIPRONIL

{Optional text appears in brackets – the final product label may include some or all of the optional text on front, back or side label panels. The CRP required text and format will not change from current label] {Information is instructional}

Sergeant's Fipronil Squeeze-On for Dogs

{Market Label - the word 'Dog' will be 40-75% in height of the largest letter in the primary brand name.} {Market Label-a large clear picture of a Dog in the appropriate weight range will be on the front panel of the label}

ACCEPTED

11/20/2017

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

{A minimum of 1.5 cm x 1.5 cm icon as indicated: black cat, black text, red circle and line through cat, on white background to ensure easy spotting, in lower right-hand corner of front label panel.}



{One of the statements below will appear prominently on the front panel of market label as required}

For use ONLY on [Small] dogs [&] [and] puppies [weighing] 5-22 lbs. [&] [and] over 8 weeks of age. **{OR}**

ONLY For [Small] dogs [&] [and] puppies 8 weeks or older [&] [and] [weighing] 5-22 lbs.

Apply ONLY to [Small] dogs [&] [and] puppies 8 weeks or older [&] [and] [weighing] 5-22 lbs.

{OR}

For use ONLY on [Medium] [Large] [Extra Large] dogs [&] [and] [puppies] [weighing] [23-44], [45-88], [89-132] lbs.

{OR}

ONLY For [Medium] [Large] [Extra Large] dogs [&] [and][puppies] [weighing] [23-44], [45-88], [89-132] lbs.

{OR}

Apply ONLY to [Medium] [Large] [Extra Large] dogs [&] [and][puppies] [weighing] [23-44], [45-88], [89-132] lbs.

Text within box designates Vet Only language. All required text on Master Label applies to all type of packaging. The 'Vet Only language' applies additionally to labeling for products sold to Vets.}

{SUBLABEL: FOR USE ONLY BY LICENSED VETERINARIANS ON DOG IN THEIR CONTROL OR UNDER THEIR IMMEDIATE SUPERVISION

FOR USE ONLY BY LICENSED VETERINARIANS ON DOG IN THEIR CONTROL OR UNDER THEIR IMMEDIATE SUPERVISION

For use in veterinarian clinics, animal shelters, grooming facilities and boarding kennels. Not for residential use. Do not repackage.

[Ideal for shelter use when under direct supervision of veterinarian]

[Professional Roll Pack]

[Convenient roll pack for in clinic use]

[Convenient roll pack for animal facility use]

[For use only by licensed veterinarians]

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ACTIVE INGREDIENT:

Fipronil 9.70% **OTHER INGREDIENT:** 90.30%

TOTAL 100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

See [Back][Side] [Label[s]] [Panel[s]][or][Insert] for First Aid [and] [Additional] Precautionary Statements

Net Contents:

[1][2][3][4][5][6][12][24] tube(s) [vials(s)] each 0.023 fl oz (0.67 mL)

[1][2][3][4][5][6][12][24] tube(s) [vials(s)] each 0.045 fl oz (1.34 mL)

[1][2][3][4][5][6][12][24] tube(s) [vials(s)] each 0.091 fl oz (2.68 mL)

[1][2][3][4][5][6][12][24] tube(s) [vials(s)] each 0.136 fl oz (4.02 mL)

{OR} {Text within box designates Vet Only language. All required text on Master Label applies to all type of packaging. The 'Vet Only language' applies additionally to labeling for products sold to Vets.}

Net Contents:

[35][50][75][100][160] tubes (vials) each 0.023 fl oz (0.67 mL)

[35][50][75][100][160] tubes (vials) each 0.045 fl oz (1.34 mL)

[35][50][75][100][160] tubes (vials) each 0.091 fl oz (2.68 mL)

[35][50][75][100][160] tubes (vials) each 0.136 fl oz (4.02 mL)

{END - FRONT PANEL}

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BACK/SIDE PANEL

DOG SQUEEZE ON FIPRONIL

[[Brand Name] [This product] contains Fipronil to effectively kill fleas and ticks [(including those that may transmit Lyme disease).] [The active ingredient in [Brand Name] [this product] features 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. [WEIGHING] [5-22], [23-44], [45-88] [89-132] lbs.

[[Brand Name] [This product] for dogs provides [[four] [three] way] protection that kills fleas, ticks, [mosquitoes] and chewing lice. Controls mites that may cause sarcoptic mange. Kills deer ticks that transmit Lyme disease. Kills brown dog ticks, American dog ticks, and lone star ticks. Prevents flea reinfestation for [[4] [four] weeks] [[1] [one]month] [30 days].]

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. Remove and wash contaminated clothing before reuse.

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.

OR {Text within box designates Vet Only language. All required text on Master Label applies to all type of packaging. The 'Vet Only language' applies additionally to labeling for products sold to Vets.}

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 a dog with more than one pesticide product at a time. Over dosing a dog can result in serious illness and even death. Use caution before using on medicated, debilitated, aged, pregnant, nursing dogs or dogs with known organ dysfunction. If the dog is exhibiting signs of and/or is being treated for skin dermatitis, use caution 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:	 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:	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. 			
HOT LINE NUMBER				

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-781-4738 for emergency medical treatment information.

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. Dog must be dry at time of application and remain dry for 24 hours after application. Use entire contents of [tube] [vial] on each 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.

RESTRICTIONS:

Do not use on cats 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 5 [23][45][89] lbs.

Do not bathe or allow dog to swim for 24 hours after application.

Do not apply more than one [tube][vial] per treatment for one dog regardless of dog's weight.

Do not reapply for [30 days][4 weeks][one month].

{Side Effects box to be located immediately above the cat warning box on the back label panel}

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 any side effects occur or your dog has unusual reaction to the application, consult your veterinarian or call 1-800-781-4738. Consult your veterinarian before repeating application.

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{A minimum of 1.5cm x 1.5cm cat prohibition icon and warning text will be in a box in the lower right hand corner of the back panel with black cat + red circle and line through the cat, black text, on white background to ensure easy spotting.}

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.



[See Insert inside [or] [Folded Panel(s)/Flap] for information on **How to open** and **How to apply**] {Referral Statement used only when 'Directions for Use' on outer packaging does not contain information below}

How to open: Remove product tubes [vial] from the package. [Separate one tube [vial] 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: Invert [tube] [vial] over dog and use open end to part dog's hair. Squeeze [tube] [vial] 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) tube(s) [vial(s)]}

Only For Dogs Weighing 5[-][to] 22 lbs. including small dogs and puppies, 8 weeks or older. Do not apply to dogs weighing less than 5 lbs.

Apply one [tube] [vial] (0.67 mL) (0.023 fl oz) [directly to skin] [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.] [as a [strip][line] starting [at the middle of the back] [at a midway point between the neck and tail] and ending [at a spot] between the shoulder blades. [This allows for a more direct application to the skin]

{For cartons containing 1.34 mL (0.045 fl oz) tube [vial(s)]}

Only For Dogs Weighing 23 [-] [to] 44 lbs. Do not apply to dogs weighing less than 23 lbs.

Apply one [tube] [vial] (1.34 mL) (0.045 fl. oz.) [directly to skin] [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.] [as a [strip][line] starting [at the middle of the back] [at a midway point between the neck and tail] and ending [at a spot] between the shoulder blades. [This allows for a more direct application to the skin]

{For cartons containing 2.68 mL (0.091 fl oz) tube [vial(s)]}

Only For Dogs Weighing 45 [-] [to] 88 lbs. Do not apply to dogs weighing less than 45 lbs.

Apply one [tube] [vial] (2.68 mL) (0.091 fl. oz.) [directly to skin] [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.] [as a [strip][line] starting [at the middle of the back] [at a midway point between the neck and tail] and ending [at a spot] between the shoulder blades. [This allows for a more direct application to the skin]

For cartons containing 4.02 mL (0.136 fl oz) tube [vial(s)]

Only For Dogs Weighing 89[-] [to] 132 lbs. Do not apply to dogs weighing less than 89 lbs.

Apply one [tube] [vial] (4.02 mL) (0.136 fl. oz.) [directly to skin] [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.] [as a [strip][line] starting [at the middle of the back] [at a midway point between the neck and tail] and ending [at a spot] between the shoulder blades]. [This allows for a more direct application to the skin]

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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 for 24 hours. Do not reapply for [30 days] [4 weeks] [one month].

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Do not remove tube [vial] 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.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: 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.] [XXXX]]

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

[Coupon(s) inside or on outside of box] {When outside of the box, coupon will not cover or distract from required text}

[Made in USA]

[Distributed by:][Manufactured by:]

Sergeant's Pet Care Products, Inc.

Omaha, NE 68138-3710

[BAR CODE AREA] {lot, date & label code} EPA Reg. No. 2517-136

EPA Est. No. [XXX-XX-XXX]

[Product of [Specific Country]. Blended and packaged in U.S.]

{END - BACK / SIDE PANEL}

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TUBE/VIAL LABEL

DOG SQUEEZE ON FIPRONIL

{Front Label} {Icon as indicated} {Brand Name} For Dogs [5-22], [23-44], [45-88]

[89-132] lbs ≥ 8 wks Fipronil 9.7%

0.023 fl oz (or) 0.045 fl oz (or) 0.091 fl oz (or)

0.136 fl oz {Lot No.} {label code}

KEEP OUT OF REACH OF CHILDREN

CAUTION: Read entire label before each use.

{Back Label}

Use scissors to open.

EPA REG. No. 2517-136

{Lot No. is engraved on the crimp portion of the tube} {label code refers to an internal product tracking code} {EPA Reg. No. may be on either the front or back label}

{END – TUBE/VIAL COPY}

INSERT OR FOLDED PANEL/ FLAP OF FRONT OF PACKAGE

DOG SQUEEZE ON FIPRONIL

{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 tube [vial] labeling.}

> READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS [AND] [PUPPIES] OVER 8 WEEKS OF AGE. [WEIGHING] [5-22], [23-44], [45-88] [89-132] lbs.

[[Clip. Part. Squeeze.]

Easier-than-ever tube [vial] lets you *clip* the tip, *part* the fur and *apply* directly to the skin – putting flea and tick protection where it needs to be.]

[Application Instructions] [Directions for Use] How to open

- **1.** Remove product tube [vial] from the package.
- 2. [Separate one tube [vial] 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] [vial] over dog and use open end to part dog's hair.
- 2. Squeeze tube [vial] 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.]

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[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 treated dogs from other pets after [treatment] [application] to avoid chance of ingestion
- [6] Do NOT split tubes [vial] between dogs [and use the ENTIRE tube [vial] contents]

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:	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice. 			
HOT I INE NUMPED				

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.

[Brand Name]

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

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

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

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

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

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

[Application date][Date of Application]

[calendar stickers with [Brand Name][This Product]

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[Place stickers on your calendar as a reminder to reapply [**Brand Name**][This Product] in 30 days.] [Place sticker on your calendar or [refrigerator] to remind yourself to apply [Brand name][this product] to your dog]

[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.]

{END - OPTIONAL INSERT OR PACKAGE COPY}

{Optional graphics below may or may not appear anywhere on finished label}

Total	Fleas	
*	Ticks	®
*	Brown Dog Tick	®
*	Deer Tick	8
*	American Dog Tick	S
*	Chewing Lice	
*	Lone Star Tick	
7	Mosquitoes	
*	Mite	















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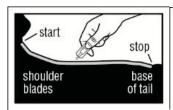


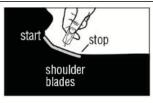






















{ABNs:}

[FRONTIER GOLD for Dogs]

[FRONTIER GOLD Spot On for Dogs]

[Sergeant's® FRONTIER GOLD for Dogs]

[Sergeant's® FRONTIER GOLD Spot On for Dogs]

[Sentry® FRONTIER GOLD for Dogs]

[Sentry® FRONTIER GOLD Spot On for Dogs]

[Ectoadvance for Dogs]

[Ectoadvance Spot-On for Dogs]

[Sergeant's® Ectoadvance for Dogs]

[Sergeant's® Ectoadvance Spot-On for Dogs]

[Sentry® Ectoadvance for Dogs]

[Sentry® Ectoadvance Spot-On for Dogs]

[SentryProline for Dogs]

[SentryProline Spot On for Dogs]

[SENTRY® FIPROGUARD™ for Dogs]

[PRONYL OTCTM for Dogs]

 $[Sergeant's^{\circledR}\ PRONYL\ OTC^{\tiny TM}\ for\ Dogs]$

[AdvanSpot for Dogs]

[AdvanSpot Spot On for Dogs]

[Sergeant's® AdvanSpot for Dogs]

[Sergeant's® AdvanSpot Spot On for Dogs]

[Sentry® AdvanSpot for Dogs]

[Sentry® AdvanSpot Spot On for Dogs]

[FiproSpot for Dogs]

[FiproSpot Topical for Dogs]

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[FiproSpot Topical for Dogs and Puppies]

[FiproSpot for Dogs and Puppies]

[EctoSpot for Dogs]

[EctoSpot for Dogs and Puppies]

[EctoSpot Topical for Dogs]

[EctoSpot Topical for Dogs and Puppies]

[Ectopronil for Dogs]

[Ectopronil for Dogs and Puppies]

[Ectopronil Topical for Dogs]

[Ectopronil Topical for Dogs and Puppies]

[EctoAdvance for Dogs]

[EctoAdvance for Dogs and Puppies]

[EctoAdvance Topical for Dogs]

[EctoAdvance Topical for Dogs and Puppies]

[F-Pronil for Dogs]

[F-Pronil for Dogs and Puppies]

[F-Pronil Topical for Dogs]

[F-Pronil Topical for Dogs and Puppies]

[Meridian Animal Health]

[PetArmor® for dogs]

[Sergeant's® PetArmor® for dogs]

[Optional marketing statements below may appear anywhere on the market label]

[Mosquitoes]

[Kills mosquitoes] [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] [and] [, 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 [[Small][S] Dogs [&] [and] Puppies 5-22 lbs.] [[Medium][M] Dogs 23-44 lbs.] [[Large][L] Dogs 45-88 lbs.] [[Extra Large] [XL] Dogs 89-132 lbs.] 8 weeks [of age] or older]

[Kills fleas, ticks, chewing lice [&] [and] [mosquitoes]]

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[Kills Fleas, Ticks [&] [and] [Mosquitoes]]

[Kills fleas, ticks, [mosquitoes] [and] [chewing lice]]

[Monthly flea, tick, [mosquito], and chewing lice [application] [treatment]

[Four [4] Three [3] Way [Action][Effectiveness][Control] to kill fleas, ticks, [mosquito,] and chewing lice]

[[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, [Mosquitoes] and Chewing Lice Control]

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

[Once A Month Flea, Tick, [Mosquitoes] [and] [Chewing Lice][Application] [Treatment]]

[Use [Brand Name][this product] monthly to control ticks and chewing lice]

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

[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]!]

[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], [American dog ticks,] [and] [lone star ticks][,][and deer 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]!]

[All Others]

{Active ingredients comparison statement will appear on same label panel as the corresponding disclaimer indicated with a *} [Fipronil (9.7%)]

[Contains the same active ingredient used in [Fipaira for Dogs (or any approved ABN)].*]

[Compare to [Fipaira for Dogs (or any approved ABN)], contains the same active ingredient.*]

[Compare to [Fipaira for Dogs (or any approved ABN)], contains the same active ingredient fipronil.*]

[[Brand Name] [products] [This product] contains(s) fipronil, the same active ingredient used in

[Fipaira for Dogs (or any approved ABN)].*]

[[Brand Name] [products] [This product] contains(s) fipronil, compared to the same active ingredient used in [Fipaira for Dogs (or any approved ABN)].*]

[[*][Brand Name][This product] is not manufactured or distributed by [Merial®] [Company name], the makers of [Fipaira for Dogs (or any approved ABN)].]

[[Brand Name][This product][Fipaira] is a trademark of [Merial®] [Company name].]

[[Brand Name] is a registered trademark of Sergeant's Pet Care Products, Inc.]

[Can be used on [Small Dogs 5-22 lbs] [Medium Dogs 23-44 lbs.] [Large Dogs 45-88 lbs.] [Extra Large Dogs 89-132 lbs.] 8 weeks [of age] or older]

[Formulated for Dogs and Puppies [Small Dogs 5-22 lbs.] [Medium Dogs 23-44 lbs.] [Large Dogs 45-88 lbs.] [Extra Large Dogs 89-132 lbs.] 8 weeks [of age] or older]

[For [Small Dogs 5-22 lbs.] [Medium Dogs 23-44 lbs.] [Large Dogs 45-88 lbs.] [Extra Large Dogs 89-132 lbs.] 8 weeks [of age] or older]

30 Oct 2017 Amendment Information in { } is instructional

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[Fast Acting] [Long Lasting]

[Convenient spot treatment]

[Easy to Use [Application]]

[Best if used year round!]

[For year-round protection, apply [Brand Name] [this product] monthly]

[(ICON Showing 4 Week Protection)]

[Apply monthly]

[Prevents infestation of listed pests for [1 month] [4 weeks]]

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

[4 Week Dose!] [1 Month Dose!] [30 Day Dose!]

[One Application] [Two Applications] [Five Applications] [Four Applications]

Applications][Six Applications][Twelve Applications][Twenty-Four Applications] and/or [1 Month Supply][2 Month Supply][3 Month Supply][4 Month Supply][5Month Supply][6 Month Supply][12 Month Supply][12 Week Supply][16 Week Supply][16 Week Supply][17 Week Supply][18 Week Supply][18 Week Supply][19 Week

Supply][Twenty Week Supply][24 Week Supply][48 Week Supply][52 Week Supply]

[[A once monthly application required] [Apply monthly to control] [for] chewing lice]

[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]]

[[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]

[[S][Small] (5 to 22 lbs.)] [[M][Medium] (23-44lbs.)] [[L][Large] (45-88 lbs.)] [[XL][Extra Large] (89-132 lbs.)] 8 weeks [of age] or older.

[Direct to skin [tube][vial]

[Easy to Use] [tube][vial]

[Clean cut [open] [tube][vial][No-mess [open] [tube][vial]

[Clip-tip design [tube][vial][!]]

[Satisfaction Guaranteed. If you are not satisfied, we will make it right with a replacement or refund.] [If you are not satisfied, we will make it right with a replacement or refund.]

{note to reviewer: X&Y is based on the number of tubes/vials or %. When additional [tube][vial] is provided, the extra tube or vial will not cover or distract consumer from required text.}

[Save Now!] [Buy more and save!]

[Value Size] [Club Size] [Bonus Size]

[Great Value] [Better Value]

[Bonus Pack] [(x) + (x) bonus pack!] [Club Pack]

[Buy X Get Y Free] [Buy 3 get 1 free] [(x)% (More) (Free)!] [33% more free]

[(x) Dose(s) Free!] [(x) Day(s) (Free)!] [(x) Month(s) Free!] [(x) Day(s) of treatment- Free!]

 $[(x)\ Tube(s)\ Free!]\ [(x)\ Application(s)\ Free!]$