

### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

October 16, 2017

Kelly Hoskins Manager, Regulatory Affairs Sergeant's Pet Care Products, Inc. 10077 South 134th Street Omaha, NE 68138

Subject: PRIA Label Amendment – Addition of claims other than speed-of-kill Product Name: Sergeant's Fipronil + Etofenprox Squeeze-On for Dogs EPA Registration Number: 2517-153 Application Date: 18-Sep-17 Decision Number: 533336

Dear Mr. Hoskins:

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, you may contact Julie Breeden-Alemi, DVM at 703-347-0511 or via email at <u>Breeden-Alemi.Julie@epa.gov</u>.

Sincerely,

Elizabet Falue

Elizabeth Fertich Acting Product Manager 03 Invertebrate & Vertebrate Branch 1 Registration Division (7505P) Office of Pesticide Programs

Enclosure

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FRONT PANEL

Information in [] is optional.

#### **DOG SOUEEZE ON** FIPRONIL+ETOFENPROX

[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 the current label.] {Information is instructional}

## Sergeant's Fipronil + Etofenprox Squeeze-On for Dogs

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

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

For use ONLY on dogs [&] [and] [puppies] [weighing] [4-22][23-44][45-88][89-132] lbs. [&] [and] 13 weeks of age or older.

**{OR}** 

ONLY For dogs [&] [and] [puppies] 13 weeks or older [&] [and] [weighing] [4-22][23-44][45-88][89-132] lbs.

> {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}

DO NOT USE ON CATS

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

**SUBLABEL:** FOR USE ONLY BY LICENSED VETERINARIANS ON DOGS IN THEIR CONTROL OR UNDER THEIR IMMEDIATE SUPERVISION}

### FOR USE ONLY BY LICENSED VETERINARIANS ON DOGS 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]

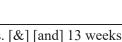
#### **ACTIVE INGREDIENTS:**

Fipronil	
Etofenprox	
OTHER INGREDIENTS:	
TOTAL	100.00%

### **KEEP OUT OF REACH OF CHILDREN** CAUTION

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

{Note to reviewer: First "X" = the total volume for the container as required by law "Y" = the number of tubes in the container as required by law. Second "X" = the tube fill volume as listed below and required by law.}



ACCEPTED 10/16/2017

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2517-153

Sergeant's Master Label		
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**Net Contents:** X fl oz ([Y – X fl oz [tube][vial] [s]]) {applies to all packaging except single tube packages} [1][One][2][Two][3][Three][4][Four][5][Five][6][Six ][12][Twelve][24][Twenty-Four]

**OR** {box only designates Vet Only language}

Net Contents: X fl oz [Y – X fl oz [tube][vial] [s]
[Thirty-five] 35[Fifty][50][Seventy-five][75][One hundred][100] [One hundred sixty 160]

[0.023 fl oz (0.67 mL) [tube] [s] [0.045 fl oz (1.34 mL) [tube][s] [0.091 fl oz (2.68 mL) [tube][s] [0.136 fl oz (4.02 mL) [tube][s]

### **{END - FRONT PANEL}**

#### **BACK /SIDE PANEL**

#### DOG SQUEEZE ON FIPRONIL+ETOFENPROX

[[**Brand Name**][This product] contains Fipronil And Etofenprox 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.]

[[**Brand Name**][This product] for dogs provides [[four] [three] way] protection that kills fleas, ticks, [mosquitoes] and chewing lice. Aids in control of 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].]

#### READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS [AND][&] [PUPPIES] OVER 13 WEEKS OF AGE OR OLDER [AND][&] [4-22][23-44][45-88][89-132] LBS

### PRECAUTIONARY STATEMENTS

**HAZARDS TO HUMANS. CAUTION.** Harmful if swallowed or absorbed through skin. Causes moderate 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**} {box only designates Vet Only language}

**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

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Information in [] is optional.

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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.

FIRST AID				
If On Skin	Take off contaminated clothing.			
Or Clothing	<b>Clothing</b> • Rinse skin immediately with plenty of water for 15-20 minutes.			
	• Call a poison control center or doctor for treatment advice.			
If Swallowed	• Call a poison control center or 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 further treatment advice.				
	HOT LINE NUMBER			
Have the product	t container or label with you when calling a poison control center or doctor, or going			
for treatment. For more information on this pesticide product (including health concerns, medical				
emergencies or pesticide incidents), you may call 1-800-781-4738.				
NOTE TO PHYSICIAN OR VETERINARIAN				
Treat patient symptomatically				

### **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **DO NOT 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.

**RESTRICTIONS:** Do not use on cats, rabbits and animals other than dogs. Do not allow [your] dog to ingest this product. Do not use on puppies under 13 weeks of age or less than [4][23][45][89] lbs. Do not bathe or allow dog to swim for 24 hours after application. Use entire contents of [tube][vial] on each dog. [Do not split one [tube][vial] between dogs.] [Do not use multiple [tube] [vial]s on one dog.] Do not apply more than one [tube][vial] per treatment for one dog regardless of dog's weight. 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. Do not apply more often than once every [4 weeks][30 days][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 an unusual reaction to the application, consult your veterinarian or call 1-800-781-4783. Consult your veterinarian before repeating application.

{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 a black cat + red circle and line through the cat, black text, on white background to ensure easy spotting}

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Information in [] is optional.

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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.

{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.}

{Either the paragraph or number format presented below will be used on the market label}

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

#### [How to open:

- 1. Remove product [tube[s][vial][s] 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.]

{Either the paragraph or number format presented below will be used on the market label} [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][30 days][month].]

Apply one [tube][vial] [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 [stripe][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.]

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

### **FREQUENCY OF APPLICATION**

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

#### STORAGE AND DISPOSAL

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

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. If empty: 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.

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

[Distributed by:][Manufactured by:] Sergeant's Pet Care Products, Inc. Omaha, NE 68138-3710 [BAR CODE AREA][Lot code] EPA Reg. No. 2517-153 EPA Est. No. [2517-NE-02] [2517-NE-03] [XXX-XX-XXX]

### {END - BACK / SIDE PANEL}

### **TUBE/VIAL LABEL**

#### DOG SQUEEZE ON FIPRONIL+ETOFENPROX

{Front Label} **{Brand Name}** For dogs [4-22][23-44][45-

88][89-132] lbs. ≥13 wks



Fipronil 9.8%, Etofenprox 15.0% [0.023][0.045][0.091][0.136] fl. oz. [XXXXX] {Xs refer to internal code for tracking purposes} {EPA REG No. may be on either the front or back label}

{LOT No. is debossed on the crimp portion of the tube}

{END – TUBE/VIAL COPY}

{Back Label}

KEEP OUT OF REACH OF CHILDREN CAUTION: Read entire label before each use. Use scissors to open. EPA REG. No. 2517-153 [XXXXX] {Xs refer to internal code for tracking purposes}

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Information in [] is optional. INSERT

DOG SQUEEZE ON FIPRONIL+ETOFENPROX

Sergeant's Fipronil + Etofenprox Squeeze-On for Dogs

{The word Dog will be at least 40-75% in height of the largest letter in the primary brand name.}



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

For use ONLY on dogs [&] [and] [puppies][weighing] [4-22][23-44][45-88][89-132] lbs. [&] [and] 13 weeks of age or older.

**{OR}** 

ONLY For dogs [&] [and] [puppies] 13 weeks or older [&] [and] [weighing] [4-22][23-44][45-88][89-132] lbs.

{Box only designates Vet only language}

**(SUBLABEL:** FOR USE ONLY BY LICENSED VETERINARIANS ON DOGS IN THEIR CONTROL OR UNDER THEIR IMMEDIATE SUPERVISION}

# FOR USE ONLY BY LICENSED VETERINARIANS ON DOGS 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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Information in [] is optional.

ACTIVE INGREDIENTS:	
Fipronil	
Etofenprox	
OTHER INGREDIENTS:	<u>75.20%</u>
TOTAL	100.00%

### KEEP OUT OF REACH OF CHILDREN CAUTION

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

{Note to reviewer: First "X" = the total volume for the container as required by law "Y" = the number of tubes in the container as required by law. Second "X" = the tube fill volume as listed below and required by law.}

Net Contents: X fl oz ([Y - X fl oz [tube][vial] [s]){applies to all packaging except single tube packages} [1][One][2][Two][3][Three][4][Four][5][Five][6][Six ][12][Twelve][24][Twenty-Four]

**OR** {box only designates Vet Only language}

Net Contents: X fl oz X count [Y – X fl oz [tube][vial][s] [Thirty-five] 35[Fifty][50][Seventy-five][75][One hundred][100] [One hundred sixty 160]

[0.023 fl oz (0.67 mL) [tube][s] [0.045 fl oz (1.34 mL) [tube][s] [0.091 fl oz (2.68 mL) [tube][s] [0.136 fl oz (4.02 mL) [tube][s]

[[**Brand Name**][This product] contains Fipronil And Etofenprox 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.]

[[**Brand Name**][This product] for dogs provides [[four] [three] way] protection that kills fleas, ticks, [mosquitoes] and chewing lice. Aids in control of 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].]

#### READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON DOGS [AND][&] [PUPPIES] OVER 13 WEEKS OF AGE OR OLDER [AND][&] [4-22][23-44][45-88][89-132] LBS.

#### PRECAUTIONARY STATEMENTS

**HAZARDS TO HUMANS. CAUTION.** Harmful if swallowed or absorbed through skin. Causes moderate 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

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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** {box only designates Vet Only language}

**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.

FIRST AID			
If On Skin	• Take off contaminated clothing.		
Or Clothing	• Rinse skin immediately with plenty of water for 15-20 minutes.		
	• Call a poison control center or doctor for treatment advice.		
If Swallowed	• Call a poison control center or 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 further treatment advice.			
	HOT LINE NUMBER		
Have the product	t container or label with you when calling a poison control center or doctor, or going		
for treatment. For more information on this pesticide product (including health concerns, medical			
emergencies or pesticide incidents), you may call 1-800-781-4738.			
NOTE TO PHYSICIAN OR VETERINARIAN			
Treat patient symptomatically			

#### **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **DO NOT 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.

**RESTRICTIONS:** Do not use on cats, rabbits and animals other than dogs. Do not allow [your] dog to ingest this product. Do not use on puppies under 13 weeks of age or less than [4][23][45][89] lbs. Do not bathe or allow dog to swim for 24 hours after application. Use entire contents of [tube][vial] on each dog. [Do not split one [tube][vial] between dogs.] [Do not use multiple [tube] [vial]s on one dog.] Do not apply more than one [tube][vial] per treatment for one dog regardless of dog's weight. 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. Do not apply more often than once every [4 weeks][30 days][month].

**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

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your dog with a mild soap and rinse with large amounts of water. If any side effects occur or your dog has an unusual reaction to the application, consult your veterinarian or call 1-800-781-4783. Consult your veterinarian before repeating application.

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.



{Either the paragraph or number format presented below will be used on the market label}

{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.}

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

#### [How to open:

- 1. Remove product [tube][s][vial][s] 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.]

{Either the paragraph or number format presented below will be used on the market label} [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][30 days][month].]

Apply one [tube][vial] [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 [stripe][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.]

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

#### FREQUENCY OF APPLICATION

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

### STORAGE AND DISPOSAL

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

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**PESTICIDE DISPOSAL AND CONTAINER HANDLING:** Non-refillable container. Do not reuse or refill this container. **If empty:** 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)

[Distributed by:][Manufactured by:] Sergeant's Pet Care Products, Inc. Omaha, NE 68138-3710 [BAR CODE AREA][Lot code] EPA Reg. No. 2517-153 EPA Est. No. [2517-NE-02] [2517-NE-03] [XXX-XX-XXX]

### {END - INSERT}

#### DOG SQUEEZE ON FIPRONIL+ETOFENPROX

{Optional graphics and marketing statements below may appear anywhere on the market label}

#### [[Clip. Part. Squeeze.]

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

[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 dog from other pets to avoid chance of ingestion
- [6] Do NOT split [tube][vial]s between dogs [and use the ENTIRE [tube][vial]contents]

### [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 weight)]

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

[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].

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

[Place sticker on your calendar or [refrigerator] to remind yourself to apply [Brand name][this product] to vour 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.]



TAN	Adult Flea	
×.	Ticks	
-	Brown Dog Tick	
-	Deer Tick	
*	American Dog Tick	
「	Chewing Lice	
*	Lone Star Tick	
₹¥	Mosquitoes	
-	Mite	8

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

#### [Mosquitoes]

Information in [] is optional.

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

### [Chewing Lice]

[Kills chewing lice] [Rapid elimination of chewing lice infestation] [A once monthly application required for chewing lice] [Apply monthly to control chewing lice.] [Fast Action against chewing lice infestations]

### [Fleas]

[Kills fleas which may be a source of [flea allergy dermatitis] [flea bite anemia]] [Kills fleas which may transmit tapeworm] [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]

### [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]!]

### [Multiple Infestations]

[Kills Fleas and Ticks for up to [4 weeks!] [30 days!] [1 month!]] [[4 Week] [30 Day] [1 Month][Flea and Tick Treatment]] [Kills chewing lice [and aids in control of mites that may cause sarcoptic mange]] [Kills fleas, ticks, chewing lice [&] [and] [mosquitoes]] [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, [mosquitoes,] 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 protection from flea, tick, [mosquito], and chewing lice] [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]!]

Serg	geant's Master La	ıbel
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Information in [] is optional.	Page 14 of 15	EPA SAL 12/14/2015
[All Others]		
[Fipronil (9.8%) + Etofenprox (15.0%)	]	
[[Brand Name][This product] is a [regi		I [Company Name]]
[Only For [Small Dogs 4-22 lbs.] [Med	lium Dogs 23-44 lbs.] [Large Dog	gs 45-88 lbs.] [Extra Large Dogs 89-
132 lbs.] [&] [and] 13 weeks of age or	older.	
[[Small [S] 4-22 lbs.] [Medium [M] 23	-44 lbs.] [Large [L] 45-88 lbs.] [H	Extra Large [XL] 89-132 lbs.] [&]
[and] 13 weeks of age or older.		
[Fast Acting] [Long Lasting] [Conveni	ent spot treatment]	
[Easy to Use [Application]]		
[Best if used year round!]		
[For year-round protection, apply [Bra	nd Name][this product] monthly]	]
[(ICON Showing 4 Week Protection)]		
[Apply monthly]		
[Prevents infestation of fleas, ticks, and	<b>e</b> 1	eeks]]
[Apply once every [4 weeks] [month] [		
[4 Week Dose!] [1 Month Dose!] [30 I		
[One Application][Two Applications][		32 11 32
Applications][Twelve Applications][T		
Supply][3 Month Supply][4 Month Sup		
Supply] or [4 Week Supply][8 Week S		k Supply][Twenty Week Supply][24
Week Supply][48 Week Supply][52 W		
[Aids in control of mites that may caus	e sarcoptic mange]	
[Waterproof]		
[Effective after bathing and exposure to	b water and sunlight]	
[[Free] Calendar Stickers Inside!] [[Free with purchase] [Free inside] Mo	nthly Application Dominder [May	an at [incide]]
[[1][2][3][4][5][6][12][24] Application		glietj[lilside]]
[Stops and prevents infestation of listed	-	
[Stops existing infestation and prevents		station of listed nests]
[Direct to skin [tube][vial]]	s establishment of additional miles	station of fisted pests]
[Easy to Use] [tube][vial]e]		
[Clean cut [open] [tube][vial]]		
[No-mess [open] [tube][vial]]		
[Clip-tip design [tube][vial] [!]]		
[Satisfaction Guaranteed. If you are no	t satisfied, we will make it right v	vith a replacement or refund.
[If you are not satisfied, we will make	÷	
		-
[Triple-Action Formula – {will specify	3 pests to qualify this statement}]	

{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!]	[Better Value]
[Value Size]	[Bonus Pack]
[Club Size]	[Buy more and save!]
[Bonus Size]	[(x) Dose(s) Free!]
[Club Pack]	[(x) Day(s) (Free)!]
[Great Value]	[(x) Month(s) Free!]
[Buy X Get Y Free]	[(x) + (x) bonus pack!]
[Buy 3 get 1 free]	[(x) Tube(s) Free!]
[(x)% (More) (Free)!]	[(x) [tube][vial](s) Free!]
[33% more free]	

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