

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

January 20, 2016

Mr. Prince M. Bamaze Regulatory Affairs Associate Sergeant's Pet Care Products, Inc. 10077 South 134th Street Omaha, NE 68138-3710

Subject: CSF and Label Notification per PRN 98-10 – New Alternate CSFs 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, and 19) and Addition of Toxic Inert Statement to the Label Product Name: SPCP4 EPA Registration Number: 2517-166 Application Date: October 22, 2015 Decision Number: 512445

Dear Mr. Bamaze:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The CSFs submitted with your application have been stamped "Notification" and placed in our files. The label submitted with the application has been stamped "Notification" and will be placed in our records.

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.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 03/26/2014
- Alternate CSF 1 dated 03/26/2014
- Alternate CSF 2 dated 03/26/2014
- Alternate CSF 3 dated 03/26/2014
- Alternate CSF 4 dated 11/20/2015

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- Alternate CSF 5 dated 11/20/2015
- Alternate CSF 6 dated 11/20/2015
- Alternate CSF 7 dated 11/20/2015
- Alternate CSF 8 dated 11/20/2015
- Alternate CSF 9 dated 11/20/2015
- Alternate CSF 10 dated 11/20/2015
- Alternate CSF 11 dated 11/20/2015
- Alternate CSF 12 dated 11/20/2015
- Alternate CSF 13 dated 11/20/2015
- Alternate CSF 14 dated 11/20/2015
- Alternate CSF 15 dated 11/20/2015
- Alternate CSF 16 dated 11/20/2015
- Alternate CSF 17 dated 11/20/2015
- Alternate CSF 18 dated 11/20/2015
- Alternate CSF 19 dated 11/20/2015

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, please contact Tim Ciarlo at 703-347-8082 or by email at <u>Ciarlo.Timothy@epa.gov</u>.

Sincerely,

Kable Bo Davis, Product Manager 3 Invertebrate and Vertebrate Branch 1 Registration Division (7505P) Office of Pesticide Programs

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SPCP4 (DOG)

Editor's Note: [Optional proposed text appears in brackets - the final label may include some or all of the optional text]

SPCP4

{ABN} [Sergeant's Deltamethrin Collar]

- {ABN} [Sergeant's Triple Protection Flea & Tick Collar]
- {ABN} [Sergeant's Dual Action Flea & Tick Collar for Small Dogs & Puppies]
- {ABN} [Sergeant's Dual Action Flea & Tick Collar for Dogs]
- {ABN} [Sergeant's Dual Action Flea & Tick Collar for Large Dogs]
- {ABN} [Sergeant's Flea & Tick Collar for Small Dogs & Puppies]
- {ABN} [Sergeant's Flea & Tick Collar for Dogs]
- {ABN} [Sergeant's Flea & Tick Collar for Large Dogs]
- {ABN} [SENTRY Dual Action Flea & Tick Collar for Small Dogs & Puppies]
- {ABN} [SENTRY Dual Action Flea & Tick Collar for Dogs]
- {ABN} [SENTRY Dual Action Flea & Tick Collar for Dogs and Puppies]
- {ABN} [SENTRY Dual Action Flea & Tick Collar for Large Dogs]
- {ABN} [SENTRY Flea & Tick Collar for Dogs]
- {ABN} [SENTRY Flea & Tick Collar for Small Dogs & Puppies]
- {ABN} [SENTRY Flea & Tick Collar for Dogs]
- {ABN} [SENTRY Flea & Tick Collar for Large Dogs]
- {ABN} [SENTRY Flea & Tick Collar for Dogs & Puppies]
- {ABN} [PetArmor® Collar Dogs]
- {ABN} [PetArmor® Collar for Dogs]
- {ABN} [PetArmor® Collar Small Dogs]
- {ABN} [PetArmor® Collar for Small Dogs]
- {ABN} [PetArmor® Collar Small Dogs and Puppies]
- {ABN} [PetArmor® Collar for Small Dogs and Puppies]
- {ABN} [PetArmor® Collar Dogs and Puppies]
- {ABN} [PetArmor® Collar for Dogs and Puppies]
- {ABN} [PetArmor® Collar Medium Dogs]
- {ABN} [PetArmor® Collar for Medium Dogs]
- {ABN} [PetArmor® Collar Large Dogs]
- {ABN} [PetArmor® Collar for Large Dogs]
- {ABN} [PetArmor® Flea and Tick Collar Dogs]
- ABN [PetArmor® Flea and Tick Collar for Dogs]
- [ABN] [PetArmor® Flea and Tick Collar Small Dogs]
- {ABN} [PetArmor® Flea and Tick Collar for Small Dogs]
- {ABN} [PetArmor® Flea and Tick Collar Small Dogs]
- {ABN} [PetArmor® Flea and Tick Collar for Small Dogs and Puppies]
- {ABN} [PetArmor® Flea and Tick Collar Dogs and Puppies]
- [ABN] [PetArmor® Flea and Tick Collar for Dogs and Puppies]
- [ABN] [PetArmor® Flea and Tick Collar Medium Dogs]
- {ABN} [PetArmor® Flea and Tick Collar for Medium Dogs]
- [ABN] [PetArmor® Flea and Tick Collar Large Dogs]
- (ADN) [P (A @ FL = 1T' 1 C 11 C L D
- {ABN} [PetArmor® Flea and Tick Collar for Large Dogs]
- {ABN} [SENTRY Flea & Tick Collar for Small Dogs & Puppies]
- {ABN} [SENTRY Flea & Tick Collar for Large Dogs]
- {ABN} [SENTRY Flea & Tick Collar for Dogs & Puppies]
- {ABN} [Sentry Vet Flea & Tick Collar for Dogs]
- {ABN} [Sergeant's Dual Action Flea & Tick Collar II for Small Dogs & Puppies]
- {ABN} [Sergeant's Dual Action Flea & Tick Collar II for Dogs]

NOTIFICATION

2517-166

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

01/20/2016

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{ABN} [Sergeant's Dual Action Flea & Tick Collar II for Large Dogs]

{ABN} [SENTRY® DELTAGUARD Dogs]

{ABN} [SENTRY® DELTAGUARD for Dogs]

{ABN} [SENTRY® DELTAGUARD Small Dogs]

{ABN} [SENTRY® DELTAGUARD for Small Dogs]

{ABN} [SENTRY® DELTAGUARD Medium Dogs] {ABN} [SENTRY® DELTAGUARD for Medium Dogs]

{ABN} [SENTRY® DELTAGUARD for Medium Dog {ABN} [SENTRY® DELTAGUARD Large Dogs]

{ABN} [SENTRY® DELTAGUARD Large Dogs] {ABN} [SENTRY® DELTAGUARD for Large Dogs]

{ABN} [SENTRY® Long Last Collar Dogs]

{ABN} [SENTRY® Long Last Collar for Dogs]

{ABN} [SENTRY® Long Last Collar Small Dogs]

{ABN} [SENTRY® Long Last Collar for Small Dogs]

{ABN} [SENTRY® Long Last Collar Medium Dogs]

[ABN] [SENTRY® Long Last Collar for Medium Dogs]

{ABN} [SENTRY® Long Last Collar Large Dogs]

ABN [SENTRY® Long Last Collar for Large Dogs]

[Compare to Scalibor® Protector Band for Dogs [Tick and Flea Collar for Dogs], contains the same active ingredient.*]

[Compare to Scalibor® Protector Band for Dogs [Tick and Flea Collar for Dogs], contains the same active ingredient deltamethrin.*]

[Compare to the same active ingredient found in Scalibor® Protector Band for Dogs [Tick and Flea Collar for Dogs]*]

[[Brand Name] [This product] contains deltamethrin, the same active ingredient used in Scalibor® Protector Band for Dogs [Tick and Flea Collar for Dogs].*]

*Scalibor® is a registered trademark of [Merck Animal Health][Intervet International B.V.]. [Brand Name] [This product] is not manufactured or distributed by [Merck Animal Health][Intervet International B.V.]. **OR**

*Scalibor® is a registered trademark of [Merck Animal Health][Intervet International B.V.]. [Brand Name] [This product] is not manufactured or distributed by the makers of Scalibor® Protector [Band] [Brand] for Dogs.

Fleas

- [Flea (control) (prevention) for dogs (& puppies)]
- [Kills Fleas]
- [Kills [Adult] Fleas for up to [60][90][120][150][180] days[!]]
- [Kills [Adult] Fleas for up to [2][two][3][three][4][four][5][five][6][six] months[!]]
- [Provides [long lasting] [60][90][120][150][180] days[s]] protection against fleas]
- [Provides [long lasting] [2][two][3][three][4][four][5][five][6][six] month[s]] protection against fleas]
- [Prevents new flea infestations]
- [Kills adult fleas (before they lay eggs)]
- [Kills fleas that may cause anemia]
- [Kills fleas that may cause bartonellosis]
- [Kills fleas that may cause anaplasmosis]
- [Kills [adult] fleas which may transmit tapeworms]
- [Kills [adult] fleas which may cause flea bite anemia]
- [Kills [adult] fleas and may reduce the incidence of FAD]
- [Kills [adult] fleas that may cause [Flea Allergy Dermatitis (FAD)][and][flea bite dermatitis]]
- [Kills [adult] fleas which may be a source of flea allergy dermatitis][(and) flea bite anemia][(and)tapeworm]

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Ticks

- [Tick (control)(prevention) for dogs (& puppies)]
- [Kills Ticks]
- [Kills Ticks for up to [60][90][120][150][180] days[!]]
- [Kills Ticks for up to [2][two][3][three][4][four][5][five][6][six] months[!]]
- [Provides [long lasting] [60][90][120][150][180] days[s]] protection against ticks]
- [Provides [long lasting] [2][two][3][three][4][four][5][five][6][six] month[s]] protection against ticks]
- [Kills ticks that may transmit disease]
- [Kills ticks that may cause babesiosis]
- [Kills ticks (including deer ticks which may carry Lyme disease)]
- [Kills the Ticks that may carry Rocky Mountain Spotted Fever]
- [Kills ticks for [2][two][3][three][4][four][5][five][6][six] months, including Deer ticks (vector of Lyme disease and anaplasmosis), American dog ticks (vector of Rocky Mountain spotted fever and ehrlichiosis), and Brown dog ticks (vector of ehrlichiosis, anaplasmosis, bartonellosis, canine hemoplasmosis, babesiosis)]

Multiple Pests

- [Provides up to [60][90][120][150][180] days control [of fleas [and] [&] ticks]]
- [Provides up to [2][two][3][three][4][four][5][five][6][six] months control [of fleas [and] [&] ticks]]
- [Kills Fleas [and][&] Ticks]
- [Kills Fleas and Ticks [for up to] [60][90][120][150][180] days]]
- [Kills Fleas and Ticks [for up to] [2][two][3][three][4][four][5][five][6][six] months]]

Multiple Package Claims

- [2 [Two] Collars = [4][four][6][six][8][eight][10][ten][12][twelve] month[s] protection]
- [2 [Two] Collars for [4][four][6][six][8][eight][10][ten][12][twelve] month[s] protection]
- [2 [Two] Collars provide up to [4][four][6][six][8][eight][10][ten][12][twelve] month[s] protection [against ticks and fleas]]
- [[Up to] [4][four][6][six][8][eight][10][ten][12][twelve] month[s] protection [against ticks and fleas] with 2 [Two] collars [in] [1][one] [per] [package]]

Collar Fit Claims

- [Lock and Stay Design]
- [Click and Stay Design]
- [Pull and Click]
- [Clicks into place]
- [Click to Fit Design]
- [Modern Click to Fit Design]
- [[New] Lock and Fit Design]
- [Slide [to] [and] Fit [Design]]
- [Fit] [-] [and] Stay [Design]]
- [Slide Fit [and] Stay Design]
- [Right Fit [Design]]
- [Just Right Fit [Design]]
- [Fits Just Right [Design]]
- [Fits securely] [Stays in place]
- [Fits just right ... won't be too loose or too tight]
- [Best Fitting Flea Collar]

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- [Comfort Fit [Design]]
- [Designed for Comfort]
- [Stay in Place design]
- [Won't slide and stretch]
- [Won't be too loose or too tight [...fits just right [!]]]
- [Grreat Fit]
- [Grr.eat [Fit]]
- [GRR...eat FIT]
- [Cut to size]
- [Size to fit]
- [Fit to size]
- [Adjustable]
- [Fits all size dogs]
- [Right Size Collar [Design]]
- [Fits securely on any size dog]
- [Notched to fit securely on any size dog]
- [Fits Neck to [specific inch size]]
- [Fits neck up to [15"] [20'] [23"][26"]
- [Fits right over existing collar]

All Other

- [From the makers of PetArmor®]
- [Time Release formula]
- [Continuous protection]
- [[Features] insecticide-release technology]
- [Long[-]Lasting]
- [[2][two][3][three][4][four][5][five][6][six] months protection]
- [Long Lasting Protection [for up to] [60][90][120][150][180] days]]
- [Long Lasting Protection [for up to [2][two][3][three][4][four][5][five][6][six] months]]
- [Apply new collar every [60][90][120][150][180] days]
- [Apply new collar every [2][two][3][three][4][four][5][five][6][six] months]
- [All Weather Collar]
- [Not affected by water] [Water resistant] [Waterproof]
- [Rugged][and][weatherproof]
- [Wetting will not impair the collar's effectiveness or the pet's protection]
- [Convenient]
- [Easy to (use)(apply)(attach)]
- [Cut off excess length]
- [Sergeant's collar technology]
- [For multiple dog [and puppy] households]
- [*over 12 [twelve] weeks of age]
- [For dog(s) (and puppies) 12 weeks of age and older]
- [For [Dogs], [Large Dogs], [Medium Dogs] [Small Dogs & Puppies] [Small Breeds]]
- [Deodorizes]
- [Deodorizing]
- [[Fresh][Powdery][Clean] Scent]
- [Specific fragrance noted here][Scent][Fragrance]]
- [Designed] [and] [Tested] to work [exclusively][specifically] with [Brand Name]
- [Specific printed design described here (i.e., animal paw print, paw print, etc.][print][design][collar]

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• [Reflective][Stylish][Trendy][Fashion][Glow-in-the Dark][Collar Cover][Protector Band][Collar Embellishment][Collar Accessories]

- [Pup-cessory]
- [Save Now!]
- [Great Value]
- [Better Value]
- [Bonus Pack]
- [Club Pack]
- [Club Size]
- [Value Size]
- [Value Pack]
- [Multi[[-][Pack]
- [[X] % Free]
- [Buy [X] and Save]
- [Buy More and Save]
- [Buy [X] Get [X] Free]
- [(X) Month(s) Free!]
- [X+X=X Bonus Pack!]
- [Coupon Inside!]
- [Product Coupons on inside or outside of package]
- [[New!] [Now] [Available without a visit to a veterinarian]]

ACTIVE INGREDIENT:

| Deltamethrin | 4.00% |
|-------------------|----------|
| OTHER INGREDIENTS | . 96.00% |
| Total | 100.00% |

"Note to PM: This statement will be included on all labels containing Bis (2-ethylhexyl) adipate (DEHA)." [This product contains the toxic inert ingredient Bis (2-ethylhexyl) adipate (DEHA) at 24.76%.]

DO NOT ALLOW CHILDREN TO PLAY WITH COLLAR CAUTION

See [Back] [Insert] [or] [Side] Label [Panel(s)] for Additional Precautionary Statements Net Weight: [[Small] 0.65oz. (18.4g)] [[Medium] 0.85oz. (24.1g)] [[Large] 0.97oz. (27.5g)] [Multi Packs] [[XX oz](XX g)]

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{Product Name} READ ENTIRE LABEL BEFORE EACH USE USE ONLY ON [DOGS] [MEDIUM DOGS] [SMALL DOGS] [SMALL BREEDS] [PUPPIES] [DO NOT USE ON CATS]

[PRODUCT INFORMATION]

[[**Product Name]** [This collar kills fleas and ticks for up to [2][two][3][three][4][four][5][five][6][six] months.] Collar is a [double layer] sustained-release system [containing deltamethrin] combining the insecticidal actions of vapors and powders [working in [two] [three] ways to provide head to tail protection]. Thus, collar has the effect of simultaneous usage of a spray and powder [in the control of fleas and ticks, including ticks that may carry Rocky Mountain spotted fever]. Use [**Product Name**] year round for most effective control. [Replace every [2][two][3][three][4][four][5][five][6][six] months or sooner if needed.]]

[[Product Name], containing deltamethrin insecticide, has been specially formulated using [patented] insecticiderelease technology. [Maximum effectiveness may not occur for 2-3 weeks after collar placement.] [If your dog is infested, you may consider shampooing your dog with an EPA registered [brand name] [flea and tick shampoo] to provide immediate relief from itching and biting before applying the [collar][product name]. Fleas (*Ctenocephalides sp.*) on the dog will be killed and ones which are present in the dog's environment that may appear on your pet will be killed. Collar will also kill ticks for up to [2][two][3][three][4][four][5][five][6][six] months. Collar will kill ticks including Brown dog tick (*Rhipicephalu sanguineus*), American dog tick (*Dermacentor variabilis*), and deer ticks (*Ixodes scaplilaris* and *Ixodes pacificus*), which may carry the Lyme disease. This collar should be worn continuously.]

[Reapply a new collar every [2][two][3][three][4][four][5][five][6][six] months.]

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Do not open protective [pouch][package] until ready to use. Do not let children play with this collar. Harmful if swallowed or absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling.

Do not use on puppies under 12 weeks. Do not use on cats. Consult a veterinarian before using this product on debilitated, aged, pregnant, medicated, or nursing animals. Sensitivities may occur after using ANY pesticide products for pets. If signs of sensitivity occur, remove collar and bathe your dog with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

This collar is intended for use only as an insecticide and is not to be taken internally by humans or animals.

[Notice: This product contains a chemical (Di-isodecyl phthalate (DIDP)) known to the State of California to cause birth defects or reproductive harm.]

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| FIRST AID | | |
|---|--|--|
| 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 the poison control | |
| | center or doctor. | |
| | • Do not give anything by mouth to an unconscious person. | |
| IF ON SKIN OR | • Take off contaminated clothing. | |
| CLOTHING: | • Rinse skin immediately with plenty of water for 15-20 minutes. | |
| | • Call a poison control center or doctor for treatment advice. | |
| 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. | |
| Have the product container or label with you when calling a poison control center or doctor, or | | |
| going for treatment. | You may contact 1-800-781-4738 for emergency medical treatment | |
| information. | | |

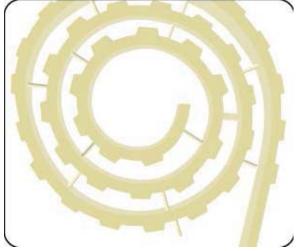
DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not open until ready to use. Dust [will][may] form on collar during storage. Do not get dust in mouth or eyes.] Place collar around pet's neck, adjust for fit, and buckle in place. The collar must be worn loosely to allow for growth of the pet and to permit the collar to move about the neck. Generally, a properly fitted collar is one that when fastened, will snugly slide over pet's head. Leave 2 or 3 inches for extra adjustment. Cut off and dispose of excess length. Wash hands after [installing] [placing] collar on pet. Replace collar every [2][two][3][three] [4][four][5][five][6][six] months or sooner if needed.

[OPTIONAL ALTERNATE DIRECTIONS FOR USE FOR INJECTION MOLDED COLLARS]

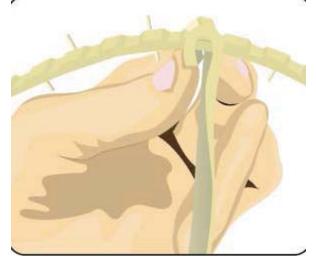
[[1.] Do not open until ready to use. Dust [will] form on collar during storage. Do not get dust in mouth or eyes. Take the collar out of the packaging and stretch to full length. [The tabs that held the collar in place [should][will] fall off when stretching; pull on any remaining tabs to remove them.]



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[[2.] Bend the buckle in half between the holes in the buckle, so that you can easily pass the end of the collar through both holes.]

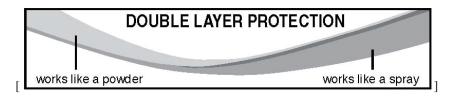


[[3.] Place the collar around your pet's neck. Feed the collar through both holes [[ridges][notches] facing out]. Fit to the neck of the dog. The collar must be worn loosely to allow for growth of the pet and to permit the collar to move about the neck. Generally, a properly fitted collar is one that, when fastened, will snugly slide over pet's head [, and two fingers can be placed between the collar and pet's neck]. Leave [2 or 3] [1 or 2] extra inches for collar adjustment, cut off remaining excess collar and dispose of in the trash.]



[4.] Wash hands after [installing] [placing] collar on pet. Replace collar every [2][two][3][three][4][four] [5][five] [6][six] months, or sooner if needed.]

[(INSERT DIAGRAM THAT DEPICTS DOUBLE LAYER PROTECTION OF PRODUCT)]



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STORAGE AND DISPOSAL

Pesticide Storage: Store this product in a cool, dry place away from children and pets. **Pesticide and Container Disposal:** Do not reuse container or used collar. Dispose of in trash.

[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 be 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.]

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

[If you have questions or comments about this product, please write: [SENTRY][Sergeant's] 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] {lot, date & label code}

Distributed by: Sergeant's Pet Care Products, Inc. P.O. Box 540399 Omaha, NE 68154-0399

[BAR CODE AREA] EPA Reg. No. 2517-166 EPA Est. No. XXXXX-XX-XXX

{END - BACK / SIDE PANEL}

{Each optional graphic below may or may not appear anywhere on the finished label}

