

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

October 3, 2019

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

Subject: Label Amendment – Revisions to Directions for Use and marketing text

Product Name: SPCP4 PLUS 1

EPA Registration Number: 2517-177 Application Date: 25-July-2018 Decision Number: 542951

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

Page 2 of 2 EPA Reg. No. 2517-177 Decision No. 542951

with FIFRA section 6. If you have any questions, you may contact Dr. Breeden-Alemi at 703-347-0511 or via email at <u>Breeden-Alemi.Julie@epa.gov</u>.

Id Herrick

Sincerely,

Jacquelyn Herrick, Product Manager 03 Invertebrate & Vertebrate Branch 1 Registration Division (7505P) Office of Pesticide Programs

Enclosure

02 JULY 2018 Amendment Version 18.1 EPA Reg. No. 2517-177 Information in [] is optional. Page 1 of 21 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

FRONT LABEL PANEL

SPCP4 Plus 1 (DOG)

SPCP4 Plus 1

ONLY For Dogs [and puppies] 12 weeks of age and older

{A statement of purpose of the product (flea and tick control for dogs) and the duration of protection per collar, indicated in the optional claims section will be included on the front panel}

ACTIVE INGREDIENTS:

Deltamethrin	4.00%
Pyriproxyfen	1.00%
OTHER INGREDIENTS	95.00%
Total	100.00%

This product contains the toxic inert ingredient Bis (2-ethylhexyl) adipate (DEHA) at 24.49%

DO NOT ALLOW CHILDREN TO PLAY WITH COLLAR

CAUTION

{Configuration 1:}

See Insert for First Aid, Directions for Use and [Additional] Precautionary Statements

{Configuration 2:}

See Back Label Panels for First Aid, Directions for Use and [Additional] Precautionary Statements

{-For both extruded and molded collars the following net weight information, corresponding to the appropriate package will be used. Multi Packs contains 2 same size collars. Statement of net weight will include individual collar weight as well as total weight for 2 collars}

Net Weight:

 Small:
 0.65oz. (18.4g) [Collar] - Fits neck up to 15"

 Medium:
 0.85oz. (24.1g) [Collar] - Fits neck up to 20"

 Large:
 0.97oz. (27.5g) [Collar] - Fits neck up to 23"

One Size Fits All: 0.97oz. (27.5g) [Collar]

{Multi Pack total} Two [XX] oz ([YY]) g Collars

{END - FRONT LABEL PANEL}

ACCEPTED

10/03/2019

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

2517-177

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 2 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

BACK LABEL PANEL

SPCP4 Plus 1 (DOG)

CONFIGURATION 1

{LIMITED BACK LABEL PANEL - WITH AN INSERT}

{Product Name}

READ ENTIRE LABEL BEFORE EACH USE USE ONLY ON [DOGS] [LARGE DOGS] [MEDIUM DOGS] [SMALL DOGS] [SMALL BREED DOGS] [PUPPIES] 12 WEEKS OF AGE AND OLDER DO NOT ALLOW CHILDREN TO PLAY WITH COLLAR DO NOT USE ON CATS

[[[SPCP4 Plus 1 {or} Alternate Brand Name] keeps your dog protected against fleas and ticks.] [As a bonus, it also prevents new flea infestations by preventing fleas from developing into biting adults.] [As a bonus, it does more to prevent new flea infestations, [killing fleas so they can't multiply and] [by] preventing new fleas from developing into biting adults.] [[Each] collar provides continuous protection for [up to] 6 months and is [simple] [easy] to use on [any] [small] [medium] [large] [size] dog 12 weeks of age and older: just slide and lock into place, then cut off the excess length.]]

If you have questions or comments about this product, please write: Sergeant's Consumer Response, P.O. Box 540399, Omaha, NE 68154-0399

For Emergency[?] [,] call: 1-800-781-4738 / Non-Emergency] [?] [,] call 1-800-224-7387

{or}

Questions or medical emergency: 1-800-224-7387

[[Text [xxxxx] to [xxxxx]] [or] [visit] [website] [website address] [to sign up for] [for access to] [to access] [tips] [how to apply videos] [reminders] [application reminders] [coupons] [special offers] [and more]]. [Facebook icon] [Twitter icon] [YouTube icon] [Instagram] [QR code]

STORAGE AND DISPOSAL

Pesticide Storage: Store this product in a cool, dry place away from children and pets.

Pesticide Disposal and Container Handling: Do not reuse container or used collar. Dispose of in trash.

Distributed by:

Sergeant's Pet Care Products, Inc. P.O. Box 540399 Omaha, NE 68154-0399 {Lot, date & label code}

[BAR CODE AREA] EPA Reg. No. 2517-177 EPA Est. No. XXXXX

{END – LIMITED BACK LABEL PANEL}

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 3 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

{INSERT - (USED FOR COMPLETE LABELING INFORMATION WHEN USING CONFIGURATION 1 - LIMITED BACK PANEL OPTION)}

{Product Name}

READ ENTIRE LABEL BEFORE EACH USE
USE ONLY ON [DOGS] [LARGE DOGS] [MEDIUM DOGS] [SMALL DOGS]
[SMALL BREED DOGS] [PUPPIES] 12 WEEKS OF AGE AND OLDER.
DO NOT ALLOW CHILDREN TO PLAY WITH COLLAR
DO NOT USE ON CATS

ACTIVE INGREDIENTS:

 Deltamethrin
 4.00%

 Pyriproxyfen
 1.00%

 OTHER INGREDIENTS
 95.00%

 Total
 100.00%

This product contains the toxic inert ingredient Bis (2-ethylhexyl) adipate (DEHA) at 24.49%

[PRODUCT INFORMATION]

[[SPCP4 Plus 1 {or} Alternate Brand Name] [This collar] kills fleas, ticks for [up to] 6 [six] months] [Product Name] Collar is a [double layer] sustained release system [containing deltamethrin and pyriproxyfen]. This, collar has the effect of simultaneous control of fleas and ticks, including ticks that may transmit Rocky Mountain spotted fever]. Use [Product Name] year round for most effective control. To protect continuously against adult fleas and ticks, collar should be replaced every 6 [six] months.]

[[Product Name], containing deltamethrin insecticide and pyriproxyfen an insect growth regulator (IGR), has been specially formulated using [features] insecticide-release technology. Collar will also kill ticks for [up to] 6 months. Collar will kill ticks including brown dog tick (*Rhipicephalus sanguineus*), American dog tick (*Dermacentor variabilis*), and deer ticks (*Ixodes scaplularis* and *Ixodes pacificus*) which may transmit Lyme disease. This collar should be worn for continuous protection up to 6 months.]
[Replace a new collar every 6 [six] months.]

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Do not open protective [wrapper {or}pouch {or}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 dogs. Sensitivities may occur after using ANY pesticide products for dogs. 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 for use only as an insecticide and is not to be taken internally by humans or animals.

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 4 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

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 also call 1-XXX-XXXX 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.

{DIRECTIONS FOR USE OPTIONS: One of the options below will be used with appropriate collar type; for Multi-Packs the statement: "Use only one collar per dog at a time" will be included}

{Option #1 – FOR EXTRUDED COLLARS}

Do not open [wrapper{or}pouch {or} package] until ready to use. Do not let children play with collar. Dust [will][may] form on collar during storage. Do not get dust in mouth or eyes. [Use only one collar per dog at a time.] Place collar around dog's neck, adjust for fit, and buckle in place. The collar must be worn loosely to allow for growth of the dog and to permit the collar to move about the neck. Maximum effectiveness may not occur for 2-3 weeks after collar placement. Generally, a properly fitted collar is one that when fastened, will snugly slide over dog's head. Two fingers should fit between the collar and neck. Leave 2 or 3 inches for extra adjustment. Cut off excess length, wrap in newspaper and dispose of in trash. Wash hands after placing collar on dog. Replace collar every 6 [six] months.

{Option #2A - FOR INJECTION MOLDED COLLARS}

Do not open [wrapper {or} pouch {or} package] until ready to use. Do not let children play with collar. Dust [will][may] form on collar during storage. Do not get dust in mouth or eyes. [Use only one collar per dog at a time.] Separate the collar from the pull tab strip and discard the pull tab strip in the trash. Place collar around dog's neck; adjust for fit, and buckle in place [with the main clasp]. Feed excess collar through the remaining two clasps for extra hold and a clean fit. The collar must be worn loosely to allow for growth of the dog and to permit the collar to move about the neck. Maximum effectiveness may not occur for 2-3 weeks after collar placement. Generally, a properly fitted collar is one that when fastened, will snugly slide over dog's head. Two fingers should fit between the collar and neck. Leave 2 or 3 inches for extra adjustment. Cut off excess length, wrap in newspaper and dispose in the trash. Wash hands after placing collar on dog. Replace collar every 6 [six]months.

02 JULY 2018 Amendment Version 18.1
Information in [] is optional. Page 5 of 21

Text in { } is informational/note to reviewer

EPA Reg. No. 2517-177 EPA SAL 04/20/2016

{Option #2B - FOR INJECTION MOLDED COLLARS}

Do not open [wrapper {or} pouch {or} package] until ready to use. Do not let children play with collar. Dust [will][may] form on collar during storage. Do not get dust in mouth or eyes. [Use only one collar per dog at a time.]

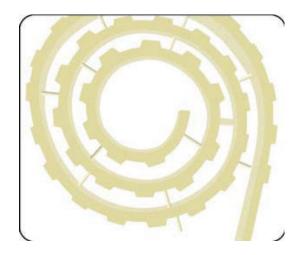
- 1. Unroll the collar.
- 2. Separate the collar from the pull tab strip. Start at either end by slowly pulling the strip away from the collar. Pull on any remaining strip to remove it. Discard the pull tab strip in the trash.
- 3. Place the collar around dog's neck. Pinch the buckle, [and] [then] insert the end of the collar through the buckle and slide to adjust for fit. Two fingers should fit between the collar and neck. Maximum effectiveness may not occur for 2-3 weeks after collar placement. The collar must be worn loosely to allow for growth of the dog and to permit the collar to move about the neck.
- 4. Once fitted comfortably, feed the excess collar through the loops.
- 5. Any excess length of the collar beyond 2-3 inches past the loops should be cut off, wrapped in newspaper and placed in the trash. (Depending on the size of your dog it may be easier to cut off the excess length before feeding through the loops.)
- 6. Wash hands after placing collar on dog.

{Optional graphics below may or may not appear on the market label}



{Option #3 – FOR INJECTION MOLDED COLLARS}

1. Do not open [wrapper {or} pouch {or} package] until ready to use. Do not let children play with collar. Dust [will][may] form on collar during storage. Do not get dust in mouth or eyes. [Use only one collar per dog at a time.] 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.



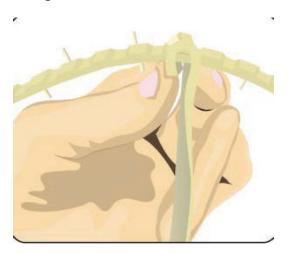
02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 6 of 21

EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

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 dog'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 dog and to permit the collar to move about the neck. Maximum effectiveness may not occur for 2-3 weeks after collar placement. Generally, a properly fitted collar is one that, when fastened, will snugly slide over dog's head [, and two fingers can be placed between the collar and dog's neck]. Leave [2 or 3] [1 or 2] extra inches for collar adjustment, cut off remaining excess collar, wrap in newspaper and dispose of in the trash.



[4.] Wash hands after placing collar on dog. Replace collar every 6 [six] months.

STORAGE AND DISPOSAL

Pesticide Storage: Store this product in a cool, dry place away from children and pets.

Pesticide Disposal and Container Handling: Do not reuse container or used collar. Dispose of in trash.

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 7 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

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

If you have questions or comments about this product, please write: 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) [Coupon(s) inside or on outside of box] [Manufactured for the USA]

Distributed by: [BAR CODE AREA] {lot, date & label code} Sergeant's Pet Care Products, Inc. EPA Reg. No. 2517-177

Omaha, NE 68138-3710 EPA Reg. No. 2517-177
EPA Est. No. XXX-XX-XXX

{END – INSERT FOR LIMITED BACK LABEL OPTION}

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 8 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

CONFIGURATION 2

{MULTI-FOLDED BACK LABEL PANELS – INSERT IS OPTIONAL}

{Text visible to consumer matches the text on the back panel of Configuration 1}

{Product Name}

READ ENTIRE LABEL BEFORE EACH USE USE ONLY ON [DOGS] [LARGE DOGS] [MEDIUM DOGS] [SMALL DOGS] [SMALL BREED DOGS] [PUPPIES] 12 WEEKS OF AGE AND OLDER DO NOT ALLOW CHILDREN TO PLAY WITH COLLAR DO NOT USE ON CATS

[[[SPCP4 Plus 1 {or} Alternate Brand Name] keeps your dog protected against fleas and ticks.] [As a bonus, it also prevents new flea infestations by preventing fleas from developing into biting adults.] [As a bonus, it does more to prevent new flea infestations, [killing fleas so they can't multiply and] [by] preventing new fleas from developing into biting adults.] [[Each] collar provides continuous protection for [up to] 6 months and is [simple] [easy] to use on [any] [small] [medium] [large] [size] dog 12 weeks of age and older: just slide and lock into place, then cut off the excess length.]]

If you have questions or comments about this product, please write: Sergeant's Consumer Response, P.O. Box 540399, Omaha, NE 68154-0399

For Emergency[?] [,] call: 1-800-781-4738 / Non-Emergency] [?] [,] call 1-800-224-7387

{or}

Questions or medical emergency: 1-800-224-7387

[[Text [xxxxx] to [xxxxx]] [or] [visit] [website] [website address] [to sign up for] [for access to] [to access] [tips] [how to apply video] [reminders] [application reminders] [coupons] [special offers] [and more]]. [Facebook icon] [Twitter icon] [YouTube icon] [Instagram] [QR code]

STORAGE AND DISPOSAL

Pesticide Storage: Store this product in a cool, dry place away from children and pets.

Pesticide Disposal and Container Handling: Do not reuse container or used collar. Dispose of in trash.

Distributed by:

Sergeant's Pet Care Products, Inc. P.O. Box 540399 Omaha, NE 68154-0399 {Lot, date & label code} [BAR CODE AREA] EPA Reg. No. 2517-177 EPA Est. No. XXXX-XX-XXX

[Manufactured for the USA]

[PRODUCT INFORMATION]

[[SPCP4 Plus 1 {or} Alternate Brand Name] [This collar] kills fleas, ticks for [up to] 6 [six] months] [Product Name] Collar is a [double layer] sustained release system [containing deltamethrin and pyriproxyfen]. This, collar has the effect of simultaneous control of fleas and ticks, including ticks that may

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 9 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

transmit Rocky Mountain spotted fever]. Use **[Product Name]** year round for most effective control. To protect continuously against adult fleas and ticks, collar should be replaced every 6 [six] months.]

[[Product Name], containing deltamethrin insecticide and pyriproxyfen an insect growth regulator (IGR), has been specially formulated using [features] insecticide-release technology. Collar will also kill ticks for [up to] 6 months. Collar will kill ticks including brown dog tick (*Rhipicephalus sanguineus*), American dog tick (*Dermacentor variabilis*), and deer ticks (*Ixodes scaplularis* and *Ixodes pacificus*) which may carry Lyme disease. This collar should be worn for continuous protection up to 6 months.]

[Replace a new collar every 6 [six] months.]

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Do not open protective [wrapper {or} pouch {or} 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 dogs. Sensitivities may occur after using ANY pesticide products for dogs. 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 for use only as an insecticide and is not to be taken internally by humans or animals.

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 also call 1-XXX-XXXX 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.

{DIRECTIONS FOR USE OPTIONS: One of the options below will be used with appropriate collar type; for Multi-Packs the statement: "Use only one collar per dog at a time" will be included}

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 10 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

{Option #1 – FOR EXTRUDED COLLARS}

Do not open [wrapper{or}pouch {or} package] until ready to use. Do not let children play with collar. Dust [will][may] form on collar during storage. Do not get dust in mouth or eyes. [Use only one collar per dog at a time.] Place collar around dog's neck, adjust for fit, and buckle in place. The collar must be worn loosely to allow for growth of the dog and to permit the collar to move about the neck. Maximum effectiveness may not occur for 2-3 weeks after collar placement. Generally, a properly fitted collar is one that when fastened, will snugly slide over dog's head. Two fingers should fit between the collar and neck. Leave 2 or 3 inches for extra adjustment. Cut off excess length, wrap in newspaper and dispose of in trash. Wash hands after placing collar on dog. Replace collar every 6 [six] months.

{Option #2A – FOR INJECTION MOLDED COLLARS}

Do not open [wrapper {or} pouch {or} package] until ready to use. Do not let children play with collar. Dust [will][may] form on collar during storage. Do not get dust in mouth or eyes. [Use only one collar per dog at a time.] Separate the collar from the pull tab strip and discard the pull tab strip in the trash. Place collar around dog's neck; adjust for fit, and buckle in place [with the main clasp]. Feed excess collar through the remaining two clasps for extra hold and a clean fit. The collar must be worn loosely to allow for growth of the dog and to permit the collar to move about the neck. Maximum effectiveness may not occur for 2-3 weeks after collar placement. Generally, a properly fitted collar is one that when fastened, will snugly slide over dog's head. Two fingers should fit between the collar and neck. Leave 2 or 3 inches for extra adjustment. Cut off excess length, wrap in newspaper and dispose in the trash. Wash hands after placing collar on dog. Replace collar every 6 [six] months.

{Option #2B - FOR INJECTION MOLDED COLLARS}

Do not open [wrapper {or} pouch {or} package] until ready to use. Do not let children play with collar. Dust [will][may] form on collar during storage. Do not get dust in mouth or eyes. [Use only one collar per dog at a time.]

- 1. Unroll the collar.
- 2. Separate the collar from the pull tab strip. Start at either end by slowly pulling the strip away from the collar. Pull on any remaining strip to remove it. Discard the pull tab strip in the trash.
- 3. Place the collar around dog's neck. Pinch the buckle, [and] [then] insert the end of the collar through the buckle and slide to adjust for fit. Two fingers should fit between the collar and neck. Maximum effectiveness may not occur for 2-3 weeks after collar placement. The collar must be worn loosely to allow for growth of the dog and to permit the collar to move about the neck.
- 4. Once fitted comfortably, feed the excess collar through the loops.
- 5. Any excess length of the collar beyond 2-3 inches past the loops should be cut off, wrapped in newspaper and placed in the trash. (Depending on the size of your dog it may be easier to cut off the excess length before feeding through the loops.)
- 6. Wash hands after placing collar on dog.

{Optional graphics below may or may not appear on the market label}









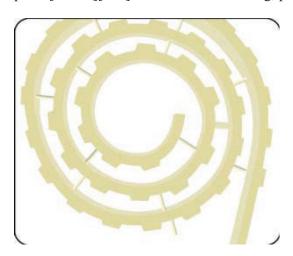
02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 11 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

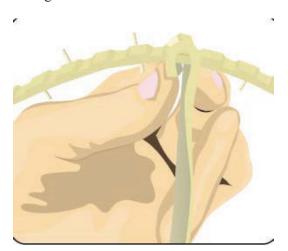
Text in { } is informational/note to reviewer

{Option #3 – FOR INJECTION MOLDED COLLARS}

1. Do not open [wrapper {or} pouch{or} package] until ready to use. Do not let children play with collar. Dust [will][may] form on collar during storage. Do not get dust in mouth or eyes. [Use only one collar per dog at a time]. 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.



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 dog'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 dog and to permit the collar to move about the neck. Maximum effectiveness may not occur for 2-3 weeks after collar placement. Generally, a properly fitted collar is one that, when fastened, will snugly slide over dog's head [, and two fingers can be placed between the collar and dog's neck]. Leave [2 or 3] [1 or 2] extra inches for collar adjustment, cut off remaining excess collar, wrap in newspaper and dispose of in the trash.

02 JULY 2018 Amendment Information in [] is optional. Text in {} is informational/note to reviewer Version 18.1 Page 12 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016



4. Wash hands after placing collar on dog. Replace collar every 6 [six] months.

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

{END - BACK LABEL PANEL}

Alternate Brand Names

{ABN} [Bansect Flea & Tick Collar for Dogs]

{ABN} [Bansect Flea & Tick Plus Collar for Dogs]

{ABN} [Sergeant's Dual Action Flea & Tick Plus Collar for Small Dogs & Puppies]

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

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

{ABN} [Sergeant's Flea & Tick Collar Plus for Small Dogs & Puppies]

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 13 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

- {ABN} [Sergeant's Flea & Tick Plus Collar for Dogs]
- {ABN} [Sergeant's Flea & Tick Plus Collar for Large Dogs]
- {ABN} [Sergeant's Silver Flea & Tick Collar for Small Dogs & Puppies]
- {ABN} [Sergeant's Silver Flea & Tick Plus Collar for Small Dogs & Puppies]
- {ABN} [Sergeant's Silver Flea & Tick Collar for Dogs]
- {ABN} [Sergeant's Silver Flea & Tick Plus Collar for Dogs]
- {ABN} [Sergeant's Silver Flea & Tick Collar for Large Dogs]
- {ABN} [Sergeant's Silver Flea & Tick Plus Collar for Large Dogs]
- {ABN} [SENTRY Dual Action Flea & Tick Plus Collar for Small Dogs & Puppies]
- {ABN} [SENTRY Dual Action Flea & Tick Plus Collar for Dogs]
- {ABN} [SENTRY Dual Action Flea & Tick Plus Collar for Dogs and Puppies]
- {ABN} [SENTRY Dual Action Flea & Tick Plus Collar for Large Dogs]
- {ABN} [SENTRY Flea & Tick Plus Collar for Dogs]
- {ABN} [PetArmor Plus Flea & Tick Dog Collar]
- {ABN} [PetArmor Plus Flea & Tick Collar Dogs]
- {ABN} [PetArmor Plus Flea & Tick Collar for Dogs]
- {ABN} [PetArmor Plus Flea & Tick Collar for Dogs & Puppies]
- {ABN} [PetArmor Plus Flea & Tick Collar for Small Dogs & Puppies]
- {ABN} [Sergeant's Double Duty Flea & Tick Collar for Dogs]
- {ABN} [Sergeant's Double Duty Flea & Tick Collar for Dogs & Puppies]
- {ABN} [Sergeant's Double Duty Flea & Tick Collar for Small Dogs & Puppies]
- {ABN} [Sergeant's Gold Flea & Tick Collar for Dogs]
- {ABN} [Sergeant's Gold Flea & Tick Collar for Dogs & Puppies]
- {ABN} [Sergeant's Gold Flea & Tick Collar for Small Dogs & Puppies]
- {ABN} [Sergeant's Gold Advance Flea & Tick Collar for Dogs]
- {ABN} [Sergeant's Gold Advance Flea & Tick Collar for Dogs & Puppies]
- {ABN} [Sergeant's Gold Advance Flea & Tick Collar for Small Dogs & Puppies]
- {ABN} [Sergeant's Evolve Flea & Tick Collar for Dogs]
- {ABN} [Sergeant's Evolve Flea & Tick Collar for Dogs & Puppies]
- {ABN} [Sergeant's Evolve Flea & Tick Collar for Small Dogs & Puppies]
- {ABN} [SENTRY PRO Flea & Tick Dog Collar]
- {ABN} [SENTRY PRO Flea & Tick Collar Dogs]
- {ABN} [SENTRY PRO Flea & Tick Collar for Dogs]
- {ABN} [SENTRY PRO Flea & Tick Collar for Dogs & Puppies]
- {ABN} [SENTRY PRO Flea & Tick Collar for Small Dogs & Puppies]
- {ABN} [SENTRY PRO XFT Flea & Tick Collar for Dogs]
- {ABN} [SENTRY PRO XFT Flea & Tick Collar for Dogs & Puppies]
- {ABN} [SENTRY PRO XFT Flea & Tick Collar for Small Dogs & Puppies]
- {ABN} [Sergeant's PROPYL OTC Flea & Tick Collar for Dogs]
- {ABN} [Sergeant's PROPYL OTC Flea & Tick Collar for Dogs & Puppies]
- {ABN} [Sergeant's PROPYL OTC Flea & Tick Collar for Small Dogs & Puppies]
- {ABN} [Sergeant's PROPYL OTC Plus Flea & Tick Collar for Dogs]
- {ABN} [Sergeant's PROPYL OTC Plus Flea & Tick Collar for Dogs & Puppies]
- {ABN} [Sergeant's PROPYL OTC Plus Flea & Tick Collar for Small Dogs & Puppies]

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 14 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

{OPTIONAL MARKETING STATEMENTS AND GRAPHICS – MAY APPEAR ANYWHERE ON LABELING FOR SINGLE COLLAR OR MULTI-PACK PACKAGING}

Fleas

- Kills fleas that may cause anemia
- Kills fleas that may cause bartonellosis
- Kills fleas that may transmit tapeworms
- Kills [adult] fleas that may cause [Flea Allergy Dermatitis (FAD)][and][flea bite dermatitis]
- Kills fleas
- Kills fleas that may cause anaplasmosis
- Kills [adult] fleas which may cause flea bite anemia
- Kills [adult] fleas which may transmit tapeworms
- Kills fleas which may be a source of Flea Allergy Dermatitis [FAD] [and] [flea bite anemia] [and] [tapeworm]
- Prevents new flea infestations
- Prevents reoccurrence of flea infestation
- [Controls][kills] [adult] fleas so they can't multiply
- Prevents new fleas from developing into biting adults
- Kills adult fleas (before they lay eggs)
- Flea [control] [prevention] for dogs [& puppies 12 weeks of age and older]

Ticks

- Kills the ticks that may transmit Rocky Mountain spotted fever
- Kills ticks that may cause babesiosis
- Kills ticks for 6 months, including Deer ticks (which may transmit Lyme disease and anaplasmosis), American dog ticks (which may transmit Rocky Mountain spotted fever and ehrlichiosis), and Brown dog ticks (which may transmit ehrlichiosis, anaplasmosis, bartonellosis, canine hemoplasmosis, babesiosis)
- Tick [control] [prevention] for dogs [& puppies 12 weeks and older]
- Kills ticks (including deer ticks which may transmit Lyme disease)
- Provides [long lasting] [6 month] protection against ticks

Multiple Pests

- Kills Fleas [and][&] Ticks
- Flea [and][&] Tick Collar for Dogs
- Dog Collar for Flea and Tick Control
- Collar will kill ticks for [up to] 6 months including: Lone Star tick (*Amblyomma americanum*), Brown dog tick (*Rhipicephalus sanguineus*), American dog tick (*Dermacentor variabilis*), and deer ticks (*Ixodes scapularis* and *Ixodes pacificus*) which may transmit Lyme disease.
- Flea [and] [&] Tick Collar for Dogs
- Contains an Insect Growth Regulator (IGR) [Long Lasting Protection against fleas and ticks for [up to] 6 [six] months!]

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 15 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

Single Collar Package Claims

- 6 [six] months protection [1] [one] collar
- Kills [Adult] Fleas for [up to] 180 days[!]
- Kills [Adult] Fleas for [up to] 6 [six] months[!]
- Provides [long lasting] 180 days[s] protection against fleas
- Provides [long lasting] 6 [six] month[s]] protection against fleas
- Kills Ticks for [up to]180 days[!]
- Kills Ticks for [up to] 6 [six] months[!]
- Provides [long lasting] 180 days[s] protection against ticks
- Provides [long lasting] 6 [six] month[s] protection against ticks
- Kills Fleas and Ticks for [up to] 6 [six] Months]]
- Provides up to 6 months control [of fleas and ticks]]
- Protects your dog from fleas and ticks for up to 6 [six] Months]
- Kills [fleas] [and] [ticks] for [up to] 6 [six] [months] [180 days] [!]]
- Continuous 6 [six] months Protection against fleas and ticks
- 6[six] months Protection [against Fleas & Ticks]

Two Collars Package Claims {Same size collars in one container}

- [2] [Two] Collars | each collar 6 [six] months protection; Total protection 12 [twelve] months] [**]
- 2 [Two] Collars provides [up to] 12 [twelve] consecutive months protection against fleas and ticks [*]/[**]
- [Up to] 12 [twelve] [total] months protection [against fleas and ticks] with 2 [Two] collars [in][1] [per] [package] used consecutively [*]/[**]
- Each collar provides [up to] 6 [six] months of protection
- Two collars provides [up to] 12 [twelve] consecutive months of protection [*]/[**]
- Two collars, one at a time = 12 [twelve] months of protection [**]
- Two collars, one at a time, provides 12 [twelve] consecutive months of protection [**]
- Two collars =12] [twelve] consecutive months of protection [*]/[**]
- 6 [six] months protection each collar [2] [two] collars [*]
- 2 [Two] Collars; One collar = 6 [six] months of protection [**]

{One or both statements below will appear in the same font size, in close proximity to the claim above on same label panel, indicated with */**}

- [*] Use one collar per dog at a time
- [**] One collar provides 6 months of protection.

Collar Fit Claims

- Lock and Stay Design
- Click and Stay Design
- Click to Fit Design
- Fits Just Right [Design]
- Comfort Fit [Design]

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 16 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

- Designed for Comfort
- Rugged [and] weatherproof
- Time Release formula
- Modern Click- to- Fit Design
- Pull and Click
- Best Fitting Flea [and Tick] Collar
- Stay in Place Design
- Clicks into place
- Slides into place
- Won't slide and stretch
- Won't be too loose or too tight [...fits just right [!]]
- Fits Just Right [Design]
- Fits just right ... won't be too loose or too tight
- Right Size Collar [Design]
- [New] Lock and Fit Design
- Slide [to] [and] Fit [Design]
- Fits securely
- Stays in place
- Fit] [-] [and] Stay [Design]
- Slide Fit [and] Stay Design
- Right Fit [Design]
- Just Right Fit [Design]
- [Adjustable] [Fits all size dogs over 12 weeks of age]
- [Adjust to fit] [Easy to adjust]
- Cut to size] [Size to fit] [Fit to size]

{The following claims will be used only when the age requirement is visible on the front and back panels and included on the insert}

- One size fits all dogs
- Notched to fit securely on [any] [small] [medium] [large] [size] dog
- Fits securely on [any] [small] [medium] [large] [size] dog
- [Great] For multiple dog [and puppy 12 weeks of age and older] households

All Other

- Sergeant's collar technology
- From the makers of PetArmor®
- Continuous protection for [up to] 6 [six] months
- Protection wherever you go for [up to] 6 [six] months
- [Long [-] Lasting] [Continuous] [up to] 6 [six] months
- Protection built to last [up to] 6 [six] months
- [Long [-] Lasting] [Collar for Dogs]]
- Lasting protection against fleas and ticks
- Long Lasting Protection against fleas for [up to] 6 [six] months
- 6 [six] months protection
- 6 [six] months

02 JULY 2018 AmendmentVersion 18.1EPA Reg. No. 2517-177Information in [] is optional.Page 17 of 21EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

- Long lasting flea protection [for] [up to] 6 [six] [months] [180 days] [!]
- For [Dogs], [Large Dogs], [Medium Dogs] [Small Dogs & Puppies] [Small Breeds Dogs]
- [Fresh] [Powdery] [Clean] Scent
- {Specific fragrance noted here} [Scent][Fragrance]
- Odorless
- Fits Neck to [15"] [20"] [23"]
- Illustration of dog appropriate to collar size
- [Features] insecticide-release technology
- [All Weather Collar] [All seasons protection] [up to] 6 [six] months
- Set it and forget it [for] [up to] 6 [six] months
- Protection made easy
- Adventure appropriate
- Perfect for any adventure
- [Not affected by water] [Water resistant]
- Wetting will not impair the collar's effectiveness or the dog's protection
- Convenient
- Fits right over existing dog tag collar
- Easy to [use] [apply] [attach]
- Cut off excess length
- Replace new collar every 6 months
- For dog [and puppies 12 weeks of age and older]
- Specific print design described here (i.e., dog paw print, paw print, etc.)
- [Reflective] [Glow-in-the Dark] [Collar Embellishment]
- For year round protection, replace [SPCP4 Plus 1 {or} Alternate Brand name] [New Collar] every 6 [six] months.
- {Dog's Name/Weight (Empty blank for owner to fill in name and/or weight)}
- Treatment:][Treatment[X][Date:][First][Next] Treatment Date:] {Empty blank for owner to fill in date}
- [Date of] Application [Date]] {Calendar sticker with Brand Name}
- Place sticker on your calendar as a reminder to replace [SPCP4 Plus 1 {or} Alternate Brand Name] [New Collar] in 6 [six] months
- Place reminder sticker on your calendar now
- Place sticker on your calendar (or refrigerator) to remind yourself to replace [SPCP4 Plus 1 {or} Alternate Brand Name] [New Collar] on your dog
- [Plan ahead] [Don't miss a treatment]
- It's important to protect your dog from fleas and ticks consistently
- [(Deltamethrin 4% + IGR Collar) (alternate brand name) kills fleas that may cause Flea Allergy Dermatitis (FAD)]
- [Deltamethrin 4% + IGR Collar] [alternate brand name] kills fleas that may cause flea bite anemia.
- [Deltamethrin 4% + IGR Collar] [alternate brand name] kills fleas that may transmit bartonellosis.
- [Deltamethrin 4% + IGR Collar] [alternate brand name] kills fleas that may transmit tapeworms.
- [Deltamethrin 4% + IGR Collar] [alternate brand name] kills ticks that may transmit babesiosis.
- [Deltamethrin 4% + IGR Collar] [alternate brand name] kills ticks that may transmit anaplasmosis.
- Over 12 weeks of age and older
- For dog(s) [and puppies 12 weeks of age and older]
- For [Dogs], [Large Dogs], [Medium Dogs] [Small Breed Dogs] [Small Dogs & Puppies 12 weeks of age and older]
- Proprietary Triple Clasp System

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 18 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

{X &Y are based on number of collars in packaging. Total number is reflected in Net Content/Weight. When provided, coupon will not obscure or distract from required text}

- [Save Now!] [Buy More and Save] [Buy [X] and Save]
- [Great Value] [Better Value]
- [Value Pack] [Club Pack] [Club Pack] [Bonus Pack] [Multi [-] Pack]
- [Value Size] [Club Size]
- [X+X=X Bonus Pack!]
- [[X]% Free] [(X) Month(s) Free!] [Buy [X] Get [X] Free]
- [Buy [X] and Save] [Buy More and Save]
- [Coupon Inside!] [Product Coupons inside or outside package]

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 19 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

{ADDITIONAL OPTIONAL MARKETING STATEMENTS AND GRAPHICS – MAY APPEAR ON INSERT LABELING FOR SINGLE OR MULTI-PACK PACKAGING}

Here are a few reminders. If you need additional help we're here!

How does this product work? The collar uses sustained release technology releasing the active ingredients at a steady rate [for] [up to] 6 [six] months. The dog's natural oils help to distribute the product through your dog's skin and coat providing full body protection. The active ingredient, Deltamethrin, kills fleas and ticks by direct contact or if the fleas and ticks ingest it.

How quickly will it start to work? It should start working soon after application, but maximum effectiveness may not occur for 2 to 3 weeks after placement.

Should my dog wear the collar all the time? Yes, the [product name] must be worn continuously to remain effective, and a new one should be replaced every 6 [six] months.

How often do I need to replace the collar? The [product name] should be replaced every 6 [six] months.

What should I do with the piece of collar that I cut off? After removing the extra length of [product name] wrap it in newspaper and place it in the trash.

Do I need to remove the collar when my dog goes out in the rain? No. Wetting the collar will not impair its effectiveness, and it is not necessary to remove the collar if the dog is out in the rain.

Can I place 2 collars on my dog at the same time? No, do not place 2 collars on your dog at the same time. You have two, 6 [six]-month collars to be used sequentially (one after the other) or use one collar for each dog in your household.

My dog wears a standard collar. If I add this collar as a second collar, will the standard fabric collar rub the active ingredients off this collar and reduce its effectiveness?

No, a standard collar should not rub the ingredients off the flea and tick collar. The active ingredients in the collar migrate to the surface at a certain rate. Friction will not affect the rate of release for the actives.

Can I use a flea and tick topical, shampoo or spray on my dog while the flea and tick collar is still on? We do not recommend treating with another topical pesticide product. Other forms of flea and tick treatments contain different active ingredients, and we do not recommend mixing treatments in the event of an adverse reaction.

What should I do if my dog shows signs of irritation from the collar? Sensitivities may occur after using ANY pesticide products for dogs. 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.

Things to consider if still seeing fleas on your dog: Did you have a lapse in treatment? It's possible you had fleas in your home or yard that were present BEFORE you started using [SPCP4 Plus 1 {or} Alternate brand name]. Adult fleas represent only 5% of the flea population. What you don't see are the other life stages (eggs, larvae, pupae) which could be lurking on your dog or in your home. Break the cycle by regularly using this collar on your dog. This product is for treating fleas and ticks on your dog. For home and outdoor pests please use the appropriate product as needed.

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 20 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

What To Look For

Fleas: Signs your dog may have fleas can include flea dirt (small dark flakes), excessive itching or scratching. You may also see adult fleas on your dog's coat and skin.

Ticks: Adult ticks are often visible to the naked eye, so you may spot them on short-haired dogs. But with longer-haired dogs, it's best to do a thorough inspection with a flea comb.

Why Protect your Dog?

Both fleas and ticks are small but harmful.

- Some dogs may have sensitivity to flea saliva and can have allergic reactions, leading to painful and intense itching. Fleas can also transmit parasites such as tapeworms.
- Tick bites may also trigger allergic reactions, but even more serious are the diseases they can transmit like Lyme disease.

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









[Water Resistant]

[Our company heritage dates back over 150 years. Polk Miller, a pharmacist and pet lover, started by formulating pet health products for his own dogs in 1868. We continue that tradition today by providing products and services that help take the guesswork out of pet parenting.]

[Packaged with care by dog lovers [in Omaha, Neb.]]

[Need help? We are your [flea and tick] experts!]

[SPCP4 Plus1 {or} Alternate Brand Name] cares [about your experience]] [!]

[We care about your experience, please contact us with any questions]

[If you're not satisfied with [SPCP4 Plus1 {or} Brand Name], let's talk! We'll gladly provide you with a refund]

{END - OPTIONAL MARKETING STATEMENTS AND GRAPHICS}

02 JULY 2018 Amendment Information in [] is optional.

Version 18.1 Page 21 of 21 EPA Reg. No. 2517-177 EPA SAL 04/20/2016

Text in { } is informational/note to reviewer

{COLLAR WRAPPER/POUCH LABEL WITHIN PRIMARY PACKAGING}

{PRODUCT NAME}
Contains Deltamethrin and Pyriproxyfen
Do not allow children to play with collar
For use ONLY on dogs
See insert for complete label information
Do not open until ready to use.
This unit not for retail sale
[Sergeant's Pet Care Products, Inc.]

EPA Reg. No. 2517-177 EPA Est. No. XXXXX-XXXX Lot Number

{END -COLLAR WRAPER/POUCH LABEL}