

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

November 21, 2017

Joseph A. Conti Sr. Director, Regulatory Affairs and Quality Assurance Hartz Mountain Corporation 400 Plaza Drive Secaucus, NJ 07094-3688

Subject: PRIA Label Amendment – Addition of CRP screw-top cap Product Name: Hartz reference #130 EPA Registration Number: 2596-165 Application Date: 5-July-2017 Decision Number: 531133

Dear Mr. Conti:

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,

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

Enclosure

# Hartz<sup>®</sup> Reference # 130

*{Note to Reviewer - Brackets used in this label are as follows: [] are for optional/alternate text, {} are Notes to Reviewer, () are for text location/positioning.}* 

*{Primary Brand Name not to be used on any product labels. The word Dog will be included in all Alternate Brand Names and be at least 40% of the size of the largest letter in the Alternate Brand Name.}* 

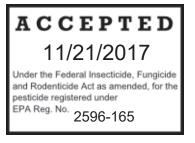
{Alternate Brand Names listed at end of document}

# (FRONT PANEL)

(Included on the front panel is a clear picture of a dog in the weight range for the product.)

{Each of the above brands will be packaged in the weight classes designated below:}

[Weighing 5 - 22 lbs., 8 weeks of age and older] [Weighing 23 - 44 lbs., 8 weeks of age and older] [Weighing 45 - 88 lbs., 8 weeks of age and older] [Weighing 89 - 132 lbs., 8 weeks of age and older]



#### **ACTIVE INGREDIENTS**:

Fipronil	9.80%
[S]-Methoprene	8.80%
OTHER INGREDIENTS	
TOTAL	.100.00%

# **KEEP OUT OF REACH OF CHILDREN**

CAUTION: See back panel for First Aid and additional precautionary statements.

#### **NET CONTENTS:**

*{For 1 applicator and each weight class noted is for separate tube text}* 

[For Use] ONLY [for use] on Dogs and Puppies 8 Weeks and Older Weighing:	Net Contents
5 - 22 lbs	0.023 fl oz [0.67 mL]
23 - 44 lbs	0.045 fl oz [1.34 mL]
45 - 88 lbs	0.091 fl oz [2.68 mL]
89 - 132 lbs	0.136 fl oz [4.02 mL]

{For 2 pack}	
[For use] ONLY [for use] on Dogs and Puppies 8 weeks and older Weighing:	Net Contents:
5 - 22 lbs	0.046 fl oz [1.34 mL], Contains 2 [-] [tubes, each] [applicator tubes, each] 0.023 fl oz [0.67 mL][Applicator tubes] [tubes]
23 - 44 lbs	0.09 fl oz [2.68 mL], Contains 2 [-] [tubes, each] [applicator tubes, each] 0.045 fl oz [1.34 mL][Applicator tubes][tubes]
45 - 88 lbs	0.182 fl oz [5.36 mL], Contains 2 [-] [tubes, each] [applicator tubes, each] 0.091 fl oz [2.68 mL][Applicator tubes][tubes]
89 – 132 lbs	0.272 fl oz [8.04 mL], Contains 2 [-] [tubes, each] [applicator tubes, each] 0.136 fl oz [4.02 mL] [Applicator tubes][tubes]

### {For 3 pack}

[For use] ONLY [for use] on Dogs and Puppies 8 weeks and older Weighing:	Net Contents:
5 - 22 lbs	0.069 fl oz [2.01 mL], Contains 3 [-] [tubes, each] [applicator tubes, each] 0.023 fl oz [0.67 mL][Applicator tubes][tubes]
23 - 44 lbs	0.135 fl oz [4.02 mL], Contains 3 [-] [tubes, each] [applicator tubes, each] 0.045 fl oz [1.34 mL][Applicator tubes][tubes]
45 - 88 lbs	0.273 fl oz [8.04 mL], Contains 3 [-] [tubes, each] [applicator tubes, each] 0.091 fl oz [2.68 mL][Applicator tubes][tubes]
89 – 132 lbs	0.408 fl oz [12.06 mL], Contains 3 [-] [tubes, each] [applicator tubes, each] 0.136 fl oz [4.02 mL][Applicator tubes][tubes]

{For 4 pack}		
	Net Contents:	
[For use] ONLY [for use] on Dogs and		
Puppies 8 weeks and older Weighing:		
5 - 22 lbs	0.092 fl oz [2.68 mL],	
	Contains 4 [-] [tubes, each] [applicator tubes, each]	
	0.023 fl oz [0.67 mL] [Applicator tubes][tubes]	
23 - 44 lbs	0.180 fl oz [5.36 mL],	
	Contains 4 [-] [tubes, each] [applicator tubes, each]	
	0.045 fl oz [1.34 mL] [Applicator tubes][tubes]	
45 - 88 lbs	0.364 fl oz [10.72 mL],	
	Contains 4 [-] [tubes, each] [applicator tubes, each]	
	0.091 fl oz [2.68 mL] [Applicator tubes][tubes]	
89 – 132 lbs	0.544 fl oz [16.08 mL],	
	Contains 4 [-] [tubes, each] [applicator tubes, each]	
	0.136 fl oz [4.02 mL] [Applicator tubes][tubes]	

{For 6 pack}	
[For use] ONLY [for use] on Dogs	Net Contents
and Puppies 8 weeks and older	
Weighing:	
5 - 22 lbs	0.138 fl oz [4.02 mL],
	Contains 6 [-] [tubes, each] [applicator tubes, each]
	0.023 fl oz [0.67 mL] [Applicator tubes][tubes]
23 - 44 lbs	0.27 fl oz [8.04 mL],
	Contains 6 [-] [tubes, each] [applicator tubes, each]
	0.045 fl oz [1.34 mL] [Applicator tubes][tubes]
45 - 88 lbs	0.546 fl oz [16.08 mL],
	Contains 6 [-] [tubes, each] [applicator tubes, each]
	0.091 fl oz [2.68 mL] [Applicator tubes][tubes]
89 – 132 lbs	0.816 fl oz [24.12 mL],
	Contains 6 [-] [tubes, each] [applicator tubes, each]
	0.136 fl oz [4.02 mL] [Applicator tubes][tubes]

{For 8 pack}	
[For use] ONLY [for use] on Dogs	Net Contents
and Puppies 8 weeks and older	
Weighing:	
5 - 22 lbs	0.184 fl oz [5.36 mL],
	Contains 8 [-] [tubes, each] [applicator tubes, each]
	0.023 fl oz [0.67 mL] [Applicator tubes][tubes]
23 - 44 lbs	0.36 fl oz [10.72 mL],
	Contains 8 [-] [tubes, each] [applicator tubes, each]
	0.045 fl oz [1.34 mL] [Applicator tubes][tubes]
45 - 88 lbs	0.728 fl oz [21.44 mL],
	Contains 8 [-] [tubes, each] [applicator tubes, each]
	0.091 fl oz [2.68 mL] [Applicator tubes][tubes]
89 – 132 lbs	1.088 fl oz [32.16 mL],
	Contains 8 [-] [tubes, each] [applicator tubes, each]
	0.136 fl oz [4.02 mL] [Applicator tubes][tubes]

[Hartz<sup>®</sup> and other trademarks are trademarks of The Hartz Mountain Corporation.] [Made by The Hartz Mountain Corporation, 400 Plaza Drive, Secaucus, NJ 07094 [U.S.A.]]

{*Cat Warning: A cat prohibition icon in a box, 1.5 cm x 1.5cm, black image on a yellow background, will appear on the lower right hand corner of the front panel.*}



DO NOT USE ON CATS

# (BACK PANEL)

#### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS. CAUTION.

Harmful if swallowed or absorbed through the skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

#### HAZARDS TO DOMESTIC ANIMALS.

For external use only. Do not use on puppies under 8 weeks of age and weighing less than (insert lowest weight of weight class). Sensitivities may occur after using **ANY** pesticide product for dogs. If signs of sensitivity occur bathe your dog with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately. Dogs may experience some temporary irritation at the site of product application.

Consult a veterinarian before using this product on medicated, debilitated, or aged dogs. Call [1-800-275-1414] [1-XXX-XXX-XXX] for 24-hour assistance.

#### PHYSICAL OR CHEMICAL HAZARDS

**COMBUSTIBLE**: Do not use or store near heat or open flame.

#### 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 a poison control center or doctor. Do not give anything by mouth to an unconscious person.

**IF IN EYES:** Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

**IF ON SKIN OR CLOTHING:** Take off contaminated clothing. Rinse skin immediately with plenty of water for 15 - 20 minutes. Call a poison control center or doctor for treatment advice.

**HOT LINE NUMBER:** Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For additional information on this product (including health concerns, medical emergencies, or pesticide incidents), you may call [X-XXX-XXX-XXX] [1-800-275-1414], twenty-four [24] hours per day, seven [7] days per week.

Brackets used in this label are as follows: [ ] are for optional/alternate text, { } are for notes to reviewer, ( ) are for text location/positioning.

## **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.

#### **READ ENTIRE LABEL BEFORE EACH USE**

RESTRICTIONS DO NOT USE ON DOGS OR PUPPIES LESS THAN 8 WEEKS OF AGE WEIGHING LESS THAN [5] [23] [45] [89] LBS DO NOT EXCEED LISTED DOSAGE AMOUNT FOR DOGS DO NOT ALLOW YOUR DOG TO INGEST THIS PRODUCT DO NOT USE ON RABBITS, CATS, KITTENS, OR OTHER ANIMALS DO NOT USE ON RABBITS, CATS, KITTENS, OR OTHER ANIMALS DO NOT REAPPLY (ALTERNATE BRAND NAME) FOR 30 DAYS DO NOT APPLY MORE THAN ONE [APPLICATOR TUBE] [TUBE] PER TREATMENT FOR ONE DOG, REGARDLESS OF WEIGHT DO NOT BATHE FOR 48 HOURS AFTER APPLICATION

*{Note to Reviewer:* CRP text and format will not change from that used in the testing. CRP: free tubes; SAUE opening instructions apply to long-tip applicator tube and will not change in text or format on the final printed label from that used in testing; Whenever this package is used, the term 'applicator tube' or 'tube' can be used, but whichever term is used, that term will be used consistently throughout the label.}

# **DIRECTIONS FOR USE** {*CONTINUED*}

Dog must be dry at the time of the application and remain dry for 48 hours after application.

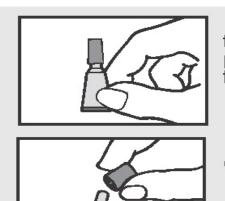


) Repeat [every] [once a] month

# **DIRECTIONS FOR USE** {Alternate Directions for Cap Tube, through Step 5}

*(CRP: Strip of 3 blister pack with applicator tube; SAUE opening instructions are on the blister* and will not change in text or format from that used in testing; Whenever this package is used, the term 'applicator tube' or 'tube' can be used, but whichever term is used, that term will be used consistently throughout the label.}

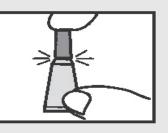
Dog must be dry at the time of the application and remain dry for 48 hours after application.



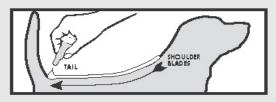
1. Remove one applicator tube from the package and hold in an upright position pointed away from your face.

2. Pull off cap. Turn the cap around and place on top of tube.





seal of the tube. Remove cap carefully.



4. Position the tip of the tube on the dog's back between the shoulder blades. Use the tip of the tube to part the dog's hair so that the product will be

applied at skin level. Begin squeezing out the contents of the tube to form a stripe as you move from the shoulder blades along the dog's back to the base of the tail.

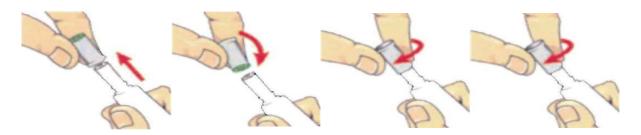
Repeat [every] [once a] month 5

*{CRP: free tubes; SAUE opening instructions apply to screw-top tube and will not change in text or format on the final printed label from that used in testing; Whenever this package is used, the term "tube" will used consistently throughout the label.}* 

#### *{ALTERNATE DIRECTIONS FOR USE WITH SCREW-TOP CAP}*

{*Note to Reviewer: CRP: free tubes; SAUE opening instructions apply to screw-top tube and will not change in text or format on the final printed label from that used in testing; Whenever this package is used, the term "tube" will be used consistently throughout the label.*}

Remove inner tray from carton. Firmly grasp one tube and pull away from tray. Hold tube firmly in one hand. With the other hand, push down firmly on the cap and turn counter clockwise (to the left). Continue twisting cap until it comes off the tube. Turn the cap around and place opposite end of cap back on tube. Twist cap to break seal. Remove cap from tube.



You may bathe your dog 48 hours after application.

Repeat [every] [once a] month.

#### **FREQUENCY OF APPLICATION**

[[When used monthly, [Alternate Brand Name] completely breaks the flea life cycle and controls tick and chewing lice infestations]. [Research demonstrates that [Alternate Brand Name] kills adult fleas, flea eggs, and flea larvae for up to six weeks]. [Alternate Brand Name] [also] prevents development of all flea stages for up to six weeks. Although [Alternate Brand Name] can control fleas for up to six weeks, if there is a high risk of re-infestation or if the dog has fleas which may cause flea allergy dermatitis, [a once monthly application may be needed][apply [Alternate Brand Name] once every 30 days]].

[Alternate Brand Name] kills ticks for at least one month. A once monthly application is recommended where tick control is needed.

[Alternate Brand Name] kills chewing lice for 30 days. [Do not reapply product for 30 days.]

#### STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal. Do not use or store near heat or open flame.

**PESTICIDE STORAGE:** Keep this product in its tightly closed original container, when not in use. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER HANDLING:** Non-refillable container. Do not reuse or refill this container. *If empty:* Offer for recycling, if available or place in trash. *If partly filled:* Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

**SIDE EFFECTS** *{Located in a box immediately above the cat warning}* Monitor your dog after application. Side effects may include signs of skin irritation such as redness, scratching, or other signs of discomfort. Gastrointestinal signs such as vomiting or diarrhea have also been reported. If these or other side effects occur, consult your veterinarian or call [x-xxx-xxxx] [1-800-275-1414].

{*Cat Warning: A 1.5 cm x 1.5 cm cat prohibition icon and warning text will be in a box in the lower right hand corner of the back panel, in yellow with black images and text.*}



DO NOT USE ON CATS. Keep cats away from treated dogs for 24 hours. If applied to or ingested by a cat, contact your veterinarian.

For more information, call our [flea and tick] experts at [1-XXX-XXXX] [1-800-275-1414] [weekdays, X am – X pm E.S.T.]

EPA Reg. No. 2596-165 EPA Est. No. 2596-XX-X

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#### {INDIVIDUAL TUBE TEXT}

[Alternate Brand Name] [For use Only] [Only for use] on DOGS AND PUPPIES 8 WEEKS OR OLDER weighing {*insert from weight range list below*} -

5 - 22 lbs - 0.023 fl oz [0.67 mL] 23 - 44 lbs - 0.045 fl oz [1.34 mL] 45 - 88 lbs - 0.091 fl oz [2.68 mL] 89 - 132 lbs - 0.136 fl oz [4.02 mL]

Contains Fipronil 9.8%, (S)-Methoprene 8.8% Keep Out of Reach of Children Caution Read accompanying label before use EPA Reg. No. 2596-165 EPA Est. No. 2596-XX-X

{Lot number to appear on tube crimp}

{A cat prohibition icon will appear on the tube and/or the immediate container for the tube itself.}



#### *(BLISTER TEXT when strip of 3 blister pack with applicator tube is used)*

{Alternate Brand Name} ACTIVE INGREDIENTS: Fipronil.....9.80% (S)-Methoprene....8.80% Keep out of reach of children CAUTION Read accompanying label before use EPA Reg. No. 2596-165 EPA Est. No. 2596-XX-X

*{SAUE graphic demonstrating dotted line with scissors icon and arrow to peel back}* 

## {<u>OPTIONAL/ALTERNATE LABEL TEXT</u>}

*{Note to Reviewer:* Bullets have been added to <u>Optional/Alternate Label Text</u> and <u>Non-Pesticide</u> <u>Related Claims & Other Optional Text</u> sections whenever possible, to make it easier to itemize and review.}</u>

- Weighing 5 22 lbs,. 8 weeks or older
- Weighing 23 44 lbs., 8 weeks or older
- Weighing 45 88 lbs., 8 weeks or older
- Weighing 89 132 lbs., 8 weeks or older

#### [Adult Fleas]

- Kills Fleas [that may transmit tapeworm] [for] [28 days] [30 days] [1 month] [4 weeks] [on dogs and puppies older than 8 weeks and weighing [5–22 lbs] [23-44 lbs] [45-88 lbs] [89-132 lbs]
- Kills [Adult] Fleas
- [Kills][Controls] fleas that [which] may cause [flea allergy dermatitis] [and] [flea bite anemia [for] [28 days] [30 days] [1 month] [4 weeks] [on dogs]
- Kills newly emerged adult Fleas before they lay eggs
- If there is a high risk for flea re-infestation, a once a month application may be needed

#### Starts killing new fleas within 30 minutes\*

\*48 hours after initial application

*(Both statements must appear on the same panel. The qualifying statement is to be in close proximity with the same font, color and background with font size being 40% or greater})* 

#### [Flea Eggs]

- Kills Flea Eggs [and Flea Larvae] [for] [28 days] [30 days] [1 month] [4 weeks]
- Prevents Flea Eggs from hatching

#### [Ticks]

- Kills Ticks [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills [all stages of ] Brown Dog Ticks, American Dog Ticks, Lone Star Ticks and Deer Ticks [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills Deer Ticks [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills Deer Ticks [for] [28 days] [30 days] [1 month] [4 weeks] on dogs and puppies 8 weeks of age or older weighing [5–22 lbs] [23-44 lbs] [45-88 lbs] [89-132 lbs]
- Kills all stages of Deer Ticks [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills all stages of Deer Ticks [for] [28 days] [30 days] [1 month] [4 weeks] on dogs and puppies 8 weeks of age or older weighing [5–22 lbs] [23-44 lbs] [45-88 lbs] [89-132 lbs]
- Kills Deer Ticks that may carry Lyme disease [for] [28 days] [30 days] [1 month] [4 weeks]

- Kills Deer Ticks that may carry Lyme disease [for] [28 days] [30 days] [1 month] [4 weeks] on dogs and puppies 8 weeks of age or older weighing [5–22 lbs] [23-44 lbs] [45-88 lbs] [89-132 lbs]
- Kills all stages of Deer Ticks that may carry Lyme disease [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills all stages of Deer Ticks that may carry Lyme disease [for] [28 days] [30 days] [1 month] [4 weeks] on dogs and puppies 8 weeks of age or older weighing [5–22 lbs] [23-44 lbs] [45-88 lbs] [89-132 lbs]
- Kills all stages of ticks [larva, nymph, and adult] [:] Brown Dog ticks [*R. sanguineus*], American dog ticks [*D. variabilis*], Lone Star ticks [*Amblyomma americanum*], Deer ticks [*Ixodes scapularis*] [which may transmit Lyme disease]
- Kills all stages of Ticks, [including those that may transmit Lyme disease]
- Kills [all stages of] Deer Ticks [that may carry Lyme disease] [for] [28 days] [30 days] [1 month] [4 weeks] [on dogs]
- Kills all biting stages of ticks
- Kills adult [brown dog] [deer] ticks, nymphs and larvae
- Kills Ticks including those that may transmit Lyme disease
- Kills all stages of ticks [larva, nymph, and adult]

# [Lice & Mange]

- Eliminates chewing lice infestations
- Controls infestations of chewing lice
- Aids in Control of sarcoptic mange [mite] infestations

# [Multiple]

- Kills Fleas, Flea Eggs [and] Larvae [and][ Chewing Lice]
- Kills Fleas, Ticks, Flea eggs, Chewing Lice, [Flea larvae]
- [Kills fleas, flea eggs [and] [&] larvae, [ticks], [and] [chewing lice]
- Kills Fleas, Ticks, Flea eggs, [Flea larvae], Chewing Lice
- Kills Fleas, Ticks, Flea eggs through contact [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills Fleas, Ticks, Flea eggs, [Flea larvae] [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills Fleas, Ticks, Flea eggs, [Flea larvae] [through contact] [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills Fleas, Ticks, Flea Eggs, Flea larvae [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills Fleas, Ticks, Flea Eggs, [Flea larvae] [through contact] [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills Fleas, Ticks, Flea Eggs, Chewing lice [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills Fleas, Ticks, Flea Eggs, Chewing lice through contact [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills Fleas, Ticks, Flea Eggs, [Flea larvae], and Chewing lice [through contact] [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills Fleas, Ticks, Flea eggs, [Flea larvae] [after contact] [for] [28 days] [30 days] [1 month] [4 weeks]

- Kills Fleas, Ticks, Flea eggs, after contact [for] [28 days] [30 days] [1 month] [4 weeks]
- Prevents development of all flea stages for up to 3 months.
- Kills adult Fleas, Flea Eggs and Larvae
- Prevents all Flea stages [eggs, larvae, pupae] from [hatching][developing]
- Kills Fleas, Brown Dog Ticks, Deer Ticks, Flea Eggs, Flea larvae after contact [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills Fleas, Brown Dog Ticks, Deer Ticks, Flea Eggs, Flea larvae [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills Fleas, Brown Dog Ticks, Deer Ticks, Flea Eggs, after contact [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills Fleas, Brown Dog Ticks, Deer Ticks, Flea Eggs, [Flea larvae] [after contact] [for] [28 days] [30 days] [1 month] [4 weeks]
- Controls Flea and Tick infestations [on dogs] [for] [28 days] [30 days] [1 month] [4 weeks]
- Provides fast, effective and convenient treatment and control of fleas, [ticks] [and chewing lice] [for dogs and puppies 8 weeks and older weighing [5–22 lbs] [23-44 lbs] [45-88 lbs] [89-132 lbs]
- Helps prevent re-infestation of fleas and ticks [for] [28 days] [30 days] [1 month] [4 weeks]
- Helps prevent flea and tick re-infestation [for] [28 days] [30 days] [1 month] [4 weeks]
- Kills flea eggs and flea larvae to help prevent future re-infestations
- Kills all stages of the flea life cycle
- Breaks the flea life cycle
- Prevents all flea stages [eggs, larvae, pupae] from developing
- Controls flea and tick infestations
- Once-a month Flea and Tick [Prevention] [Treatment] [Control] [Solution]
- Monthly Flea and Tick [Prevention] [Treatment] [Control] [Solution]
- [28 day] [30 day] [1 month] [4 week] Flea and Tick [Prevention] [Treatment] [Control] [Solution]
- Prevents flea eggs from developing into biting adults [for] [up to] [30 days] [1 month] [4 weeks]
- Kills fleas for 30 days [1 month] [4 weeks]
- Controls and prevents flea infestations
- Prevents flea re-infestation
- Prevents [and controls] flea re-infestation[s]
- Eliminates fleas
- Effective and convenient topical treatment
- Kills fleas [and ticks] through [after] contact
- [With] patented applicator
- [With] patent pending applicator
- Effective after exposure to water
- Waterproof
- Easy spot on topical applicator
- Do not reapply product for 30 days

- Remains effective even after bathing, [water immersion], [swimming,] [or] [exposure to sunlight]
- Avoid contact with treated area until dry
- [Alternate Brand Name] remains effective after bathing or exposure to sunlight.
- [Alternate Brand Name] remains effective after bathing, water immersion or exposure to sunlight
- [Alternate Brand Name] Can be used on breeding, pregnant and lactating bitches
- [Alternate Brand Name] Contains Fipronil and the insect growth regulator [IGR] (S)-Methoprene.
- [Alternate Brand Name] effectively targets all stages of fleas.
- Fipronil collects in the oils of the skin and hair follicles, and continues to be released from hair follicles onto the skin and coat, resulting in long-lasting activity against fleas, ticks and chewing lice.
- [Alternate Brand Name] is fast-acting, long-lasting, waterproof, [and] [&] [convenient] [easy] [to use].

# {<u>NON-PESTICIDE RELATED CLAIMS AND OTHER OPTIONAL TEXT</u>}

*{For any claims containing an "X", the "X" will correspond to the net contents. Any "free" applications will be included in the carton.}* 

- 1<sup>st</sup> dose, 2<sup>nd</sup> dose, 3<sup>rd</sup> dose [X<sup>th</sup> dose]
- First month, second month, third month [Xth month]
- Value pack
- [2][3][4][6][8] month supply
- [2][3][4][6][8] monthly treatment[s]
- Fragrance-free
- Unscented
- Convenient [easy to use] applicator
- X Pro-cision Flo<sup>®</sup> Applicator[s]
- [Pro-cision Flo<sup>®</sup>Applicator]
- Direct to your dog's skin
- Easy [simple] to use [handle] [apply]
- Easy to use [applicator tube] [tube]
- After application, the treated area may appear wet [or] [oily] for up to 24 hours
- You may bathe your dog 48 hours after application
- To help remind you when you last applied treatment, simply write in the date when each dose is applied:

First Dose	
Second Dose	
Third Dose	
Xth Dose	

- [Calendar] [Reminder] stickers [inside]
- [2] [3] [4] [6] [7] [8] Doses [Inside]
- [3 Pack] [3 Applicator tubes] [3 tubes] [3 Months Supply] [3 Doses]
- [4 Pack] [4 Applicator tubes] [4 tubes] [4 Months Supply] [4 Doses]
- [6 Pack] [6 Applicator tubes] [6 tubes] [6 Months Supply] [6 Doses]
- [8 Pack] [8 Applicator tubes] [8 tubes] [8 Months Supply] [8 Doses]
- [2] [3] [4] [6] [8] Dose Value Pack
- [2] [3] [4] [6] [8] [doses][tubes][applicator tubes][month supply]
- Bonus Pack
- Buy 3 get 1 free
- 3 month supply
- 4 month supply
- 6 month supply
- 8 month supply
- Contains [2] [3] [4] [6] [8] [applicator tubes] [tubes]

The first time you treat your dog, place the First Application Sticker on your calendar. Apply Stickers [2 and 3] [2 through 4] [2 through 6] [2 through 7] [2 through 8] to the calendar [30 and 60 days] [30, 60, 90 days] [30, 60, 90, 120 days] [30, 60, 90, 120, 150, 180 days], [30, 60, 90, 120, 150, 180, 210 days] [30, 60, 90, 120, 150, 180, 210, 240 days][at the end of each 30 day period] after the first application to remind you it's time to reapply [Alternate Brand Name].

[First Application Sticker:] Apply [Alternate Brand Name]
[Month 2 Sticker:] Apply [Alternate Brand Name]
[Month 3 Sticker:] Apply [Alternate Brand Name]
[Month 4 Sticker:] Apply [Alternate Brand Name]
[Month 5 Sticker:] Apply [Alternate Brand Name]
[Month 6 Sticker:] Apply [Alternate Brand Name]
[Month 7 Sticker:] Apply [Alternate Brand Name]
[Month 8 Sticker:] Apply [Alternate Brand Name]

- For Customer Service please call 1-xxx-xxxx
- Questions or comments about this product? Call [X-XXX-XXXX] [1-888-843-2596] Monday Friday X am- X pm EST
- Hartz<sup>®</sup> and other trademarks are trademarks of The Hartz Mountain Corporation

*{Note to Reviewer:* The remaining Non-Pesticide Related Claims and Other Optional Text were moved from their prior location under Optional/Alternate Label Text.}

- Fast acting
- Long lasting
- Convenient to use
- Easy to use
- For dogs and puppies 8 weeks of age or older weighing [5–22 lbs] [23-44 lbs] [45-88 lbs] [89-132 lbs]
- Formulated for dogs and puppies 8 weeks of age or older weighing [5–22 lbs] [23-44 lbs] [45-88 lbs] [89-132 lbs]
  - ✓ Contains the same active ingredients fipronil and (S)-methoprene found in Frontline<sup>®</sup> Plus for Dogs
  - ✓ Contains Fipronil and (S)-Methoprene, the same active ingredients used in Frontline<sup>®</sup> Plus for Dogs
  - ✓ Contains Fipronil and (S)-Methoprene [, the active ingredients used in Frontline<sup>®</sup> Plus for Dogs]
  - ✓ Contains the same active ingredients as Frontline<sup>®</sup> Plus for Dogs

{*Note to Reviewer:* Whenever any of the three claims immediately above (check marked) are included on product labels, then the label will contain the appropriate disclaimers below (asterisked). The disclaimers will be placed in the same area of the label as the optional claims so that both are viewed together.}

- \* [Alternate Brand Name] is not manufactured by or distributed by Merial Limited
- \* Frontline® is a registered trademark of Merial Limited
- \* Frontline® Plus is a registered trademark of Merial
- \* [Alternate Brand Name] is not manufactured by or distributed by Merial

## **{OPTIONAL MARKETING ICONS}**

	Adult Fleas	<b>7</b> 855	Flea Eggs
*	Adult Ticks		Flea Larvae
(1) (1) (1)	flea Eggs	3	Flea Larvae
* *	Tick Larvae and Nymph	8	Tick Larvae and Nymph
*	Chewing Lice		

#### {Alternate Brand Names}

Hartz<sup>®</sup> Force Plus<sup>TM</sup> Dual Action<sup>TM</sup> Topical Treatment for Dogs [&] [and Puppies] Hartz® Field Force Plus<sup>TM</sup> Dual Action<sup>TM</sup> Topical Treatment for Dogs [&] [and Puppies] Hartz<sup>®</sup> First Defense Plus<sup>™</sup> Dual Action<sup>™</sup> Topical Treatment for Dogs [&] [and Puppies] Hartz® First Defense Plus<sup>TM</sup> Dual Active Topical Treatment for Dogs [&] [and Puppies] Hartz<sup>®</sup> Plus Force<sup>TM</sup> for Dogs [&] [and Puppies] Hartz<sup>®</sup> FieldForce Plus<sup>™</sup> for Dogs [&] [and Puppies] Hartz® First Defense Plus<sup>TM</sup> for Dogs [& [and Puppies] Hartz<sup>®</sup> Plus Force<sup>TM</sup> Dual Action<sup>TM</sup> Topical Solution for Dogs [&] [and Puppies] Hartz® FieldForce Plus<sup>TM</sup> Dual Action<sup>TM</sup> Topical Solution for Dogs [&] [and Puppies] Hartz<sup>®</sup> First Defense Plus<sup>™</sup> Dual Action<sup>™</sup> Topical Solution for Dogs [&] [and Puppies] Hartz® First Defense Plus<sup>TM</sup> Dual Active Topical Solution for Dogs [&] [and Puppies] FieldForce Plus<sup>TM</sup> Dual Action<sup>TM</sup> Topical Treatment for Dogs [&] [and Puppies] First Defense Plus<sup>TM</sup> Dual Action<sup>TM</sup> Topical Treatment for Dogs [&] [and Puppies] First Defense Plus<sup>TM</sup> Dual Active Topical Treatment for Dogs [&] [and Puppies]

FieldForce Plus<sup>TM</sup> for Dogs [&] [and Puppies] First Defense Plus<sup>TM</sup> for Dogs [&] [and Puppies] FieldForce Plus<sup>TM</sup> Dual Action<sup>TM</sup> Topical Solution for Dogs [&] [and Puppies] First Defense Plus<sup>TM</sup> Dual Action<sup>TM</sup> Topical Solution for Dogs [&] [and Puppies] First Defense Plus<sup>TM</sup> Dual Active Topical Solution for Dogs [&] [and Puppies]

Hartz Pet Defender Plus for Dogs Hartz PetDefender Plus for Dogs Pet Defender Plus for Dogs PetDefender Plus for Dogs