

#### OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

September 29, 2025

Anna McGrath
Senior Regulatory Affairs Specialist
The Hartz Mountain Corporation
400 Plaza Dr. Secaucus, NJ 07094

Subject: Label Amendment – Addition of registration review interim decision label

language for etofenprox and pyriproxyfen and revised directions for use

Product Name: Hartz Reference #135 EPA Registration Number: 2596-168

Application Date: 08/21/2024; 05/07/2024; 04/05/2024

Case Number: 632440; 642054; 642056

#### Dear Anna McGrath:

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable under FIFRA Section 3(c)(7)(A), subject to the following conditions:

- 1. You must submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.
- 2. This registration is time-limited and expires two years from the date of this letter.
- 3. You must submit quarterly enhanced incident reports and quarterly sales information in doses sold for this product beginning within 3 months of the date the product is first released for shipment, on the first day of the quarter (i.e., January 1, April 1, July 1, or October 1). Please flag any Confidential Business Information as such. Submit enhanced incident reporting and quarterly sales information to the Product Manager's attention. The following is a list of information that must be included in the quarterly reports for each incident:
  - EPA Registration Number
  - Product name (brand name)
  - Lot #

Page 2 of 4

EPA Reg. No. 2596-168

Case No. 632440; 642054; 642056

- Where purchased: internet, store, veterinarian
- Active Ingredient(s)
- Weight range for product
- Date on which incident occurred. (mm/dd/yyyy)
- State in which the incident occurred. (standard 2 letter abbreviation)
- Registrant case #
- Species: dog, cat, other (specify)
- Breed: (as reported by pet owner)
- Age: months or years
- Sex: M, F, or neutered
- Weight: pounds
- Primary Route of Exposure: dermal, oral, other animal, inhalation, other
- Body System: neurological, dermatological, GI, respiratory, ocular, other
- Major signs noted with separate column for each sign, using standard terminology
- Time to Onset: (hours, days)
- Treated by veterinarian: yes or no
- First time product used: yes or no
- Misuse: use on incorrect species, overdose, too frequent dosing, other (describe)
- Any known precondition
- EPA Severity Code: death, major, moderate, minor
- Outcome: died, recovered, still treated, unknown
- 4. Along with the enhanced incident reporting, you must submit an analysis of the incidents seen, to include the following details:
  - All incidents should be reported including all minor dermal and ocular irritation reports.
  - Summary table for dogs showing number of incidents of each severity code for
    each route of exposure. Each incident should only be reported once. If one
    incident has several routes of exposure, the order should be ocular > oral >
    dermal. In other words, an incident with both oral and dermal exposure would
    be reported as oral exposure, and an incident with both ocular and oral exposure
    would be reported as ocular exposure.
  - A similar summary table for cats (misuse or secondary exposure) showing number of incidents of each severity code for each route of exposure.
  - Summary table for cats and table for dogs showing number of incidents that are believed due to secondary exposure (e.g., multi-pet households).
  - A summary table for dogs showing number of incidents for each severity code for these age ranges: <3 months, 3-6 months, 6-9 months, 9-12 months, 1 yr, 2 yr, 3 yr, 4 yr, 5 yr, 6 yr, 7 yr, 8 yr, 9 yr, 10 yr, 11 yr, 12 yr, 13 yr, 14 yr, 15 yr, >15 yr.

Page 3 of 4

EPA Reg. No. 2596-168

Case No. 632440; 642054; 642056

- A summary table showing the number of dogs incidents for each severity code for each pet weight range on the product label, as applicable.
- A summary table for dog weight showing number of incidents for each product weight range. This table should show number of incidents in dogs weighing less than that product weight range, number of incidents in dogs in lower half of weight range, number of incidents in dogs in upper half of weight range, and dogs weighing more than the product weight range, as applicable.
- Table showing number of incidents for each dog breed, where provided.
- Table showing number of incidents in dogs for each clinical sign.
- Table showing number of incidents in dogs for each organ system.
- Report aggregate incidents, but do not combine moderate and minor incidents.

If EPA determines that future mitigation measures are necessary for all pet spot-ons, the Agency will inform registrants. If mitigation measures are necessary, EPA may take regulatory action.

- 5. You are required to comply with the data requirements described in the DCIs identified below:
  - a. n-octyl bicycloheptene dicarboximide (MGK 264) GDCI- 057001-1224
  - b. n-octyl bicycloheptene dicarboximide (MGK 264) GDCI- 057001-1851

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCIs listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division:

http://www.epa.gov/oppsrrd1/contacts\_prd.htm

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. You must submit one (1) 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

Page 4 of 4 EPA Reg. No. 2596-168

Case No. 632440; 642054; 642056

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.

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the etofenprox and pyriproxyfen Interim Decisions, and has concluded that your submission is acceptable.

Your release for shipment of the product constitutes acceptance of these conditions. If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). If you have any questions, you may contact Robert Mitchell at 202-566-2842 or via email at <a href="mailto:mitchell.robert@epa.gov">mitchell.robert@epa.gov</a>.

Sincerely,

Elizabeth Fertich, Product Manager 04 Invertebrate & Vertebrate Branch 1 Registration Division (7505P) Office of Pesticide Programs

**Enclosure** 

## Hartz<sup>®</sup> Reference #135

{The primary brand name will not be used. Only an alternate brand name will be used and it will include the word "dog" in the product's name. In addition, the size of the word "dog" will be increased to at least 75% of the size of the largest letter in the alternate brand name.}

## {ALTERNATE BRAND NAMES} {Alternate brand names listed in alphabetical order.}

FieldForce<sup>TM</sup> Dual Action Topical Solution for Dogs

FieldForce™ Dual Action Topical Solution for Dogs & Puppies

FieldForce™ Topical Solution for Dogs

FieldForce<sup>TM</sup> Topical Solution for Dogs & Puppies

First Defense<sup>TM</sup> Dual Action Topical Solution for Dogs

First Defense™ Dual Action Topical Solution for Dogs & Puppies

First Defense<sup>TM</sup> Topical Solution for Dogs

First Defense<sup>TM</sup> Topical Solution for Dogs

First Defense<sup>TM</sup> Topical Solution for Dogs & Puppies

First Defense™ Topical Solution for Dogs & Puppies

Hartz Advanced Dual Action<sup>TM</sup> for Dogs & Puppies

Hartz Dual Action™ Topical for Dogs & Puppies

Hartz® 15 to 30 lbs. UltraGuard® Dual Action™ Topical for Dogs & Puppies

Hartz® 31to 60 lbs. UltraGuard® Dual Action<sup>TM</sup> Topical for Dogs & Puppies

Hartz® 5 to 14 lbs. UltraGuard® Dual Action™ Topical for Dogs & Puppies

Hartz® 61 to 150 lbs. UltraGuard® Dual Action™ Topical for Dogs & Puppies

Hartz® Advanced Dual Action<sup>TM</sup> Flea & Tick Topical for Dogs & Puppies

Hartz® Dual Action<sup>TM</sup> Flea & Tick Topical Drops for Dogs & Puppies

Hartz® FieldForce™ Dual Action Topical Solution for Dogs

Hartz® FieldForce<sup>TM</sup> Dual Action Topical Solution for Dogs & Puppies

Hartz® FieldForce™ Topical Solution for Dogs

Hartz® FieldForce™ Topical Solution for Dogs & Puppies

Hartz® First Defense™ Dual Action Topical Solution for Dogs

Hartz® First Defense™ Dual Action Topical Solution for Dogs & Puppies

Hartz® First Defense™ Topical Solution for Dogs

Hartz® First Defense<sup>TM</sup> Topical Solution for Dogs & Puppies

Hartz<sup>®</sup> InControl Advanced<sup>®</sup> Flea & Tick Topical Drops for Dogs

Hartz<sup>®</sup> InControl Advanced<sup>®</sup> Flea & Tick Topical Drops for Dogs & Puppies

Hartz<sup>®</sup> InControl Advanced<sup>®</sup> Flea & Tick Topical Drops for Dogs and Puppies

Hartz<sup>®</sup> InControl® Dual Action Flea & Tick Drops for Dogs

Hartz<sup>®</sup> InControl® Dual Action Flea & Tick Drops for Dogs & Puppies

Hartz<sup>®</sup> InControl® Dual Action Flea & Tick Drops for Dogs and Puppies

Hartz<sup>®</sup> InControl® Dual Active Flea & Tick Drops for Dogs

Hartz<sup>®</sup> InControl® Dual Active Flea & Tick Drops for Dogs & Puppies

Hartz<sup>®</sup> InControl® Dual Active Flea & Tick Drops for Dogs and Puppies

Hartz® InControl® Flea & Tick Prevention for Dogs & Puppies

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		Page 1 of 17	

Hartz<sup>®</sup> InControl® Flea & Tick Prevention for Dogs and Puppies Hartz<sup>®</sup> InControl® Topical Flea & Tick Control for Dogs Hartz® InControl® Topical Flea & Tick Control for Dogs & Puppies Hartz<sup>®</sup> InControl® Topical Flea & Tick Control for Dogs and Puppies Hartz<sup>®</sup> InControl® Topical Flea & Tick Prevention for Dogs Hartz<sup>®</sup> InControl® Topical Flea & Tick Prevention for Dogs & Puppies Hartz® InControl® Topical Flea & Tick Prevention for Dogs and Puppies Hartz<sup>®</sup> InControl® Topical Flea & Tick Solution for Dogs Hartz<sup>®</sup> InControl® Topical Flea & Tick Solution for Dogs & Puppies Hartz<sup>®</sup> InControl® Topical Flea & Tick Solution for Dogs and Puppies Hartz<sup>®</sup> InControl® Topical Flea & Tick Treatment for Dogs Hartz<sup>®</sup> InControl® Topical Flea & Tick Treatment for Dogs & Puppies Hartz® InControl® Topical Flea & Tick Treatment for Dogs and Puppies Hartz® Pro Force™ Dual Action Topical Solution for Dogs Hartz® Pro Force™ Dual Action Topical Solution for Dogs & Puppies Hartz® Pro Force<sup>TM</sup> Topical Solution for Dogs Hartz® Pro Force™ Topical Solution for Dogs & Puppies Hartz<sup>®</sup> Revo® Dual Action Flea & Tick Drops for Dogs Hartz<sup>®</sup> Revo® Dual Action Flea & Tick Drops for Dogs & Puppies Hartz® Revo® Dual Action Flea & Tick Drops for Dogs and Puppies Hartz<sup>®</sup> Revo® Dual Active Flea & Tick Drops for Dogs Hartz<sup>®</sup> Revo® Dual Active Flea & Tick Drops for Dogs & Puppies Hartz<sup>®</sup> Revo® Dual Active Flea & Tick Drops for Dogs and Puppies Hartz® Revo® Topical Flea & Tick Control for Dogs Hartz<sup>®</sup> Revo® Topical Flea & Tick Control for Dogs & Puppies Hartz<sup>®</sup> Revo® Topical Flea & Tick Control for Dogs and Puppies Hartz<sup>®</sup> Revo® Topical Flea & Tick Prevention for Dogs Hartz<sup>®</sup> Revo® Topical Flea & Tick Prevention for Dogs & Puppies Hartz<sup>®</sup> Revo® Topical Flea & Tick Prevention for Dogs and Puppies Hartz<sup>®</sup> Revo® Topical Flea & Tick Solution for Dogs Hartz<sup>®</sup> Revo® Topical Flea & Tick Solution for Dogs & Puppies Hartz<sup>®</sup> Revo® Topical Flea & Tick Solution for Dogs and Puppies Hartz<sup>®</sup> Revo® Topical Flea & Tick Treatment for Dogs Hartz<sup>®</sup> Revo® Topical Flea & Tick Treatment for Dogs & Puppies Hartz® Revo® Topical Flea & Tick Treatment for Dogs and Puppies Hartz® Revo® Topical Treatment for Dogs Hartz<sup>®</sup> Revo® Topical Treatment for Dogs & Puppies Hartz<sup>®</sup> Revo® Topical Treatment for Dogs and Puppies Hartz® UltraGuard Plus® Topical Flea & Tick Control for Dogs Hartz<sup>®</sup> UltraGuard Plus <sup>®</sup> Topical Flea & Tick Control for Dogs & Puppies Hartz<sup>®</sup> UltraGuard Plus <sup>®</sup> Topical Flea & Tick Control for Dogs and Puppies Hartz<sup>®</sup> UltraGuard Plus <sup>®</sup> Topical Flea & Tick Prevention for Dogs Hartz<sup>®</sup> UltraGuard Plus <sup>®</sup> Topical Flea & Tick Prevention for Dogs & Puppies Hartz<sup>®</sup> UltraGuard Plus <sup>®</sup> Topical Flea & Tick Prevention for Dogs and Puppies Hartz® UltraGuard Plus® Topical Flea & Tick Solution for Dogs

Hartz<sup>®</sup> UltraGuard Plus <sup>®</sup> Topical Flea & Tick Solution for Dogs & Puppies Hartz<sup>®</sup> UltraGuard Plus <sup>®</sup> Topical Flea & Tick Solution for Dogs and Puppies Hartz® UltraGuard Plus® Topical Flea & Tick Treatment for Dogs Hartz<sup>®</sup> UltraGuard Plus <sup>®</sup> Topical Flea & Tick Treatment for Dogs & Puppies Hartz<sup>®</sup> UltraGuard Plus <sup>®</sup> Topical Flea & Tick Treatment for Dogs and Puppies Hartz<sup>®</sup> UltraGuard Plus<sup>®</sup> Dual Action Flea & Tick Drops for Dogs Hartz<sup>®</sup> UltraGuard Plus<sup>®</sup> Dual Action Flea & Tick Drops for Dogs & Puppies Hartz<sup>®</sup> UltraGuard Plus<sup>®</sup> Dual Action Flea & Tick Drops for Dogs and Puppies Hartz<sup>®</sup> UltraGuard Plus<sup>®</sup> Dual Active Flea & Tick Drops for Dogs Hartz<sup>®</sup> UltraGuard Plus<sup>®</sup> Dual Active Flea & Tick Drops for Dogs & Puppies Hartz<sup>®</sup> UltraGuard Plus<sup>®</sup> Dual Active Flea & Tick Drops for Dogs and Puppies Hartz<sup>®</sup> UltraGuard PRO<sup>®</sup> Flea & Tick Treatment for Dogs Hartz<sup>®</sup> UltraGuard PRO<sup>®</sup> Flea & Tick Treatment for Dogs & Puppies Hartz<sup>®</sup> UltraGuard PRO<sup>®</sup> Flea & Tick Treatment for Dogs and Puppies Hartz® UltraGuard® Dual Action™ Flea & Tick Topical for Dogs & Puppies Hartz® UltraGuard® Dual Action™ for Dogs & Puppies Hartz® UltraGuard® Dual Action<sup>TM</sup> Topical for Dogs & Puppies Pro Force<sup>TM</sup> Dual Action Topical Solution for Dogs Pro Force<sup>TM</sup> Dual Action Topical Solution for Dogs& Puppies Pro Force<sup>TM</sup> Topical Solution for Dogs Pro Force<sup>TM</sup> Topical Solution for Dogs & Puppies Revo® Dual Action Flea & Tick Drops for Dogs and Puppies Revo® Dual Action<sup>TM</sup> Flea & Tick Drops for Dogs Revo® Dual Action<sup>TM</sup> Flea & Tick Drops for Dogs & Puppies Revo® Dual Active Flea & Tick Drops for Dogs Revo® Dual Active Flea & Tick Drops for Dogs & Puppies Revo® Dual Active Flea & Tick Drops for Dogs and Puppies Revo® Topical Flea & Tick Control for Dogs Revo® Topical Flea & Tick Control for Dogs & Puppies Revo® Topical Flea & Tick Control for Dogs and Puppies Revo® Topical Flea & Tick Prevention for Dogs Revo® Topical Flea & Tick Prevention for Dogs & Puppies Revo® Topical Flea & Tick Prevention for Dogs and Puppies Revo® Topical Flea & Tick Solution for Dogs Revo® Topical Flea & Tick Solution for Dogs & Puppies Revo® Topical Flea & Tick Solution for Dogs and Puppies Revo® Topical Flea & Tick Treatment for Dogs Revo® Topical Flea & Tick Treatment for Dogs & Puppies Revo® Topical Flea & Tick Treatment for Dogs and Puppies Revo® Topical Treatment for Dogs Revo® Topical Treatment for Dogs & Puppies

Revo® Topical Treatment for Dogs and Puppies

Hartz <sup>®</sup> Reference #135 September 26, 2025 EPA Reg. No.: 2596-168 EPA MASTER LABEL

{Note to Reviewer: [Optional/alternate text in brackets]; {Administrative text in braces contain notes to reviewer that are not intended for printing}; (Text in parenthesis will appear on final marketplace label.)}

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

For use **ONLY** on dogs 12 weeks and older, weighing 5 to 14 lbs.

For use **ONLY** on dogs 12 weeks and older, weighing 15 to 30 lbs.

For use **ONLY** on dogs 12 weeks and older, weighing 31 to 60 lbs.

For use **ONLY** on dogs 12 weeks and older, weighing 61 to 150 lbs.

# ACCEPTED

09/29/2025

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

EPA Reg. No. 2596-168

# **{FRONT PANEL}**

{Note: For each brand as packaged, a large, clear picture of a dog in the weight range will be on the front panel of the label.}

{Note: Each of the brands will be packaged in the weight class and age designated below. One of these statements will be displayed prominently in a box on the front panel, based on the contents of the package.}

Only for use on dogs weighing 5 to 14 lbs. and 12 weeks of age and older Only for use on dogs weighing 15 to 30 lbs. and 12 weeks of age and older Only for use on dogs weighing 31 to 60 lbs. and 12 weeks of age and older Only for use on dogs weighing 61-150 lbs. and 12 weeks of age and older

#### **ACTIVE INGREDIENTS:**

Etofenprox	55.0%
*Piperonyl Butoxide (PBO)	10.0%
**n-octyl bicycloheptene dicarboximide (MGK 264)	1.0%
Pyriproxyfen (Nylar)	0.5%
OTHER INGREDIENTS	33.50%
solvent, safflower oil, fragrance	
TOTAL	100.0%

<sup>\*(</sup>butylcarbityl)(6-propylpiperonyl) ether and related compounds

NYLAR, MGK®- Registered Trademarks of McLaughlin Gormley King Company

#### KEEP OUT OF REACH OF CHILDREN

**CAUTION:** See back panel for additional precautionary statements.

**NET CONTENT:** Contains 1 [2] [3] [4][6] [8] tubes, each fl. oz. (ml)

For use ONLY on Dogs and	Net Contents (Each tube)
Puppies 12 weeks and older	
Weighing:	
5 to 14 lbs.	0.031 fl. oz. (0.91 ml)
15 to 30 lbs.	0.066 fl. oz. (1.95 ml)
31 to 60 lbs.	0.132 fl. oz. (3.90 ml)
61 to 150 lbs.	0.220 fl. oz. (6.50 ml)

<sup>\*\*</sup>MGK ® 264, Insecticide Synergist

Hartz <sup>®</sup> Reference #135 EPA Reg. No.: 2596-168

September 26, 2025 EPA MASTER LABEL

{Note to Reviewer: [Optional/alternate text in brackets]; {Administrative text in braces contain notes to reviewer that are not intended for printing}; (Text in parenthesis will appear on final marketplace label.)}

EPA Reg. No. 2596-168

EPA Est. No.

Hartz<sup>®</sup> and other trademarks are trademarks of The Hartz Mountain Corporation. Made by The Hartz Mountain Corporation, 200 Plaza Drive, Secaucus, NJ 07094

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



DO NOT USE ON CATS

# **{BACK PANEL}**

# PRECAUTIONARY STATEMENTS

**HAZARDS TO HUMANS** 

**CAUTION**: Causes moderate eye irritation. Avoid contact with eyes, skin or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using toilet. Remove and wash contaminated clothing before reuse.

#### HAZARDS TO DOMESTIC ANIMALS

## FOR EXTERNAL USE ONLY. DO NOT USE ON ANIMALS OTHER THAN DOGS.

Do not use on dogs or puppies less than 12 weeks old and weighing less than 5 [15] [31] [61] lbs. Do not use this product on debilitated, aged, medicated, pregnant or nursing dogs or on dogs known to be sensitive to pesticide products without first consulting a veterinarian. Sensitivity, such as slight transitory redness of the skin at the site of application, may occur after using ANY pesticide product for dogs. If signs of sensitivity occur, bathe your dog with mild soap, rinse with large amounts of water, and consult a veterinarian immediately. Dogs may experience some temporary irritation at the site of product application. This product is not a substitute for prescribed heartworm preventative.

#### **ENVIRONMENTAL HAZARDS**

This product is toxic to fish. This pesticide is extremely toxic to aquatic organisms, including fish and invertebrates. Do not add directly to water. Do not contaminate water when disposing of product or packaging.

Pa	age 5 of 17

Hartz<sup>®</sup> Reference #135 EPA Reg. No.: 2596-168

September 26, 2025 EPA MASTER LABEL

{Note to Reviewer: [Optional/alternate text in brackets]; {Administrative text in braces contain notes to reviewer that are not intended for printing}; (Text in parenthesis will appear on final marketplace label.)}

#### **FIRST AID**

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.

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

#### **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For Indoor use only. Application of product on pets must only be done indoors.

IMPORTANT! READ ENTIRE LABEL BEFORE EACH USE.

#### **USE RESTRICTIONS:**

DO NOT ALLOW CHILDREN TO APPLY PRODUCT.

DO NOT USE ON DOGS OR PUPPIES 12 WEEKS OF AGE WEIGHING LESS THAN 5 [15] [31] [61] LBS.

DO NOT ALLOW YOUR DOG/PUPPY TO INGEST THIS PRODUCT.

DO NOT EXCEED LABELED DOSAGE AMOUNT FOR DOGS.

DO NOT APPLY MORE THAN ONE TUBE PER TREATMENT REGARDLESS OF DOG'S WEIGHT.

DO NOT HAVE CONTACT OR ALLOW CHILDREN TO HAVE CONTACT WITH TREATED AREA UNTIL COMPLETELY DRY.

DO NOT USE ON CATS, RABBITS AND ANIMALS OTHER THAN DOGS.

DO NOT REAPPLY {insert Alternate Brand Name} FOR 28 DAYS [30 DAYS] [4 WEEKS] [1 MONTH]

{The application steps below may optionally be numbered or bulleted to clarify the order, depending on the final physical layout of the label but the wording will be identical.}

{When referring to the application device (i.e., "applicator tube", "tube", etc.) only one term will be selected and used throughout the entire label.}

#### {Option 1}

Dog should be dry and standing at time of application. Dog should remain dry and not bathed for 48 hours after application for best performance. Remove one applicator tube [tube] from the package and hold in an upright position pointed away from your face. Pull off cap. Turn the cap around and place on top of applicator tube [tube]. Simply press cap down to break the seal of the tube. Remove cap

Hartz<sup>®</sup> Reference #135 EPA Reg. No.: 2596-168

September 26, 2025 EPA MASTER LABEL

{Note to Reviewer: [Optional/alternate text in brackets]; {Administrative text in braces contain notes to reviewer that are not intended for printing}; (Text in parenthesis will appear on final marketplace label.)}

carefully. Position the tip of the applicator tube [tube] on the dog's back between the shoulder blades. Use the tip of the applicator tube [tube] to part the dog's hair so that the product will be applied at skin level. Begin squeezing out the contents of the applicator tube [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 month. Separate treated dog from other dogs, cats and pets for 24 hours after treatment has been applied.

## {Option 2}

Dog should be dry and standing at time of application. Dog should remain dry and not bathed for 48 hours after application for best performance. Remove one applicator tube [tube] from the package and hold in an upright position pointed away from your face. Twist dispensing tip clockwise about ½ turn while pushing down to break the applicator tube's [tube's] seal. Do not remove the dispensing tip. Position the dispensing tip on the dog's back between the shoulder blades. Use the dispensing tip of the applicator tube [tube] to part the dog's hair so that the product will be applied at skin level. Begin squeezing out the contents of the applicator tube [tube] to form a stripe as you move [glide] from the shoulder blades along the dog's back to the base of the tail. Repeat every month. Separate treated dog from other dogs, cats and pets for 24 hours after treatment has been applied.

## {Option 3}

Dog should be dry and standing at time of application. Dog should remain dry and not bathed for 48 hours after application for best performance. Remove one applicator tube [tube] from the package and hold in an upright position pointed away from your face. Pull off cap. Turn the cap around and place on top of applicator tube [tube]. Simply press cap down to break the seal of the applicator tube [tube]. Remove cap carefully. Position the tip of the applicator tube [tube] on the dog's back at the base of the dog's tail. Use the tip of the applicator tube [tube] to part the dog's hair so that the product will be applied at skin level. Begin squeezing out the contents of the applicator tube [tube] to form a stripe as you move from the base of the tail along the dog's back to the shoulder blades. Repeat every month. Separate treated dog from other dogs and cats [pets] for 24 hours after treatment has been applied.

### {Option 4}

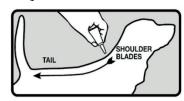
Dog should be dry and standing at time of application. Dog should remain dry and not bathed for 48 hours after application for best performance. Remove one applicator tube [tube] from the package and hold in an upright position pointed away from your face. Twist dispensing tip clockwise about ½ turn while pushing down to break the applicator tube's [tube's] seal. Do not remove the dispensing tip. Position the dispensing tip on the dog's back at the base of the dog's tail. Use the dispensing tip of the applicator tube [tube] to part the dog's hair so that the product will be applied at skin level. Begin squeezing out the contents of the applicator tube [tube] to form a stripe as you move [glide] from the base of the tail along the dog's back to the shoulder blades. Repeat every month. Separate treated dog from other dogs and cats [pets] for 24 hours after treatment has been applied.

## {Option 5 – Neck to Tail}

- 1. Dog should be dry and standing at time of application. Dog should remain dry and not bathed for 48 hours after application for best performance
- 2. Remove one applicator tube [tube] from the package and hold in an upright position [at the neck of the tube] pointed away from your face.
- 3. Lift the handle [lever] [at the neck of the tube] in an upward motion to separate from [the body of] the tube.
- 4. Position the tip of the tube on the dog's back at the base of the dog's neck between the shoulder blades. Use the tip of the tube to part the dog's hair so that the product will be applied at the skin level [to the skin].
- 5. Begin squeezing out the contents of the tube to form a stripe as you move from the base of the neck, along the dog's back to the tail.
- 6. Repeat every month [30 days] [4 weeks].







## Option 6 – Neck to Tail with Applicator Tapping instructions}

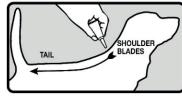
- 1. Dog should be dry and standing at time of application. Dog should remain dry and not bathed for 48 hours after application for best performance.
- 2. Remove one applicator tube [tube] from the package and hold in an upright position [at the neck of the tube] pointed away from your face.
- 3. Tap applicator tube [tube] to settle liquid into the sealed end of the tube.
- 4. Lift the handle [lever] [at the neck of the tube] in an upward motion to separate from [the body of] the tube.
- 5. Position the tip of the tube on the dog's back at the base of the dog's neck between the shoulder blades. Use the tip of the tube to part the dog's hair so that the product will be applied at the skin level [to the skin].
- 6. Begin squeezing out the contents of the tube to form a stripe as you move from the base of the neck, along the dog's back to the tail.
- 7. Repeat every month [30 days] [4 weeks].

{Note to Reviewer: Below images refer to step 3, tapping applicator.}







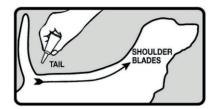


## {Option 7 – Tail to Neck}

- 1. Dog should be dry and standing at time of application. Dog should remain dry and not bathed for 48 hours after application for best performance
- 2. Remove one applicator tube [tube] from the package and hold in an upright position [at the neck of the tube] pointed away from your face.
- 3. Lift the handle [lever] [at the neck of the tube] in an upward motion to separate from [the body of] the tube.
- 4. Position the tip of the tube on the dog's back at the base of the dog's tail. Use the tip of the tube to part the dog's hair so that the product will be applied at the skin level [to the skin].
- 5. Begin squeezing out the contents of the tube to form a stripe as you move from the base of the tail, along the dog's back to the shoulder blades.
- 6. Repeat every month [30 days] [4 weeks].





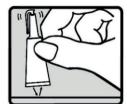


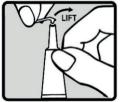
#### {Option 8 – Tail to Neck with Applicator Tapping instructions}

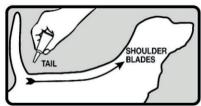
- 1. Dog should be dry and standing at time of application. Dog should remain dry and not bathed for 48 hours after application for best performance.
- 2. Remove one applicator tube [tube] from the package and hold in an upright position [at the neck of the tube] pointed away from your face.
- 3. Tap applicator tube [tube] to settle liquid into the sealed end of the tube.
- 4. Lift the handle [lever] [at the neck of the tube] in an upward motion to separate from [the body of] the tube.
- 5. Position the tip of the tube on the dog's back at the base of the dog's tail. Use the tip of the tube to part the dog's hair so that the product will be applied at the skin level [to the skin].
- 6. Begin squeezing out the contents of the tube to form a stripe as you move from the base of the tail, along the dog's back to the shoulder blades.
- 7. Repeat every month [30 days] [4 weeks].

{Note to Reviewer: Below images refer to step 3, tapping applicator.}









### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**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 & CONTAINER HANDLING**: Call your local solid waste agency for local disposal options.

Non-refillable container. Do not reuse or refill container. *If empty*: Offer for recycling if available. *If partly filled*: Call your local solid waste agency for disposal instructions. Do not pour or dispose down the drain or sewer. Never place unused product down any indoor or outdoor drain.

{ Note to Reviewer: A box labeled "Side Effects" will be immediately above the cat warning box on the back panel.}

**Side Effects:** 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 1-800-275-1414.

{Cat Warning Icon: A cat prohibition icon and warning text in a box will appear on the back panel, lower right corner. Icon is 1.5 cm x 1.5 cm black image on a yellow background. The following text will be below or adjacent to the icon.}



**DO NOT USE ON CATS.** Keep cats away from treated dogs for 24 hours. If applied to a cat or ingested by a cat, contact your veterinarian. For more information call our [flea and tick] experts at 1-800-275-1414 (weekdays 9 a.m. – 5 p.m. E.S.T.)

## **<u>{INDIVIDUAL TUBE TEXT}</u>**

{Product name on applicator tube (i.e. tube) will be followed by weight and age limits of dog for which the applicator tube (i.e. tube) is intended.}

[Active Ingredients:]

Etofenprox 55.0%, PBO 10.0%, MGK 264 1.0%, Nylar 0.5%

Keep Out of Reach of Children

#### **CAUTION**

Read accompanying label before use

{Net Content, depending on weight of dog, will appear on applicator tube as follows:}

5 to 14 lbs.	0.031 fl. oz. (0.91 ml)
15 to 30 lbs.	0.066 fl. oz. (1.95 ml)
31 to 60 lbs.	0.132 fl. oz. (3.90 ml)
61 to 150 lbs.	0.220 fl. oz. (6.50 ml)

EPA Reg. No. 2596-168

EPA Est. No.

{Lot number to be located on tube crimp}

{Note: Cat Warning Icon: A cat prohibition icon in a box will appear on the immediate container that holds the tube(s). Icon is 1.5 cm x 1.5 cm black image on a yellow background.}



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

- Weighing 5 to 14 lbs. on dogs and puppies 12 weeks and older
- Weighing 15 to 30 lbs. on dogs and puppies 12 weeks and older
- Weighing 31 to 60 lbs. on dogs and puppies 12 weeks and older
- Weighing 61 to 150 lbs. on dogs and puppies 12 weeks and older
- [S] Only for Dogs & Puppies 5-14 lbs., 12 weeks and older [Small]
- [M] Only for Dogs & Puppies 15-30 lbs., 12 weeks and older [Medium] [L] Only [or] Dogs & Puppies 31-60 lbs., 12 weeks and older [Large]
- [XL] Only for Dogs & Puppies 61-150 lbs., 12 weeks and older [Extra Large]
- [S] Only for [Small] Dogs & Puppies 5-14 lbs., 12 weeks and older
- [M] Only for [Medium] Dogs & Puppies 15-30 lbs., 12 weeks and older.
- [L] Only for [Large] Dogs & Puppies 31-60 lbs., 12 weeks and older.
- [XL] Only for [Extra Large] Dogs & Puppies 61-150 lbs., 12 weeks and older.

|--|

\_\_\_\_\_\_

- Repels Mosquitoes, Prevent re-infestation(s) for 30 days [1 month] [4 weeks]
- Repels Mosquitoes for 30 days [1 month] [4 weeks]
- After the applied treatment has spread over the dog's body, this product will kill newly infesting fleas on dogs within 15 minutes.
- Within 24 hours of application, this product will kill fleas by contact within 15 minutes.
- When fully protected by full coverage of this product, infesting fleas will be killed within 15 minutes.
- Kills Fleas, Brown Dog Ticks, Deer Ticks, Flea Eggs, [Flea larvae] [after contact] [through contact]
- Kills Fleas, Brown Dog [Ticks] [and] Deer Ticks, Flea Eggs, [Flea larvae] [through contact] for 30 days [1 month] [4 weeks]
- Kills Fleas, Brown Dog Ticks [and] Deer Ticks, Flea Eggs, [Flea larvae] [after contact] [through contact]
- Long Lasting for 30 days [1 month] [4 weeks]
- Kills Fleas [that may transmit tapeworm] for 30 days [1 month] [4 weeks] [on dogs]
- Kills fleas that may cause flea allergy dermatitis [and flea bite anemia] for 30 days [1 month] [4 weeks] [on dogs]
- Kills Brown Dog Ticks and Deer Ticks for 30 days [1 month] [4 weeks] [on dogs]
- Kills Flea Eggs [and Flea Larvae] for 30 days [1 month] [4 weeks]
- Prevents Flea Eggs from hatching
- Kills Brown Dog Ticks for 30 days[1 month] [4 weeks]
- Kills Deer Ticks [that may carry Lyme disease] for 30 days[1 month] [4 weeks] [on dogs]
- Kills adult Brown Dog Ticks and Deer Ticks
- Kills Fleas, Brown Dog Ticks, Deer Ticks, Flea Eggs, [Flea larvae]
- Kills Fleas, Brown Dog Ticks, Deer Ticks, Flea Eggs, [Flea larvae] [through contact] for 30 days [1 month] [4 weeks] Kills Fleas, Brown Dog Ticks, Deer Ticks, Flea Eggs, [Flea larvae] [after contact] for 30 days [1 month] [4 weeks]
- Controls Flea [and] [Brown Dog Tick] [and] [Deer Tick] infestations [on dogs] for 30 days [1 month] [4 weeks]
- Helps prevent re-infestation of fleas [and] [Brown Dog Tick] [and] [Deer Tick] for 30 days [1 month] [4 weeks]
- Helps reduce flea [and] [Brown Dog Tick] [and] [Deer Tick] re-infestation [on dogs] for 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
- Repels Mosquitoes [on dogs] for 30 days [1 month] [4 weeks]
- Repels Mosquitoes that may transmit West Nile for 30 days [1 month] [4 weeks] [on dogs]
- Once-a-month Flea [and Brown Dog Tick, and Deer Tick] Treatment [Control] [Solution]
- Monthly Flea [and Brown Dog Tick, and Deer Tick] Treatment [Control] [Solution]
- 28 day [30 day] [1 month] [4 weeks] Flea [and Brown Dog Tick, and Deer Tick] Treatment [Control] [Solution]
- Prevents flea eggs from developing into biting adults [on dogs] for 30 days [1 month] [4 weeks]
- Stays on and doesn't rub off
- Spreads with dog's natural skin oils

Page 12 of 17
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Hartz ® Reference #135 EPA Reg. No.: 2596-168

#### **September 26, 2025 EPA MASTER LABEL**

{Note to Reviewer: [Optional/alternate text in brackets]; {Administrative text in braces contain notes to reviewer that are not intended for printing}; (Text in parenthesis will appear on final marketplace label.)}

Starting 7 days after application, this product will start killing fleas by contact within 15 minutes.

- Starting 7 days after application, this product will start killing fleas by contact within 15 minutes and last for 30 days [1 month] [4 weeks]
- Starting 7 says after application this product will start killing fleas within 15 minutes
- Starting 7 days after application, this product will start killing fleas within 15 minutes and last for 30 days [1 month] [4 weeks]
- Kills fleas for 30 days [1 month] [4 weeks]
- Prevents and controls re-infestation[s] [on dogs]
- Long lasting for 30 days [1 month] [4 weeks]
- Effective and convenient topical treatment
- Kills fleas [and Brown Dog, Deer Ticks] through [after] contact
- [With] patented [applicator] [tube]
- Easy spot on topical [applicator] [tube]
- Waterproof after 48 hours
- Kills fleas before they have a chance to lay eggs

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

```
First treatment, second treatment, third treatment {Xth treatment}
X-pack
X-tubes
X month supply
X monthly treatment(s)
Bonus Pack*
Club Pack*
Value Pack*
 [Value Pack x + y = z Monthly Treatments]*
 [Bonus Pack x + y = z Monthly Treatments]*
 [Club Pack x + y = z Monthly Treatments]*
 \{x=1, 2, 3, 4, 6, \text{ or } 8\}
 \{y=1, 2\}
 \{z=x+y\}
*{Note to Reviewer : Value, Club, Bonus are designation which could be used on packs with 6 or more doses, for promotional
purposes.}
{Six month limited claims with "Free" and "Bonus" type terms below}
 [1][2] Month[s] Free!**
 [1][2] Tube (s] Free!**
 [30] [60] Day] [s] (Free]!**
 [30] (60] Day[s] of treatment- Free!**
 [1][2] Applicator [s] Free!**
 [1][2] Dose[s] Free!**
 **{Note to Reviewer; Promotion to be used with 3 pack 1 additional dose final count 4, 6 packs 2 additional doses final
count 8}
    Save Now!
   Club Size***
    Value Size***
   Great Value***
    Better Value***
***{Note to Reviewer: Value, Club, Bonus are designations which could be used on packs with 6 or more doses, for
promotional purposes}
   Fragrance-free
  Unscented
• Fresh fragrance
• Powder fragrance
   Pleasant fragrance
    Spring Fresh Scent
   Convenient[easy to use] applicator
                                                Page 14 of 17
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- [X] Pro-cision Flo® Applicator[s]
- [X] Pro-Glide<sup>TM</sup> Applicator[s]
- [Now] [featuring the angled] [Pro-cision Flo®Applicator]
- [Pro-Glide<sup>TM</sup> Applicator] easily gets through dog's fur, for on-skin application
- Pro-cision Flo®Applicator
- [Now] [featuring the angled] [Pro-Glide<sup>TM</sup> Applicator] quickly gets through dog's fur, for on-skin application
- [Now] [featuring the angled] [Pro-cision Flo®Applicator]
- [Pro-Glide<sup>TM</sup> Applicator] easily penetrates dog's fur [, for on-skin application]
- [Now] [featuring the angled] [Pro-Glide<sup>TM</sup> Applicator] quickly penetrates dog's fur, for on-skin application
- Advanced Pro-Glide® Applicator
- Pro-Glide<sup>TM</sup> Applicator glides through the dog's fur
- Pro-Glide™ Applicator easily gets through dog's fur to minimize [oily] residue
- Pro-Glide<sup>TM</sup> Applicator easily penetrates dog's fur to minimize [oily] residue
- Pro-Glide<sup>TM</sup> Applicator features rounded edges for on-skin application
- Pro-Glide<sup>TM</sup> Applicator glides smoothly through the dog's fur
- Pro-Glide™ Applicator features an angled tip to help guide the application
- Easy to use Pro-Glide™ Applicator
- Direct to your dog's skin
- Easy [simple] to use [handle] [apply]
- Featuring the [with] EZC<sup>TM</sup> tube
- Featuring the [with] EZ2C<sup>TM</sup> tube
- Featuring the [with] EZView<sup>TM</sup> tube
- Featuring the [with] Clearview<sup>TM</sup> tube
- Clearview<sup>TM</sup> [EZC<sup>TM</sup>] [EZ2C<sup>TM</sup>] [EZView<sup>TM</sup>] tube[visually] ensures all product has been dispensed
- Clearview<sup>TM</sup> [EZC<sup>TM</sup>] [EZ2C<sup>TM</sup>] [EZView<sup>TM</sup>] tubes give you the assurance all the product has been applied
- After application, the treated area may appear wet [or] [oily] for up to 24 hours
- You may bathe your dog 48 hours after application

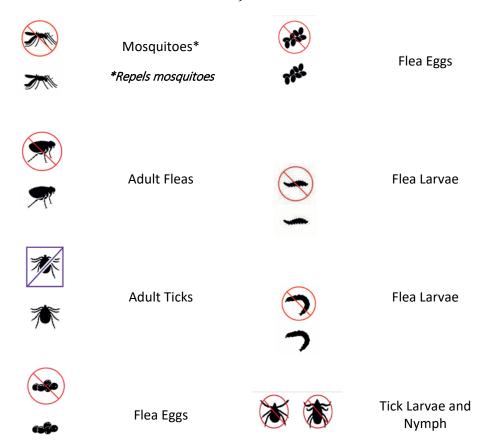
•	To help remind y	you when	you last	t applied	treatment,	simply	write	in the	date	when	each	dose	is
	applied:												

First Dose	
Second Dose	
Third Dose	
Xth Dose	Note: X  will not exceed the net contents.
0 4 4	

- Hartz® and other trademarks are trademarks of The Hartz Mountain Corporation
- This item is {insert retailer company name} ELECTRONICALLY PROTECTED
- This item is {insert retailer company name} Electronically Protected
- Hartz, the brand with [over] 95 [96] [97] [98] [99] [100] years of experience
- Hartz, the trusted brand [used by your grandparents and parents] with [over] 95 [96] [97] [98] [99] [100] years of experience

Page 15 of 17
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## **{OPTIONAL MARKETING ICONS}**



{Note to Reviewer: The following images or graphics have been added to the EPA label dated September 26, 2025.}





Color strip on bottom of tube will change depending on size of dog





