

2724-811

8/15/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

AUG 15 2013

Ms. Nancy Huebl
Senior Registration Specialist
Wellmark International
1501 East Woodfield Road, Suite 200 West
Schaumburg, IL 60173

Subject: Label Notification per PR Notice 98-10
RF2164 A/T Combo
EPA Reg. No. 2724-811
Application dated June 17, 2013

Dear Ms. Huebl,

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated June 17, 2013 for the product, RF2164 A/T Combo, EPA Reg. No. 2724-811. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The label submitted with the application has (have) been stamped "Notification" and will be placed in our records.

If you have any questions, please call Kevin Sweeney at (703) 305-5063.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Sweeney".

Richard Gebken
Product Manager 10
Registration Division (7505P)
Office of Pesticide Programs

Enclosure

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United States
Environmental Protection Agency
Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number Wellmark International/2724-811	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Wellmark International/RF2164 A/T Combo	PM # 10	
5. Name and Address of Applicant / Registrant (Include ZIP Code) Wellmark International 1501 East Woodfield Road, Suite 200W Schaumburg, Illinois 60173 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(C)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. NOTIFICATION Product Name AUG 15 2013	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and section II.)

Notification to (1) change text size for "dog" in product name by agreement with EPA and (2) add graphics that correspond to existing DFU per PR 98-10. This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packagin <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input checked="" type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container 1.5 - 9 cc 1 - 6	If "Yes" Unit Packaging wgt. No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container 0.05 - 0.30 fl oz (1.5 - 9 cc) tubes,	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Label Accompanying Product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled <input checked="" type="checkbox"/> Other printed on cardboard or blister card			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Nancy Huebl	Title Sr. Registration Specialist	Telephone No. (Include Area Code) 847-330-5376
2. Signature <i>Nancy Huebl</i>		6. Date Application Received (Stamped)
3. Title Sr. Registration Specialist		
4. Typed Name Nancy Huebl		
5. Date June 17, 2013		
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.		

Wellmark

June 17, 2013

Document Processing Desk (NOTIF)
Office of Pesticide Programs 7504P
U.S. Environmental Protection Agency
Room S-4900 One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202-4501

ATTENTION: Richard Gebken, PM 10

SUBJECT: LABEL NOTIFICATION TO ADD OPTIONAL GRAPHICS (FOR USE WITHOUT APPLICATOR DEVICE FOR RF2164 A/T COMBO/EPA REG. NO. 2724-811)

Dear Mr. Gebken:

Per PRN 98-10, §II.M.2 Directions for Use, Addition of tables, charts or other graphics which present the same use directions already approved by EPA in narrative form, enclosed is completed EPA Form 8570-1 and 2 copies of highlighted revised labeling for the above product (red is new text).

This label change is submitted as a notification because it meets the requirements of PRN 98-10, §II.M.2. and meets the criteria noted in the PRN (no increase in dosage, exposure, frequency, method). If you have any questions please, call me directly at 847-330-5376. Thank you for your assistance in this matter.

Yours sincerely,
WELLMARK INTERNATIONAL



Nancy Huebl
Senior Registration Specialist
nhuebl@central.com

enclosure

cc: J. McFadden/C. Elmi/H. Friedli

cc: J. McFadden/C. Elmi/H. Friedli

RF2164 A/T COMBO

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[Include "Dog" in product name and the Text for "Dog" must be the same size as at least 75% of the largest letter in the Brand Name]

Front Panel - For Use ONLY on Toy (6-12 lbs.), Small (13-31 lbs.), Medium (32-55 lbs.), Large (56 - 80 lbs.), and Extra Large (81 lbs. and over) Dogs/Puppies (10 Weeks of age or older)

**Front Panel - For Use ONLY on Dogs (Over 6 lbs) & Puppies (10 Weeks of age or older)
[Flea & Tick [& Mosquito][Treatment] [and] Control]
Spot-On Flea & Tick Control ONLY for Dogs (Over 6 lbs) & Puppies (10 Weeks of age or older)**

General Claims:

- 5 size categories provide [smaller] weight ranges to improve [maintain][deliver] efficacy [performance][flea and tick][control][protection] on [for] your dog/puppy
- Effective on indoor and outdoor dogs/puppies
- ([1][3][4][6] monthly treatments) [1][3][4][6] Months Supply [24][48] doses
- Spreads naturally with dog's/puppy's movement (skin and hair oils)
- [Formula][Contains lanolin for coat conditioning]
- [Water Resistant] [to keep killing fleas and ticks in humid and wet conditions]
- [Fast Acting][Long Lasting][Kills Fleas and Ticks by Contact]
- [Fresh][Clean][Scent][Smell]
- [Reapply monthly] [Suitable for year-round use][Month] sticker for home calendar
- [Satisfaction guaranteed or your money back]
- [Patent Pending]
- [Can be used in households with dogs and cats]

NOTIFICATION

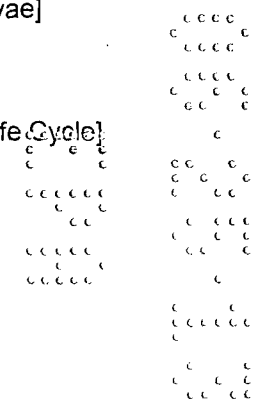
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Efficacy Claims:

- Each tube [cartridge][vial] [application] [kills fleas & ticks for 3 weeks] and [kills and repels mosquitoes for 3 to 4 weeks]
- [Protects for up to [Four/4] Weeks][One month][Four/4 Week [Flea][Tick][Mosquito] Treatment]
- [Controls fleas, ticks and mosquitoes for up to one month][Monthly treatment for control of fleas, ticks and mosquitoes]
- [Aids in Control of Ticks for up to 30 days]
- [Starts Killing Fleas and Ticks within 15 minutes]
- [Kills 85% of ticks within 48 hours][Kills more than 50% of fleas in 2 hours]
- [Dual Action kills adult fleas and prevents flea development]
- [Kills fleas, ticks, mosquitoes, flea eggs and flea larvae] [Dual protection (against fleas and ticks)]
- Kills the Deer Tick, which may transmit Lyme Disease
- Kills and Repels mosquitoes (the major carrier of canine heartworm)
- Monthly application for most effective protection

IGR Claims:

- [Contains [InfestStop™] an Insect Growth Regulator (IGR) to kill flea eggs and prevent flea development for [more than 10 weeks] up to [75 days][2.5 months]]
- [Contains [InfestStop™] [an Insect Growth Regulator (IGR) to kill flea eggs and larvae]
- [Breaks Flea Life Cycle for [more than 10 weeks] up to [75 days][2.5 months]
- An important step in breaking the flea life cycle
- [Controls flea reinfestation for [more than 10 weeks] up to [75 days][2.5 months]
- [With [InfestStop™][S-Methoprene] Insect Growth Regulator [IGR] to Break Flea Life Cycle]
- InfestStop/Infestop™ logo



Applicator Claims

[applicator]

Contemporary design

[brand name] [Applicator] helps to prevent getting liquid on [your] hands

[brand name] [Applicator] tip parts hair to help [liquid][application] get down to [the][your][dog's/puppy's] skin

Ergonomically contoured [ergonomic][shape][design] for easy handling [ease of use] [easy use]

For use with [only][brand name][disposable][liquid dispensing] tubes [pods] [vials] [cartridges]

[brand name] [applicator] [has] [provides] [allows for] [delivers] better grip

[brand name] [provides] re-closable [re-sealable] packaging for [easy] storage

Closing [the][brand name][applicator] door automatically opens the [disposable][liquid dispensing] tube

[pod][vial][cartridge]

[brand name] [Applicator] [will not drip after opening]

[brand name] [Applicator] Won't drip when set down as you go fetch the [your] dog/puppy

Includes unique [brand] applicator

Puts the liquid on your dog/puppy – not your hands

Directs the liquid onto your dog [/puppy] – not your hands

Directs the liquid onto your dog [/puppy] – away from your hands

Applies liquid to your dog's [/puppy's] skin – not yours

Helps prevent applying the wrong spot-on [dose] [product] on [to] the wrong pet

Convenient, easy to use ACCU-TIP [Applicator] [DISPENSER]

[Easy to use] Longer applicator tip for easy application to long-haired dogs/puppies

Thermoform claims

[disposable][liquid dispensing] tube [cartridge][vial][pod]

(Note tube/vial/cartridge/pod used interchangeably)

[brand name][disposable][liquid dispensing] [tube][vial][pod] tip [helps][to] spread out liquid [on your][dog/puppy]

Unique [cartridge] [tube][vial][pod] with flow control

[no drip][no mess][application][tube][cartridge][vial][pod]

Promotional Package Copy

One month [dose] free

One free month supply [dose] included

Bonus pack

Free [applicator][tube][vial][cartridge][pod][inside]

Designed not to drip when set on top of the counter, or table, or other flat surface.

For use with [brand] applicator

Applicator [device] not included

[brand] Refill Pack [brand][applicator [device] not included]

Refill Claims

For use [only] with [brand name][Applicator]

([1][3][4][6] monthly treatments) [1][3][4][6] Months Supply [24][48] doses

Easy to use [convenient] refills

[Can be used with] [Use with] [Brand Name] applicator

[Brand Name (e.g., Adams or Bio Spot, Smart Shield)] [Applicator] [Refills][Refill Pack]

[Refill Pack] [for][Brand Name] Applicator

[tube][cartridge][vial][pod] refill pack [refills]

Refills [Refill Pack] available

[refill][tube][cartridge][vial][pod] design

Applicator name options (applicator device is used in text)

Applicator

Tool

Device

Applicator Device

Application Tool

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Thermoform name options (tube, cartridge and vial are used in the text)

- Ampoule
- Cartridge
- Packet
- Pod
- Refill
- Tube
- Vial

(Front panel)

ACTIVE INGREDIENTS:

Etofenprox (CAS # 80844-07-1).....	30.0%
S-Methoprene (CAS # 65733-16-6).....	3.6%
Piperonyl Butoxide (CAS # 51-03-6)*	5.0%

OTHER INGREDIENTS: 61.4%

TOTAL 100.0%

*(butyl carbityl) (6-propylpiperonyl ether) and related compounds

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See Back Panel for Additional Precautionary Statements

NET CONTENTS:

- One: 0.05 fl oz (1.5 cc) [vial][tube][cartridge] (Toy Dogs)/[and Puppies]
- 0.10 fl oz (3.0 cc) [vial] [tube][cartridge] (Small Dogs)/[and Puppies]
- 0.15 fl oz (4.5 cc) [vial][tube][cartridge] (Medium Dogs)/[and Puppies]
- 0.20 fl oz (6.0 cc) [vial][tube][cartridge] (Large Dogs)/[and Puppies]
- 0.30 fl oz (9.0 cc) [vial][tube][cartridge] (Extra Large Dogs)/[and Puppies]

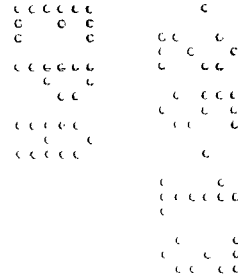
EPA Reg. No. 2724-811

EPA Est. No.



**DO NOT USE
ON CATS**

Minimum of 1.5 cm X 1.5 cm



SUBLABEL A – APPLICATOR DEVICE PACKAGE

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1. DIRECTIONS FOR USE WITH APPLICATOR RF2164 A/T COMBO

[Back Panel]

[RF2164 A/T COMBO] prevents flea eggs from developing into adult fleas [more than 10 weeks] for up to [75 days][2.5 months]. RF2164 A/T COMBO also kills fleas and ticks for 3 weeks and kills and repels mosquitoes for 3 to 4 weeks.]

Effective flea & tick control for your dog/puppy.

[brand] provides flea and tick protection for dogs/puppies for up to 30-days – and protection from flea reinfestation beyond. That's because it doesn't just kill adult fleas and ticks, it also prevents reinfestation by knocking out flea eggs and larvae that could hatch later on. Plus, it kills and repels mosquitoes.

A unique, convenient applicator for you. The new [brand] Applicator is specially designed to make applying flea and tick control easier, more precise -- and neater – than ever before. You simply insert the appropriate [brand] tube [vial][cartridge] for your dog/puppy into the applicator, close it and squeeze to apply. The applicator's ergonomic, contoured shape [design] makes it easy to grip and a built-in fin [tip] [comb] helps to spread [part] the [your] dog's/puppy's hair to allow the liquid to more readily [better] reach [apply] the [to] [your dog's/puppy's] skin. The tube [vial][cartridge] is sealed inside, so you can be confident that the liquid goes onto your dog/puppy – and not your hand. Plus, if the applicator is laid down on a table, counter or other flat surface, it won't run out or drip.

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. **IMPORTANT! READ ENTIRE LABEL BEFORE EACH USE. FOR USE ONLY ON DOGS/PUPPIES (10 WEEKS OF AGE OR OLDER) DO NOT USE ON OTHER ANIMALS!** Read and follow all directions and precautions on this product label. [If you choose to apply directly to dog without using the applicator device, read and follow the Directions for Use For Direct Application to Dog on this package.]

USE RESTRICTIONS

THIS PRODUCT IS FOR INDOOR USE ONLY.

Do not apply this product to puppies less than 10 weeks of age, and do not apply this product to other animals!

Do not apply this product to dogs/puppies weighing less than 6 lbs. (for smallest size dog package only)

Do not allow your dog/puppy to ingest this product.

Apply this product once every 30 days unless a retreatment is necessary. Do not make the repeat retreatment sooner than 8 days following the initial treatment. Do not use more than one tube [vial][cartridge] per dog/puppy and do not retreat more than once per month.

RF2164 A/T COMBO works by application directly to the dog's/puppy's skin, not to the hair. When applying, use applicator device tip to push aside dog's/puppy's hair to allow direct application to the skin. Do not get this product in dog's/puppy's eyes or mouth. [(Note: Application now assumes one tube[vial][cartridge] per dog/puppy per application)]

The RF2164 A/T COMBO provides a unique applicator device that allows dog/puppy owners to treat their dogs/puppies more securely, and dispose of liquid cartridges [tubes][vials] with less mess.

[Note: Each package contains sufficient cartridges/tubes/vials for [X] applications]

[DFU Set No. 1]

FOR USE ONLY ON [TOY] (OVER 6 LBS) [SMALL][MEDIUM] SIZE DOGS/PUPPIES (10 WEEKS OF AGE OR OLDER)

To apply the [RF2164 A/T COMBO] treatment, use one disposable liquid cartridge [tube][vial][for each application] with the applicator device.

1. OPEN [icon]

Use finger scoop to lift open [color, e.g. green] door.

2. LOAD [icon] (2 alternate statements)

-[To Load, place tube [cartridge][vial] white side up into the open applicator with front of tube placed under tab on door]

-[To Load, place tube [cartridge][vial] white side up into the [open] applicator with tip end of tube placed under [color][U-shaped] tab on door]

[Ensure that tube [cartridge][vial] fits securely in the applicator.]

3. CLOSE [icon]

Gently close the [color, e.g. green] door [and] the tube will snap open.

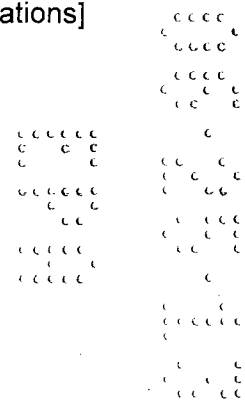
4. APPLY [icon]

The dog/puppy should be standing for easy application. To apply, use [front edge of applicator] [tip] to part hair and get next to dog's/puppy's skin. Press [circle] [[round] thumb pad] on [color-green] door [number-once] at each of [two] (Toy dogs (Over 6 lbs) or puppies(10 weeks of Age or Older) [three] (Small Dogs/puppies (10 weeks of Age or Older) (Medium dogs/puppies (10 weeks of Age or Older) evenly placed spots between the shoulder and the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Do not spread RF2164 A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after treatment will help to distribute the material over the skin.

5. DISPOSE [icon]

[When finished, hold applicator device over trash.] To dispose of empty tube, open [color, e.g. green] door and drop empty tube into trash or offer for recycling if available. [Close applicator device door and store in original package.]

[Note: Each package contains sufficient cartridges/tubes/vials for [X] applications]



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FOR USE ONLY ON [LARGE][EXTRA LARGE] DOGS/PUPPIES (10 WEEKS OF AGE OR OLDER)

- 1 ...
- 2 ...
- 3 ...
- 4 APPLY [icon]

The dog should be standing for easy application. To apply, use [front edge of applicator][tip] to part hair and get next to dog's/puppy's skin. Press [circle] [[round] thumb pad] on [color][green] door [number-once] at each of four or five evenly placed spots between the shoulder to the base of the tail.

Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Do not spread RF2164 A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after treatment will help to distribute the material over the skin.

- 5 ...
- 6 ...

[Note: Each package contains sufficient cartridges/tubes/vials for [X] applications]

RF2164 A/T COMBO is most effective when used as part of a total flea and tick management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2164 A/T COMBO rapidly kills fleas and may reduce the incidence of this condition.] [RF2164 A/T COMBO is water resistant and remains efficacious following exposure to rainfall or swimming.]

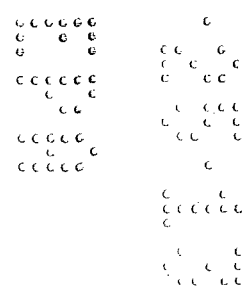
[TREATMENT SCHEDULE			
Dosage: 1 [cartridge] [tube][vial] every 30 days per dog/puppy			
Dog's/Puppy's Name	First Treatment Date	Second Treatment Date (30 Days From 1 st)	Third Treatment Date (30 Days From 2 nd)

Reminder: I purchased RF2164 A/T COMBO from: _____

NOTES: _____

Treatment table can be expanded based on package size. (6 months)]

STORAGE and 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. **Liquid Cartridge [vial][tube] Container Disposal: If empty:** Do not reuse cartridge [vial] [tube]. Place in trash or offer for recycling if available. **If partially filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.



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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION

DO NOT USE ON DOGS LESS THAN 6 LBS OR PUPPIES LESS THAN 10 WEEKS OF AGE. For external use only. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Repeated exposure to etofenprox can cause skin irritation. Consult a veterinarian before using this product on debilitated, aged, pregnant, nursing, or animals on medication. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your dog/puppy with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.

Some dogs/puppies may experience hair loss or temporary skin irritation at the application site. If signs persist or become more severe, contact veterinarian immediately and report incident to company at 1-800-XXX-XXXX.

FIRST AID	
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after first 5 minutes, then continue rinsing • 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 pesticide product (including health concerns, medical emergencies or pesticide incidents), you may also call 1-800-XXX-XXXX 24 hours/day, 7 days/week.	

WARRANTY AND CONDITIONS OF SALE:

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

In case of emergency or for product information, call 1-800-xxx-xxxx or contact your veterinarian if your pet is experiencing an adverse event.

Wellmark International
1501 E. Woodfield Road. 200W
Schaumburg, Illinois 60173

[URL]
Made in USA

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 [Brand name] at [phone number].



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

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TEXT FOR LIQUID TUBE/CARTRIDGE/MIAL

Product name

Etofenprox 30%, (S)-Methoprene 3.6%, Piperonyl Butoxide 5%

KEEP OUT OF REACH OF CHILDREN

CAUTION

[READ DIRECTIONS BEFORE USING] (if space permits)

EPA Reg. No. 2724-811

Net Contents



**DO NOT USE
ON CATS**

**For Use Only on Toy (6-12 lbs.), Small (13-31 lbs.), Medium (32-55 lbs.), Large (56 -80 lbs.), and
Extra Large (81 lbs. and over) Dogs/Puppies (10 Weeks of age or older)**

cccccc
cccccc
cccccc
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With green door facing down
Push two side buttons
to OPEN door

To LOAD Place tube with
WHITE side UP into applicator

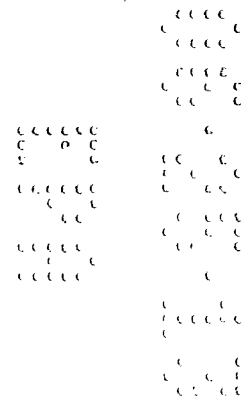
Click tube under
green holding tabs.

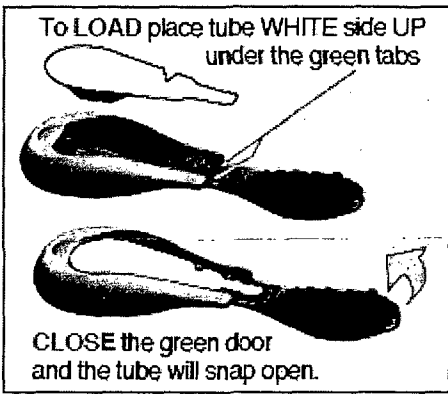
Close the green door and
the tube will snap open.

To APPLY Use Tip to part fur
and get next to dog's skin.
Press circle on green door
once at each of # spots
between shoulders
and tail

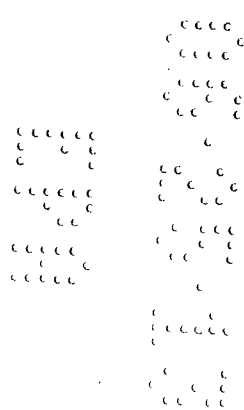
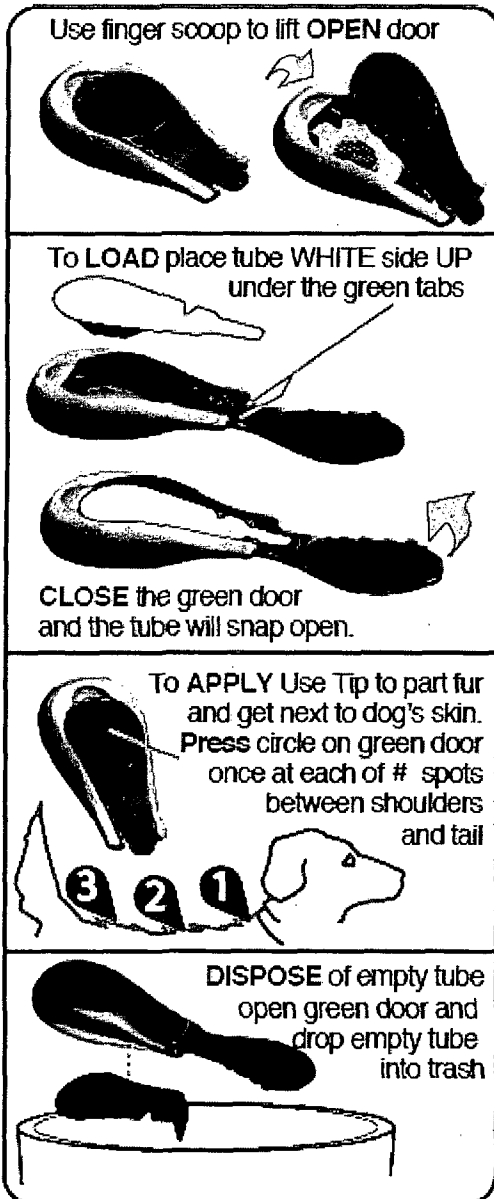
DISPOSE of empty tube
Push two side buttons to
open green door and
drop empty tube
into trash

("#Spots" is a variable dependent on size)
Door color may change based on brand.
(Alternate LOAD icon)





[ICON SET 3] ALTERNATE ICONS FOR DIRECTIONS FOR USE (will be specific to dog's/puppy's size)



("#Spots" is a variable dependent on size)
Door color may change based on brand.

12. DIRECTIONS FOR USE FOR DIRECT APPLICATION TO DOG/PUPPY

USE RESTRICTIONS

THIS PRODUCT IS FOR INDOOR USE ONLY.

Do not apply this product to puppies less than 10 weeks of age, and do not apply this product to other animals!

Do not apply this product to dogs/puppies weighing less than 6 lbs. (for smallest size dog package only)

Do not allow your dog/puppy to ingest this product.

Apply this product once every 30 days unless a retreatment is necessary. Do not make the repeat retreatment sooner than 8 days following the initial treatment. Do not use more than one tube [vial][cartridge] per dog/puppy and do not retreat more than once per month.

RF2164 A/T COMBO works by application directly to the dog's/puppy's skin, not to the hair. When applying, manually push aside dog's/puppy's hair to allow direct application to the skin. Do not get this product in dog's/puppy's eyes or mouth.

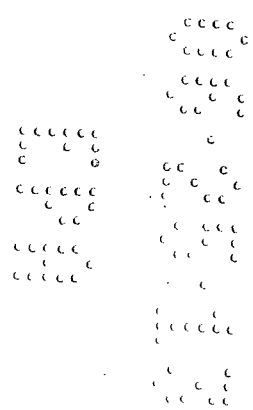
[(Note: Application now assumes one applicator per animal per application)]

[Note: Each package contains sufficient tubes/applicators for [X] applications]

FOR USE ONLY ON [TOY] (OVER 6 LBS)[SMALL][MEDIUM] SIZE DOGS/PUPPIES (10 WEEKS OF AGE OR OLDER)

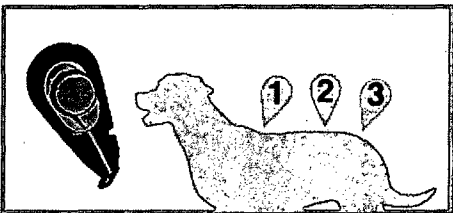
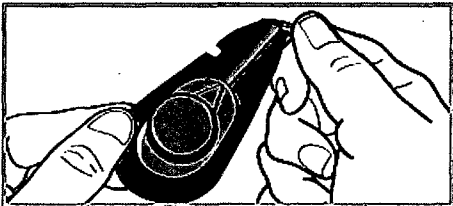
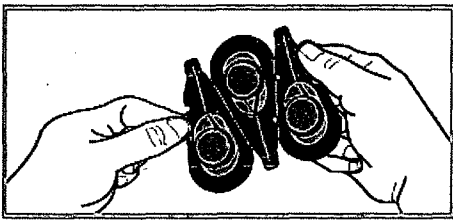
1. [Bend at perforation and tear off first applicator [tube].]
2. [Hold applicator [tube][and bend area of plastic at perforation, tear off and discard.]] Hold applicator [tube] upright and snap tip back, away from face and body.
3. The dog/puppy should be standing for easy application. Apply RF2164 A/T COMBO evenly to [two spots](toy dogs (over 6 lbs) or puppies (10 weeks of age or older))[three spots](small or medium dogs/puppies (10 weeks of age or older)) on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2164 A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin..
5. Discard empty [tube][applicator] as described in Storage and Disposal
6. Do not reapply product for 30 days unless re-treatment is required, but not sooner than 8 days following the initial treatment. Do not retreat more than once per month.

[Note: Each package contains sufficient tubes/applicators for [X] applications]



OPTIONAL GRAPHICS

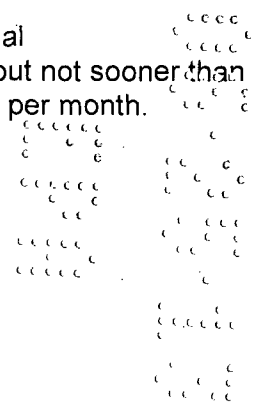
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22



of spots is a variable dependent on dog size

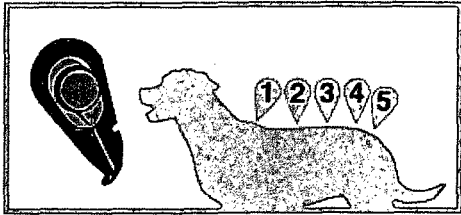
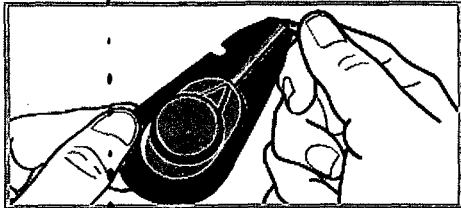
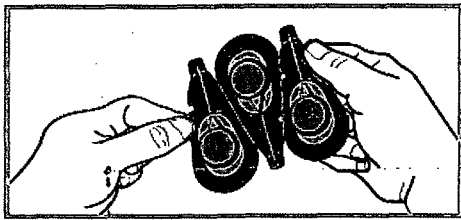
FOR USE ONLY ON [LARGE][EXTRA LARGE] DOGS OR PUPPIES (10 WEEKS OF AGE OR OLDER)

1. [Bend at perforation and tear off first applicator [tube].]
2. [Hold applicator [tube][and bend area of plastic at perforation, tear off and discard.]] Hold applicator [tube] upright and snap tip back, away from face and body
3. The dog/puppy should be standing for easy application. Apply RF2164 A/T COMBO evenly to four or five spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2164 A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin..
5. Discard empty [tube][applicator] as described in Storage and Disposal
6. Do not reapply product for 30 days unless re-treatment is required, but not sooner than 8 days following the initial treatment. Do not retreat more than once per month.



OPTIONAL GRAPHICS

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RF2164 A/T COMBO is most effective when used as part of a total flea and tick management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

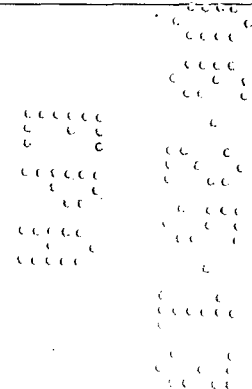
[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2164 A/T COMBO rapidly kills fleas and may reduce the incidence of this condition.] [RF2164 A/T COMBO is water resistant and remains efficacious following exposure to rainfall or swimming.]

[TREATMENT SCHEDULE			
Dosage: 1 [cartridge] [tube][vial] every 30 days per dog/puppy			
Dog's/Puppy's Name	First Treatment Date	Second Treatment Date (30 Days From 1 st)	Third Treatment Date (30 Days From 2 nd)

Reminder: I purchased RF2164 A/T COMBO from: _____

NOTES: _____

Treatment table can be expanded based on package size. (6 months)]]



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SUB-LABEL B FOR REFILLPACKAGE

(For use with applicator device or direct application to dog/puppy without applicator device)

(Front Panel)

[Product Name]

[Include "Dog" in product name and theText for "Dog" must be at least 75% of the same size as the largest letter in Brand Name]

Front Panel - For Use Only on Toy (6-12 lbs.), Small (13-31 lbs.), Medium (32-55 lbs.), Large (56 -80 lbs.), and Extra Large (81 lbs. and over) Dogs/Puppies (10 Weeks of age or older)

[Flea & Tick [& Mosquito][Treatment] [and] Control]

Spot-On Flea & Tick Control ONLY for Dogs (Over 6 lbs)/Puppies (10 Weeks of Age or Older)

ACTIVE INGREDIENTS:

Etofenprox (CAS # 80844-07-1)	30.0%
S-Methoprene (CAS # 65733-16-6)	3.6%
Piperonyl Butoxide (CAS # 51-03-6)*	5.0%

OTHER INGREDIENTS: 61.4%

TOTAL 100.0%

*(butyl carbityl) (6-propylpiperonyl ether) and related compounds

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Back Panel for Additional Precautionary Statements

EPA Reg. No. 2724-811

EPA Est No.

NET CONTENTS:

- One 0.05 fl oz (1.5 cc) [vial][tube][cartridge] (Toy Dogs (Over 6 lbs)/Puppies)(10 Weeks of Age or Older)
- 0.10 fl oz (3.0 cc) [vial] [tube][cartridge] (Small Dogs/Puppies)/(10 Weeks of Age or Older)
- 0.15 fl oz (4.5 cc) [vial][tube][cartridge] (Medium Dogs/Puppies)/ (10 Weeks of Age or Older)
- 0.20 fl oz (6.0 cc) [vial][tube][cartridge] (Large Dogs/Puppies) (10 Weeks of Age or Older)
- 0.30 fl oz (9.0 cc) [vial][tube][cartridge] (Extra Large Dogs) (10 Weeks of Age or Older)



Minimum of 1.5 cm X 1.5 cm

(Back Panel)

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[Back Panel]

[RF2164 A/T COMBO] prevents flea eggs from developing into adult fleas [more than 10 weeks] for up to [75 days][2.5 months]. RF2164 A/T COMBO also kills fleas and ticks for 3 weeks and kills and repels mosquitoes for 3 to 4 weeks.]

[Effective flea & tick control for your dog/puppy.

[brand] provides flea and tick protection for dogs/puppies for up to 30-days – and protection from flea reinfestation beyond. That’s because it doesn’t just kill adult fleas and ticks, it also prevents reinfestation by knocking out flea eggs and larvae that could hatch later on. Plus, it kills and repels mosquitoes.]

[Note: full directions for use to be used if space allows]

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. **IMPORTANT! READ ENTIRE LABEL BEFORE EACH USE. FOR USE ONLY ON DOGS (OVER 6 LBS) OR PUPPIES 10 WEEKS OF AGE OR OLDER. DO NOT USE ON OTHER ANIMALS!**

Read and follow all directions and precautions on this product label.

[To apply the RF2164 A/T COMBO treatment with the [Brand Name] applicator, use one disposable liquid cartridge [tube][vial][for each application] with the applicator device.]

[Remove one refill tube [cartridge][vial] from the package and insert into opened [brand name] applicator device. Make application according to label directions supplied with the [brand name] applicator device.] If you need directions for application, please call 1-800-XXX-XXXX.

[However, if you choose to apply directly to dog/puppy without using the applicator device, read and follow the Directions for Use For Direct Application to Dog /Puppy on this package.]

(DIRECTIONS FOR USE FOR DIRECT APPLICATION TO DOG/PUPPY)

[USE RESTRICTIONS

THIS PRODUCT IS FOR INDOOR USE ONLY.

Do not apply this product to puppies less than 10 weeks of age, and do not apply this product to other animals!

Do not apply to dogs/puppies weighing less than 6 lbs. (for smallest size dog package only)

Do not allow your dog/puppy to ingest this product.

Apply this product once every 30 days unless a retreatment is necessary. Do not make the retreatment sooner than 8 days following the initial treatment. Do not use more than one tube per dog/puppy and do not retreat more than once per month.

RF2164 A/T COMBO works by application directly to the dog’s/puppy’s skin, not to the hair. When applying, manually push aside dog’s/puppy’s hair to allow direct application to the skin. Do not get this product in dog’s/puppy’s eyes or mouth.

[(Note: Application now assumes one applicator per animal per application)]

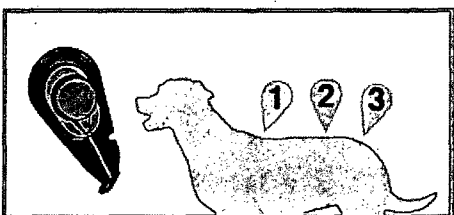
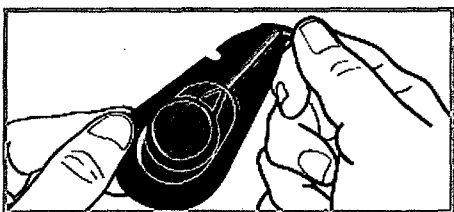
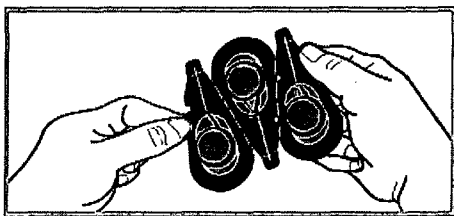
[Note: Each package contains sufficient tubes/applicators for [X] applications]

FOR USE ONLY ON [TOY (OVER 6 LBS)][SMALL][MEDIUM] SIZE DOGS OR PUPPIES (10 WEEKS OF AGE OR OLDER)

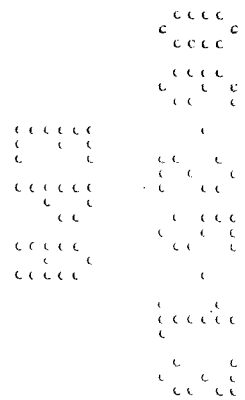
1. [Bend at perforation and tear off first applicator [tube].]
2. [Hold applicator [tube][and bend area of plastic at perforation, tear off and discard.]]
Hold applicator [tube] upright and snap tip back, away from face and body.
3. The dog/puppy should be standing for easy application. Apply RF2164 A/T COMBO evenly to [two spots](toy dogs/puppies)[three spots](small or medium dogs/puppies) on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2164 A/T COMBO by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin.
5. Discard empty [tube][applicator] as described in Storage and Disposal
6. Do not reapply product for 30 days unless re-treatment is required, but not sooner than 8 days after the initial treatment. Do not retreat more than once per month.

[Note: Each package contains sufficient tubes/applicators for [X] applications]

OPTIONAL GRAPHICS



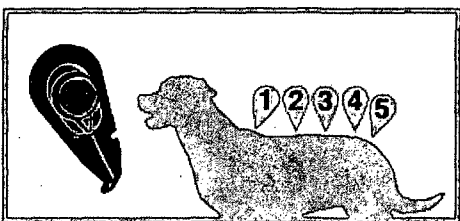
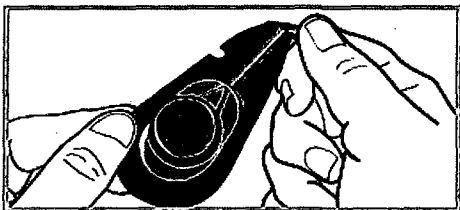
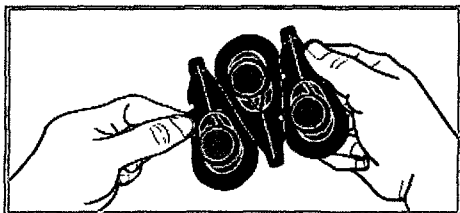
of spots is a variable dependent on dog size



FOR USE ONLY ON [LARGE, EXTRA LARGE] DOGS/PUPPIES (10 WEEKS OF AGE OR OLDER)

1. [Bend at perforation and tear off first applicator [tube].]
2. [Hold applicator [tube][and bend area of plastic at perforation, tear off and discard.]] Hold applicator [tube] upright and snap tip back, away from face and body
3. The dog/puppy should be standing for easy application. Apply RF2164 A/T COMBO evenly to four or five spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
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5. Discard empty [tube][applicator] as described in Storage and Disposal
6. Do not reapply product for 30 days unless re-treatment is required, but not sooner than 8 days after the initial treatment. Do not retreat more than once per month.

OPTIONAL GRAPHICS



RF2164 A/T COMBO is most effective when used as part of a total flea and tick management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2164 A/T COMBO rapidly kills fleas and may reduce the incidence of this condition.] [RF2164 A/T COMBO is water resistant and remains efficacious following exposure to rainfall or swimming.]

[TREATMENT SCHEDULE Dosage: 1 [cartridge] [tube][vial] every 30 days per dog/puppy			
Dog's/Puppy's Name	First Treatment Date	Second Treatment Date (30 Days From 1 st)	Third Treatment Date (30 Days From 2 nd)

Reminder: I purchased RF2164 A/T COMBO from: _____

NOTES: _____

Treatment table can be expanded based on package size. (6 months)]]

(Precautionary/First Aid and Storage/Disposal) text included)

WARRANTY AND CONDITIONS OF SALE:

Seller warrants that this product conforms to the chemical specifications expressed on the label. To the extent consistent with applicable law, Seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability for default, breach, or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, Seller shall have no liability for consequential damages.

In case of emergency or for product information, call 1-800-xxx-xxxx or contact your veterinarian if your pet is experiencing an adverse event.

Wellmark International
1501 East Woodfield Road 200W
Schaumburg, Illinois 60173

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 [Brand name] at [phone number].



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

