

2724-813

3/29/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 29, 2012

Mr. James J. McFadden, Ph.D.
Regulatory Project Manager
Wellmark International
1501 East Woodfield Road, Suite 200 West
Schaumburg, IL 60173-5417

Subject: Amending Labeling; Addition of Speed of Kill Claim, Refill Sublabel, DFU Without Applicator, and Revisions to Hazards to Domestic Animals Subsection RF2170 A/T COMBO, EPA Reg. No. 2724-813 Your Submission Dated December 22, 2011

Dear Mr. McFadden

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable with the following label revision provision(s):

General Comment(s):

1. Delete all text throughout the label marked with "strikethrough."
2. You should remove/delete all instances of the word "natural" and/or "naturally" throughout the subject label, since it is considered to be an implied safety claim.
3. You must remove/delete all instances of the word "[InfestStop]" throughout the subject label, since there is no significance to its meaning and it could potentially imply heightened efficacy.
4. The inclusion of the words "New [formula]" and other claims employing the word "New" throughout this product label is permitted for a period not to exceed six (6) months from the original date of registration for the subject product. **As such, the words "New [formula]" and "New" must be deleted from this label by no later than June 2, 2012.**

Kills/Repels/Controls Claims section comment(s), top of page 2 of 17:

5. Delete the 8th kills/repels/controls claim, since there is no approved efficacy (product performance) data to substantiate this claim.

Brand Claims section comment(s), top of page 6 of 17:

6. Delete the 4th brand claim, since it is considered a comparative claim.

Precautionary Statements, Hazards to Domestic Animals subsection comment(s), bottom of page 9 of 17:

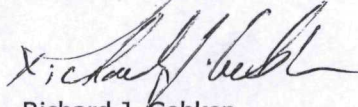
7. You must delete the newly added modifications to this subsection. In order for the Agency to approve this method, it must have been tested and/or otherwise found to be an effective remedy for oral exposure to this formulation.

Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under FIFRA 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 section 12(a)(1)(E) of FIFRA. 40 CFR §156.10(a)(5) lists 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 be 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 EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Per 40 CFR §156.10(a)(6), submit one (1) copy of your final printed labeling, incorporating the above changes, before you release the product for shipment. As defined in 40 CFR §152.3, "final printed labeling" means the "label or labeling of the product when distributed or sold." Clearly legible reproductions or photo reductions will be accepted for unusual labels. Note that a clean copy of the master label in most cases does not meet the definition of final printed labeling. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen Rodia at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely Yours,



Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosure: *Label stamped "Accepted with Comments"*
002724-00813 D459645

[] Optional Copy

RF2170 A/T COMBO

[Text for "Cat" must be 75% the height of largest letter in primary Brand Name]
Front Panel - For Use Only on Cats and Kittens [5 lbs. and over] [over 2.5 lbs but under 5 lbs] & 12 weeks of age or older
[Flea & Deer Tick] [Treatment] [and] [Control]

(General/Protection claims)

1 ml [cc] [0.034 fl oz] for cats [kittens] over 2.5 lbs and under 5 lbs.; 1.8 ml [cc][0.061 fl oz] for cats/kittens 5 lbs. and over
Do not use more than one vial per cat
For use only on cats/kittens [weighing] [over 2.5 lbs and under 5 lbs.][5 lbs. and over]
[Flea & deer tick] treatment for cats [& kittens]
[Special formula for cats/kittens][flea prevention and treatment specially formulated for use only on cats and kittens [12 weeks of age and older]
Spot On® [Topical][Non-systemic] treatment for cats/kittens
Spreads ~~naturally~~ with cat's movement (skin and hair oils)
Flea, Deer Tick, and Mosquito Treatment [Control][Prevention][Relief] for Cats & Kittens
5 in 1 Control [Protection][Treatment] (Fleas, Flea Eggs, flea larvae, Deer Ticks, and Mosquitoes)
Flea [and deer tick][and mosquito] control for your cat/kitten
A smart approach to flea control
Etofenprox provides a novel [smart] approach to flea, deer tick, and mosquito control
Advanced Formula [for cats & kittens]
Improved flea, deer tick, and mosquito control
Keeps fleas, deer ticks, and mosquitoes under control
[Advanced] Spot On® [Plus] Insect Control [Treatment and Prevention]
Controls flea, deer tick, and mosquito problems on your cat/kitten
Provide your cat/kitten with flea, deer tick, and mosquito protection, right from the start
Direct on-animal protection from fleas, deer ticks, and mosquitoes
Provides relief [protection] from fleas, deer ticks, and mosquitoes
When it comes to fleas and deer ticks, there's no room for compromise [Brand Name]
[Satisfaction guaranteed or your money back]
[Patent Pending]

ACCEPTED
With COMMENTS
In EPA Letter Dated:
March 29, 2012
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:
2724-013

Kills/Repels/Controls Claims

[Actively] Kills [Controls] [adult] fleas, deer ticks, [flea larvae], and flea eggs for [up to][4 weeks][1 month][per application]
 [Protects for up to [Four/4] Weeks][One month][Four/4 Week [Flea] [Deer Tick][Mosquito] Treatment] [1 month][monthly][flea, deer tick, & flea egg][protection
 Monthly treatment for [fleas, flea eggs, & deer ticks]
 Once-a-month [topical][Spot On®] protection from fleas, and deer ticks,
 [Reapply monthly] [Suitable for year-round use][Month] sticker for home calendar
 [Kills adult fleas, deer ticks, mosquitoes, flea eggs and flea larvae] [Dual protection (against fleas and deer ticks)]
~~Starts killing fleas within 15 minutes~~
 Starts working on contact
 [Dual Action kills adult fleas and prevents flea development]
 [Actively] Kills [adult][fleas][deer ticks][flea eggs][larvae][&][and][mosquitoes][by contact]
 Kills [and/or Repels] mosquitoes [for up to 28 days][by contact]
 [Kills Fleas and Deer Ticks by Contact]
 Controls fleas, deer ticks, and mosquitoes & prevents flea reinfestations
 [Kills deer ticks] (for up to 1 month [4 weeks]) [per application]
 Monthly application for most effective protection
 Protects your [cat][kitten] from fleas, deer ticks, and mosquitoes (which may transmit heartworm)
 Effectively controls fleas, deer ticks, and mosquitoes
 Kills [Controls] deer ticks that may transmit [Lyme disease][and Cytauzoonosis] for up to [1 month][4 weeks]
 Protect your [cat/kitten] from [against] deer ticks that may transmit Lyme disease
 Kills [and repels] mosquitoes that may transmit heartworm
 Prevents mosquitoes from feeding on cats
 Kills fleas that may cause flea allergy dermatitis, flea bite anemia, and tapeworm infestation
 Preventative treatment for fleas that may cause flea allergy dermatitis, flea bite anemia, and tapeworm infestation
 Controls fleas, deer ticks, and mosquitoes that cause highly irritating [insect] bites

[All text below represents one label statement with any selected line]
 [Protect your family and cat/kitten from:]
 [When your cat has fleas and ticks, your family and cat/kitten may be exposed to:]

Fleas that may cause:
 Flea allergy dermatitis
 Tapeworm infestation

IGR /Flea egg/life cycle Claims:

[Plus][Contains][With] PRECOR® [vIGRen®][S-Methoprene][InfectStop], the first insect growth regulator for flea control

Contains [Features][InfectStop] an Insect Growth Regulator (IGR) to inhibit the development of flea eggs

Flea control for cats with [PRECOR®][vIGRen®][InfectStop] Insect Growth Regulator (IGR) [(S)-Methoprene][InfectStop] Insect Growth Regulator (IGR) interrupts the development of the flea life cycle [at the egg stage]

[(S)-Methoprene][InfectStop] Insect Growth Regulator (IGR) prevents the development of flea eggs into adult fleas and [inhibits the development of flea eggs into adult fleas]

Controlling flea reproduction is the first step in controlling flea populations on your cat/kitten [(S)-Methoprene][InfectStop] Insect Growth Regulator (IGR) prevents flea reinfestation on your cat/kitten

Flea treatment and preventative with an [insecticide] adulticide and [InfectStop] Insect Growth Regulator (IGR)

[With [S-Methoprene][InfectStop] Insect Growth Regulator [IGR] to Break Flea Life Cycle]

Controls[Kills][Lasts][Works][Protects] flea infestations for up to [1 month][4 weeks]

[Contains [InfectStop] an Insect Growth Regulator (IGR) to kill flea eggs and prevent flea development for [1 month][30 days][4 weeks]

[Controls flea reinfestation for [1 month][30 days][4 weeks]

Breaks the flea life cycle for [up to] [1 month][4 weeks][30 days]

Kills [Controls] flea eggs for up to [30 days][1 month][4 weeks][per application]

Kills flea eggs, the source of home flea infestations and cat/kitten re-infestations, for up to [30 days][1 month][4 weeks]

[Kills][Prevents][Keeps] flea eggs from hatching for up to [30 days][1 month][4 weeks]

Prevents flea eggs from developing into biting adults for up to [30 days][1 month][4 weeks][per application]

Prevents re-infestation for up to [1 month][30 days][4 weeks]

Advanced [topical][flea egg treatment] that's easy and convenient to use

An effective flea topical [A Spot On®] product that kills adult fleas and halts the development of flea eggs [immature stages in the flea life cycle]

Controls existing fleas and flea eggs, plus [and][prevents] future flea infestations

Interrupts normal flea development [Stops the flea life cycle]

Interrupts the flea life cycle

Kills [flea] eggs before they hatch into biting adults

Kills hatching [developing] flea eggs

One-two punch controls fleas and flea eggs

Plus kills flea eggs and larvae to prevent future infestations

Prevention Claims

Preventing fleas and deer ticks from infesting your cat/kitten is much easier than treating an existing problem

Flea prevention has never been easier

An excellent preventative, offering protection against fleas

Prevents flea, deer tick, and mosquito infestations

Prevents flea recurrence

Control flea infestations by preventing them

Flea prevention is the best flea control strategy

Quick and sure flea, deer tick, and mosquito prevention

A quick and sure way to avert a flea problem is to [prevent it] use a preventative

It is far easier to prevent fleas than to control them

Flea control involves [requires] preventative measures [for your cat/kitten][and]

[Year-round][Flea Treatment][Preventative]

Use a flea preventative year-round (to prevent painful bites, itching and scratching, discomfort

Application claims

[#] pack [# days'] [#] doses [1/2/3/4/5/6] months supply
 One tube gives [1 month][4 weeks] of protection
 [Pre-measured][Convenient][and][&][No mess][easy][simple] to [use][handle][apply] disposable applicator [tube]
 Convenient [and effective], once-a-month [liquid][topical][Spot On] solution
 Practical solution
 Simple choice [flea & deer tick control]
 A [One] simple application provides your cat/kitten with protection for up to [1 month]
 Apply to one spot for head to tail (total body) flea protection [control]
 Apply to 1 spot - spreads over the cat's/kitten's [entire] body [from head to tail] through natural skin oils
 Spreads naturally with cat's/kitten's skin oils
 [Plus] Contains a ~~natural~~ coat conditioner
 [Once][One] Monthly Application
 Easy to use [once] monthly application [liquid] prevents [and controls] fleas [& deer ticks]
 Reapply [Repeat] [once] monthly
 Repeat [treatment] every month
 Monthly Control [Relief][treatment]

Applicator Claims

Unique shape [for cats & kittens 5 lbs and over][for cats & kittens over 2.5 lbs and under 5 lbs]
 [New][Exclusive][Pinpoint][Applicator] for [pinpoint][exact][direct][easy][direct to skin] application
 For pinpoint accuracy
 Helps provide accurate dosing
 Provides just the right dose [in just the right place]
 Direct to your cat's/kitten's skin
 Easily penetrates hair
 The [exclusive][new] applicator [tube][easily penetrates hair][fur][coat] for [improved][direct] application [directly to your cat's/kitten's skin]
 Easy to apply [identify][use] applicator [tube]
 The right choice [applicator][tube] for the right cat/kitten
 Make [Select] the right choice [applicator][tube][shape]
 Choice [selection] is simple
 Easy choice
 Simple choice delivery system
 Easy to use applicator [tube] [provides direct on-animal protection]
 EZ-squeeze [Easy squeeze] tube [applicator][shape]
 [New] [applicator]
 [New] 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][cat's/kitten'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 [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 [vial][cartridge]
 [Includes] unique [brand][applicator]
 Puts the liquid on your cat/kitten - not your hands
 Directs the liquid onto your cat/kitten - not your hands [away from your hands]
 Applies liquid to your cat's/kitten's skin - not yours
 Helps prevent applying the wrong spot-on [dose] [product] on [to] the wrong pet
 A more confident, secure application
 Convenient, easy to use ACCU-TIP [Applicator] [DISPENSER]
 Will not drip after opening
 [Easy to use] Longer applicator tip for easy application to long-haired cats
 Longer applicator tip is ideal for long-haired cats/kittens

Thermoform claims

New

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

[New] [brand name][disposable][liquid dispensing] [tube][vial] tip [helps][to] spread out liquid [on your][cat/kitten]

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

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

Promotional Package Copy

One month [dose] free

One free month supply [dose] included

Bonus pack

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

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 applicator [Refills][Refill Pack]

Refill Pack [for][Brand Name} applicator

Refills {Refill Pack} available

Applicator name options (applicator device is used in text)

Applicator

Tool

Device

Applicator Device

Application Tool

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

Ampoule

Cartridge

Packet

Pod

Refill

Tube

Vial

Product Claims

Odorless

Effective Control [Relief][Prevention]

Starts working by contact

Dual-action for immediate and long-lasting effects

[Flea prevention] Helps stop itching and scratching [from flea bites]

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Brand Claims

We (Brand) put(s) your pet(s) first
Brand...putting (your pet) pets first
Smarter Pet Care
~~Right choice – best defense~~
Perfect choice
Brand – caring & committed
Brand makes the choice simple
[Money-back guarantee]

(FRONT PANEL)

ACTIVE INGREDIENTS:

(S)-Methoprene (CAS # 65733-16-6)..... 3.6%
Etofenprox (CAS # 80844-07-1) 40.0%

OTHER INGREDIENTS:..... 56.4%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN

See back panel for additional Precautionary Statements

EPA Reg. No. 2724-813
EPA Est. No.

Net Contents:
Lot Number

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SUBLABEL A – APPLICATOR DEVICE PACKAGE

1. DIRECTIONS FOR USE WITH APPLICATOR

READ ENTIRE LABEL BEFORE USE

USE ONLY ON CATS OR KITTENS 12 WEEKS OF AGE AND OLDER AND [OVER 2.5 LBS AND UNDER 5 LBS][5 LBS AND OVER]

[Specially formulated for cats [& kittens]][For use on cats only][Do not use on other animals]

INTRODUCTION:

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 cat/kitten 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] cat's/kitten's hair to allow the liquid to more readily [better] reach [apply] the [to] [your cat's/kitten's] skin. The tube [vial] [cartridge] is sealed inside, so you can be confident that the liquid goes onto your cat/kitten - and not your hand.

[RF2170 A/T Combo] is a topically applied [long-lasting] [flea and tick treatment] product specifically formulated for cats and kittens with [containing] [it also contains] an insect growth regulator (IGR)[S-Methoprene][InfectStop] [to prevent and control flea infestations][to kill fleas before they hatch][which prevents flea eggs from maturing into biting adults]. It [This product] also contains the highly effective flea, deer tick, and mosquito killing agent [Etofenprox], which kills biting adult fleas, deer ticks, and mosquitoes your cat/kitten may acquire from its surroundings. A single application of [RF2170 A/T Combo] will provide flea egg hatch inhibition for up to 30 days [1 month][4 weeks]. Each package contains enough product for xx monthly applications (xx days of protection [control]). [RF2170 A/T Combo] provides relief from flea infestations for up to 1 month [4 weeks][30 days] by killing adult fleas and flea eggs on your cat or kitten. Adult fleas can live on your cat while producing vast numbers of eggs, which drop off your cat and develop in the surrounding environment. Normal insecticides will not kill the flea eggs, but [RF2170 A/T Combo] [is designed to] kill(s) adult fleas and flea eggs, breaking the flea life cycle and providing your cat/kitten relief from flea bites at the same time.

After application, your cat's/kitten's natural skin oils [disperse] carry [RF2170 A/T Combo] over your cat's/kitten's body for protection against biting adult fleas and the development of flea eggs. [(This product) may stain leather and suede fabrics for (24)(24 to 48) hours after application.] Once adult fleas are evident on your cat/kitten, there is likely an infestation of flea eggs and flea larvae in your home. To completely kill the existing flea population, you may need to treat your home and your cat's bedding (home sprays, foggers), as well as your yard (yard spray/outdoor fogger) with traditional flea products approved for use on pets, around the home, or in your yard. [RF2170 A/T Combo] can be used in conjunction with other [Brand Name] premise products. As with all flea products, they are [RF2170 A/T Combo is] most effective when used as part of a total program aimed at reducing all stages of fleas in the cat's/kitten's environment. [Brand Name] products [They] are designed to complement each other in an integrated program for flea, deer tick, and mosquito management. To assure proper treatment, we recommend use of [Brand Name] products as directed to treat all pets in the household, as well as the indoor and outdoor home environments.]

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label. [If you choose to apply treatment directly to cat without using the applicator device, read and follow the Directions For Use for Direct Application to Cat on this package.]

USE RESTRICTIONS:

This product contains xx monthly dosages [one monthly dose], each (1 [0.034 fl oz] and 1.8 ml [cc] [0.061 fl oz]). Do not apply more than once every month. Do not use more than one tube/vial/cartridge per cat. Do not get this product in your cat's eyes or mouth. Do not allow your cat to ingest this product. [Do not apply to cats weighing less than 2.5 lbs.]

RF2170 A/T COMBO works by application directly to the cat's/kitten's skin, not to the hair. When applying, use applicator device tip to push aside cat's/kitten's hair to allow direct application to the skin. Do not get this product in cat's/kitten's eyes or mouth.

[(Note: Application now assumes one tube[vial] [cartridge] per cat per application)]

The RF2170 A/T COMBO provides a unique applicator device that allows cat/kitten owners to treat their cats/kittens more securely, and dispose of liquid cartridges [tubes][vials]with less mess.

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

[1 ml [cc] [0.034 fl oz] dose for use on cats and kittens over 2.5 lbs and under 5 lbs only .

1.8 ml [cc] [0.061 fl oz] dose for use on cats and kittens 5 lbs. and over only (Same size applicators with different fill amounts)]

To apply the [RF2170 A/T COMBO] treatment, use one disposable liquid cartridge [tube][vial] [for each application] with the applicator device. Do not use more than one vial per cat.

1. OPEN [icon]

Use finger scoop to lift open [color] door [of applicator device].

2. LOAD [icon]

[To Load, place tube [cartridge] [vial] white side up [under the [color] tabs] into the applicator] [with [tip end][front] of tube placed under tab on door] [Tip end of tube [cartridge] must fit under the [U-shaped] [notch][tab] in the [color] [lid] [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 cat/kitten should be standing for easy application.

[To apply, use tip to part hair and get next to cat's/kitten's skin at the base of the skull. Press [shape e.g. square] [thumb pad][button] on [color] door and squeeze out the entire contents of the applicator [tube] [cartridge] onto the cat's/kitten's skin.]

-OR-

[To **APPLY** Use front edge of applicator to part fur and get next to cat's/kitten's skin at one spot at the base of the skull. Press [shape e.g. square] [button] on door. Repeat until tube is empty.]

-OR-

[To **APPLY** Use tip to part fur and get next to cat's/kitten's skin. **Press** [shape e.g. square] [button] on door [x times to empty tube] at one spot at the base of the skull.]

Do not spread RF2170 A/T COMBO by hand over the cat/kitten. Do not bathe the cat/kitten within the first 24 hours after Spot On [squeeze on] has been applied. Households with more than one cat/kitten should prevent cats/kittens from grooming each other until solution has dried.

5. DISPOSE [icon]

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 [return applicator to package until next use][store in original package.]

6. RETREAT AFTER 30 DAYS

Do not reapply product for 30 days. Do not treat more than once per month.

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

RF2170 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 cats may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of cats with RF2170 A/T COMBO rapidly kills fleas and may reduce the incidence of this condition.](Optional marketing text for subregistrant)

[TREATMENT SCHEDULE

Dosage: Use only 1 applicator every 30 days per cat/kitten

| Cat's/Kitten's Name | First Treatment Date | Second Treatment Date (30 Days From 1 st) | Third Treatment Date (30 Days From 2nd) |
|---------------------|----------------------|--|--|
| | | | |
| | | | |

NOTES: _____

REMINDER: I purchased [Brand Name] _____ from _____]

STORAGE AND DISPOSAL: Storage: Store in a cool, dry area away from children and animals.

Do not store unused applicators [tubes] separately from their packaging. **Liquid Cartridge [vial]**

[tube] Disposal: If empty: Do not reuse empty cartridge [vial] [tube]. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions.

Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

HAZARDS TO HUMANS: Repeated exposure to etofenprox can cause skin irritation.

HAZARDS TO DOMESTIC ANIMALS: For External Use on Cats Only. **Do not use on kittens weighing less than 2.5 [5] pounds. Do not use on kittens less than 12 weeks old.** Consult a veterinarian before using this product on debilitated, aged, pregnant or nursing animals. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated animals. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately. ~~Due to the bitter taste of the product, oral exposure could result in salivation. Be careful not to get any product in the cat's mouth during application. For multiple cat households, prevent the cats from grooming each other until the product has dried. If an oral exposure occurs, offer the cat a taste treat, such as tuna, milk, or any other food items your cat enjoys. If the problem continues or other clinical signs are noted, please call 1-800-brand phone number.~~

SIDE EFFECTS: Monitor your cat 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 1-800-brand phone number.

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 cat/kitten is experiencing an adverse event.

To learn more about treating current infestations and preventing future outbreaks, please, visit our website: [URL]

[For more information, call our experts at 1-800-xxx-xxx (weekdays, 9am – 5 pm EST)]

To learn more, visit [URL]

For product use information, call [phone number] or visit our Web site: [URL]

Wellmark International
1501 East Woodfield Road 200W
Schaumburg, IL 60173
Made in USA

TEXT FOR LIQUID TUBE / CARTRIDGE / VIAL

Product name

Etofenprox 40%, (S)-Methoprene 3.6%, Other Ingredients 56.4%

KEEP OUT OF REACH OF CHILDREN

READ DIRECTIONS BEFORE USING

EPA Reg. No. 2724-813

Net Contents

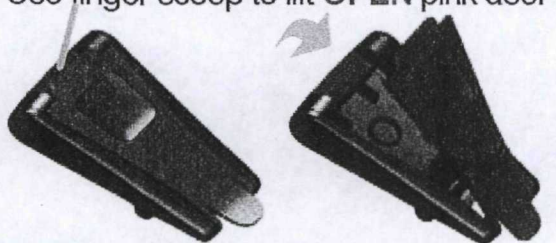
Lot Number

For Use Only on Cats/Kittens [5 lbs. and over] [over 2.5 lbs but under 5 lbs] & 12 weeks of age or older

Directions for Use/Icons

To apply the treatment, use applicator device with **ONLY ONE** liquid tube per application / per cat

Use finger scoop to lift **OPEN** pink door



The diagram shows two views of the applicator device. On the left, the pink door is closed. On the right, a finger scoop is shown lifting the pink door upwards, indicated by a curved arrow.

To **LOAD** place tube **WHITE** side **UP** into applicator with tip end of tube placed under tab on door



The diagram shows the applicator device with the pink door open. A liquid tube is being inserted into the device. The white side of the tube is facing up. The tip of the tube is placed under a tab on the pink door. A curved arrow indicates the direction of insertion.

Gently **CLOSE** door the tube will snap open.

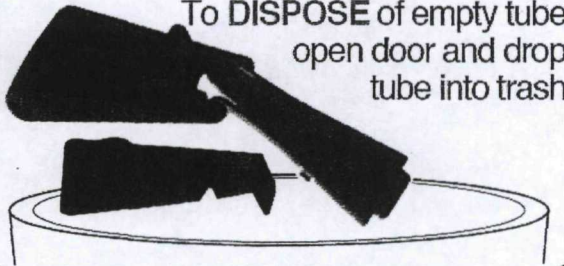
To **APPLY** Use tip to part fur and get next to cat's skin.



The diagram shows a line drawing of a cat's head and neck. The applicator device is being used to apply treatment to the cat's skin. The tip of the device is shown parting the fur. A small circle with the number '1' is placed on the skin where the treatment is being applied.

Press square on door at one spot between shoulders

To **DISPOSE** of empty tube open door and drop tube into trash



The diagram shows the applicator device with the pink door open. An empty tube is shown being dropped into a trash can.

2. DIRECTIONS FOR USE FOR DIRECT APPLICATION TO CAT

READ ENTIRE LABEL BEFORE USE

USE ONLY ON CATS OR KITTENS 12 WEEKS OF AGE AND OLDER AND [OVER 2.5 LBS AND UNDER 5 LBS][5 LBS AND OVER]

[Specially formulated for cats [& kittens]][For use on cats only][Do not use on other animals]

DIRECTIONS FOR USE: It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label.

USE RESTRICTIONS:

This product contains xx monthly dosages [one monthly dose], each (1 [0.034 fl oz] and 1.8 ml [cc] [0.061 fl oz]). Do not apply more than once every month. Do not use more than one tube/vial/cartridge per cat. Do not get this product in your cat's eyes or mouth. Do not allow your cat to ingest this product. [Do not apply to cats weighing less than 2.5 lbs.]

RF2170 A/T COMBO works by application directly to the cat's/kitten's skin, not to the hair. Do not get this product in cat's/kitten's eyes or mouth. [(Note: Application now assumes one tube[vial] [cartridge] per cat per application)]

[APPLICATION METHOD]

1. **OPEN** [icon]: [Remove one applicator tube from the package and hold in an upright position (pointed away from your face).] [Bend at perforation and tear off 1st month's applicator.] [Hold applicator upright] and snap tip back, away from face and body.
2. **APPLY** [icon]: The cat/kitten should be standing for easy application. Use tip of [vial][tube] [cartridge] prior to application of the product, to gently lift the cat's or kitten's hair coat on the back of the neck at the base of the skull, position the tip of the [vial] tube [cartridge] on the cat's exposed skin and squeeze out the [entire] contents of the [vial] tube [cartridge] onto the cat's skin.

Do not spread RF2170 A/T COMBO by hand over the cat/kitten. Do not bathe cat within the first 24 hours after Spot On [squeeze on] has been applied. Households with more than one cat should prevent cats from grooming each other until solution has dried.

3. **DISPOSE** [icon]: To dispose of empty [tube][vial][cartridge], drop [empty] tube [vial][cartridge] into trash or offer for recycling if available.
4. **RETREAT:** Repeat application once monthly.

[Note: Each package contains sufficient cartridges/tubes/vials for [X] applications] [1 ml [cc] [0.034 fl oz] dose for use on cats and kittens over 2.5 lbs and under 5 lbs only . 1.8 ml [cc] [0.061 fl oz] dose for use on cats and kittens 5 lbs. and over only (Same size applicators with different fill amounts)]

RF2170 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 cats may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of cats with RF2170 A/T COMBO rapidly kills fleas and may reduce the incidence of this condition.](Optional marketing text for subregistrant)

[TREATMENT SCHEDULE

Dosage: Use only 1 applicator every 30 days per cat/kitten

| Cat's/Kitten's Name | First Treatment Date | Second Treatment Date (30 Days From 1 st) | Third Treatment Date (30 Days From 2nd) |
|---------------------|----------------------|---|---|
| | | | |
| | | | |
| | | | |

NOTES:

REMINDER: I purchased [Brand Name] from _____]

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SUBLABEL B FOR REFILL PACKAGE

(For use with applicator device or direct application to cat without applicator device)

(Front Panel)

[Product Name] [Text for "Cat" must be 75% the height of largest letter in primary Brand Name]

For Use Only on Cats and Kittens [5 lbs. and over] [over 2.5 lbs but under 5 lbs] & 12 weeks of age or older

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

ACTIVE INGREDIENTS:

(S)-Methoprene (CAS # 65733-16-6) 3.6%

Etofenprox (CAS # 80844-07-1) 40.0%

OTHER INGREDIENTS: 56.4%

Total 100.0%

KEEP OUT OF REACH OF CHILDREN

See back panel for additional Precautionary Statements

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EPA Est. No.

Net Contents:

Lot No.

(Back Panel)

READ ENTIRE LABEL BEFORE USE

USE ONLY ON CATS OR KITTENS 12 WEEKS OF AGE AND OLDER AND [OVER 2.5 LBS AND UNDER 5 LBS][5 LBS AND OVER]

[Specially formulated for cats [& kittens]][For use on cats only][Do not use on other animals]

INTRODUCTION:

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 cat/kitten 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] cat's/kitten's hair to allow the liquid to more readily [better] reach [apply] the [to] [your cat's/kitten's] skin. The tube [vial] [cartridge] is sealed inside, so you can be confident that the liquid goes onto your cat/kitten - and not your hand.

[RF2170 A/T Combo] is a topically applied [long-lasting] [flea and tick treatment] product specifically formulated for cats and kittens with [containing] [it also contains] an insect growth regulator (IGR)[S-Methoprene][InfestStop][to prevent and control flea infestations][to kill fleas before they hatch][which prevents flea eggs from maturing into biting adults]. It [This product] also contains the highly effective flea, deer tick, and mosquito killing agent [Etofenprox], which kills biting adult fleas, deer ticks, and mosquitoes your cat/kitten may acquire from its surroundings. A single application of [RF2170 A/T Combo] will provide flea egg hatch inhibition for up to 30 days [1 month][4 weeks]. Each package contains enough product for xx monthly applications (xx days of protection [control]). [RF2170 A/T Combo] provides relief from flea infestations for up to 1 month [4 weeks][30 days] by killing adult fleas and flea eggs on your cat or kitten. Adult fleas can live on your cat while producing vast numbers of eggs, which drop off your cat and develop in the surrounding environment. Normal insecticides will not kill the flea eggs, but [RF2170 A/T Combo] [is designed to] kill(s) adult fleas and flea eggs, breaking the flea life cycle and providing your cat/kitten relief from flea bites at the same time.

After application, your cat's/kitten's natural skin oils [disperse] carry [RF2170 A/T Combo] over your cat's/kitten's body for protection against biting adult fleas and the development of flea eggs. [(This product) may stain leather and suede fabrics for (24)(24 to 48) hours after application.] Once adult fleas are evident on your cat/kitten, there is likely an infestation of flea eggs and flea larvae in your home. To completely kill the existing flea population, you may need to treat your home and your cat's bedding (home sprays, foggers), as well as your yard (yard spray/outdoor fogger) with traditional flea products approved for use on pets, around the home, or in your yard. [RF2170 A/T Combo] can be used in conjunction with other [Brand Name] premise products. As with all flea products, they are [RF2170 A/T Combo is] most effective when used as part of a total program aimed at reducing all stages of fleas in the cat's/kitten's environment. [Brand Name] products [They] are designed to complement each other in an integrated program for flea, deer tick, and mosquito management. To assure proper treatment, we recommend use of [Brand Name] products as directed to treat all pets in the household, as well as the indoor and outdoor home environments.]

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

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1. DIRECTIONS FOR USE WITH APPLICATOR

[To apply the RF2170 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 [cartridge][tube][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-(brand phone number).

[If you choose to apply directly to cat without using the applicator device, read and follow the Directions For Use for Direct Application to Cat on this package.]

2. DIRECTIONS FOR USE FOR DIRECT APPLICATION TO CAT

READ ENTIRE LABEL BEFORE USE

USE ONLY ON CATS OR KITTENS 12 WEEKS OF AGE AND OLDER AND [OVER 2.5 LBS AND UNDER 5 LBS][5 LBS AND OVER]

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[APPLICATION METHOD]

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3. **DISPOSE** [icon]: To dispose of empty [tube][vial][cartridge], drop [empty] tube [vial][cartridge] into trash or offer for recycling if available.
4. **RETREAT**: Repeat application once monthly.

[Note: Each package contains sufficient cartridges/tubes/vials for [X] applications]
[1 ml [cc] [0.034 fl oz] dose for use on cats and kittens over 2.5 lbs and under 5 lbs only .
1.8 ml [cc] [0.061 fl oz] dose for use on cats and kittens 5 lbs. and over only (Same size applicators with different fill amounts)]

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[TREATMENT SCHEDULE

Dosage: Use only 1 applicator every 30 days per cat/kitten

| Cat's/Kitten's Name | First Treatment Date | Second Treatment Date (30 Days From 1 st) | Third Treatment Date (30 Days From 2nd) |
|---------------------|----------------------|---|---|
| | | | |
| | | | |
| | | | |

NOTES: _____

REMINDER: I purchased [Brand Name] _____ from _____]

(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 cat/kitten is experiencing an adverse event.

To learn more about treating current infestations and preventing future outbreaks, please, visit our website: [URL]

[For more information, call our experts at 1-800-xxx-xxx (weekdays, 9am – 5 pm EST)]

To learn more, visit [URL]

For product use information, call [phone number] or visit our Web site: [URL]

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Made in USA