2724-814

1/10/2013



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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

January 10, 2013

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 \*InfestStop™ to Subject Label RF2175 CCSO-K, EPA Reg. No. 2724-814 Your Submission Dated October 16, 2012

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."

Directions for Use, USE RESTRICTIONS subsection comment(s), top of page 6 of 9:

 Insert the following text immediately following the existing 2<sup>nd</sup> sentence to read "Do not use on kittens less than 12 weeks old."

Storage and Disposal section comment(s), middle of page 7 of 9:

3. Within the **"Pesticide Storage:**" subsection, you must revise the existing 1<sup>st</sup> sentence to read "Store applicators in a cool, dry (preferably locked) area away from children and animals."

#### First Aid section comment(s), top of page 8 of 9:

Revise the 2<sup>nd</sup> sentence within the "HOT LINE NUMBER:" subsection to read "For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-888-987-4110, twenty-four (24) hours per day, seven (7) days per week."

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. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. 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 <u>Rodia.Carmen@epa.gov</u>.

Sincerely Yours,

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

Enclosure: Label stamped "Accepted with Comments," dated January 10, 2013 002724-00814 D471757

1.

[] Optional Copy

# **RF2175 CCSO-K**

# Alternate brand name: Kirkland Signature Flea & Tick Control for Cats

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

Front Panel - For Use Only on Cats and Kittens 12 weeks of age or older and [5 lbs. and over] [over 2.5 lbs and under 5 lbs] Small size only, Do not apply to kittens weighing less than 2.5 lbs.

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

(General/Protection claims)

1 mI [cc] [0.034 fl oz] for cats [kittens] over 2.5 lbs and under 5 lbs.; 1.8 mI [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]

Only For use on cats/kittens weighing [5 lbs and over][over 2.5 lbs and under 5 lbs]

Flea & Deer Tick [Protective] for cats [& kittens]

[Flea & deer tick] treatment for cats [& kittens]

[Special formula for cats/kittens][Superior flea prevention and treatment specially formulated for use only on [all] cats and kittens [12 weeks of age and older]

Spot On® [Topical][Non-systemic] treatment for pets [cats]

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)

[1 month][monthly][flea, deer tick, & flea egg][ protection

Monthly treatment for [fleas, flea eggs, & deer ticks]

Flea [and deer tick][and mosquito] control for your cat/kitten

A smart approach to flea control

[Brand] Provides a novel [smart] approach to flea, deer tick, and mosquito control Improved flea, deer tick, and mosquito control

Keeps fleas, deer ticks, and mosquitoes under control

-[Advanced]-Spot On® [Plus] Insect Control [Treatment and Prevention]

A flea control program

Controls flea, deer tick, and mosquito problems [on your cat/kitten]

-Isecurel flea, deer tick, and mosquito protoction-

Provide your cat/kitten with flea, deer tick, and mosquito protection, right from the start Provides protection

Direct on-animal protection from fleas, deer ticks, and mosquitoes

Provides relief [protection] from fleas, deer ticks, and mosquitoes

Once-a-month [topical][Spot On] protection from fleas, and deer ticks,

Reapply monthly] [Suitable for year-round use][Month] sticker for home calendar Monthly application for most effective protection

When it comes to fleas and deer ticks, there's no room for compromise [Brand Name] [Satisfaction guaranteed or your money back][money back guarantee]

ACCEPTED With COMMENTS In EPA Letter Dated:

2724-814

Under the Federal Insecticide, Fungicide and Rodenticide Act, As amended, for the pesticide Registered under EPA Reg. No: (Kills/Repels/Controls claims)

[Actively] Kills [Controls] [adult] fleas, deer ticks, [larvae], and flea eggs for [up to][4 weeks][1 month][per application]

[Actively] Kills [fleas][deer ticks][flea eggs][larvae][&][and][mosquitoes][by contact]Kills [and/or Repels] mosquitoes [for up to 28 days][by contact]

[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]

Controls fleas, deer ticks, and mosquitoes & prevents flea reinfestations

[Kills deer ticks] (for up to 1 month [4 weeks]) [per application]

Starts killing fleas in 15 minutes

Starts working on contact

Protects your [cat][kitten] from fleas, deer ticks, and mosquitoes (which may transmit heartworm disease) 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 disease]

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

(Flea egg/life cycle claims)

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

Contains [Features][\*InfestStop<sup>™</sup>] an Insect Growth Regulator (IGR) to inhibit the development of flea eggs

Flea control for cats with [PRECOR®][vIGRen®] [\*InfestStop™] Insect Growth Regulator (IGR)

[(S)-Methoprene][\*InfestStop™] Insect Growth Regulator (IGR) interrupts the development of the flea life cycle [at the egg stage]

[(S)-Methoprene][\*InfestStop™] 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][\*InfestStop™] Insect Growth Regulator (IGR) prevents flea reinfestation on your cat/kitten

Flea treatment and preventative with an [insecticide] adulticide and [\*InfestStop™] Insect Growth Regulator (IGR)

[With [S-Methoprene][\*InfestStop<sup>™</sup>] Insect Growth Regulator [IGR] to Break Flea Life Cycle] [Contains [\*InfestStop<sup>™</sup>] 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] Kills [Controls] flea eggs for up to [30 days][4 month][4 weeks][per application]

Kills flea eggs, the source of home flea infestations and pet 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]

2

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]

Kills [flea] eggs before they hatch into biting adults

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

Kills hatching [developing] flea eggs

Interrupts normal flea development [Stops][Interrupts] the flea life cycle]

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

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

One-two punch controls fleas and flea eggs

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

Plus kills flea eggs and larvae to prevent future infestations

\*(S)-Methoprene (Must occur on same panel wherever InfestStop™ is used)

(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 [entire] body [from head to tail] through skin oils - Spreads naturally with cat's skin oils -

Spreads [over time] with cat's movement (skin and hair oils)

[Plus] Contains a 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 Applicator [tube] Shape [Design][helps prevents misuse on dogs][helps prevents misapplication on dogs]

Unique shape [only for cats & kittens 5 lbs and over][only for cats & kittens under 5 lbs]

Pet Specifix® Applicator Accu-Tip Dispenser

[X] Pro-cision Flo<sup>™</sup> Applicators [tubes]

[Exclusive][Pinpoint][Applicator] for [pinpoint][exact][direct][easy][direct to skin] application

Patent pending

For pinpoint accuracy

Helps provide accurate dosing

Provides just the right dose [in just the right place]

Direct to your cat's skin

Easily penetrates hair

The [Pro-cision Flo<sup>™</sup>][exclusive] applicator [tube][easily penetrates hair][fur][coat] for [improved][direct] application [directly to your cat's skin]

3

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] Longer Applicator [tube][tip] for easy application [to long-haired cats] Longer tube [applicator][tip] is ideal for long-haired pets [cats/kittens] Helps Prevent [misapplication on dogs] misuse on dogs with unique [specially designed] applicator [tube] design

A more confident, secure application

EZ-squeeze [Easy squeeze] tube [applicator][shape]

(Product Claims) Odorless Clean fresh scent Effective Control [Relief][Prevention] Fast [Quick] acting [Relief] Starts working by contact Dual-action for immediate and long-lasting effects Quick acting, long lasting [treatment] Long lasting and easy to use [apply] [Flea prevention] Helps stop itching and scratching [from flea bites]

(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 [Satisfaction guaranteed][Money-back guarantee]

(Prevention claims)

Preventing fleas and deer ticks from infesting your pet 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 pet][and][for your home]

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

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

# Thermoform claims

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

4

## **Promotional Package Copy**

One month [dose] free One free month supply [dose] included Bonus pack

# **KEEP OUT OF REACH OF CHILDREN**

See back panel for ingredients and additional Precautionary Statements

5

EPA Reg. No. 2724-814 EPA Est. No.

Net Contents: (Number): 0.034 fl oz (1.0 cc) Applicator [tube] (Cats/Kittens over 2.5 lbs and under 5 lbs)/ 0.061 fl oz (1.8 cc) Applicator [tube] (Cats/Kittens 5 lbs and over)

Lot Number:

# READ ENTIRE LABEL [AND INSERT(S)] BEFORE USE

# USE ONLY ON CATS OR KITTENS 12 WEEKS OF AGE AND OLDER AND [OVER 2.5 LBS AND UNDER 5 LBS][5LBS AND OVER]. DO NOT APPLY TO CATS WEIGHING LESS THAN [5 LBS][2.5 LBS]

# DO NOT ALLOW CHILDREN TO APPLY PRODUCT.

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

## **INTRODUCTION:**

[Brand] Flea & Tick Control for Cats is a topically applied long-lasting product specifically formulated for cats to prevent and control flea infestations. This product contains Etofenprox, which kills biting adult fleas, deer ticks and mosquitoes your cat may acquire from its surroundings. This product provides relief from flea infestations for up to 1 month by killing adult fleas on your cat or kitten and flea eggs in your home.

[RF2175 CCSO-K is a topically applied [long-lasting] 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][Brand Name], which kills biting adult fleas, deer ticks, and mosquitoes your cat may acquire from its surroundings. A single application of RF2175 CCSO-K will provide 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]). RF2175 CCSO-K provides relief from flea infestations for up to 1 month [4 weeks] by killing adult fleas on your cat or kitten and flea eggs in your home. Adult fleas can live on your cat/kitten while producing vast numbers of eggs, which drop off your cat/kitten and develop in the surrounding environment. Normal insectisides will not kill the flea eggs, but RF2175 CCSO-K [is designed to] kill(s) adult fleas and flea eggs, breaking the flea life cycle and providing your cat relief from flea bites at the same time.]

[After application, your cat's skin oils [disperse] carry RF2175 CCSO-K over your cat's body for protection against biting adult fleas and the development of flea eggs. [(product) may stain leather and suede fabrics for (24)(24 to 48) hours after application.] Once adult fleas are evident on your cat, 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/kitten's bedding (home sprays, foggers); as well as your yard (yard spray/outdoor fogger) with traditional flea products approved for use on cats/kittens, around the home, or in your yard. RF2175 CCSO-K can be used in conjunction with other [Brand] premise products. As with all flea products, [they are] [RF2175 CCSO-K is] most effective when used as part of a total program aimed at reducing all stages of fleas in the cat's environment. [BRAND] 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] 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.

#### **USE RESTRICTIONS:**

This product works by application directly to the cat's skin, not to the hair. When applying, manually push aside cat's hair to allow direct application to the skin. Do not use more than one tube/vial/cartridge per cat and do not apply more than once every month. Do not get this product in your cat's every mouth. Do not allow your cat to ingest this product.

6

USE ONLY ON CATS AND KITTENS 12 WEEKS OF AGE AND OLDER. [1 ml [cc] [0.034 fl oz] dose for use on cats and kittens over 2.5 lbs and under 5 lbs. 1.8 ml [cc] [0.061 fl oz] dose for use on cats and kittens 5 lbs. and over (Same size applicators with different fill amounts)]

# [APPLICATION METHOD]

- 1. [Bend at perforation and tear off 1<sup>st</sup> month's applicator.]
- 2. Hold [applicator] upright [and bend area of plastic at perforation, tear off and discard.] [Hold applicator upright] and snap tip back, away from face and body.
- 3. Prior to application of the product, 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 [applicator] tube on the cat's exposed skin and squeeze out the [entire] contents of the [applicator] tube onto the cat's skin.
- 4. Do not spread this product by hand over the cat. Do not bathe the 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. [Although the cat's/kitten's skin and hair oils will [over time] distribute the application over the entire cat/kitten, brushing the cat/kitten 12-24 hours after treatment will help to distribute the material over the skin.]
- 5. [Repeat application once monthly.][Do not treat more than once per month.]
- 6. Discard empty applicator as described in STORAGE and DISPOSAL

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/kittens with this product rapidly kills fleas and may reduce the incidence of this condition.

Adding a Dose Reminder section to appear as follows on the back panel:

First Monthly Application:	Month	Day	Year	
Second Monthly Application:	Month	Day	Year	
Third Monthly Application:	Month	Day	Year	
[Fourth Monthly Application:	Month	Day	Year	· ]

Optional marketing text for subregistrant

#### TREATMENT SCHEDULE

Dosage: 1 applicator every 30 days per cat

Cat's/Kitten's Name	First Treatment Date	Second Treatment Date (30 Days From 1 <sup>st</sup> )	Third Treatment Date (30 Days From 2nd)
			· · · · ·

NOTES:

REMINDER: I purchased [Brand Name] \_\_\_\_\_ from \_\_\_\_\_]

**STORAGE AND DISPOSAL:** Pesticide Storage: Store applicators together in a cool area away from children and animals. Container Disposal: If empty: Do not reuse empty applicator [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: Wash your 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

**HAZARDS TO ANIMALS**: For External Use on Cats Only. **Do not use on kittens less than 12 weeks old or on kittens weighing less than 2.5 lbs**. 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 cat/kitten with mild soap and rinse with large amounts of water. If signs continue, please call 1-888-987-4110 or 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 the salivation continues or other clinical signs are noted, please call 1-888-987-4110.

1011

FIRST AID	
If in eyes	Hold eye open and rinse slowly and gently with water for 15 to 20 minutes.
	Remove contact lenses, if present, after first 5 minutes, then continue rinsing
	Call a poison control center or doctor for treatment advice.
Have the pro	duct container or label with you when calling a poison control center or doctor or going for treatment
	o contact 1-888-987-4110 for emergency medical treatment information.

**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 Wellmark at 1-888-987-4110. (This box will appear in lower right hand corner of back panel)

# 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 be consistent with applicable law.

In case of emergency or for product information, call 1-888-987-4110 [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 1-888-987-4110 (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% KEEP OUT OF REACH OF CHILDREN READ DIRECTIONS BEFORE USING EPA Reg. No. 2724-814 Net Contents Lot Number For Use Only on Cats/Kittens 12 weeks of age or older and [5 lbs. and over] [over 2.5 lbs and under 5 lbs]

# OPTIONAL TEXT FOR PACKAGE INSERTS OPTIONAL INSERT 1 Dear Valued [Channel Customer],

Thank you for your purchase of [Product Name]. We are delighted to share with you some great tips on using the product for the best results.

- A. For best results, apply the full product in a single spot on the cat's back between the shoulder blades. Applying the material in a single spot is intended to reduce the potential for oral exposure via self-grooming activity. For complete instructions on application, please read the package label.
- B. [Product Name] contains sesame oil as a coat conditioner. The sesame oil helps the product to spread over the cat's fur and acts as a coat conditioner as well. After the product has dried, you may brush through your cat's fur with a cat brush or comb for distribution of the product and coat conditioning sesame oil.
- C. Sensitivities may occur after the use of any topically applied product. A pet's skin is a complex organ, and your pet's skin may be generally sensitive to topical products. If you have questions about best results or if your pet experiences a reaction after application, please call 1-888-987-4110 to talk to a product specialist.
- D. Cats are inclined to self groom, especially after an application of any dermal product. This is a normal activity. For multiple cat households, prevent the cats from grooming each other until the product has dried.
- E. Although self-grooming is a normal activity, it is possible for cats to have oral exposure to [Product Name] as a result of self-grooming. Due to the taste, oral exposure could result in salivation, which can be a cat's normal response to a bad taste. If you are concerned about salivation or other responses by your cat, please call 1-888-987-4110 to talk to a product specialist.
- F. Treatment of fleas on your pet does not address the 95-99% of the flea population that lives in your house and yard. So even after your cat is treated with [Product Name] and adult fleas are killed, flea eggs may continue to hatch in your home for up to two months. For best results, treat your yard and home for fleas with treatments that contain an Insect Growth Regulator, which kills flea eggs. Over time, treatment of your pet and its environment will eliminate fleas from your home.

#### **OPTIONAL INSERT 2**

STOP. Please read this insert/card and the entire instructions before using this product.

[Brand Name] wants the best for your cat/pet, and we are pleased to share with you some great tips for using the product.

- Use [Product Name] only as directed.
- For best results, brush your cat's/pet's coat 24 hours after application.
- Apply away from furniture and carpeting.
- · Consult a veterinarian before using if your cat/pet is aged, pregnant, nursing, or taking other medication.