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# U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7505P) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460 EPA Registration No.

2724-825

Date of Issuance:

NOV = 8 2012

# NOTICE OF PESTICIDE:

☑ Registration
☐ Reregistration

(under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended)

Term of Issuance:

Conditional Registration Expires November 8, 2014

Name of Pesticide Product: **RF2180 KC A/T Combo** 

Name and Address of Registrant (include ZIP Code):

Wellmark International 1501 E. Woodfield Road Suite 200 West Schaumberg, IL 60173

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(a) provided that:

1. This registration is time-limited and expires two years from the date this product is first released for shipment.

You must provide the Agency with a projected release for shipment date within 30 days of the date of this Notice of Registration. The Agency will calculate the expiration date based on the projected release for shipment date until an actual release for shipment date is provided in writing.

- 2. The basic Confidential Statement of Formula (CSF) dated May 25, 2012 is the CSF of record and supersedes all previously accepted CSFs.
- 3. Make the following changes to the label:
  - a. Revise the EPA Registration Number to read: "EPA Registration No. 2724-825".
  - b. Place a large, clear picture of a cat in the weight range for the product as packaged on the front panel of the label.
  - c. Remove the words "natural" and "naturally" wherever they appear on the label.
  - d. Remove the phrase: "Normal insecticides will not kill the flea eggs"

4. You must submit quarterly enhanced incident reports and quarterly sales information in doses sold for this product for the quarter that begins on January 1, 2013. The quarterly reports are due two months after the quarter ends. Please flag any Confidential Business Information as such. Enhanced incident reporting should be submitted to the Product Manager. Quarterly sales information should be submitted to the Registration Division, Immediate Office (attn: Kimberly Nesci).

The following is a list of information that must be included in the quarterly reports for each incident:

EPA Registration Number
Product name (brand name)
Lot #
Where purchased: internet, store, veterinarian
Active Ingredient(s)
Weight range for product

Date on which incident occurred. (mm/dd/yyyy)
State in which the incident occurred. (standard 2 letter abbreviation)
Registrant case #

Species: dog, cat, other (specify) Breed: (as reported by pet owner)

Age: months or years Sex: M, F, or neutered Weight: pounds

Primary Route of Exposure: dermal, oral, other animal, inhalation, other Body System: neurological, dermatological, GI, respiratory, ocular, other

Major signs noted with separate column for each sign, using standard terminology

Time to Onset: (hours, days)
Treated by veterinarian: yes or no
First time product used: yes or no

Misuse: use on incorrect species, overdose, too frequent dosing, other (describe)

Any known precondition

EPA Severity Code: death, major, moderate, minor Outcome: died, recovered, still treated, unknown

- 1. Along with the enhanced incident reporting, you must submit an analysis of the incidents seen, to include the following details:
  - All incidents should be reported including all minor dermal and ocular irritation reports.
  - Summary table for cats showing number of incidents of each severity code for each route of exposure. Each incident should only be reported once. If one incident has several routes of exposure, the order should be ocular > oral > dermal. In other words, an incident with both oral and dermal exposure would be reported as oral exposure, and an incident with both ocular and oral exposure would be reported as ocular exposure.

- A similar summary table for dogs (misuse or secondary exposure) showing number of incidents of each severity code for each route of exposure.
- Summary table for dogs and table for cats showing number of incidents that are believed due to secondary exposure (e.g., multi-pet households).
- A summary table for cats showing number of incidents for each severity code for these age ranges: <3 months, 3-6 months, 6-9 months, 9-12 months, 1 yr, 2 yr, 3 yr, 4 yr, 5 yr, 6 yr, 7 yr, 8 yr, 9 yr, 10 yr, 11 yr, 12 yr, 13 yr, 14 yr, 15 yr, >15 yr.
- A summary table showing the number of cat incidents for each severity code for each pet weight range on the product label (if applicable).
- A summary table for cat weight showing number of incidents for each product weight range. This table should show number of incidents in cats weighing less than that product weight range, number of incidents in cats in lower half of weight range, number of incidents in cats in upper half of weight range, and cats weighing more than the product weight range (if applicable).
- Table showing number of incidents for each cat breed, where provided.
- Table showing number of incidents in cats for each clinical sign.
- Table showing number of incidents in cats for each organ system.
- Report aggregate incidents, but do not combine moderate and minor incidents.
- 2. You must submit and/or cite all data required for registration of your product under FIFRA Section 3(c)(5) when the Agency requires all registrants of similar products to submit such data, and submit acceptable responses required for reregistration of your product under FIFRA section 4.
- 3. The acute toxicity profile for this product is as follows:

Route of Exposure	Toxicity Category
Acute oral toxicity	IV
Acute dermal toxicity	IV
Acute inhalation toxicity	IV
Primary eye irritation	· IV
Primary skin irritation	ΙV
Dermal sensitization	Non-sensitizer

A stamped copy of the label and copies of the Data Evaluation Records (DERs) are included for your file. Two copies of the finished labeling must be submitted prior to releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A copy of your label stamped "Accepted with Comments" is enclosed for your records.

If EPA determines that future mitigation measures are necessary for all pet spot-ons, the Agency
will inform registrants. If mitigation measures are necessary, EPA may take regulatory action. If you
have any questions concerning this registration, please contact Kevin Sweeney at (703) 305-5063.

Signature of Approving Official:

Richard Gebken, Product Manager (10) Registration Division, Insecticide Branch

Date:

NOV - 8 2012

# [] Optional Copy

# RF2180 KC 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 forcats/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

[New] 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

NOV

Under the Federal inserticide.
Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.

c.c.

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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][InfestStop], the first insect growth regulator for flea control

Contains [Features][InfestStop] 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] Insect Growth Regulator [IGR] to Break Flea Life Cycle]

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

[Contains [InfestStop] 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 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]

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 name
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]

**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:	
Total	100.0%

# KEEP OUT OF REACH OF CHILDREN

See back panel for additional Precautionary Statements

EPA Reg. No. 2724-xxx

EPA Est. No.

Net Contents: xxx fi oz

**Lot Number** 

# 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]
DO NOT APPLY TO CATS WEIGHING LESS THAN 2.5 [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:**

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.

[RF2180 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 [RF2180 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]). [RF2180 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 [RF2180 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 [RF2180 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. [RF2180 A/T Combo] can be used in conjunction with other [Brand Name] premise products. As a with all flea products, they are [RF2180 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.]

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[This product contains xx monthly dosages [one monthly dose], each (1 [0.034 fl oz] and 1.8 ml [cc] [0.061 fl oz]].

#### **USE RESTRICTIONS:**

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 eyes or mouth. Do not allow your cat to ingest this product. Use only on cats 12 weeks of age and older. Do not apply to cats weighing less than 2.5 [5] lbs (required for smallest size).

RF2180 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. [(Note: Application now assumes one tube[vial] [cartridge] per cat per application)]

The RF2180 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 [RF2180 A/T COMBO] treatment, use one disposable liquid cartridge [tube][vial] [for each application] with the applicator device. [bullets may be used instead of numbers]

#### 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] or door [x times to empty tube] at one spot at the base of the skull.]

Do not spread RF2180 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

**ITREATMENT SCHEDULE** 

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]

RF2180 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 RF2180 A/T COMBO rapidly kills fleas and may reduce the incidence of this condition.](Optional marketing text for subregistrant)

Dosage: Use only 1 ap	plicator every 30 days per	cat/kitten	
Cat's/Kitten's	First Treatment Date	Second Treatment	Third Treatment Date
Name		Date	(30 Days From 2nd)
		(30 Days From 1 <sup>st</sup> )	
<u> </u>	<del></del>		

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][cartridges] 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**: 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 weighing less than 2.5 [5] pounds or 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 cat with mild soap and rinse with large amounts of water. 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 signs continue, please call 1-800-brand phone number or consult a veterinarian immediately.

## **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 product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-brand phone number for emergency medical treatment information.

#### 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

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.

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-xxx

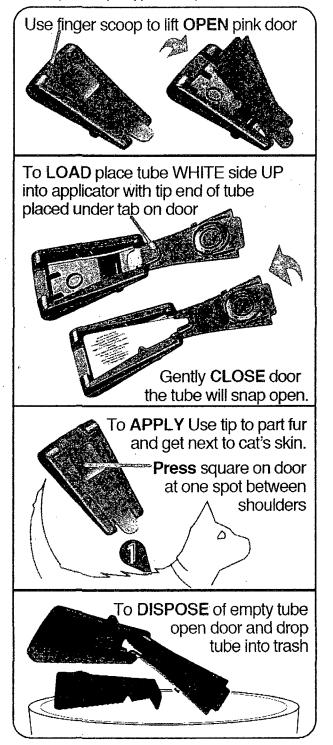
Net Contents xx fl oz

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



# 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]
DO NOT APPLY TO CATS WEIGHING LESS THAN 2.5 [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]

**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.

[This product contains xx monthly dosages [one monthly dose], each (1 [0.034 fl oz] and 1.8 ml [cc] [0.061 fl oz]].

## **USE RESTRICTIONS:**

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 eyes or mouth. Do not allow your cat to ingest this product. Use only on cats 12 weeks of age and older. Do not apply to cats weighing less than 2.5 [5] lbs (required for smallest size).

RF2180 A/T COMBO works by application directly to the cat's/kitten's skin, not to the hair. [(Note: Application now assumes one tube[vial] [cartridge] per cat per application)] [bullets may be used instead of numbers]

## [APPLICATION METHOD]

- 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 1<sup>st</sup> 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 RF2180 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)]

RF2180 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 RF2180 A/T COMBO rapidly kills fleas and may reduce the incidence of this condition.](Optional marketing text for subregistrant)

[TREATMENT SCHEDU	JLE ·				
Dosage: Use only 1 app	plicator every 30 days per	cat/kitten			
Cat's/Kitten's	First Treatment Date	Second Treatment Date	Third Treatment Date		
Name		(30 Days From 1 <sup>st</sup> )	(30 Days From 2nd)		
NOTES:					
REMINDER: I purchase	ed [Brand Name]	from	<u>I</u>		

# 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)	
Etofenprox (CAS # 80844-07-1)	
OTHER INGREDIENTS:	
Total	100.0%

# **KEEP OUT OF REACH OF CHILDREN**

See back panel for additional Precautionary Statements

EPA Reg. No. 2724-xxx EPA Est. No.

Net Contents: xx fl oz

Lot No.

ece.

(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]
DO NOT APPLY TO CATS WEIGHING LESS THAN 2.5 [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:

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.

[RF2180 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 [RF2180 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]). [RF2180 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 [RF2180 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 [RF2180 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. [RF2180 A/T Combo] can be used in conjunction with other [Brand Name] premise products. As with all flea products, they are [RF2180 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 Court County Name] products as directed to treat all pets in the household, as well as the indoor and outdoor county 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 incofisistent with its labeling. Read and follow all directions and precautions on this product label.

# 1. DIRECTIONS FOR USE WITH APPLICATOR

[To apply the RF2180 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]
DO NOT APPLY TO CATS WEIGHING LESS THAN 2.5 [5] LBS.
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## [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 1<sup>st</sup> 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]  $\epsilon$  [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.

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[TREATMENT	SCHEDULE
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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:	ased [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]	cccc
[For more information, call our experts at 1-800-xxx-xxx (weekdays, 9am – 5 pm EST)]	сесс
To learn more, visit [URL]	e c c
For product use information, call [phone number] or visit our Web site: [URL]	(

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