

2724-829

3/13/2013

1/24



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505C)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

EPA Reg. Number:

2724-829

Date of Issuance:

March 13, 2013

NOTICE OF PESTICIDE:

Registration
 Reregistration
(under FIFRA, as amended)

Term of Issuance:

Unconditional

Name of Pesticide Product:

RF2187 CDSO Plus II

Name and Address of Registrant (include ZIP Code):

Wellmark International
1501 E. Woodfield Rd.
Suite 200W
Schaumburg, 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/reregistered 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 registered in accordance with FIFRA section 3(c)(5) provided that you:

1. Submit and/or cite all data required when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for registration review.

(continued on page 2)

Signature of Approving Official:

Refer to Page 4 of 4

Richard J. Gebken, Product Manager (10)
Insecticide Branch, Registration Division (7505P)

Date:

March 13, 2013

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. Only one basic confidential statement of formula will be on file for this product at any one time; no alternate formulations or minor formulation amendments will be submitted or approved for this product.
3. You must submit quarterly enhanced incident reports and quarterly sales information in doses sold for this product for the quarter that begins on April 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: Katlin Keller).

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

4. Along with the enhanced incident reporting, you must submit an analysis of the incidents seen, to include the following details:

- All incidents should be reported including all minor dermal and ocular irritation reports.
- Summary table for dogs showing number of incidents of each severity code for each route of exposure. Each incident should only be reported once. If one incident has several routes of exposure, the order should be ocular > oral > dermal. In other words, an incident with both oral and dermal exposure would be reported as oral exposure, and an incident with both ocular and oral exposure would be reported as ocular exposure.
- A similar summary table for cats (misuse or secondary exposure) showing number of incidents of each severity code for each route of exposure.
- Summary table for 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 dogs showing number of incidents for each severity code for these age ranges: <3 months, 3-6 months, 6-9 months, 9-12 months, 1 yr, 2 yr, 3 yr, 4 yr, 5 yr, 6 yr, 7 yr, 8 yr, 9 yr, 10 yr, 11 yr, 12 yr, 13 yr, 14 yr, 15 yr, >15 yr.
- A summary table showing the number of dog incidents for each severity code for each pet weight range on the product label.
- A summary table for dog weight showing number of incidents for each product weight range. This table should show number of incidents in dogs weighing less than that product weight range, number of incidents in dogs in lower half of weight range, number of incidents in dogs in upper half of weight range, and dogs weighing more than the product weight range.
- Table showing number of incidents for each dog breed.
- Table showing number of incidents in dogs for each clinical sign.
- Table showing number of incidents in dogs for each organ system.
- Report aggregate incidents, but do not combine moderate and minor incidents.

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Label Revisions:

1. You revise the EPA Registration Number to read: "EPA Registration No. 2724-829" on the label.
2. Revise the label in accordance with all of the markups identified on the accompanying label.

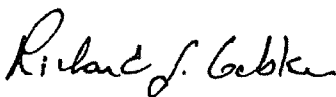
If EPA determines that future mitigation measures are necessary for all pet spot-ons, the Agency will inform registrants. If mitigation measures are necessary, EPA may take regulatory action.

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 you have any questions concerning this action, please contact Richard J. Gebken at (703) 305-6701. Submit one copy of the revised final printed label for the record before the product is released for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the label is enclosed for your records.



Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7505P)

Enclosure: Label stamped "Accepted with Comments"

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5/24

RF2187 CDSO Plus II

SUBLABEL A - APPLICATOR DEVICE PACKAGE

Font size for word "Dog" in product name must be at least 75% the height of the largest letter in the primary brand name

Front Panel: For Use only on Toy/Small (5-14 lbs.), Medium (15-30 lbs.), Large (31-60 lbs.), and Extra Large (61-150 lbs.) Dogs/Puppies & 12 weeks of age or older

(Flea & Tick [& Mosquito][Treatment] [and] Control only for Dogs and Puppies 12 weeks of age or older)

DO NOT USE ON DOGS OR PUPPIES WEIGHING LESS THAN 5 LBS.

[Each brand name product will be packaged in the weight classes designated below]
Weighing 5 to 14 lbs./15 to 30 lbs./31 to 60 lbs./61-150 lbs.

ACTIVE INGREDIENTS:

Ectfenprox	50.00%
Piperonyl Butoxide*	9.10%
N-cycly bicycloheptene dicarboximide (MGK 264)	0.91%
Pyriproxyfen (Nylar)	0.45%
(S)-Methoprene	0.23%
OTHER INGREDIENTS:	39.31%
TOTAL	100.00%

*[1-methyl carbityl](6-propylpiperonyl) ether and related compounds

KEEP OUT OF REACH OF CHILDREN CAUTION

See back panel for additional precautionary statements.

NET CONTENTS: (number) tubes, each fl. oz. (ml) (cc)
EPA Reg. No. 2724-XXX
EPA Est. No. 2724-TX-1
Batch/Lot No. _____

For Dogs and Puppies Weighing:	Net Contents (Each tube)
5 to 14 lbs.	0.034 fl. oz. (1.0 ml.)
15 to 30 lbs.	0.074 fl. oz. (2.2 ml.)
31 to 60 lbs.	0.149 fl. oz. (4.4 ml.)
61 to 150 lbs.	0.247 fl. oz. (7.3 ml.)

ACCEPTED
With COMMENTS
In EPA Letter Dated:

MAR 13 2013

Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

2724-829



6/24

READ ENTIRE LABEL BEFORE EACH USE
IMPORTANT - USE ONLY ON DOGS OR ON PUPPIES 12 WEEKS OF AGE OR OLDER
DO NOT USE ON DOGS OR PUPPIES WEIGHING LESS THAN 5 LBS (on toy/small package only).

[Black Panel]

Side Effects: Monitor your dog after application. Side effects may include signs of skin irritation such as redness, scratching, or other signs of discomfort. Gastrointestinal signs such as vomiting or diarrhea have also been reported. If these or other side effects occur, consult your veterinarian or [Brand name] at [phone number].



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

PRECAUTIONARY STATEMENTS

CAUTION

HAZARDS TO HUMANS

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

? SKIN ✓ Dermal irritant cat III

HAZARDS TO DOMESTIC ANIMALS

DO NOT USE ON OTHER ANIMALS. Do not use on dogs or puppies less than 12 weeks old or weighing less than 5 lbs. Do not use this product on debilitated, aged, medicated, pregnant or nursing animals or on animals known to be sensitive to pesticide products without first consulting a veterinarian. Sensitivity, such as slight transitory redness of the skin at the site of application, may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap, rinse with large amounts of water, and consult a veterinarian immediately.

FIRST AID

If in eyes

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER: Have the product container or label with you when calling a poison control center, doctor or veterinarian, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-XXX-XXX.

90% SKIN ✓

DIRECTIONS FOR USE WITH [brand][Smart Shield™] APPLICATOR

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 directly to dog without using the [brand][Smart Shield™] applicator device, read and follow the Directions for Use For Direct Application to Dog on this package.]

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USE RESTRICTIONS:

Do not use more than one tube [vial][cartridge] per dog/puppy and do not treat more than once per month. Do not allow your dog/puppy to ingest this product. (Do not bathe your dog 48 hours prior to application.)

RF2187 CDSO Plus II works by application directly to the dog's/puppy's skin, not to the hair. When applying, use [brand][Smart Shield™] applicator device tip to push aside dog's/puppy's hair to allow direct application to the skin.

RF2187 CDSO Plus II provides a unique [brand][Smart Shield™] applicator device that allows dog/puppy owners to treat their dogs/puppies more securely, and dispose of liquid cartridges [tubes][vials]with less mess.

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

(The application steps below may optionally be formatted as a paragraph, or by number or bullets to clarify the order, depending on the final physical layout of the label)

To apply the [RF2187 CDSO Plus II] treatment, use one disposable liquid cartridge [tube][vial][for each application] with the [brand][Smart Shield™] applicator device.

FOR [TOY/SMALL][MEDIUM] SIZE DOGS/PUPPIES

1. OPEN [icon]

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

2. LOAD [icon] (2 alternate statements)

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

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

[Ensure that tube [cartridge][vial] fits securely in the [brand][Smart Shield™] applicator.]

3. CLOSE [icon]

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

4. APPLY [icon]

The dog/puppy should be standing for easy application. To apply, use [front edge of [brand][Smart Shield™] applicator] [tip] to part hair and get next to dog's/puppy's skin. Press [circle] [[round] thumb pad] on [color-green] door [number][once] at each of two to three evenly placed spots between the shoulder and the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Do not spread RF2187 CDSO Plus II by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after treatment will help to distribute the material over the skin.

5. DISPOSE [icon]

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

FOR [LARGE][EXTRA LARGE] DOGS/PUPPIES

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

The dog should be standing for easy application. To apply, use [front edge of [brand][Smart Shield™] applicator][tip] to part hair and get next to dog's/puppy's skin. Press [circle] [[round] thumb pad] on [color][green] door [number-once] at each of four or five evenly placed spots between the shoulder to the base of the tail. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy. Do not spread RF2187 CDSO Plus II by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after treatment will help to distribute the material over the skin.

5 ...

RF2187 CDSO Plus II is most effective when used as part of a total flea and tick management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2187 CDSO Plus II rapidly kills fleas and may reduce the incidence of this condition.]
[RF2187 CDSO Plus II is water resistant and remains efficacious following exposure to rainfall or swimming.]

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

Reminder: I purchased RF2187 CDSO Plus II from: _____

NOTES: _____

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

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep this product in its tightly closed original container, when not in use. Store in a cool, dry (preferably locked) area that is inaccessible to children and animals.

CONTAINER DISPOSAL: Do not reuse empty cartridge [vial][tube]. If empty: 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.

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.

[For more information call our (flea and tick) experts at 1-800-xxx-xxxx]
In case of emergency or for product information, call 1-800-xxx-xxxx or contact your veterinarian if your pet is experiencing an adverse event.

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

[URL]: _____

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INDIVIDUAL TUBE TEXT

RF2187 CDSO Plus II [Brand Name]

For Use only on toy/small (5-14 lbs), medium (15-30 lbs), large (31-60 lbs), Extra Large (61-150 lbs) dogs/puppies & 12 wks [of age] or older

Etofenprox 50% PBO 9.1% MGK 264 0.91% Nylar 0.45% S-Methoprene 0.23%

KEEP OUT OF REACH OF CHILDREN

CAUTION

Read Directions before use

Range of volumes from 0.034 fl. oz. (1.0 ml) to 0.247 fl. oz (7.3 ml) depending upon weight of dog

EPA Reg. No. 2724-xxx

[EPA Est. No.]

[Batch/Lot No.]



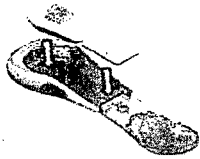
**DO NOT USE
ON CATS**

Alternate Sets of ICONS for the RF2187 CDSO Plus II

[ICON SET 1]

[OPEN]

[LOAD]



[CLOSE]



[APPLY]

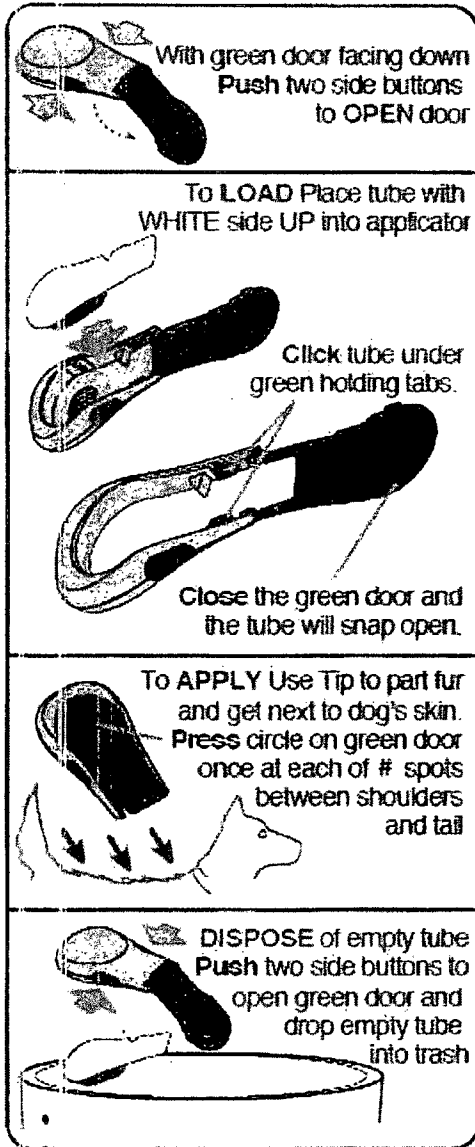


[DISPOSE]



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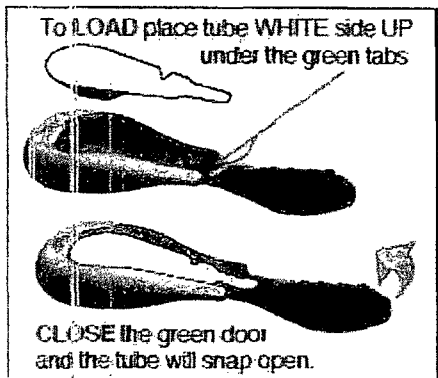
[ICON SET 2] ALTERNATE ICONS FOR DIRECTIONS FOF. USE (will be specific to dog's/puppy's size)



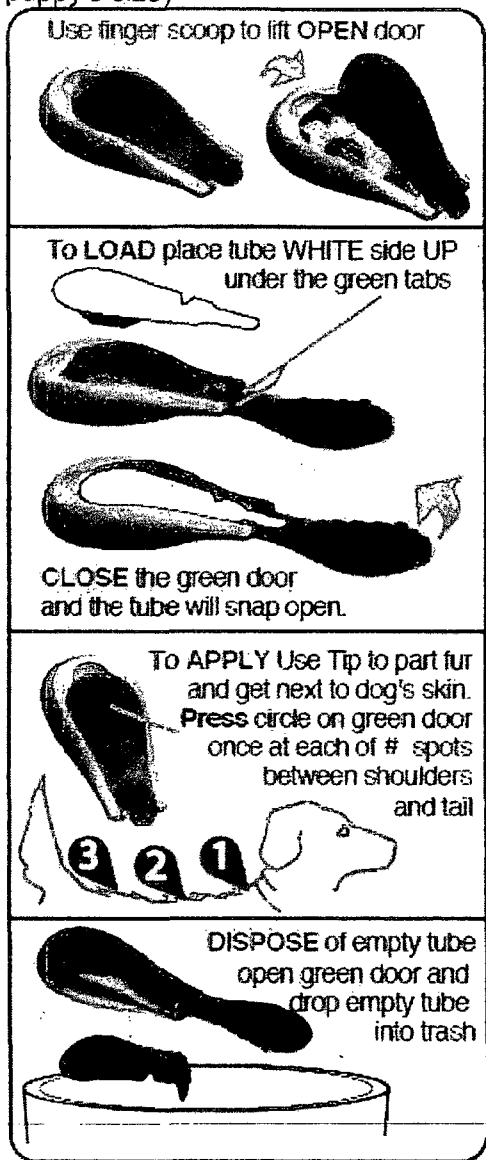
("#Spots" is a variable dependent on size)

Door color may change based on brand.

(Alternate LOAD icon)



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



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

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[2. DIRECTIONS FOR USE FOR DIRECT APPLICATION TO DOG/PUPPY]

(Optional if printed on applicator package)

USE RESTRICTIONS:

Do not use more than one tube [vial][cartridge] per dog/puppy and do not treat more than once per month. Do not allow your dog/puppy to ingest this product. (Do not bathe your dog 48 hours prior to application.)

RF2187 CDSO Plus II works by application directly to the dog s/puppy's skin, not to the hair. When applying, manually push aside dog's/puppy's hair to allow direct application to the skin.

[[Note: Application now assumes one [cartridge][tube][vial] per animal per application]]
[Note: Each package contains sufficient tubes/applicators for [X] applications]

(The application steps below may optionally be formatted as a paragraph, or by number or bullets to clarify the order, depending on the final physical layout of the label)

To apply the [RF2187 CDSO Plus II] treatment, use one disposable liquid cartridge [tube][vial] for each application.

FOR [TOY/SMALL][MEDIUM] SIZE DOGS/PUPPIES

1. [Bend at perforation and tear off first [tube][cartridge][vial].]
2. [Hold [tube][cartridge][vial] [and bend area of plastic at perforation, tear off and discard.]] Hold [tube][cartridge][vial] upright and snap tip back, away from face and body.
3. The dog/puppy should be standing for easy application. Apply RF2187 CDSO Plus II evenly to two to three spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube [cartridge][vial] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2187 CDSO Plus II by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin.
5. Discard empty [tube] [cartridge][vial] as described in Storage and Disposal

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FOR [LARGE][EXTRA LARGE] DOGS/PUPPIES

1. [Bend at perforation and tear off first [tube][cartridge][vial]]
2. [Hold [tube][cartridge][vial] [and bend area of plastic at perforation, tear off and discard.]] Hold [tube] [cartridge][vial] upright and snap tip back, away from face and body
3. The dog/puppy should be standing for easy application. Apply RF2187 CDSO Plus II evenly to four or five spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube [cartridge][vial] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2187 CDSO Plus II by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin.
5. Discard empty [tube][cartridge][vial] as described in Storage and Disposal

RF2187 CDSO Plus II is most effective when used as part of a total flea and tick management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2187 CDSO Plus II rapidly kills fleas and may reduce the incidence of this condition.]
[RF2187 CDSO Plus II is water resistant and remains efficacious following exposure to rainfall or swimming.]

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

Reminder: I purchased RF2187 CDSO Plus II from: _____

NOTES: _____

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

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SUB-LABEL B FOR REFILL PACKAGE

(For use with [brand][Smart Shield™] applicator device or direct application to dog/puppy without [brand][Smart Shield™] applicator device)

Font size for word "Dog" in product name must be at least 75% the height of the largest letter in the primary brand name

Front Panel: For Use only on Toy/Small (5-14 lbs.), Medium (15-30 lbs.), Large (31-60 lbs.), and Extra Large (61-150 lbs.) Dogs/Puppies & 12 weeks of age or older

[Flea & Tick [& Mosquito][Treatment] [and] Control only for Dogs and Puppies 12 weeks of age or older]

DO NOT USE ON DOGS OR PUPPIES WEIGHING LESS THAN 5 LBS.

[Each brand name product will be packaged in the weight classes designated below]
Weighing 5 to 14 lbs./15 to 30 lbs./31 to 60 lbs./61-150 lbs.

ACTIVE INGREDIENTS:

Etofenprox	50.00%
Piperonyl Butoxide*	9.10%
N-octyl bicycloheptene dicarboximide (MGK 264)	0.91%
Pyriproxyfen (Nylar)	0.45%
(S)-Methoprene	0.23%

OTHER INGREDIENTS:	39.31%
TOTAL	100.00%

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

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

See back panel for additional precautionary statements.

NET CONTENTS: (number) tubes, each fl. oz. (ml) (cc)

EPA Reg. No. 2724-XXX

EPA Est. No. 2724-TX-1

Batch/Lot No. _____

For Dogs and Puppies Weighing:	Net Contents (Each tube)
5 to 14 lbs.	0.034 fl. oz. (1.0 ml.)
15 to 30 lbs.	0.074 fl. oz. (2.2 ml.)
31 to 60 lbs.	0.149 fl. oz. (4.4 ml.)
61 to 150 lbs.	0.247 fl. oz. (7.3 ml.)



**DO NOT USE
ON CATS!**

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24

READ ENTIRE LABEL BEFORE EACH USE
IMPORTANT - USE ONLY ON DOGS OR ON PUPPIES 12 WEEKS OF AGE OR OLDER
DO NOT USE ON DOGS OR PUPPIES WEIGHING LESS THAN 5 LBS (on toy/small package only).

[Back Panel]

Side Effects: Monitor your dog after application. Side effects may include signs of skin irritation such as redness, scratching, or other signs of discomfort. Gastrointestinal signs such as vomiting or diarrhea have also been reported. If these or other side effects occur, consult your veterinarian or [Brand name] at [phone number].



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

PRECAUTIONARY STATEMENTS

CAUTION

HAZARDS TO HUMANS

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet.

HAZARDS TO DOMESTIC ANIMALS

DO NOT USE ON OTHER ANIMALS. Do not use on dogs or puppies less than 12 weeks old or weighing less than 5 lbs. Do not use this product on debilitated, aged, medicated, pregnant or nursing animals or on animals known to be sensitive to pesticide products without first consulting a veterinarian. Sensitivity, such as slight transitory redness of the skin at the site of application, may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap, rinse with large amounts of water, and consult a veterinarian immediately.

FIRST AID

If in eyes

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a poison control center or doctor for treatment advice.



HOT LINE NUMBER: Have the product container or label with you when calling a poison control center, doctor or veterinarian, or going for treatment. For additional information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-XXX-XXX.

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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[To apply the RF2187 CDSO Plus II treatment with the [Brand Name] [Smart Shield™] applicator, use one disposable liquid cartridge [tube][vial][for each application] with the [brand][Smart Shield™] applicator device.]

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

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

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

USE RESTRICTIONS:

Do not use more than one tube [vial][cartridge] per dog/puppy and do not treat more than once per month. Do not allow your dog/puppy to ingest this product. (Do not bathe your dog 48 hours prior to application.)

RF2187 CDSO Plus II works by application directly to the dog's/puppy's skin, not to the hair. When applying, manually push aside dog's/puppy's hair to allow direct application to the skin.

[(Note: Application now assumes one [cartridge][vial][tube] per animal per application)]
[Note: Each package contains sufficient tubes [cartridges][vials] for [X] applications]

(The application steps below may optionally be formatted as a paragraph, or by number or bullets to clarify the order, depending on the final physical layout of the label)

To apply the [RF2187 CDSO Plus II] treatment, use one disposable liquid cartridge [tube][vial] for each application.

FOR [TOY/SMALL][MEDIUM] SIZE DOGS/PUPPIES

1. [Bend at perforation and tear off first [tube][cartridge][vial].]
2. [Hold [tube][cartridge][vial] [and bend area of plastic at perforation, tear off and discard.]] Hold [tube][cartridge][vial] upright and snap tip back, away from face and body.
3. The dog/puppy should be standing for easy application. Apply RF2187 CDSO Plus II evenly to two to three spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube [cartridge][vial] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2187 CDSO Plus II by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin..
5. Discard empty [tube] [cartridge][vial] as described in Storage and Disposal

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FOR [LARGE][EXTRA LARGE] DOGS/PUPPIES

1. [Bend at perforation and tear off first [tube][cartridge][vial].]
2. [Hold [tube] [cartridge][vial] [and bend area of plastic at perforation, tear off and discard.]] Hold [tube] [cartridge][vial] upright and snap tip back, away from face and body
3. The dog/puppy should be standing for easy application. Apply RF2187 CDSO Plus II evenly to four or five spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube [cartridge][vial] on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of the solution at any one spot that could cause some of the solution to run off the side of the dog/puppy.
4. Do not spread RF2187 CDSO Plus II by hand over the dog/puppy. Although the dog's/puppy's skin and hair oils will naturally distribute the application over the entire dog/puppy, brushing the dog/puppy 12-24 hours after application will help to distribute the material over the skin..
5. Discard empty [tube] [cartridge][vial] as described in Storage and Disposal

RF2187 CDSO Plus II is most effective when used as part of a total flea and tick management program. Use other [Brand Name] products registered for residential area control of these pests in conjunction with this treatment. Monthly treatments are required for optimal control and prevention of fleas.

[The successive feeding activity of fleas on dogs/puppies may elicit a hypersensitivity skin disorder known as flea allergy dermatitis (FAD). Treatment of dogs/puppies with RF2187 CDSO Plus II rapidly kills fleas and may reduce the incidence of this condition.] [RF2187 CDSO Plus II is water resistant and remains efficacious following exposure to rainfall or swimming.]

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

Reminder: I purchased RF2187 CDSO Plus II from: _____

NOTES: _____

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

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

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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-xx-xxxx or contact your veterinarian if your pet is experiencing an adverse event.

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

OPTIONAL/ALTERNATE LABEL TEXT

- Weighing 5 to 14/15 to 30/31 to 60/61-150 lbs.
- (S) Only (for) (Small) Puppies 5-14 lbs.
- (M) Only (for) (Medium) Dogs 15-30 lbs.
- (L) Only (for) (Large) Dogs 31-60 lbs.
- (XL) Only (for) (Extra Large) Dogs 61-150 lbs.

MARKETING CLAIMS AND OTHER OPTIONAL STATEMENTS

- Made in the USA
- (Rapidly) (Quickly) eliminates fleas
- Kills [(and) (&)] Repels] Mosquitoes, Prevent re-infestation(s) for (28 days)(30 days)(1 month) (4 weeks)
- Kills [(and) (&)] Repels] Mosquitoes (before they bite) (for) (28 days) (30 days) (1 month) (4 weeks)
- Kills Fleas (that may transmit tapeworm) (for) (28 days) (30 days) (1 month) (4 weeks)(on dogs)
- Kills fleas that may cause flea allergy dermatitis (and flea bite anemia) (for) (28 days) (30 days) (1 month) (4 weeks) (on dogs)
- Kills Ticks (for) (28 days) (30 days) (1 month) (4 weeks)
- Kills Flea Eggs (and Flea Larvae) (for) (28 days) (30 days) (1 month) (4 weeks)
- Prevents Flea Eggs from hatching
- Kills Brown Dog Ticks (for) (28 days) (30 days) (1 month) (4 weeks)
- Kills Deer Ticks (that may carry Lyme disease) (for) (28 days) (30 days) (1 month) (4 weeks)(on dogs)
- Kills all biting stages of ticks
- Kills [tick nymphs][and][kills][tick larvae]
- Kills adult (brown dog) (deer) ticks, nymphs and larvae
- Kills [adult] Fleas, Ticks, Flea eggs, (Flea larvae) (through contact)(after contact) (for) (28 days) (30 days) (1 month)(4 weeks)[on your dog]
- Kills Fleas, Brown Dog Ticks, Deer Ticks, Flea Eggs, (Flea larvae) (through contact)(after contact) (for) (28 days) (30 days) (1 month) (4 weeks)
- Kills [X] kinds [types] of [pests][bugs]
- Controls Flea and Tick infestations (on dogs) (for) (28 days) (30 days) (1 month) (4 weeks)
- Helps prevent re-infestation of fleas and ticks (for) (28 days) (30 days) (1 month) (4 weeks)
- Helps prevent flea and tick re-infestation (for) (28 days) (30 days) (1 month) (4 weeks)
- Helps [Keep][Prevent] Fleas & Ticks from [coming back][returning]
- Kills flea eggs and flea larvae to help prevent future [re]-infestations
- Kills all stages of the flea life cycle
- Breaks the flea [and tick] life cycle(s)
- Repels Mosquitoes (before they bite) (for) (28 days) (1 month) (4 weeks)
- Repels Mosquitoes that may transmit West Nile virus (for) (28 days)(1 month) (4 weeks)(on dogs)
- Repels Mosquitoes that may transmit heartworm (for) (28 days)(1 month) (4 weeks)(on dogs)
- Once a month (Monthly) Flea and Tick (Prevention) (Treatment) (Control) (Solution) (28 day) (30 day) (1 month) (4 weeks) Flea and Tick (Prevention) (Treatment) (Control) (Solution)
- Prevents flea eggs from developing into biting [breeding] adults (for) (up to) (30 days) (1 month) (4 weeks)
- Gentle protection for dogs (and puppies)

- [Quick drying] formula
- Dries quickly
- Stays on and doesn't rub off
- Spreads with dog's natural skin oils
- [Brand] works with the biology of your dog [by spreading through the oils of your dog's skin]
- ~~[2] kills fleas in (as little as) 15 minutes~~
- ~~[3] kills fleas in 15 minutes and lasts for 30 days (1 month) (4 weeks)~~
- ~~[4] kills fleas within 15 minutes~~
- ~~[5] starts killing fleas (and ticks) in (as little as) 15 minutes~~
- ~~[6] starts killing fleas within 15 minutes (and lasts for 30 days (1 month) (4 weeks))~~
- ~~[7] stops fleas from biting in (as little as) 15 minutes (and lasts for 30 days (1 month) (4 weeks))~~
- ~~[8] stops fleas from biting within 15 minutes (and lasts for 30 days (1 month) (4 weeks))~~
- Kills fleas for 30 days (1 month) (4 weeks)
- Prevents (and controls) re-infestation(s)
- ~~[9] birth control for fleas~~
- Proactive [pet] protection
- ~~[10] rapidly eliminates fleas~~
- ~~[11] fast acting [formula]~~
- Long lasting [formula]
- Effective and convenient topical treatment
- Easy spot on topical [Brand] [Smart Shield™] applicator
- ~~[12] kills 95% of fleas in 8 hours (of initial application)~~
- ~~[13] kills 99% of fleas in 12 hours (of initial application)~~
- Kills fleas before they have a chance to lay eggs
- ~~[14] New (Formula) (claim to be removed after 6 months)~~
- Triple Active formula contains one adulticide and two insect growth regulators

NON-PESTICIDE RELATED CLAIMS AND OTHER OPTIONAL TEXT

- 1st/2nd/3rd/(Xth dose)
- First/second/third (Xth month)
- X-pack/X-tubes
- Value pack
- X month supply/X monthly treatment(s)
- ~~[15] fragrance-free [Unscented]~~
- Includes (Brand) (Convenient) (easy to use) [Brand] [Smart Shield™] applicator
- Easy (simple) to use (handle) (apply)
- [brand] More life in their years

[Brand] [Smart Shield™] Applicator Claims

- [Brand] [Smart Shield™] Applicator easily [quickly] gets through dog's fur, for [16]gentle on-skin application
- [Brand] [Smart Shield™] Applicator easily [quickly] penetrates dog's fur, for [17]gentle on-skin application
- [Brand] [Smart Shield™] Applicator [18]gently glides [smoothly] through the dog's fur
- [Brand] [Smart Shield™] Applicator easily gets through [penetrates] dog's fur to minimize (oily) residue
- [Brand] [Smart Shield™] Applicator features rounded edges for [19]gentle on-skin application
- [Brand] [Smart Shield™] Applicator features an angled tip to help guide the application
- Direct to your dog's skin
- You may bathe your dog 48 hours after application
- To help remind you when you last applied treatment, simply write in the date when each dose is applied:

[New] contemporary design

[brand name] [Smart Shield™] [Applicator] helps to prevent getting liquid on [your] hands
 [brand name] [Smart Shield™] [Applicator] tip parts hair to help [liquid][application] get down to [the]your][dog's/puppy's] skin
 Ergonomically contoured [ergonomic][shape][design] for easy handling [ease of use] [easy use]
 For use with [only][brand name][disposable][liquid dispensing] tubes [pods] [vials] [cartridges]
 [brand name] [Smart Shield™] [applicator][has][provides][allows for][delivers] better grip
 [brand name][provides] re-closable [re-sealable] packaging for [easy] storage
 Closing [the][brand name] [Smart Shield™] [applicator] door automatically opens the [disposable][liquid dispensing] tube [pod][vial][cartridge]
 [brand name] [Smart Shield™] [Applicator] [will not drip after opening]
 [brand name] [Smart Shield™] [Applicator] Won't drip when set down as you go fetch the [your] dog/puppy
 Includes unique [brand] [Smart Shield™] applicator
 Puts the liquid on your dog/puppy – not your hands
 Directs the liquid onto your dog [/puppy] – not your hands
 [Brand] [Smart Shield™] [Applicator] provides a [more confident][secure] application
 Directs the liquid onto your dog [/puppy] – away from your hands
 Applies liquid to your dog's [/puppy's] skin – not yours
 Helps prevent applying the wrong spot-on [dose] [product] on [to] the wrong pet
 [Introducing] [Breakthrough] Convenient, easy to use ACCU-TIP [Brand] [Smart Shield™]
 [Applicator] [DISPENSER]
 [Easy to use] Longer [Brand] [Smart Shield™] applicator tip for easy application to long-haired dogs/puppies
 [Brand] [Smart Shield™] Applicator patent pending

Thermoform claims**[New]**

New [disposable][liquid dispensing] tube [cartridge][vial][pod]
 (Note tube/vial/cartridge/pod used interchangeably)
 [New]-[brand name][disposable][liquid dispensing] [tube][vial][pod] tip [helps][to] spread out liquid [on your][dog/puppy]
 Unique [cartridge] [tube][vial][pod] with flow control
 [no drip][no mess][application][tube][cartridge][vial][pod]

Promotional Package Copy

One month [dose] free
 One free month supply [dose] included
 Bonus pack
 Free [brand] [Smart Shield™] [applicator][tube][vial][cartridge][pod][ir-side]
 Designed not to drip when set on top of the counter, or table, or other flat surface.
 For use with [brand] [Smart Shield™] applicator
 [Brand][Smart Shield™] Applicator [device] not included
 [brand] Refill Pack [brand] [Smart Shield™] [applicator] [device] not included
 Free [brand] applicator
 Free [brand][Smart Shield] applicator
 [\$x] coupons Save [\$x]
 [\$X] off
 [X%] Off
 [\$X] savings
 [X] [applicator][tube][vial][cartridge][pod][inside]
 Scan [QRcode][here] to learn more
 Scan [QRcode][here] [for] [to sign up for] [our newsletter] [special offers] [promotions] [coupons] [more information][FAQ's] [helpful tips] [product tips] [monthly reminder][program]
 Visit [website URL] [for] [to sign up for] [our newsletter] [special offers] [promotions] [coupons] [more information][FAQ's] [helpful tips] [product tips] [monthly reminder][program]
 Win [a free] [prize] [by entering] [at website URL] [visit website URL] [see official rules] [no purchase necessary]

For official rules visit [website URL]
Game piece inside
Enter to win
Buy one [product x] get one [product x] free
Buy one [product x] get one [product x] [X%][off]
Buy one [product x] get one [product x] [\$x] [off]
X [%] [more] [months] [supply] [doses] [tubes] [of protection] [free]

Refill Claims

For use [only] with [brand name] [Smart Shield™] [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][Smart Shield™] applicator
[Brand Name (e.g., Adams or Bio Spot, Smart Shield)] [Applicator] [(Refills)][Refill Pack]
[Refill Pack] [for][Brand Name] [Smart Shield™] Applicator
[tube][cartridge][vial][pod] refill pack [refills]
Refills [Refill Pack] available
[New] [refill][tube][cartridge][vial][pod] design

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

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