

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

January 2, 2018

Kim Huls Manager, Regulatory Affairs Bayer Healthcare LLC Animal Health Division P.O. Box 390 Shawnee Mission, KS 66201-0390

Subject: PRIA Label Amendment – Revise First Aid box and other minor revisions

Product Name: Advantage II Extra Large Dog

EPA Registration Number: 11556-130

Application Date: 22-Dec-2017 Decision Number: 536975

Dear Ms. Huls:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act 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 FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list 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 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 the EPA's Office of Enforcement and Compliance.

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

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with FIFRA section 6. If you have any questions, please contact Dee Colby by phone at 703-347-8657, or via email at colby.deanna@epa.gov.

Sincerely,

Venus Eagle, Product Manager 01 Invertebrate and Vertebrate Branch 3 Registration Division (7505P)

Office of Pesticide Programs

Enclosure: Stamped Label

NOTE TO REVIEWER: [Brackets indicate alternate language or notes to the EPA reviewer] Braces "{}" indicate location of text on container label

# ACCEPTED

Jan 02, 2018

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 11556-130

### **(Front Panel)**

For Use
ONLY on Dogs
7 Weeks and
Older and Over
55 lbs.

Large, clear visual image of a dog within the weight range for product.

# Advantage® II Extra Large Dog

Note: [The "Extra Large Dog" text size will be 40% to 75% of the height of the largest letter in the primary brand name.]

[Selected optional claims bulleted here from OPTIONAL MARKETING CLAIMS]

Image of tube

[1, 2, 3, 4, or 6] monthly doses

Once-A-Month Topical Treatment for Fleas and Lice For Use Only on Dogs and Puppies 7 Weeks and Older and Weighing Over 55 lbs.

ACTIVE INGREDIENTS	% By Weight
Imidacloprid	9.10%
Pyriproxyfen	0.46%
OTHER INGREDIENTS.	90.44%
TOTAL	100.00%

# KEEP OUT OF REACH OF CHILDREN CAUTION

See back panel for First Aid, Precautionary Statements, and Directions for Use. For all information, including Storage and Disposal see insert inside carton.

#### DO NOT USE ON CATS

[Icon Size 1.5 cm X 1.5 cm, Background yellow with black text positioned in the lower right hand of carton.]



#### {Back panel}

### Advantage® II Extra Large Dog

Note: [The "Extra Large Dog" text size will be 40% to 75% of the height of the largest letter in the primary brand name.]

Once-A-Month Topical Treatment for Fleas and Lice For Use Only on Dogs and Puppies 7 Weeks and Older and Weighing Over 55 lbs.

#### READ THE ENTIRE LABEL BEFORE EACH USE

For the Prevention and Treatment of Flea and Lice Infestations on Dogs

[Selected optional claims bulleted here from OPTIONAL MARKETING CLAIMS]

#### FIRST AID

**IF SWALLOWED:** • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.

**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 or doctor, or going for treatment. For medical emergencies call 1-800-422-9874. For consumer questions call 1-800-255-6826.

#### **NOTE TO PHYSICIAN**

Treat the patient symptomatically.

#### PRECAUTIONARY STATEMENTS

#### **HAZARDS TO HUMANS**

**CAUTION:** Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes and clothing. Wash hands after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

#### HAZARDS TO DOMESTIC ANIMALS

**For external use only.** Do not use on puppies under 7 weeks of age and Weighing less than 55 lbs. As with any product, consult your veterinarian before using this product on debilitated, aged, pregnant or nursing dogs. Individual sensitivities may occur after using ANY pesticide product for dogs. If signs persist, or become more severe, consult a veterinarian immediately. If your dog is on medication, consult your veterinarian before using this or any other product.

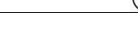
[Side Effects box to go immediately above cat warning box on back panel.]

**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 (such as lethargy) occur, consult your veterinarian or call 1-800-422-9874.

[Do Not Use On Cats box will be located immediately below Side Effects box on back panel. Icon will be yellow with black images & text unless alternate color scheme is justified.]

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

Icon size 1.5cm x 1.5 cm



#### **DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

#### **RESTRICTIONS:**

- Use only on dogs 7 weeks and older and weighing over 55 lbs. Do not apply to dogs or puppies weighing less than 55 lbs. Do not use on other animals.
- Do not apply more than one (1) tube per treatment, even for larger dogs.
- Do not have contact or allow children to have contact with treated area until completely dry.
- Do not allow children to apply the product.

• Dogs should be dry prior to application and remain dry for 24 hours after application [for product to work effectively].

See inside flap for HOW TO OPEN and HOW TO APPLY, or insert for full Directions for Use.

For consumer questions call 1-800-255-6826. For medical emergencies call 1-800-422-9874.

Net Contents: [1, 2, 3, 4, or 6] Tube(s) each 0.135 fl. oz. (4.0 mL)

EPA Est. 11556-XXX-X

EPA Reg. No. 11556-130

Manufactured for

Bayer HealthCare LLC Animal Health Division P.O. Box 390 Shawnee Mission, Kansas 66201 USA

Made in Germany

[Sample – Not for Sale]

[Note to reviewer: cartons containing 1 or 2, individually pouched tubes, are completely labeled (all components) as the 3, 4 and 6 packs. The "Sample – Not for Sale" is used as optional text for the 1 or 2 packs only].

{Any Panel}

Lot No.

### {Additionally, Inside Flap of Unit Carton for 1, 2, 3, 4, or 6 tubes}

#### **DIRECTIONS FOR USE (continued from back panel)**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

#### **HOW TO OPEN**



#### [OPTION 1: INSTRUCTIONS FOR BLISTER PACK]

- 1. Being careful not to cut close to the blister cavities, take scissors and cut off one section of the card containing a single tube.
- 2. Take the separated section, and cut into the blister cavity across the small side, close to the cap of the tube.
- 3. Peel off the foil, and take out the tube.
- 4. Repeat steps 1 to 3 for each tube.

#### [OPTION 2: INSTRUCTIONS FOR SHORT NECK TUBE POUCH]

- 1. Be sure tube is at bottom of pouch.
- 2. Using scissors, cut the pouch across the top and remove tube.

#### [OPTION 3: INSTRUCTIONS FOR LONG NECK TUBE POUCH]

- 1. Be sure the tube is at the bottom of the pouch.
- 2. Use scissors to cut the pouch across the top, being careful not to cut the tube.
- 3. Remove the tube from the package.

#### HOW TO APPLY

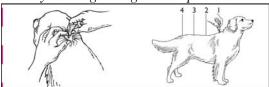
# [OPTION 1: INSTRUCTIONS FOR BLISTER PACK AND SHORT NECK TUBE POUCH]

- 1. Use only on dogs 7 weeks and older and weighing over 55 lbs. Do not apply to dogs or puppies weighing less than 55 lbs. Do not use on other animals.
- 2. Dogs should be dry prior to application and remain dry for 24 hours after application [for product to work effectively].
- 3. Remove one [blister] [pouch] from the carton. See "HOW TO OPEN" section.
- 4. Hold tube in an upright position facing away from you and your dog's face and eyes. Pull cap off tube.
- 5. Turn the cap around and place other end of cap back on tube.

Supersedes: 06/27/2017



- 6. Twist cap to break seal, then remove cap from tube.
- 7. The dog should be standing for easy application. Apply the entire contents of the tube evenly to three or four spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of solution at any one spot that could cause some of the solution to run off the side of the dog. Do not get this product in your dog's eyes or allow your dog to ingest this product.



- 8. Discard empty tube as described in the Storage and Disposal section.
- 9. Under normal conditions the product is effective for a month. However, in case of severe flea infestation, retreatment may be necessary earlier than four weeks. Do not retreat more often than once every seven (7) days, not to exceed 4 weekly treatments. After flea control is attained, return to a monthly treatment schedule.

#### [OPTION 2: INSTRUCTIONS FOR LONG NECK TUBE POUCH]

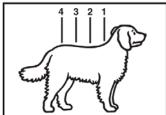
- Use only on dogs 7 weeks and older and weighing over 55 lbs. Do not apply to dogs or puppies weighing less than 55 lbs. Do not use on other animals.
- 2. Dogs should be dry prior to application and remain dry for 24 hours after application [for product to work effectively].
- Remove one pouch from the carton. See "HOW TO OPEN" section. 3.
- 4. Hold tube in an upright position facing away from you and your dog's face and eyes. Twist the tip of the applicator to break seal.





5. The dog should be standing for easy application. In order to ensure proper application, part the hair on the dog's back between the shoulder blades. Place the tip of the tube against the dog's skin.





- 6. Gently squeeze the tube to expel a portion of the solution on the skin.
- 7. Repeat steps 5 and 6 at four (4) different points down the center of the dog's back from the shoulder blades to the tail until the tube is empty.
- 8. Do not apply an excessive amount of solution at any one spot that could cause some of the solution to run off the side of the dog. *Do not get this product in your dog's eyes or allow your dog to ingest this product.*
- 9. Discard the empty tube as described in the Storage and Disposal section.
- 10. Under normal conditions, this product is effective for a month. However, if the dog has a severe infestation, retreatment within a month may be necessary. Do not retreat more than once every seven (7) days, not to exceed 4 weekly treatments. Once the infestation is under control, return to a monthly treatment schedule.

For more information visit www.petbasics.com.

Reason To Issue:	Alternate instructions for long neck tube	Date:	12/22/2017
		Supersed	es: 06/27/2017

#### {Insert}

### Advantage® II Extra Large Dog

Note: [The "Extra Large Dog" text size will be 40% to 75% of the height of the largest letter in the primary brand name.]

Once-A-Month Topical Treatment for Fleas and Lice For Use Only on Dogs and Puppies 7 Weeks and Older and Weighing Over 55 lbs.

#### READ THE ENTIRE LABEL BEFORE EACH USE

For the Prevention and Treatment of Flea and Lice Infestations on Dogs

[Selected optional claims bulleted here from OPTIONAL MARKETING CLAIMS]

ACTIVE INGREDIENTS	% By Weight
Imidacloprid	9.10%
Pyriproxyfen	0.46%
OTHER INGREDIENTS.	90.44%
TOTAL	100.00%

#### KEEP OUT OF REACH OF CHILDREN

#### **CAUTION**

#### FIRST AID

**IF SWALLOWED:** • Call a poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything by mouth to an unconscious person.

**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 or doctor, or going for treatment. For medical emergencies call 1-800-422-9874. For consumer questions call 1-800-255-6826.

#### NOTE TO PHYSICIAN

Treat the patient symptomatically.

#### PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS

**CAUTION:** Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes and clothing. Wash hands after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

#### HAZARDS TO DOMESTIC ANIMALS

**For external use only.** Do not use on puppies under 7 weeks of age and weighing less than 55 lbs. As with any product, consult your veterinarian before using this product on debilitated, aged, pregnant or nursing dogs. Individual sensitivities may occur after using ANY pesticide product for dogs. If signs persist, or become more severe, consult a veterinarian immediately. If your dog is on medication, consult your veterinarian before using this or any other product.

**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 (such as lethargy) occur, consult your veterinarian or call 1-800-422-9874.

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

Icon size 1.5cm x 1.5 cm



For consumer questions call 1-800-255-6826. For medical emergencies call 1-800-422-9874.

#### **DIRECTIONS FOR USE**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

#### **RESTRICTIONS:**

- Do not apply more than one (1) tube per treatment, even for larger dogs.
- Do not have contact or allow children to have contact with treated area until completely dry.
- Do not allow children to apply the product.

#### **HOW TO OPEN**



#### [OPTION 1: INSTRUCTIONS FOR BLISTER PACK]

- 1. Being careful not to cut close to the blister cavities, take scissors and cut off one section of the card containing a single tube.
- 2. Take the separated section, and cut into the blister cavity across the small side, close to the cap of the tube.
- 3. Peel off the foil, and take out the tube.
- 4. Repeat steps 1 to 3 for each tube.

#### [OPTION 2: INSTRUCTIONS FOR SHORT NECK TUBE POUCH]

- 1. Be sure tube is at bottom of pouch.
- 2. Using scissors, cut the pouch across the top and remove tube.

#### [OPTION 3: INSTRUCTIONS FOR LONG NECK TUBE POUCH]

- 1. Be sure the tube is at the bottom of the pouch.
- 2. Use scissors to cut the pouch across the top, being careful not to cut the tube.
- 3. Remove the tube from the package.

#### HOW TO APPLY

# [OPTION 1: INSTRUCTIONS FOR BLISTER PACK AND SHORT NECK TUBE POUCH]

- 1. Use only on dogs 7 weeks and older and weighing over 55 lbs. Do not apply to dogs or puppies weighing less than 55 lbs. Do not use on other animals.
- 2. Dogs should be dry prior to application and remain dry for 24 hours after application [for product to work effectively].
- 3. Remove one [blister] [pouch] from the carton. See "HOW TO OPEN" section.
- 4. Hold tube in an upright position facing away from you and your dog's face and eyes. Pull cap off tube.
- 5. Turn the cap around and place other end of cap back on tube.



6. Twist cap to break seal, then remove cap from tube.

7. The dog should be standing for easy application. Apply the entire contents of the tube evenly to three or four spots on the top of the back from the shoulder to the base of the tail. At each spot, part the hair until the skin is visible. Place the tip of the tube on the skin and gently squeeze to expel a portion of the solution on the skin. Do not apply an excessive amount of solution at any one spot that could cause some of the solution to run off the side of the dog. *Do not get this product in your dog's eyes or allow your dog to ingest this product.* 



- 6. Discard empty tube as described in the Storage and Disposal section.
- 7. Under normal conditions the product is effective for a month. However, in case of severe flea infestation, retreatment may be necessary earlier than four weeks. Do not retreat more often than once every seven (7) days, not to exceed 4 weekly treatments. After flea control is attained, return to a monthly treatment schedule.

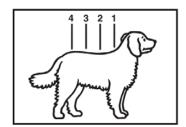
#### [OPTION 2: INSTRUCTIONS FOR LONG NECK TUBE POUCH]

- 1. Use only on dogs 7 weeks and older and weighing over 55 lbs. Do not apply to dogs or puppies weighing less than 55 lbs. Do not use on other animals.
- 2. Dogs should be dry prior to application and remain dry for 24 hours after application [for product to work effectively].
- 3. Remove one pouch from the carton. See "HOW TO OPEN" section.
- 4. Hold tube in an upright position facing away from you and your dog's face and eyes. Twist the tip of the applicator to break seal.





5. The dog should be standing for easy application. In order to ensure proper application, part the hair on the dog's back between the shoulder blades. Place the tip of the tube against the dog's skin.



- 6. Gently squeeze the tube to expel a portion of the solution on the skin.
- 7. Repeat steps 5 and 6 at different points down the center of the dog's back from the shoulder blades to the tail until the tube is empty.
- 8. Do not apply an excessive amount of solution at any one spot that could cause some of the solution to run off the side of the dog. *Do not get this product in your dog's eyes or allow your dog to ingest this product.*
- 9. Discard the empty tube as described in the Storage and Disposal section.
- 10. Under normal conditions, this product is effective for a month. However, if the dog has a severe infestation, retreatment within a month may be necessary. Do not retreat more than once every seven (7) days, not to exceed 4 weekly treatments. Once the infestation is under control, return to a monthly treatment schedule.

#### PRODUCT INFORMATION

[The successive feeding activity of fleas on dogs frequently elicits a hypersensitivity skin disorder known as flea allergy dermatitis (FAD) or flea bite hypersensitivity. Treatment of dogs with Advantage® II Extra Large Dog kills fleas rapidly, within 12 hours, which may reduce the incidence of this condition.]

[Advantage® II Extra Large Dog kills existing fleas on dogs within 12 hours. Reinfesting fleas are killed within 2 hours with protection against further flea infestation lasting for four (4) weeks. Pre-existing pupae in the environment may continue to emerge for six (6) weeks or longer depending upon the climatic conditions.]

[Advantage® II Extra Large Dog provides multi-stage flea control effectively breaking flea life-cycle stages .]

Advantage® II Extra Large Dog kills adult fleas quickly, within 12 hours, inhibits the development of immature flea life stages and prevents them from reaching the biting adult stage.

Advantage® II Extra Large Dog kills [biting/chewing] lice that infest dogs and puppies, and prevents further infestations.

Advantage® II Extra Large Dog is waterproof 24 hours after application and remains effective following a shampoo treatment, swimming or after exposure to rain or sunlight.

To successfully prevent and control fleas, all dogs must be treated with their own dose of Advantage® II Extra Large Dog.

Apply according to label instructions, ensuring that the product is applied to the skin, not on top of the fur.

If your dog wears a decorative collar, remove the collar before application, so it doesn't absorb the product.

Remember, your dog needs to be dry at the time Advantage® II Extra Large Dog is applied and remains dry 24 hours after application.

Even indoor dogs need protection against fleas because you or other pets in the household may bring fleas into the home. Fleas in your dog's environment can re-infest your dog. If you have a flea infestation, consider treating your home and yard with appropriate premise products to protect against fleas.

For optimal control and prevention of fleas on dogs, apply monthly.

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**Pesticide Storage**: Store in a cool, dry place inaccessible to children and pets. **Pesticide Disposal and Container Handling**: Nonrefillable container. **If empty:** Do not reuse or refill this container. Place in trash or offer for recycling if available. **If partly filled**: Call your local solid waste agency or 1-800-422-9874 for disposal instructions. Never place unused product down any indoor or outdoor drain.

#### LIMITED WARRANTY AND LIMITATION OF DAMAGES

Bayer HealthCare LLC, Animal Health Division warrants that this material conforms to the chemical description on the label. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, BAYER MAKES NO OTHER EXPRESS OR IMPLIED WARRANTY, INCLUDING ANY OTHER EXPRESS OR IMPLIED WARRANTY OF FITNESS OR MERCHANTABILITY, and no agent of Bayer is authorized to do so except in writing with a specific reference to this warranty. To the extent consistent with applicable law, any damages arising from a breach of this warranty shall be limited to direct damages and shall not include consequential commercial damages such as loss of profits or values, etc.

For more information visit www.petbasics.com

Manufactured for

Bayer HealthCare LLC Animal Health Division P.O. Box 390 Shawnee Mission, Kansas 66201 USA

Made in Germany

EPA Est. 11556-XXX-X EPA Reg. No. 11556-130

# {[OPTION 1: Label on blister pack; one blister pack containing 1, 2, 3, 4, or 6 tubes] } {[OPTION 2: Label on pouch containing one tube]}

## Advantage® II Extra Large Dog

For external use only on dogs and puppies 7 weeks and older and weighing over 55 lbs.

See insert for complete product information.

9.10% Imidacloprid

0.46% Pyriproxyfen

[1, 2, 3, 4, or 6] Tube(s) - 0.135 fl. oz. (4.0 mL)

EPA Reg. No. 11556-130

THIS UNIT NOT FOR RETAIL SALE

**BAYER** 



### {Label on Individual Tube - label is colored coded to age and weight grouping }

### Advantage® II Extra Large Dog

9.10% Imidacloprid

0.46% Pyriproxyfen

0.135 fl. oz. (4.0 mL)

EPA Reg. No. 11556-130

Keep Out of Reach of Children

#### **CAUTION**

Read The Entire Label Before Use

**BAYER** 

Lot No. 0000000

Supersedes. 00/2//20

#### NOTE TO REVIEWER: [Brackets indicate alternate language]

#### **OPTIONAL MARKETING CLAIMS**

- 1. For use on dogs and puppies 7 weeks of age and older and Weighing Over 55 lbs
- 2. Advantage II contains imidacloprid and an insect growth regulator
- 3. Advantage II contains imidacloprid and pyriproxyfen
- 4. Advantage II contains imidacloprid and the insect growth regulator [IGR] pyriproxyfen
- 5. A single topical application remains effective for [4 weeks] [a month]
- 6. Convenient, easy-to-apply topical solution
- 7. Convenient, easy-to-apply and fragrance free [monthly] [topical solution]
- 8. Once a month topical flea treatment for dogs 7 weeks of age or older and Weighing Over 55 lbs
- 9. Advantage II is for the prevention and treatment of fleas on dogs 7 weeks of age and older and Weighing Over 55 lbs
- 10. For the treatment and prevention of flea [and lice] infestations on dogs
- 11. One treatment prevents further flea infestations for [4 weeks] [a month]
- 12. Kills fleas on dogs within [12] hours and continues to prevent infestations for [four weeks] [a month]
- 13. Kills fleas on dogs within [12] hours of application
- 14. Stops existing flea infestations by killing adult fleas
- 15. Prevents [Stops] reinfestations by killing adult fleas so they can't lay eggs
- 16. [Prevents] [Stops] flea eggs from hatching [into biting adults]
- 17. Effectively breaks the flea life cycle
- 18. Effectively targets life stages of fleas after application
- 19. [Kills] [Controls] flea life stages
- 20. Comprehensive flea prevention and treatment kills adult fleas, flea larvae, and flea eggs
- 21. 3-way protection against fleas [kills] [controls] adults, larvae, and eggs
- 22. [Prevents] [Stops] flea eggs [and flea larvae] from developing into [biting] [adult] fleas
- 23. Treatment with Advantage II kills fleas which may cause flea allergic dermatitis [FAD] or flea bite hypersensitivity
- 24. Flea adulticide, larvicide, and ovicide
- 25. Kills flea eggs
- 26. Works through contact. Fleas do not have to bite your dog to die.
- 27. Controls flea problems on dogs
- 28. Protection against fleas
- 29. Starts working through contact
- 30. Use flea prevention year-round
- 31. Contains an insect growth regulator [IGR] to kill flea eggs and prevent reinfestation
- 32. Monthly use of Advantage II kills fleas which may cause [flea allergy dermatitis][flea bite hypersensitivity]
- 33. Multi-stage flea control

- 34. Kills fleas which may serve as intermediate hosts for tapeworms
- 35. Kills [biting/chewing] lice
- 36. For treatment and prevention of [biting/chewing] lice [infestations]
- 37. Stops existing [biting/chewing] lice infestations
- 38. Dual protection against fleas and lice
- 39. Treats, prevents and controls [biting/chewing] lice [infestations] on dogs
- 40. Provides effective control of [biting/chewing] lice [infestations] on dogs
- 41. Kills [biting/chewing] lice and prevents further infestations on dogs
- 42. For treatment and prevention of infestations with [biting/chewing] lice on dogs
- 43. Remains effective after bathing and/or swimming
- 44. Remains effective following swimming and/or shampooing
- 45. Waterproof after 24 hours
- 46. Remains effective after exposure to rain or sunlight
- 47. Fragrance-free
- 48. In child-resistant packaging
- 49. Dogs or puppies should be dry prior to application and remain dry for 24 hours after application [for product to work effectively]
- 50. Kills fleas, flea eggs, flea larvae and prevents infestations on dogs
- 51. Prevents re-infestations on dogs
- 52. Kills fleas and their eggs
- 53. Protects dogs against fleas
- 54. Protects dogs against flea infestations
- 55. Prevents [establishment of] new flea infestations on dogs after application
- 56. Kills fleas that may cause transmission of tapeworms in dogs
- 57. Kills fleas which may cause Flea Allergy Dermatitis and flea bite anemia
- 58. Kills fleas that may cause a tapeworm infestation in dogs
- 59. Protection from fleas for your Dog when applied monthly
- 60. Kills fleas even if your dog gets wet

#### **Long Neck Applicator:**

[Note to reviewer: "New" will only be used 6 months from the date EPA is notified of first use]

- 61. (New) long-neck applicator
- 62. Long-neck makes it easy to get through fur to skin
- 63. New applicator makes it easy to get through long or thick fur and direct to skin