



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 17, 2013

Mr. Douglas A. Spilker, Ph.D.
Bayer Healthcare LLC
Animal Health Division
P.O. Box 390
Shawnee Mission, KS 66201-0390

Subject: Amendment: Rebuttal to Efficacy Review.
PNR 1427 Insecticide
EPA Reg. No. 11556-155
Your Submission Dated July 3, 2013

Dear Mr. Spilker:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please contact BeWanda Alexander at Alexander.bewanda@epa.gov or (703) 305-7460.

Sincerely,

A handwritten signature in cursive script that reads "BeWanda Alexander".

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

Enclosure

Reason To Issue: Propose revision of claims and other minor label additions.

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Note to Reviewer: Brackets [] and parentheses () denote optional language

PNR1427 Insecticide

Alternate Brand Names: Seresto Small Dog; Seresto Large Dog; Seresto Cat

Optional Language for Small Collar

[For 8-month prevention and treatment of ticks, fleas, and lice on (small) dogs and puppies 7 weeks of age and older and up to [(18 lbs.)(8 kg)] [body weight]]

-or-

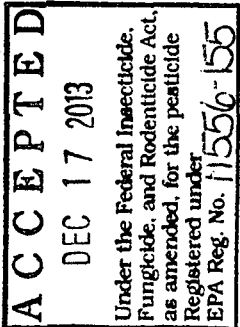
[For 8-month prevention and treatment of ticks and fleas on cats and kittens 10 weeks of age and older]

-or-

[For 8-month prevention and treatment of ticks, fleas, and lice on (small) dogs and puppies 7 weeks of age and older and up to [(18 lbs.)(8 kg)] [body weight]] [and/or] prevention and treatment of ticks and fleas on cats and kittens 10 weeks of age and older]

Optional Language for Large Collar:

[For 8-month prevention and treatment of ticks, fleas and lice for 8 months on (large) dogs and puppies 7 weeks of age and older and above [(18 lbs.)(8 kg)] [body weight]]



- [Selected optional label claims bulleted here from pages 9 to 15]

ACTIVE INGREDIENTS:

Flumethrin *	4.5%
Imidacloprid.	10.0%
OTHER INGREDIENTS	85.5%
Total	100%

*Trans Z-1/trans Z-2 ratio: max 66% trans Z-1 and min 34% trans Z-2

Net Contents: (X) Collar (s) – XX oz. (XX grams)	
EPA Reg. No. 11556-155	EPA Est. No. 11556-TBD

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Manufactured For

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

Made in Germany

READ THE ENTIRE LABEL BEFORE USE

[For small collar: USE ON [(DOGS)(CATS)]]

-or-

[For small collar: USE ON SMALL DOGS and CATS]

-or-

[For large collar: USE ONLY ON DOGS]

DO NOT OPEN UNTIL READY TO USE
DO NOT LET CHILDREN PLAY WITH THIS COLLAR [OR REFLECTORS]

KEEP OUT OF REACH OF CHILDREN
[CHOKING HAZARD - CONTAINS SMALL PARTS]

See [(back panel)(insert)] for Directions for Use.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

- For CONSUMER QUESTIONS, call 1-800-255-6826.
- For medical emergencies involving HUMANS, call 1-800-422-9874.
- For medical emergencies involving ANIMALS, call 1-800-422-9874.

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DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.
Do not contaminate feed or food.

HOW TO APPLY

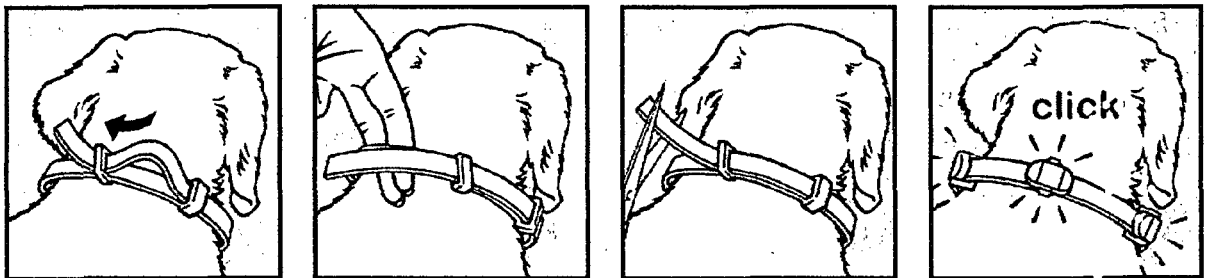
One collar per animal to be fastened around the neck.

Remove collar from protective bag directly before use. Unroll collar and make sure that there are no remnants from the plastic connectors inside the collar. Insert end of the collar through the buckle. Adjust the collar around the animal's neck without tightening it too tight or leaving it too loose. As a guide, it should be possible to only insert 2 fingers comfortably between the collar and the neck. Pull excess collar through the loop(s). Collar length of greater than (1/one/an) inch (2 cm) beyond the loop(s) should be cut off unless it is on a growing [(puppy)(kitten)], where some additional length may be needed for adjustment as the animal grows.

[After application of the collar, three reflector clips may be fixed permanently to the collar to increase the animal's visibility in the dark. Take the clips out of the bag. The clips should be evenly distributed on the non-overlapping part of the collar. The clips are correctly applied when a clicking sound is heard. For safety reasons once the reflectors are fixed to the collar the clasp closes permanently and cannot be re-opened.]

Optional Visuals:

Dog



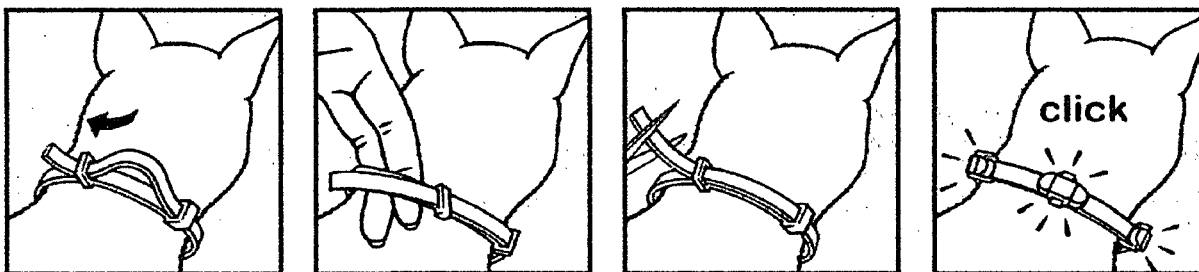
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- or -

Cat



The collar should be worn continuously for the 8 month protection period. Check periodically and adjust fit if necessary, especially when [(puppies)(kittens)] are rapidly growing.

This collar is designed with a release[(system)(mechanism)]. In the unlikely event of a [(dog)(cat)(pet)] being trapped, the [(dog's)(cat's)(pet's)] own strength is sufficient to widen the collar to allow for quick release.

Replace the collar after 8 months for (optimal) (continuous) flea and tick protection.

PRODUCT INFORMATION

Kills fleas which may cause flea allergy dermatitis (FAD) or flea bite hypersensitivity (FBH).

[(PNR 1427 Insecticide)(Brandname)(This product)(The collar)] kills existing fleas on [(dogs)(cats)] within 24 hours. Reinfesting fleas are killed within 2 hours with protection against further flea infestation lasting eight (8) months. Pre-existing pupae in the environment may continue to emerge for six (6) weeks or longer depending upon the climatic conditions.

Seresto aids in control of flea larvae in the [(dog's)(cat's)] surroundings following contact with a [(Seresto)(PNR 1427 Insecticide) treated [(dog)(cat)].

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Ticks already on the [(dog)(cat)] prior to treatment may not be killed immediately after collar application and may remain attached and visible. At the time of application remove ticks already on the [(dog)(cat)]. The prevention of infestations with new ticks starts within 48 hours after application of the collar.

Re-infesting ticks are [(repelled)(killed)(repelled and/or killed)] as quickly as 6 hours.

(Kills lice on dogs.)

Aids in the treatment (and control) of Sarcoptic mange on dogs.

[(Seresto) (PNR 1427 Insecticide) (This product)(The collar)] is [(water resistant) (waterproof)] and remains effective following a shampoo treatment, swimming or after exposure to rain or sunlight. Under normal conditions, effectiveness lasts for 8 months. In order to maintain an eight-month duration, dogs must not be bathed more than once per month. For dogs that swim once a month or more, the control duration is reduced to 5 months for flea control and reduced to 7 months for tick control.

Occasionally scratching may be observed in animals that are not used to wearing collars during the first few days after fitting. Ensure that the collar is not fitted too tightly. Slight hair loss and mild skin reactions due to the mechanical irritation of the collar may occur at the application site which usually recover within 1 or 2 weeks without the need for collar removal. For further guidance regarding individual animal sensitivities, see information below.

In case of loss of collar, a new collar may be applied immediately. Do not attach a leash to the collar as this may cause breakage.

Keep the collar in the bag and in the outer packaging until use. As with any pesticide product, do not allow small children to play with the collar (or reflectors,) or to put them into their mouths. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and cold water after fitting the collar. People with sensitivity reactions to the ingredients of the collar should avoid contact with the collar. [Choking hazard. Contains small parts]. Do not place collar [or reflectors] in mouth. Not intended for use on humans.

For external use on [(dogs)(and)(cats)] only. Do not use on other animals. [(Do not use on puppies under seven weeks of age.)(Do not use on kittens under ten (10) weeks of age.)] Do not get this product in [(dog's)(cat's)] eyes or mouth. As with any product, consult your veterinarian before using this product on debilitated, aged, breeding, pregnant, or nursing

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animals. Individual sensitivities, while rare, may occur after using ANY pesticide product for pets. Rarely, mild application site reactions may occur, such as scratching, redness and hair loss, which usually recover within 1 to 2 weeks without the need for collar removal. In some cases, a temporary collar removal and bathing may be recommended until symptoms have disappeared. In very rare cases, application site reactions such as dermatitis, inflammation, eczema or lesions may occur. In these instances, collar removal is recommended. If signs persist, or become more severe, consult a veterinarian immediately. If your animal is on medication, consult your veterinarian before using this or any other product. If your [(dog)(or)(cat)] is experiencing an adverse event, contact your veterinarian and, call 1-800-422-9874.

The patented [(sustained)(slow)(steady)(continuous)][(release)(distribution)] technology ensures that both active [(substances) (ingredients)] are slowly and continuously released in low concentrations from the collar towards the animal. This avoids peak concentrations and ensures that concentrations of both active [(substances)(ingredients)] are present in the [(cat's)(and/or)(dog's)] haircoat during the entire [(protection)(efficacy)] period. The active [(substances)(ingredients)] spread from the site of direct contact over the skin surface.

[INSERT DIAGRAM THAT DEPICTS RELEASE FROM MATRIX.]

STORAGE AND DISPOSAL

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

Do not use container for food storage or other purposes.

Pesticide Storage: Store in original unopened container in a cool, dry place that is inaccessible to children.

Container Disposal: Dispose of pouch and expired collar in trash. Outer container may be recycled or disposed of in trash.

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

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consequential commercial damages such as loss of profits or values, etc. [The reflector clips contained herein are only meant to be used in combination with the specific collar and have been tested only for such use and purpose. To the extent consistent with applicable law, Bayer excludes liability for any misuse and use other than in combination with the specific collar as described in the packaging insert.]

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Pouch Label

[(PNR 1427 Insecticide)(Brand name)]

4.5% flumethrin
10.0% imidacloprid

Do not let children play with this collar (or reflectors).
FOR USE ON (CATS)(DOGS)(CATS & DOGS)
See (outer container/leaflet/insert) for complete label information.
Do not open until ready to use.

BAYER HealthCare LLC, Animal Health Division

EPA Reg. No. 11556-155
EPA Est. No. 11556-TBD

Lot No. 0000000

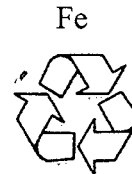
Calendar Reminder Sticker

Use[(this)(attached)(included)] calendar sticker to remind you when your
[(dog)(cat)(pet)] is due for its next application.

[(PNR 1427 Insecticide)(Brand name)]

Make sure to replace collar
after 8 months

Mobius Loop on outer container



Package

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Optional/Alternative Marketing Claims – Dogs

General Claims - Dogs

- Two active [(substances)(ingredients)] provide dual action against ticks, fleas, and lice (on dogs)
- For use on dogs and puppies 7 weeks of age and older
- Tick, (and) flea (and lice) (prevention)(control)(and) treatment for dogs 7 weeks of age or older
- [(PNR 1427)(Brand name)(This product)] is indicated for the prevention and treatment of ticks, fleas and lice on dogs and puppies (7 weeks of age and older)
- [Effective][Long-lasting] [protection] against ticks and fleas for 8 months
- [Effective][Long-lasting] [protection] against ticks, fleas and lice for 8 months
- Kills (and repels) ticks, (and) kills fleas (for 8 months)
- Reliable 8-month protection against ticks, and fleas on dogs (and puppies)
- Reliable 8-month protection against ticks, fleas and lice on dogs (and puppies)
- [3-way] protection against fleas, ticks and lice
- 8-month protection against ticks and fleas
- 8-month protection against ticks, fleas and lice
- For (small) dogs up to [(18 lbs.)(8 kg)] [body weight]
- For (large) dogs above [(18 lbs.)(8 kg)] [body weight]
- For external use on dogs
- For [(small dogs and puppies)(large dogs)]
- Fully effective within 48 hours after initial application of collar

Tick Claims - Dogs

- Repels and kills ticks for 8 months , including [(Deer)(Black-legged)] ticks, (*Ixodes scapularis*) (vector of Lyme disease and anaplasmosis), American dog ticks, (*Dermacentor variabilis*) (vector of Rocky Mountain spotted fever and ehrlichiosis), Brown dog ticks, (*Rhipicephalus sanguineus*) (vector of ehrlichiosis, anaplasmosis, bartonellosis, babesiosis, canine hemoplasmosis, and Rocky Mountain spotted fever), and Lone Star ticks (*Amblyomma americanum*) (vector of ehrlichiosis)
- Treatment with [(PNR 1427)(brand name)(this product)(the collar)] kills ticks that may vector Anaplasmosis (*Anaplasma phagocytophilum*), Bartonellosis (*Bartonella vinsonii*, *Bartonella spp.*), Babesiosis (*Babesia canis*, *B. gibsoni*), Borreliosis (*Borrelia burgdorferi*), canine hemoplasmosis (*Mycoplasma haemocanis*), Ehrlichiosis (*Ehrlichia*

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canis, *E. chaffeensis*, *E. ewingii*), Hepatozoonosis (*Hepatozoon canis* and *H. americanum*), and Rickettsiosis (*Rickettsia rickettsii*) [,which are types of (canine) vector borne diseases]

- Efficacy against ticks (by repelling and killing) that may vector Anaplasmosis (*Anaplasma phagocytophilum*), Bartonellosis (*Bartonella vinsonii*, *Bartonella spp.*), Babesiosis (*Babesia canis*, *B. gibsoni*), Borreliosis (*Borrelia burgdorferi*), canine hemoplasmosis (*Mycoplasma haemocanis*), Ehrlichiosis (*Ehrlichia canis*, *E. chaffeensis*, and *E. ewingii*), Hepatozoonosis (*Hepatozoon canis* and *H. americanum*), and Rickettsiosis (*Rickettsia rickettsii*) [,which are types of (canine) vector borne diseases]
- Kills [(Deer)(Black-legged)] ticks (, which may carry Lyme disease and Anaplasmosis)
- Kills American dog ticks (, which may vector Rocky Mountain spotted fever and Ehrlichiosis)
- Kills all [(life)(blood feeding)] stages of ticks
- Kills tick adults, larvae, and nymphs
- Kills ticks within 48 hours of (initial) application
- Prevents tick infestations within 48 hours after (initial) application
- [(Kills)(Repels)] ticks in 6 hours after (initial) efficacy has been obtained
- Re-infesting ticks are [(repelled)(killed)(repelled and/or killed)] as quickly as 6 hours
- Protects against all types of ticks (attacking dogs)
- Protects your (dog)(and/or)(puppy) from all types of ticks (for 8 months)
- Easy, effective [(treatment and prevention)(control)] of ticks, (and) fleas (,and lice)

Flea Claims - Dogs

- (Rapidly/Quickly) Kills fleas on dogs within [24] hours and continues to prevent infestations for 8 months
- Kills and repels fleas before they lay eggs
- Reinfesting fleas are killed within 2 hours with protection against further flea infestation lasting 8 months
- Seresto aids in control of flea larvae in the dog's surroundings following contact with a [(Seresto)(PNR 1427 Insecticide)]-treated dog.
- Aids in the control of flea larvae in the dog's immediate surroundings
- Protects your (dog)(and/or)(puppy) from fleas (for 8 months)
- For the treatment and prevention of flea infestations [on your dog (and in your dog's immediate surroundings)]
- One treatment prevents further flea infestations (on dogs) for 8 months
- Controls existing flea infestations by killing adult fleas
- Prevents reinfestations by killing adult fleas before they lay eggs

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- Prevents fleas on treated dogs from infesting (reinfesting) your home
- Treatment with [(PNR 1427)(brand name)(this product)(the collar)] kills fleas and may reduce the incidence of [flea allergy dermatitis (FAD)][flea bite hypersensitivity (FBH)][flea bite dermatitis (FBD)]
- For prevention and treatment of flea infestation(s) for 8 months
- [8-month] prevention and treatment of cat fleas (*Ctenocephalides felis*), dog fleas (*Ctenocephalides canis*) and human fleas (*Pulex irritans*) on dogs
- Kills cat fleas (*Ctenocephalides felis*), dog fleas (*Ctenocephalides canis*) and human fleas (*Pulex irritans*) on dogs
- Treatment with [(PNR 1427)(brand name)(this product)(the collar)] kills fleas that may vector tapeworm infections (*Dipylidium caninum*), Bartonellosis (*Bartonella vinsonii*, *Bartonella spp.*), and Rickettsiosis (*Rickettsia felis*) [,which are types of (canine) vector borne diseases]
- Efficacy against fleas that may vector tapeworm infections (*Dipylidium caninum*), Bartonellosis (*Bartonella vinsonii*, *Bartonella spp.*), and Rickettsiosis (*Rickettsia felis*) [,which are types of (canine) vector borne diseases]
- Stops fleas from feeding by (their) paralysis and death
- Kills fleas that may cause anemia in dogs

Lice & Other Efficacy Claims - Dogs

- Kills [(biting) (chewing)] lice
- For treatment and prevention of [(biting) (chewing)] lice (infestations)
- Controls existing [(biting) (chewing)] lice infestations
- Treats, prevents and controls [(biting) (chewing)] lice (infestations)
- Provides effective control of [(biting) (chewing)] lice (infestations)
- Kills [(biting) (chewing)] lice and prevents further infestations
- For treatment and prevention of infestations of [(biting) (chewing)] lice
- Aids in the treatment (and control) of Sarcoptic mange on dogs

Optional/Alternative Marketing Claims – Cats

General Claims - Cats

- Two active [(substances)(ingredients)] provide dual action against ticks and fleas (on cats)
- For use on cats and kittens 10 weeks of age and older
- [Effective][Long-lasting] [protection] for 8 months
- Tick, (and) flea (prevention)(control)(and) treatment for kittens 10 weeks of age or older

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- Tick and flea treatment for cats and kittens 10 weeks of age and older
- [(PNR 1427)(Brand name) (The collar)(This product)] is indicated for the prevention and treatment of ticks and fleas on cats and kittens (10 weeks of age and older)
- Kills (and repels) ticks and kills fleas (for 8 months)
- (Reliable) (8-month) protection against ticks and fleas [on cats (and kittens)]
- [Dual] [2-way] protection against ticks and fleas
- For external use on cats
- For cats and kittens
- Fully effective within 48 hours after initial application of collar

Tick Claims - Cats

- Repels and kills ticks, including [(Deer)(Black-legged)] ticks, (*Ixodes scapularis*) (vector of Lyme disease and anaplasmosis), American dog ticks (*Dermacentor variabilis*) (vector of Rocky Mountain spotted fever, cytauxzoonosis, and ehrlichiosis), Brown dog ticks, (*Rhipicephalus sanguineus*) (vector of ehrlichiosis, anaplasmosis, babesiosis, and Rocky Mountain spotted fever), and Lone Star ticks (*Amblyomma americanum*) (vector of cytauxzoonosis and ehrlichiosis) (for 8 months)
- Treatment with [(PNR 1427)(brand name)(this product)(the collar)] kills ticks that may vector Anaplasmosis (*Anaplasma phagocytophilum*), Babesiosis (*Babesia canis*, *B. spp.*), Borreliosis (*Borrelia burgdorferi*), Ehrlichiosis (*Ehrlichia canis*, *E. spp.*), Cytauxzoonosis (*Cytauxzoon felis*), and Rickettsiosis (*Rickettsia rickettsii*) [which are types of (cat) vector borne diseases]
- Efficacy against ticks (by repelling and killing) that may vector Anaplasmosis (*Anaplasma phagocytophilum*), Babesiosis (*Babesia canis*, *B. spp.*), Borreliosis (*Borrelia burgdorferi*), Ehrlichiosis (*Ehrlichia canis*, *E. spp.*), Cytauxzoonosis (*Cytauxzoon felis*), and Rickettsiosis (*Rickettsia rickettsii*) [which are types of (cat) vector borne diseases]
- Kills [(Deer)(Black-legged)] ticks (, which may vector Lyme disease)
- Kills American dog ticks (, which may vector Rocky Mountain spotted fever)
- Kills all (life) (blood feeding) stages of ticks
- Kills tick adults, larvae, and nymphs
- Kills ticks within 48 hours of (initial) application
- Prevents tick infestations within 48 hours after (initial) application
- [(Kills)(Repels)] ticks in 6 hours after (initial) efficacy has been obtained
- Re-infesting ticks are [(repelled)(killed)(repelled and/or killed)] as quickly as 6 hours
- Protects against all types of ticks (attacking cats)
- Protects your (cat)(and/or)(kitten) from all types of ticks (for 8 months)

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- Easy, effective [(treatment and prevention)(control)] of ticks and fleas

Flea Claims - Cats

- (Rapidly/Quickly) Kills fleas on cats within [24] hours and continues to prevent infestations (for 8 months)
- Kills and repels fleas before they lay eggs
- Reinfesting fleas are killed within 2 hours with protection against further flea infestation (lasting 8 months)
- Seresto aids in control of flea larvae in the cat's surroundings following contact with a [(Seresto)(PNR 1427 Insecticide) (brand name)]-treated cat.
- Aids in the control of flea larvae in the cat's immediate surroundings
- Protects your (cat)(and/or)(kitten) from fleas (for 8 months)
- For the treatment and prevention of flea infestations on your cat (and in your cat's immediate surroundings)
- One treatment prevents further flea infestations (for 8 months)
- Controls existing flea infestations by killing adult fleas
- Prevents reinfestations by killing adult fleas before they lay eggs
- Treatment with [(PNR 1427)(brand name)(the collar)(this product)] kills fleas and may reduce the incidence of [flea allergy dermatitis (FAD)][flea bite hypersensitivity (FBH)][flea bite dermatitis (FBD)]
- For prevention and treatment of flea infestation(s) for 8 months
- [8-month] prevention and treatment of cat fleas (*Ctenocephalides felis*), dog fleas (*Ctenocephalides canis*) and human fleas (*Pulex irritans*) on cats
- Treatment with [(PNR 1427)(brand name) (the collar)(this product)] kills fleas that may vector Bartonellosis (*Bartonella henselae*), tapeworm infections (*Dipylidium caninum*), Feline infectious anemia (*Mycoplasma spp.*), and Rickettsiosis (*Rickettsia felis*)
- Efficacy against fleas that may vector Bartonellosis (*Bartonella henselae*), tapeworm infections (*Dipylidium caninum*), Feline infectious anemia (*Mycoplasma spp.*), and Rickettsiosis (*Rickettsia felis*)
- Stops fleas from feeding by (their) paralysis and death
- Kills fleas that may cause anemia in cats

Optional/Alternative Marketing Claims – General

- Protects against ticks and fleas for 8 months

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- (8-month) [(protector band)(pet collar)(collar)]
- [(Kills)(Protects)] against ticks and fleas for 8 months
- (Make sure to) replace (the) collar after 8 months [for year-round tick and flea (control)(prevention)]
- Remains effective after bathing or swimming
- Remains effective following shampooing, swimming or after rain
- [(Wetness)(Moisture)] does not reduce the collar's effectiveness
- No need to remove (the) collar while bathing pet
- No need to remove collar when (your) pet goes swimming or [(gets bathed)(bathing)]
- [(Seresto)(PNR 1427 Insecticide) (Brand name) (This product)(The collar)] is [(water resistant)(waterproof)] and remains effective following a shampoo treatment, swimming or after exposure to rain or sunlight. Under normal conditions, effectiveness lasts for 8 months. In order to maintain an eight-month duration, dogs must not be bathed more than once per month. For dogs that swim once a month or more, the control duration is reduced to 5 months for fleas and 7 months for ticks.
- Fragrance-free
- Odorless
- No (noticeable) odor
- Non-greasy
- Easy to use
- (Easy)(convenient)(to use)(to apply)
- [(Graphite)(Gray)][Red][Yellow][(collar)(color)]
- (Adjustable)(convenient)(easy-to-apply) collar
- (Light) reflectors for added visibility (in the evening and at night)
- (Three) (3) (visibility) reflector clips (included)(for added pet visibility)
- (Snap-on) reflectors (included) for added (night-time)(pet)(visibility)
- One collar per animal (to be fastened around the neck)
- Contains one collar
- [(Patented)(Bayer)(technology) (polymer)(matrix)(system)] ensures that both active [(substances)(ingredients)] are (slowly) (and continuously) released (in low concentrations).
- (Patented) (Bayer) (Polymer) Matrix: [(effective)(dependable)(long-lasting)] (flea and tick) control (for 8 months)
- [(Sustained)(Slow)(Steady)(Continuous)] [(release)(distribution)] technology ensures that both active [(substances)(ingredients)] are (slowly) (and continuously) released (in low concentrations).

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- [(Sustained)(Slow)(Steady)(Continuous)] [(release)(distribution)] technology: [(effective)(dependable)(long-lasting)] (flea and tick) control (for 8 months)
- (Depot effect:) [Active (substances)(ingredients)] stored inside the polymer matrix and gradually released over time]
- [(Continuous)(Even distribution)(Steady)] release) of active [(substances)(ingredients)] (over 8 months)
- (Continuous) flea and tick protection (over 8 months)
- Contains [(Patented)(Bayer) (polymer)(matrix)(system)]
- Contains [(sustained)(slow)(steady)(continuous)] [(release)(distribution)] technology
- No activation needed
- Use[(this)(attached)(included)] calendar sticker to remind you when your [(dog)(cat)(pet)] is due for its next application.

Optional/Alternative Marketing Claims – Combined label for small collar for use on small dogs and cats

- For external use on small dogs and cats only