

70585-11

09/11/2013

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

P. Leanne Pruett
Agent for Novartis Animal Health US, Inc.
Pyxis Regulatory Consulting
4110 136th St. NW
Gig Harbor, WA 98332

SEP 11 2013

Subject: Novartis Animal Health Child Resistant Packaging and Spot-on Mitigation
Amendments
EPA Reg. Nos. 70585-11 (EasySpot), 70585-12 (Parastar), 70585-13 (Parastar
Plus)
EPA Decision Nos. 471126, 471379, 473239, and 471113

Dear Ms. Pruett,

The labeling referred to above submitted in connection with the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is **acceptable**. With this letter, the information submitted to support the inclusion of additional retail package sizes and corresponding label changes are accepted. Additionally, per your request of August 27, 2013, the primary brand names of "EasySpot for Cats", "Parastar for Dogs", and "Parastar Plus for Dogs" for EPA Reg. Nos. 70585-11, 70585-12, and 70585-13 respectively, are accepted as the primary brand names, and the previous primary brand names "EasySpot", "Parastar", and "Parastar Plus" are no longer active. Lastly, the label requirements for these products listed in the EPA letter "Implementation of Label Changes to Pet Spot-On Products" dated September 30, 2011, are fulfilled. Please submit final printed labels incorporating these changes to the Agency within 30 days of the date of this letter. If EPA determines that future mitigation measures are necessary for all pet spot-ons, the Agency will inform registrants and may take regulatory action.

EPA also received your February 8, 2013, request to replace the conditional time-limited registrations with unconditional registrations. At this time, EPA does not have enough information to warrant the removal of these conditions of registration. If Novartis Animal Health wishes to remove the time limitations altogether, please submit to the Product Manager an amendment application for each product to change the terms and conditions of the registration. Please include with your submission a written rationale for the removal of the time limitation. As you may remember, the Agency included this time limitation as a condition of registration for your products to allow for the post-market surveillance of these products. Therefore, we recommend that you include in your rationale the following information, along with any additional information or analyses you think would be helpful to the Agency (e.g.; tables, charts, information on stewardship activities, etc...):

- A summary and analysis of the incidents received associated with these products, including information on the following:
 - A comprehensive analysis of incident rates per doses distributed;

- An analysis of historical incident trends since the products' release into the marketplace;
- An analysis of historical incident trends by weight range of animal, breed, weight range of product, etc...
- If these products are also registered in the European Union or Canada, information on incident rates per doses distributed and trends in those countries.

Please also note that requests to remove the expiration date condition are not subject to PRIA fees and do not have to be submitted under PRIA. However, these would also not be considered 90-day, fast-track submission in order to allow the EPA enough time to fully evaluate the information provided. After receiving these submissions, the EPA will consider the incidents received since the initial registration; review the information and rationale provided; and make a decision on the request.

In the interim, the time-limited registrations for these products are extended two years from the date of this letter. If registration extension requests are not received prior to that date, the registration of these products will expire. If a review of the previously submitted enhanced incident data indicates that there is a concern with any of these products, EPA may choose to take further regulatory action at that time.

Per the additional requirements of September 30, 2011 letter, you must continue to submit quarterly enhanced incident reports and quarterly sales information in doses sold for this product, along with an analysis of the incidents reported. 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 attention of Kaitlin Keller, Pesticide Reevaluation Division, Mail Code 7508P.

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

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.

Stamped copies of the labels are enclosed for your records. If you have any questions regarding this label, please contact Kaitlin Keller at (703) 308-8172 via email at keller.kaitlin@epa.gov.

Sincerely,



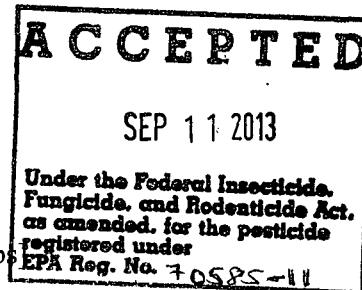
Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7504P)

Enclosure: Labels stamped "Accepted"

[Optional text appears in brackets -the final label may include some or all of the optional text on front, back, side, or inside label panels]

EasySpot™

For Cats



apply only to kittens more than 8 weeks old and over 1.5 lbs
[[alternate language] apply only to kittens 8 weeks or older and over 1.5 lbs]

[Mosquitoes]

- [[Kills mosquitoes] [within 24 hours] [within 24 hours for up to the first 7 days after treatment, and within 48 hours for up to 28 days]]

[Adult Fleas]

- [Kills adult fleas [for up to six weeks] [!]]
- [Kills newly emerged adult fleas before they lay eggs]
- [Kills fleas, a source of flea allergy dermatitis] [, flea bite anemia]
- [If cat is a high risk for flea reinfestation, apply a once a month application]
- [Kills fleas [for] up to [4 weeks] [1 month] [30 days] [!]]

[Ticks]

- [Kills ticks, including those that may carry Lyme disease]
- [Kills ticks for up to [[4] [four] weeks] [1 month] [30 days]!]
- [Kills deer ticks [that may carry Lyme disease,] for up to [[4] [four] weeks] [1 month] [30 days]]
- [Kills ticks]
- [Kills ticks (including deer ticks) for up to [[4] [four] weeks] [1 month] [30 days]]
- [Kills [brown], [American dog,] [and] [lone star,] ticks [(*Rhipicephalus sanguineus*)] for up to [4] [four] weeks] [1 month] [30 days]]
- [Kills American dog ticks [(*Dermaceniior variabilis*)] for up to [[4] [four] weeks] [1 month] [30 days]!]

[Multiple Infestations]

- [Kills chewing lice and [controls mites that may cause sarcoptic mange [infestations]]]
- [Flea [&] [and] tick control only for cats [&] [and] kittens [8 weeks old and older] [more than 8 weeks old]]
- [Kills [fleas], [ticks], [chewing lice] [&] [and] [mosquitoes]]
- [Kills [fleas], [ticks], [mosquitoes] and [chewing lice]]
- [Monthly [flea], [tick], [mosquito], and [chewing lice] [treatment]]
- [[Four] [Three] [4] [3] [-] way[s] [to kill] [control] [kills [fleas], [ticks], [mosquitoes] and [chewing lice]]]
- [[4] [four] [-] week] [1 month] [30 day] [flea] and [tick] [&] [and] treatment]
- [[4] [four] [-] week] [1 month] [flea], [tick], [mosquito] and [chewing lice] control]
- [Once-a-month [flea] and [tick] treatment]

- [Use EasySpot™ [For Cats] monthly to control [fleas] [ticks] and [chewing lice]]
- [Monthly [flea], [tick], [mosquito] and [chewing lice].]
- [Kills [fleas] and [ticks] for up to [4] [four] weeks [1 month] [30 days]!]
- EasySpot™ [For Cats] provides [convenient] and [effective] [flea], [tick] [,] [&] [and] [chewing lice] [and mosquito] control for cats and kittens 8 weeks and older.]

[All Others]

- [For use only on cats and kittens [more than 8 weeks old]]
- [For use only on cats and kittens [8 weeks old and older]]
- [Waterproof]
- [Fast-acting] [Fast acting]
- [Long-lasting] [Long lasting]
- [Prevents [flea] reinfestation]
- [Convenient spot treatment]
- [Once-a-month treatment]
- [A once monthly application for chewing lice]
- [Fast action against [chewing] lice infestations]
- [[One] [Two] [Three] [Four] [Five] [Six] [Twelve] [Twenty-Four] applications] and/or [[1] [2] [3] [4] [5] [6] [12] [24] -month supply] or [[4] [8] [12] [16] [20] [24] [48] [52] [104]-week supply] or [[1] [2] [3] [4] [5] [6] [12] [24] applications]
- [Best if used year round!]
- [4[-]week dose[!]][in Child Resistant Packaging]
- [1[-]month dose[!]][in Child Resistant Packaging]
- [30[-]day dose[!]][in Child Resistant Packaging]
- [Easy-to-use [application]]
- [Specially formulated only for cats and kittens older than 8 weeks]
- [fipronil (9.7%)]
- [A fipronil product]
- [Contains fipronil[,] [-] the active ingredient in [Frontline Top Spot®*]
- [*EasySpot™ [For Cats]] is not manufactured by or distributed by Merial. Frontline® Top Spot® is a registered trademark of Merial.]
- [Fast-acting, long-lasting that's also waterproof.]
- [[One][1][Two][2][Three][3][4][Four][5][Five][Six][6][Twelve][12][Twenty-Four][24]] [Easy to Use] Applications] and/or [1 Month Supply][2 Month Supply][3 Month Supply][Four Month Supply][Five Month Supply][6 month Supply][12 Month Supply][24 month Supply] or [4 Week Supply][8 Week Supply][12 Week Supply][16 Week Supply] [20 Week Supply][24 Week Supply][48 Week Supply][52 Week Supply][104 Week Supply] [in Child Resistant Packaging]
- [Cats can be bathed 24 hours after [application] [treatment] [EasySpot™ [For Cats]] is applied]]
- [Easy-to-use [application]]
- [[Free] calendar stickers inside!]

- [[Free] calendar stickers inside]
- [Apply once every [4 weeks] [month] [30 days]!]
- [Can be used on breeding, pregnant and lactating [cats] [queens] [female cats]]
- [[Free with purchase] [Free inside] [Monthly application reminder magnet]
- [clip] [insert] [inside]
- [Can be used only on kittens [more than 8 weeks of age]]
- [Can be used only on kittens [8 weeks of age and older]
- [Optional graphics: picture of all controlled pests with line through them]

EPA Reg. No. 70585-11
 EPA Establishment No.

ACTIVE INGREDIENTS:

Fipronil	9.7 %
INERT INGREDIENTS:	90.3%
TOTAL:	100.0%

**KEEP OUT OF REACH OF CHILDREN
 CAUTION**

See [Back][or][Side][or][Interior Panel][Label Panel[s] for Additional Precautionary Statements [and First Aid Statements].

NET CONTENTS:

[1][One][2][Two] [Three] [3] [Four][4][5][Five][6][Six][12][Twelve][24][Twenty-Four] [-]
 0.017 fl oz (0.50ml) applicators

[Back / Side Panel of Outer Packaging]

[EasySpot™ [For Cats]] contains fipronil to effectively kill fleas and ticks [(including those that may transmit Lyme disease)].

READ ENTIRE LABEL BEFORE EACH USE

[EasySpot™ [For Cats] provides [four-] [three-] way protection that kills [fleas], [ticks], [mosquitoes] and [chewing lice]. Kills deer ticks [that may transmit Lyme disease]. Kills brown dog ticks, American dog ticks and lone star ticks. Prevents flea reinfestation.]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS. CAUTION. Harmful if swallowed. Causes eye irritation. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

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HAZARDS TO DOMESTIC ANIMALS. For external use only. Individual sensitivities, while rare, may occur after using any pesticide product on cats. Certain medications can interact with pesticides. Do not treat your cat with more than one topically applied pesticide product at a time. Overdosing your cat can result in serious illness and even death. Consult a veterinarian before using on medicated, debilitated or aged cats. Can be used on breeding, pregnant, or lactating [cats][female cats][queens]. Consult a veterinarian before using on cats with known organ dysfunction.

FIRST AID	
If swallowed	Call a poison control center for a 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 a 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 to 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.
If on skin	Wash with plenty of soap and water. Get medical attention if irritation persists.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For more information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call 1-800-637-0281.	

DIRECTIONS FOR USE

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

Do not allow children to apply product. TO PREVENT HARM TO YOU AND YOUR CAT, READ ENTIRE LABEL BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. FOR EXTERNAL USE ON CATS ONLY. DO NOT USE ON RABBITS. DO NOT USE ON OTHER ANIMALS. Do not allow your cat to ingest this product. Do not use on kittens under 8 weeks of age. Do not apply to cats weighing less than 1.5 lbs. Do not double-dose cats. Use entire contents of tube vial on each cat. [Do not split one tube between two cats.]

Side Effects

Monitor your cat after application. [Some cats may experience temporary startle effects when any product is applied.] Cats may experience some temporary irritation at the site of product application such as redness, scratching, or other signs of discomfort. If signs of a sensitivity occur, bathe your cat with a mild soap and rinse with large amounts of water. If these or other side effects occur, consult your veterinarian or Novartis Animal Health at 1-800-637-0281. If your cat has an unusual reaction to the initial application, consult a veterinarian before repeating application. The most common signs of incidental ingestion are excessive salivation and foaming at the mouth. If these symptoms occur, immediately feed your cat and continue to monitor your cat for the next 24 hours.

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[(INSERT DIAGRAM THAT DEPICTS APPLICATION OF PRODUCT ON THE CAT)]

How to Open: Remove product [tubes] [vials] from the package. [Separate one tube from the others.] Hold the [tube] [vial] with notched end pointing up and away from the face and body. Use scissors to cut off the narrow end at the notches along the line.

How to apply: While holding the cat with one hand, use the other hand to apply the solution. Invert the [tube] [vial] and use the open end to part the cat's hair. Apply contents of one [tube] [vial] of EasySpot™ [For Cats] [as a spot between the shoulder blades] [as a stripe, starting high on the back of the cat's neck to in front of the shoulder blades]. Hold the cat for a few seconds to give the solution time to be absorbed into the cat's coat. When finished, wrap the [tube] [vial] in paper and put into the trash. Only one applicator per treatment is needed. Repeat application may be made if necessary, but do not apply more often than once every 30 days.

[Optional drawings of application process that may or may not appear on finished label]

FREQUENCY OF APPLICATION

Use EasySpot™ [For Cats] monthly for control of [flea], [tick] [and] [chewing lice] [and mosquito] infestations. [Studies show that] EasySpot™ [For Cats] kills fleas for up to six weeks. If your cat is at high risk for flea reinfestation [or in a highly infested environment], apply monthly. Apply monthly to control [ticks], [mosquitoes] and [chewing] [lice]. EasySpot™ [For Cats] kills mosquitoes within 24 hours for up to the first 7 days after treatment, then within 48 hours for up to 28 days.] EasySpot™ [For Cats] remains effective after water immersion, or exposure to sunlight. Allow treated area to dry thoroughly. [Cats can be bathed 24 hours after treatment.] Do not reapply for 30 days.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Do not remove tube from the pack until ready to use. Store in a cool (below 77°F [25°C]) dry place inaccessible to children and pets. Do not refrigerate. Protect from direct sunlight.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container.

If empty: Place in the 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.

[Outer Packaging or Interior Carton Panel]

WARRANTY

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Injury, ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather conditions, presence of other materials or other influencing factors in the use of the product, which are beyond the control of NOVARTIS ANIMAL HEALTH US, Inc. (NAHUS) or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold NAHUS and Seller harmless for any claims relating to such factors.

NAHUS warrants that this product conforms to the chemical description on the label and is reasonably fit for the purpose stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of the product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or NAHUS, and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, NAHUS MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with State law, in no event shall NAHUS or Seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF NAHUS AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF NAHUS OR SELLER, THE REPLACEMENT OF THE PRODUCT.

[If you have questions or comments about this product, please write to: Novartis Animal Health US, Inc., (address).]

For Technical Information call: 1-800-637-0281 [hours of service]
[Made in USA]

Distributed by [Manufactured for][Available exclusively from]:
Novartis Animal Health US, Inc.
3200 Northline Avenue, Suite 300
Greensboro NC 27408

[BAR CODE AREA]

EPA Reg. No. 70585-11
EPA Est. NO. XXXXX-XX-XXX

[Optional Exterior or Interior package copy]

[How to Apply - May contain graphics illustrating product use, e.g., cat with a drop falling onto its neck from a vial on front, side, or back carton label and/or applicator labeling.]

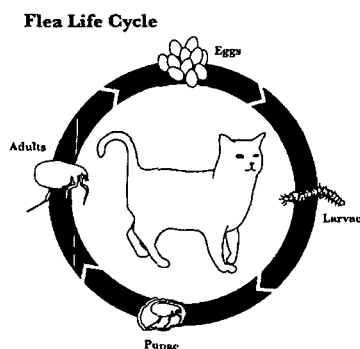
How to Open:

1. Remove product [tube] [vial] from package.
2. [Separate one [tube] [vial] from the others.] Hold the [tube] [vial] with notched end pointing up and away from the face and body. Use scissors to cut off the narrow end at the notches along the line.

How to Apply:

1. Invert [tube] [vial] over cat and use open end to part cat's hair.
2. Apply contents of one [tube] [vial] of EasySpot™ [For Cats] [as a spot between the shoulder blades] [as a stripe, starting high on the back of the cat's neck to in front of the shoulder blades].
3. Squeeze [tube] [vial] firmly to apply all of the solution to the cat's skin.

[Example Flea life cycle diagram – actual may differ slightly]



- [Look at the Label (Look at the Label icon)]

[[Easy] [6] [Six-] [Step] EasySpot™ [For Cats] [Spot-on] [Squeeze-On] Checklist

1. Read the label completely and follow directions.
2. Weigh your cat.
3. Do NOT use dog products on cats.
4. Do NOT treat with more than one pesticide product at a time.
5. Separate animals after treatment to avoid chance of ingestion.
6. Do NOT split tubes between cats.

[For year round protection, apply EasySpot™ [For Cats] monthly.]

[Cat's Name (Empty blank for owner to fill in name)]

[First [dose] [Treatment] (Empty blank for owner to fill in date)]

[Second [dose] [Treatment] (Empty blank for owner to fill in date)]

[Third [dose] [Treatment] (Empty blank for owner to fill in date)]

[Fourth [dose] [Treatment] (Empty blank for owner to fill in date)]

[Fifth [dose] [Treatment] (Empty blank for owner to fill in date)]

[Sixth [dose] [Treatment] (Empty blank for owner to fill in date)]

[Seventh [dose] [Treatment] (Empty blank for owner to fill in date)]

[Eighth [dose] [Treatment] (Empty blank for owner to fill in date)]

[Ninth [dose] [Treatment] (Empty blank for owner to fill in date)]

[Tenth [dose] [Treatment] (Empty blank for owner to fill in date)]

[Eleventh [dose] [Treatment] (Empty blank for owner to fill in date)]

[Twelfth [dose] [Treatment] (Empty blank for owner to fill in date)]

[Visit [web-address] to download a free convenient application for your smartphone for an electronic calendar reminder]

[Visit [web-address] to download a convenient electronic calendar reminder]

[Calendar stickers [with EasySpot™ [For Cats]]

[[1] [2] [3] [4] [5] [6] [12] [24]-month] [application tracker]

[For year-round protection, apply EasySpot™ [For Cats] monthly. Place stickers on your calendar as a reminder to reapply EasySpot™ [For Cats] in 30 days.]

[It's time for EasySpot™ [For Cats] [!]]

[Enclosed for your convenience [is] [are] [1] [one] [2] [two] [3] [three] [4] [four][5] [five] [6] [six] [12] [twelve] [24] [twenty-four] sticker[s].] [Place stickers on your calendar every 30 day from initial treatment as a reminder to reapply EasySpot™ [For Cats] every 30 days.]

[Optional Example graphics for calendar stickers and/or magnets.]



[Monthly Application Reminder Magnet (image of reminder magnet)]

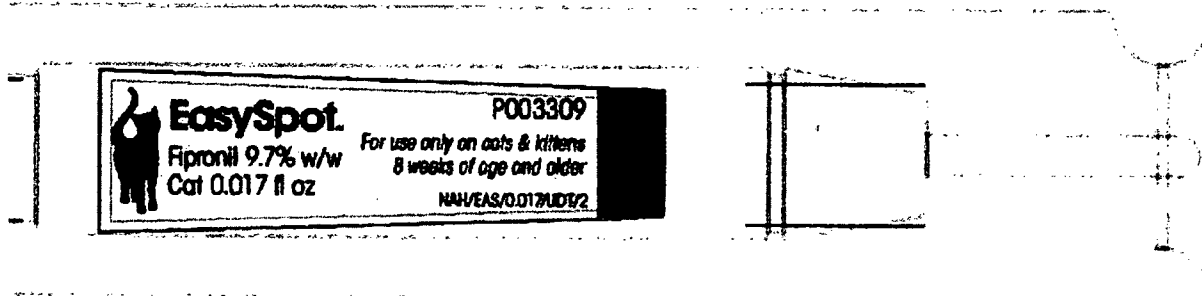
[Enclosed for your convenience is an application reminder magnet. Push the (reset) button, and the reminder light will blink twice. The reminder tag is now set for 30 days. At the end of 30 days the reminder light will blink, reminding you to reapply EasySpot™ [For Cats]. Press the button once and

the blinking light will stop. Press the button again and this will reset the timer for another 30 days.]

[END - OPTIONAL EXTERIOR OR INTERIOR PANEL PACKAGE COPY]

[BEGIN TUBE LABEL]

[FRONT OF TUBE]



{add to tube: . . . and over 1.5 lbs}

[BACK OF TUBE]

KEEP OUT OF REACH OF CHILDREN

CAUTION: Read accompanying directions and precautions before using. Use scissors to open.

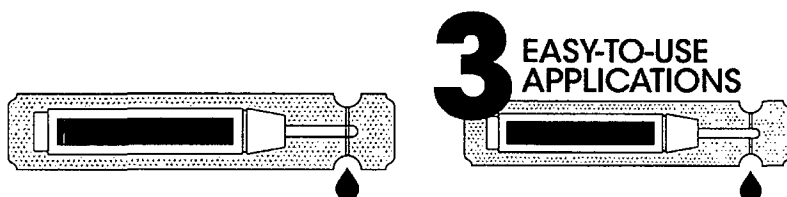
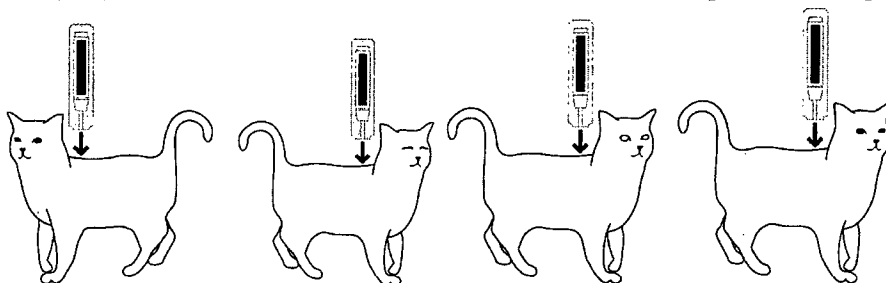
EPA REG. No. 70585-11

{label code}

[END TUBE LABEL]

[OPTIONAL GRAPHICS FOR EXTERIOR OR INTERIOR PANEL PACKAGE:

Example pictograms that may or may not be found on the printed label]



EPA [Approval Date]