88966-

1/29/2013



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

January 29, 2013

Ms. Ann M. Tillman Tru Prodigy c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332

Subject: Application for Pesticide Amendment VetGuard for Cats EPA Reg. No. 88966-1 Your Submission Dated October 3, 2012 Decision No: 474189

Dear Ms. Tillman:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the conditions of registration and label comments below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

Conditions of acceptance

- 1. This registration is now time-limited and expires two years from the date of this letter.
- 2. Please consider limiting the formulations of this product to one basic confidential statement of formula. The Agency may require this in the future and no additional alternate formulations or minor formulation amendments will be approved for this product in the future.
- 3. You must submit quarterly enhanced incident reports and quarterly sales information in doses sold for this product beginning April 1, 2013.

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: Kaitlon 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

- 1 Along with the onhoneed incident reporting you must submit on analysis
- 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.

If EPA determines that future mitigation measures are necessary for all spot-on products, the Agency will inform registrants and if needed, EPA may take regulatory action. If you have any questions contact Driss Benmhend at 703-308-9525 or by e-mail at: Benmhend.driss@epa.gov.

Sincerely,

Robentus for

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

Enclosure: Label stamped "Accepted"

1. Package Insert

- 2. Carton (front, back, inside and side panels)
- 3. [Optional text for front or Optional text for back of cardboard insert if security packaging used]
- 4. Optional card with tips for use
- 5. Reminder Stickers
- 6. Text for back of blister
- 7. Text for back of pipette (applicator)

Note to reviewer: optional text is placed in brackets

1. Package Insert, Text

VETGUARD FOR CATS

For use ONLY on CATS & KITTENS 8 weeks and older

ACTIVE INGREDIENT:

Fipronil:	· · · · · · · · · · · · · · · · · · ·	
INERT INGREDIENTS:		
TOTAL:		

KEEP OUT OF REACH OF CHILDREN

CAUTION

[Optional marketing claims]

[Quick-acting]

[Long-lasting]

[Waterproof]

[For monthly control of fleas, ticks, chewing lice, mosquitoes]

[Kills adult fleas]

[Kills newly emerged adult fleas prior to egg-laying]

[Effective treatment that kills adult fleas which may cause flea allergy dermatitis]

[Kills all life stages of ticks (larva, nymph, and adult) including brown dog ticks (*Rhipicephalus sanguineus*), American dog ticks (*Dermacentor variabilis*), lone star ticks (*Amblyomma americanum*) and deer ticks (*Ixodes scapularis*)]

[Kills ticks that may transmit Lyme disease, haemobartonellosis, ehrlichiosis, babesiosis, and anaplasmosis]

[Kills Brown dog ticks, American dog ticks, Lone Star ticks and deer ticks for up to one month]

[Eliminates chewing lice infestations]

[Kills adult mosquitoes]

VetGuard for Cats Label - 10-31-2012

ACCEPTED with COMMENTS In EPA Letter Dated JAN 2 9 2013

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

EPA Reg. No. 88966-1

Package Insert, Text

FIRST AID

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

IF SWALLOWED: Immediately call a poison control center or doctor 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 15-20 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 OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

CRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

HAZARDS TO HUMANS

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

Have the product container label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-888-314-8588 for emergency medical treatment information.

HAZARDS TO DOMESTIC ANIMALS

For external use only on cats. Do not use on kittens under 8 weeks of age. Individual sensitivities, while rare, may occur after using **ANY** pesticide product. Pets may experience some temporary irritation at the site of product application. If signs persist, or become more severe within a few days of application, consult a veterinarian immediately. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated, debilitated or aged animals. You may also contact SAFETYCALL INTERNATIONAL at 1-855-844-4375 (independent veterinarians and pharmacists on staff 24 hours/7 days per week). For Customer Service call 1-888-314-8588.

Side Effects. After applying VetGuard for Cats, check your cat for side-effects such as redness from skin irritation, scratching or other signs of discomfort. In some cases, vomiting or diarrhea have been reported from grooming after treatment. If you observe these signs or symptoms in your treated cat, contact your veterinarian. You may also contact SAFETYCALL INTERNATIONAL at 1-855-844-4375 (independent veterinarians and pharmacists on staff 24 hours/7 days per week). For Customer Service call 1-888-314-8588.

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 PET, READ THE ENTIRE LABEL AND DIRECTIONS BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. USE ON CATS ONLY. DO NOT USE ON RABBITS. DO NOT USE ON OTHER ANIMALS.

VetGuard for Cats is approved for use on all cats including breeding, pregnant and lactating queens, and on kittens that are older than 8 weeks.

VetGuard for Cats keeps on working even after cats are shampooed, rinsed with water, or if cats are outdoors and exposed to the sun or rain.

Package Insert, Text

Frequency of Application

Monthly application of VetGuard for Cats controls flea, tick and chewing lice infestations. You can reapply VetGuard for Cats once every 30 days.

Fleas: VetGuard for Cats kills adult fleas for up to six weeks. If your cat becomes reinfested with fleas, or if your cat is in situations where reinfestation may occur, you may apply VetGuard for Cats every 30 days.

Ticks: VetGuard for Cats kills ticks for at least one month. Apply VetGuard for Cats every 30 days to control ticks (larva, nymph and adult) that may transmit Lyme disease, Rocky Mountain Spotted Fever, ehrlichiosis, babesiosis, and anaplasmosis.

Chewing Lice: VetGuard for Cats kills chewing lice for at least one month. Apply VetGuard for Cats every 30 days to control chewing lice.

Mosquitoes: Apply VetGuard for Cats every 30 days to kill mosquitoes. Mosquitoes are killed within 24 hours for up to 7 days, and within 48 hours for up to 28 days.

Use VetGuard for Cats on all cats including breeding, pregnant and lactating queens, and on kittens 8 weeks or older.

A one-spot application is convenient and easy for effective treatment of fleas, ticks, chewing lice, and mosquitoes. Apply VetGuard for Cats when your cat is dry.

VetGuard for Cat is applied at a single point on the surface of the skin between the cat's shoulders and rapidly covers the entire cat by localizing in the hair, on the surface of the skin and in the sebaceous glands.

Soon after coming into contact with a treated cat, fleas, ticks, mosquitoes, and chewing lice are killed. To kill fleas, ticks, chewing lice and mosquitoes apply VetGuard for Cats as follows:

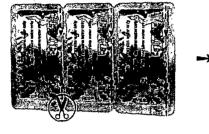
EPA Reg. No. 88966-1

Remove and Open Package



Cut along scissor cut line to separate unit

3





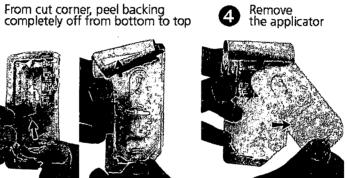




Turn unit over and cut corner at bulb end







VetGuard for Cats Label - 10-31-2012

Package Insert, Text

Open Applicator

Hold upright with foil side away from you and snap applicator tip back to open.

Apply VetGuard for Cats

Find a spot between the cat's shoulder blades and part hair. Place the open end of the applicator just above the skin and squeeze. Apply the entire contents of the applicator in a single spot directly onto the cat's skin. Avoid applying on top of the hair coat. Do not touch treated area until dry.











PHYSICAL OR CHEMICAL HAZARDS

COMBUSTIBLE. Do not use or store near heat or open flame.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE

Store unused product in original container only, out of reach of children and animals.

CONTAINER DISPOSAL

Nonrefillable container. Do not reuse or refill this container. 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.

LIMITATION OF WARRANTY AND LIABILITY

IMPORTANT: READ BEFORE USE. Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of Tru Prodigy. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Tru Prodigy makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, neither Tru Prodigy, the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages

Package Insert, Text

resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

EPA Reg. No.: 88966-1

[EPA Est. No.:]

Manufactured for:

Tru Prodigy 500 E. Shore Drive, Suite 130 Eagle, ID 83616

[Made in Germany]

[VetGuard for Cats is a registered trade name of Tru Prodigy]

[Optional Bar Code]

2. Carton Text – Front Panel

VETGUARD FOR CATS

For use ONLY on CATS & KITTENS 8 weeks and older

Fipronil	
INERT INGREDIENTS:	90.3%
TOTAL:	100.0%

Net Contents [3-pak] 0.051 fl. oz. (1.5 mL) (3 tubes containing 0.017 fl. oz. each)

[3 Doses]

KEEP OUT OF REACH OF CHILDREN

CAUTION

See label insert for First Aid and Precautionary Statements.

[Optional marketing claims]

[Quick-acting]

[Long-lasting]

[Waterproof]

[For monthly control of fleas, ticks, chewing lice, mosquitoes]

[Kills adult fleas]

[Kills newly emerged adult fleas prior to egg-laying]

[Effective treatment that kills fleas which may cause flea allergy dermatitis]

[Kills all life stages of ticks (larva, nymph, and adult) including brown dog ticks (*Rhipicephalus sanguineus*), American dog ticks (*Dermacentor variabilis*), lone star ticks (*Amblyomma americanum*) and deer ticks (*Ixodes scapularis*)]

[Kills ticks that may transmit Lyme disease, haemobartonellosis, ehrlichiosis, babesiosis, and anaplasmosis]

[Kills Brown dog ticks, American dog ticks, Lone Star ticks and deer ticks for up to one month]

[Eliminates chewing lice infestations]

[Kills adult mosquitoes]

[Kills fleas, ticks, chewing lice and mosquitoes]

[3 Month Supply]

[3 Applicators]

[FREE APP AT www.VETGUARDPLUS.com]





VetGuard for Cats Label - 10-31-2012

7.

2. Carton Text – Back Panel

VETGUARD FOR CATS

[Quick-acting]

[Long-lasting]

[Waterproof]

[3 Month Supply]

[FREE APP AT www.VETGUARDPLUS.com]

KEEP OUT OF REACH OF CHILDREN

CAUTION

READ ENTIRE LABEL AND ENCLOSED DIRECTIONS BEFORE EACH USE.

Manufactured for:

Tru Prodigy 500 E. Shore Drive, Suite 130 Eagle, ID 83616

EPA Reg. No. 88966-1

EPA Est. No.

[Made in Germany]

[Batch/Lot No.]

[Bar Code]

[VetGuard for Cats is a registered trade name of Tru Prodigy]

VetGuard for Cats can be used on all cats including breeding, pregnant and lactating queens, and on kittens that are older than 8 weeks. VetGuard for Cats controls fleas, ticks, chewing lice and mosquitoes and keeps on working even after cats are shampooed, rinsed with water, or if cats are outdoors and exposed to the sun or rain.

DIRECTIONS FOR USE

It is a violation of 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 THE ENTIRE LABEL AND DIRECTIONS BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. USE ON CATS ONLY. DO NOT USE ON RABBITS OR ON OTHER ANIMALS.

Side Effects. See package insert for side effects.

To kill fleas, ticks, chewing lice and mosquitoes apply VetGuard for Cats as follows:

Remove and Open Package

See package insert for opening instructions.

Open Applicator and Apply VetGuard for Cats

Hold upright with foil side away from you and snap applicator tip back to open.

EPA Reg. No. 88966-1



Find a spot between the cat's shoulder blades and part hair. Place the open end of the applicator just above the skin and squeeze. Apply the entire contents of the applicator in a single spot directly onto the cat's skin. Avoid applying on top of the hair coat. Do not touch treated area until dry.

2. Carton Text - Inside Panel

[3 Month Supply]

READ ENTIRE LABEL AND ENCLOSED DIRECTIONS BEFORE EACH USE.

USE ONLY ON CATS & KITTENS 8 WEEKS AND OLDER

KEEP OUT OF REACH OF CHILDREN

CAUTION

VetGuard for Cats can be used on all cats including breeding, pregnant and lactating queens, and on kittens that are older than 8 weeks. VetGuard for Cats controls fleas, ticks, chewing lice and mosquitoes and keeps on working even after cats are shampooed, rinsed with water, or if cats are outdoors and exposed to the sun or rain.

Frequency of Application

Monthly application of VetGuard for Cats controls flea, tick and chewing lice infestations. You can reapply VetGuard for Cats once every 30 days.

Fleas: VetGuard for Cats kills adult fleas for up to six weeks. If your cat becomes reinfested with fleas, or if your cat is in situations where reinfestation may occur, you may apply VetGuard for Cats every 30 days.

Ticks: VetGuard for Cats kills ticks for at least one month. Apply VetGuard for Cats every 30 days to control ticks (larva, nymph and adult) that may transmit Lyme disease, Rocky Mountain Spotted Fever, ehrlichiosis, babesiosis, and anaplasmosis.

Chewing Lice: VetGuard for Cats kills chewing lice for at least one month. Apply VetGuard for Cats every 30 days to control chewing lice.

Adult Mosquitoes: Apply VetGuard for Cats every 30 days to kill mosquitoes. Mosquitoes are killed within 24 hours for up to 7 days, and within 48 hours for up to 28 days.

PHYSICAL OR CHEMICAL HAZARDS

COMBUSTIBLE. Do not use or store near heat or open flame.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE

Store unused product in original container only, out of reach of children and animals.

CONTAINER DISPOSAL

Nonrefillable container. Do not reuse or refill this container. 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.

2. Carton Text –Side Panel

VetGuard for cats [3 Month Supply] [EPA Reg. No. 88966-1] [EPA Est. No.]

(

EPA Reg. No. 88966-1 11

3. [Optional text for front of cardboard insert if security packaging used]

VETGUARD FOR CATS

For use ONLY on CATS & KITTENS 8 weeks and older

ACTIVE INGREDIENT:		
Fipronil:		
•		
Net Contents (one box) [0.057	1 fl. oz. (1.5 mL), 3 ti	ubes containing 0.017 fl. oz. each), 3 doses]

Net Contents (two boxes) [1.02 fl. oz. (3.0 mL), each box has 3 tubes containing 0.017 fl. oz. each, 6 doses]

KEEP OUT OF REACH OF CHILDREN

CAUTION

See label insert for First Aid and Precautionary Statements.

[Optional marketing claims]

[Quick-acting]

[Long-lasting]

[Waterproof]

[For monthly control of fleas, ticks, chewing lice, mosquitoes]

[Kills adult fleas]

[Kills newly emerged adult fleas prior to egg-laying]

[Effective treatment that kills fleas which may cause flea allergy dermatitis]

[Kills all life stages of ticks (larva, nymph, and adult) including brown dog ticks (*Rhipicephalus sanguineus*), American dog ticks (*Dermacentor variabilis*), lone star ticks (*Amblyomma americanum*) and deer ticks (*Ixodes scapularis*)]

[Kills ticks that may transmit Lyme disease, haemobartonellosis, ehrlichiosis, babesiosis, and anaplasmosis]

[Kills Brown dog ticks, American dog ticks, Lone Star ticks and deer ticks for up to one month]

[Eliminates chewing lice infestations]

[Kills adult mosquitoes]

[Kills fleas, ticks, chewing lice and mosquitoes]

[3 Month Supply]

[3 Applicators]

[FREE APP AT www.VETGUARDPLUS.com]

EPA Reg. No. 88966-1

EPA Est. No.

Manufactured for:

Tru Prodigy 500 E. Shore Drive, Suite 130 Eagle, ID 83616

VetGuard for Cats Label - 10-31-2012

[Bar code]



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VetGuard for Cats Label - 10-31-2012

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3. [Optional text for for back of cardboard insert if security packaging used]

VETGUARD FOR CATS

For use ONLY on CATS & KITTENS 8 weeks and older

ACTIVE INGREDIENT:	
Fipronil	
INERT INGREDIENTS:	
TOTAL:	

KEEP OUT OF REACH OF CHILDREN CAUTION

[Quick-acting]

[Long-lasting]

[Waterproof]

[For monthly control of fleas, ticks, chewing lice, mosquitoes]

[Kills adult fleas]

[Kills newly emerged adult fleas prior to egg-laying]

[Effective treatment that kills adult fleas which may cause flea allergy dermatitis]

[Kills all life stages of ticks (larva, nymph, and adult) including brown dog ticks (*Rhipicephalus sanguineus*), American dog ticks (*Dermacentor variabilis*), Ione star ticks (*Amblyomma americanum*) and deer ticks (*Ixodes scapularis*)]

[Kills ticks that may transmit Lyme disease, haemobartonellosis, ehrlichiosis, babesiosis, and anaplasmosis]

[Kills Brown dog ticks, American dog ticks, Lone Star ticks and deer ticks for up to one month]

[Eliminates chewing lice infestations]

[Kills adult mosquitoes]

FIRST AID

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

IF SWALLOWED: Immediately call a poison control center or doctor 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 15-20 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 OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

HAZARDS TO HUMANS

VetGuard for Cats Label – 10-31-2012

EPA Reg. No. 88966-1

CAUTION: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with skin, eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, or using tobacco.

Have the product container label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-888-314-8588 for emergency medical treatment information.

HAZARDS TO DOMESTIC ANIMALS

For external use only on cats. Do not use on kittens under 8 weeks of age. Individual sensitivities, while rare, may occur after using **ANY** pesticide product. Pets may experience some temporary irritation at the site of product application. If signs persist, or become more severe within a few days of application, consult a veterinarian immediately. Certain medications can interact with pesticides. Consult a veterinarian before using on medicated, debilitated or aged animals. You may also contact SAFETYCALL INTERNATIONAL at 1-855-844-4375 (independent veterinarians and pharmacists on staff 24 hours/7 days per week). For Customer Service call 1-888-314-8588.

Side Effects. After applying VetGuard for Cats, check your cat for side-effects such as redness from skin irritation, scratching or other signs of discomfort. In some cases, vomiting or diarrhea have been reported from grooming after treatment. If you observe these signs or symptoms in your treated cat, contact your veterinarian. You may also contact SAFETYCALL INTERNATIONAL at 1-855-844-4375 (independent veterinarians and pharmacists on staff 24 hours/7 days per week). For Customer Service call 1-888-314-8588.

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 PET, READ THE ENTIRE LABEL AND DIRECTIONS BEFORE EACH USE. FOLLOW ALL DIRECTIONS AND PRECAUTIONARY STATEMENTS CAREFULLY. USE ON CATS ONLY. DO NOT USE ON RABBITS. DO NOT USE ON OTHER ANIMALS.

VetGuard for Cats is approved for use on all cats including breeding, pregnant and lactating queens, and on kittens that are older than 8 weeks.

VetGuard for Cats keeps on working even after cats are shampooed, rinsed with water, or if cats are outdoors and exposed to the sun or rain.

Frequency of Application

Monthly application of VetGuard for Cats controls flea, tick and chewing lice infestations. You can reapply VetGuard for Cats once every 30 days.

Fleas: VetGuard for Cats kills adult fleas for up to six weeks. If your cat becomes reinfested with fleas, or if your cat is in situations where reinfestation may occur, you may apply VetGuard for Cats every 30 days.

Ticks: VetGuard for Cats kills ticks for at least one month. Apply VetGuard for Cats every 30 days to control ticks (larva, nymph and adult) that may transmit Lyme disease, Rocky Mountain Spotted Fever, ehrlichiosis, babesiosis, and anaplasmosis.

Chewing Lice: VetGuard for Cats kills chewing lice for at least one month. Apply VetGuard for Cats every 30 days to control chewing lice.

Mosquitoes: Apply VetGuard for Cats every 30 days to kill mosquitoes. Mosquitoes are killed within 24 hours for up to 7 days, and within 48 hours for up to 28 days.

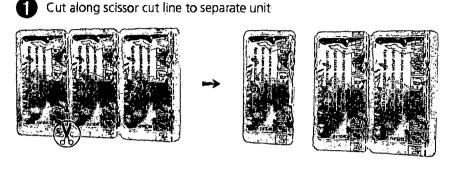
Use VetGuard for Cats on all cats including breeding, pregnant and lactating queens, and on kittens 8 weeks or older.

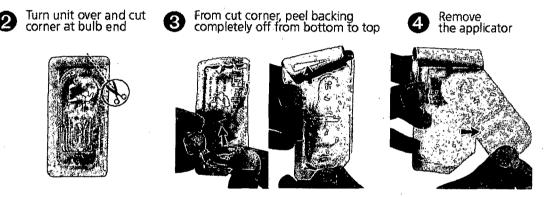
A one-spot application is convenient and easy for effective treatment of fleas, ticks, chewing lice, and mosquitoes. Apply VetGuard for Cats when your cat is dry.

VetGuard for Cat is applied at a single point on the surface of the skin between the cat's shoulders and rapidly covers the entire cat by localizing in the hair, on the surface of the skin and in the sebaceous glands.

Soon after coming into contact with a treated cat, fleas, ticks, mosquitoes, and chewing lice are killed. To kill fleas, ticks, chewing lice and mosquitoes apply VetGuard for Cats as follows:

Remove and Open Package





Open Applicator

Hold upright with foil side away from you and snap applicator tip back to open.

Apply VetGuard for Cats

Find a spot between the cat's shoulder blades and part hair. Place the open end of the applicator just above the skin and squeeze. Apply the entire contents of the applicator in a single spot directly onto the cat's skin. Avoid applying on top of the hair coat. Do not touch treated area until dry.











PHYSICAL OR CHEMICAL HAZARDS

COMBUSTIBLE. Do not use or store near heat or open flame.

VetGuard for Cats Label - 10-31-2012

[9/23

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE

Store unused product in original container only, out of reach of children and animals.

CONTAINER DISPOSAL

Nonrefillable container. Do not reuse or refill this container. 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.

LIMITATION OF WARRANTY AND LIABILITY

IMPORTANT: READ BEFORE USE. Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If these terms and conditions are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness, injury, and other unintended consequences may result because of such factors as manner of use or application (including misuse), the presence of other materials, weather conditions, and other unknown factors, all of which are beyond the control of Tru Prodigy. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Tru Prodigy makes no other warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, neither Tru Prodigy, the manufacturer, nor the Seller shall be liable for any indirect, special, incidental or consequential damages resulting from the use, handling, application, storage, or disposal of this product. To the extent consistent with applicable law, the exclusive remedy of the user or buyer for any and all losses, injuries or damages resulting from the use, handling, application, or storage of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid.

4. [Optional Card with Tips, Text]

[Optional marketing claims]

[VetGuard for Cats]

[See other side for stickers to remind you it's time to reapply VetGuard for Cats.]

[Some Tips and Other Information for Using VetGuard for Cats]

[Treat dogs and cats separately and only with the proper dose of VetGuard for Dogs or VetGuard for Cats.]

[Follow the label instructions for how to apply and be sure that VetGuard for Cats is applied to the skin, not on top of the fur and not near the collar. Removing the collar before application may help to prevent the collar from absorbing the VetGuard dose.]

[Apply VetGuard for Cats when your cat is dry. Make sure you apply all of the dose that is in the applicator.]

[Even indoor cats need flea and tick control if other household pets bring fleas into the home.]

[Fleas have many life stages and serious infestations can take up to 3 applications every 30 days for control. In fact, the flea life-cycle in the home can last as long as 21 days.]

5. Text for Reminder Stickers



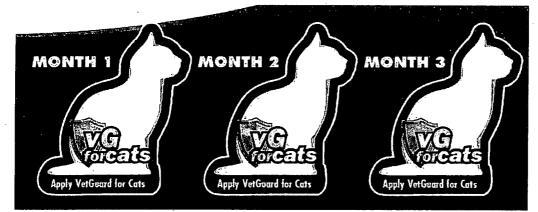
[Reminder: It's time to repurchase VetGuard for Cats!]

Use these stickers to remind you when to apply and to purchase VetGuard for Cats.

The first time you treat your cat, peel off the sticker and place on your calendar that day. To remind you when the next application is due, place the other two stickers on your calendar 1 and 2 months after the first application.

[For Customer Service call 1-888-314-8588.]

[For more information, visit <u>www.xxxxx.com</u>]

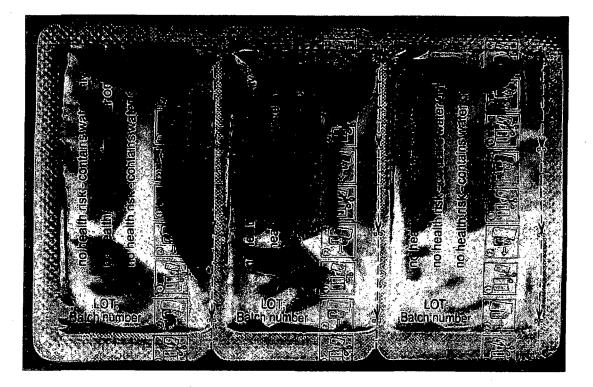


[Optional Bar code]

EPA Reg. No. 88966-1

23 23

Pictogram of Back of Blister With Opening Instructions



6. Text for Back of Blister

KEEP OUT OF REACH OF CHILDREN CAUTION: See full label for additional instructions and precautions before using Only for Cats & Kittens VetGuard for Cats EPA Reg. No. 88966-1 Lot/Batch No. 0.017 fl. oz. (0.5 mL) 9.7% Fipronil

7. Text for back of pipette (applicator)

KEEP OUT OF REACH OF CHILDREN CAUTION: See full label for additional instructions and precautions before using Only for Cats & Kittens VetGuard for Cats EPA Reg. No. 88966-1 Lot/Batch No. 0.017 fl. oz. (0.5 mL) 9.7% Fipronil

VetGuard for Cats Label – 10-31-2012