

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

January 4, 2018

Ann M. Tillman Agent for Promika, LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. Ct. NW Gig harbor, WA 98332

Subject: Label Amendment – Modification of CRP packages

Product Name: PROMIKA ZOGUARD PLUS FOR CATS

EPA Registration Number: 91300-6 Application Date: 4-Aug-2017 Decision Number: 532225

Dear Ms. Tillman,

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, you may contact Julie Breeden-Alemi, DVM at 703-347-0511 or via email at Breeden-Alemi.Julie@epa.gov.

Sincerely,

Kable Bo Davis, Product Manager 3 Invertebrate and Vertebrate Branch 1 Registration Division (7505P) Office of Pesticide Programs

Enclosure

Primary brand name: Promika ZoGuard Plus for Cats

Alternate Brand Name: Fortress Defense for Cats Heritage Plus for Cats

Sublabel 1: Promika ZoGuard Plus for Cats {Two alternate child resistant package types are included: the current approved CPR is described as an applicator inside a CRP blister and sold as a 3-count (strip of 3 applicators). The alternate CRP being added is described as a CRP blister applicator and is supplied as a 3 count and a 4 count or as multiples of 3- and 4- counts}

Sublabel 2: Promika ZoGuard Plus for Cats {single applicator. This alternate CRP is described as a CRP blister applicator and is supplied as a single applicator (1-count) in a foil pouch.}

ACCEPTED

01/04/2018

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

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Sublabel 1: Promika ZoGuard Plus for Cats [text in [] denotes optional language]

{text in {} denotes location of text on packaging, notes to reviewer, text that will not be on final label} (text in () appears on label)

{Front Panel of Carton}

Promika ZoGuard Plus for Cats [Alternate brand name: Fortress Defense for Cats; Heritage Plus for Cats]

{The word "Cats" in the product name will be 75% of the height of the largest letter in the primary brand name.}

{One of the following statements will appear on the front panel.}

Use ONLY on Cats & Kittens Weighing over 1.5 lbs. & Over 8 Weeks old {OR}

Use ONLY on Cats and Kittens Weighing over 1.5 lbs. & Over 8 Weeks old {OR}

ONLY For Cats and Kittens Older Than 8 Weeks & Weighing Over 1.5 lbs. {OR}

ONLY For Cats & Kittens Older Than 8 Weeks & Weighing Over 1.5 lbs. {OR}

ONLY For Cats and Kittens Older Than 8 Weeks and Weighing Over 1.5 lbs. {OR}

ONLY For Cats & Kittens Older Than 8 Weeks and Weighing Over 1.5 lbs.

{Optional Marketing Claim}

[[3][6][12] Month Supply]

[4][8][12] Month Supply

{When used, all three optional statements below will appear together.}

[Contains Fipronil and (S)-Methoprene, the active ingredients used in FRONTLINE® Plus for Cats]

[Frontline is a registered trademark of Merial]

[(Brand Name) is not manufactured or distributed by Merial, seller of Frontline® Plus for Cats]

{See optional graphics –on pages 9-10 of this label that may or may not appear on front panel of carton}

{The front panel will have a large, clear picture of a cat in the weight range for the product as packaged.}

ACTIVE INGREDIENTS:

Fipronil	9.80%
*	11.80%
OTHER INGREDIENTS:	
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

See Back Panel for Precautionary Statements and First Aid See Side Panel for Storage and Disposal See inside panels and insert for additional Directions for Use

Net Contents: X fl oz [(mL)]

[3][Three] [6][Six] [12][Twelve] [applicators each containing 0.017 fl oz (0.50 mL)]

[4][Four] [8][[Eight] [12][Twelve [applicators each containing 0.017 fl

oz (0.50 mL)]]

{End Front Panel of Carton}

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{BACK PANEL of Carton}

Promika ZoGuard Plus for Cats

[In Case of Emergency, call: XXX-XXX-XXXX] [Non-Emergency, call XXX-XXX-XXXX] [Formulated in the USA]

[Manufactured For][Distributed By]: [Promika, LLC. 5000 CentreGreen Way, Suite 100 Cary, NC 27513]

EPA Reg. No. 91300-6 EPA Est. No. XXXX-XXXX

READ ENTIRE LABEL BEFORE EACH USE

{One of these statements will be used}

USE ONLY ON CATS AND KITTENS WEIGHING OVER 1.5 LBS. & OVER 8 WEEKS OF AGE {OR} USE ONLY ON CATS AND KITTENS WEIGHING OVER 1.5 LBS. AND OVER 8 WEEKS OF AGE

PRECAUTIONARY STATEMENTS

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, chewing gum, using tobacco or using the toilet.

HAZARDS TO DOMESTIC ANIMALS. For external use on cats only. Individual sensitivities may occur after using any pesticide product on cats. Certain medications can interact with pesticides. Do not treat your cat with more than one pesticide product at a time. Over dosing 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. This product is not a substitute for prescribed Heartworm preventative.

FIRST AID	
If in eyes:	Hold eye open and rinse slowly and gently with water for 15 -20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a Poison Control Center or doctor for treatment advice.
If swallowed:	Call a poison control center or 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 on skin:	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.
	HOT LINE NUMBER
Have the product	container or label with you when calling a poison control center or doctor, or going for treatment.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency medical treatment information, you may contact SafetyCall at 1-844-685-9173 seven days a week, 24-hours a day.

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. Do not use on rabbits or animals other than cats.

{The following Side Effects text in a box will be placed in the lower right hand corner of back panel.}

Side Effects (Cats): 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. In some cases, gastrointestinal signs such as vomiting or diarrhea may occur. If these or other side effects occur consult your veterinarian or call SafetyCall at 1-844-685-9173. If your cat has an unusual reaction to the initial application, consult a veterinarian before repeating application.

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PRODUCT INFORMATION

[Use [Brand name][this product] monthly for control of fleas, ticks [and] chewing lice [and mosquitos]. [Studies show that] [Brand name] [this product] kills adult fleas, flea eggs, and flea larvae and prevents development of all flea stages for up to six weeks. Apply monthly if your cat is at high risk for flea reinfestation[, or in a highly infested environment]. Apply monthly to control ticks[,] [mosquitoes] and chewing lice. [Brand name][This product] remains effective, even after bathing, water immersion, or exposure to sunlight. Allow treated area to dry thoroughly. Avoid contact with treated area until dry. Do not reapply for [30 days] [4 weeks][1 month]. [[Brand name][This product] can be used on breeding, pregnant and lactating [queens] [female cats].]

[Brand Name] [This product] may be applied once every [30 days] [4 weeks] [month].

Treatment remains effective, even after bathing, water immersion, or exposure to sunlight. Do not reapply [Brand Name] for [30 days] [4 weeks] [1 month].]

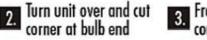
(END BACK PANEL of Carton)

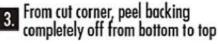
{Begin Package Insert for applicator inside the CRP blister (3-Count).}

How to Open:

REMOVE AND OPEN PACKAGE

1. Cut along scissor cut line to separate unit















OPEN APPLICATOR

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

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{Begin Package insert for alternate CRP blister applicator (3-Count)}

1 Tear through perforation







3 Cut with scissors to open applicator





{Begin Package insert for alternate CRP blister applicator (4-Count)}

1 Tear through perforation



2 Fold back the safety tab



3 Cut with scissors to open applicator



{End Package Insert}



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{Inside Carton Panels or Continuation of Package Insert for Cartons without Inside Panels}

Promika ZoGuard Plus for Cats

{One of the following statements will appear on the inside carton panel.}

Use ONLY on Cats &Kittens Weighing over 1.5 lbs. & Over 8 Weeks old {OR}

Use ONLY on Cats and Kittens Weighing over 1.5 lbs. & Over 8 Weeks old {OR}

ONLY For Cats and Kittens Older Than 8 Weeks & Weighing Over 1.5 lbs. {OR}

ONLY For Cats & Kittens Older Than 8 Weeks & Weighing Over 1.5 lbs. {OR}

ONLY For Cats and Kittens Older Than 8 Weeks and Weighing Over 1.5 lbs. {OR}

ONLY For Cats & Kittens Older Than 8 Weeks and Weighing Over 1.5 lbs.

[[Brand Name] [This product] contains Fipronil and (S)-Methoprene [insect growth regulator] [IGR] to effectively kill fleas and ticks. [The active ingredients in [Brand Name][This product] features a formula developed for fast acting [and long lasting for up to [4 weeks][30 days][1 month]] control of fleas, ticks, [mosquitoes] and chewing lice for up to [1 month] [[4][four] weeks] on cats.]

{Text below is only for Inside Carton Panels}

How to Open

Refer to package insert on directions on how to open package.

{Remaining text below is for Inside Carton Panels and for Package Insert for Cartons without Inside Panels}

How to Apply:

Remove applicator[s] from packaging. Using one applicator, hold the applicator with the narrow end pointing up.

[Snap the outline of the tip back to allow access to the [dotted tip] [applicator]]. {OR}

[Snap the applicator tip [backwards] across the marked line] [to allow access to the] [dotted tip]

[notches][applicator]]. Holding applicator away from your and your cat's eyes snap the applicator tip [at notched line] to open.] Apply [this product] at a spot between the cat's shoulder blades. Part the hair and place the open end of the applicator just above the skin. Squeeze the entire contents of the applicator and direct the solution in one spot and onto the cat's skin. Allow the area to dry. Use only one applicator per treatment.

Restrictions

Do not apply more frequently than once every [30 days][4 weeks][1 month].

Be sure your cat is dry before application and keep your cat dry for 24 hours after application.

Do not bathe your cat for 24 hours after application.

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 one applicator on each cat. [Do not split one applicator between two cats.]

Do not apply more than one applicator per treatment for one cat regardless of the cat's weight.

Separate the treated cat from all other cats and dogs for 24 hours after treatment has been applied. [Optional pictogram]







[Manufactured For][Distributed By]: [Promika, LLC. 5000 CentreGreen Way, Suite 100 Cary, NC 27513]

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[WARRANTY] [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 [Company]. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, [Company] 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 [Company], 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.]

[In Case of Emergency, call: XXX-XXX-XXXX] [Non-Emergency, call XXX-XXX-XXXX] [Formulated in the USA]

[Manufactured For][Distributed By]: [Promika, LLC. 5000 CentreGreen Way, Suite 100 Cary, NC 27513]

EPA Reg. No. 91300-6 EPA Est. No. XXXX-XXXX

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Do not remove applicator 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.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. **If empty:** 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.

[Optional recycling graphic]



{End Inside Carton Panels or Package Insert for Cartons without Inside Panels }

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(SIDE PANEL 1)

[[Brand name][This product]. [Three][Four][Six][Eight][Twelve] month supply. ONLY for Cats & Kittens 8 Weeks and Older and Over 1.5 lb.

{SIDE PANEL 2}

[[Brand name][This product]. ONLY for Cats & Kittens 8 Weeks and Older and Over 1.5 lb.

(SIDE PANEL 3)

[[Brand name][This product]. ONLY for Cats & Kittens 8 Weeks and Older and Over 1.5 lb.

(SIDE PANEL 4)

[[Brand name][This product]. ONLY for Cats & Kittens 8 Weeks and Older and Over 1.5 lb. [BAR CODE AREA] [Lot code; onlynumber will appear]

{APPLICATOR LABEL - for applicator inside the CRP blister and for the CRP blister applicator}

Promika ZoGuard Plus for Cats	KEEP OUT OF REACH OF CHILDREN
Only for cats over 8 weeks old and	CAUTION: Read accompanying label before use.
weighing over 1.5 lbs.	
Fipronil 9.8%, (S)-methoprene 11.8%	
0.017 fl. oz. [0.5 ml)]	
EPA Reg. No. 91300-6	
Lot/Batch No. {only number will appear}	

{End Applicator Label – for applicator inside the CRP blister and for the CRP blister applicator}

(OUTER BLISTER LABEL - for applicator inside the CRP blister)

Promika ZoGuard Plus for Cats Only	KEEP OUT OF REACH OF CHILDREN
for cats over 8 weeks old and weighing	CAUTION. For external use only. Read
over 1.5 lbs	accompanying label before use.
Fipronil 9.8%, (S)-methoprene 11.8%	
0.017 fl oz [(0.5 ml)]	
EPA REG. No. 91300-6	
Lot/Batch No. {only number will appear}	

{End Outer Blister Label – for applicator inside the CRP blister}

{IMAGE FOR OUTER BLISTER LABEL - for applicator inside the CRP blister}



{End Image for Outer Blister Label – for applicator inside the CRP blister}

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{Optional Marketing Claims}

- 1. For use ONLY on cats & kittens weighing over 1.5 lbs and over 8 weeks of age
- 2. Only for cats [&][and] kittens over 8 weeks of age and weighing over 1.5 lbs
- 3. Apply to kittens over 8 weeks old and weighing over 1.5 lbs.
- 4. Apply to kittens 8 weeks or older and weighing over 1.5 lbs.

Mosquitoes

5. Kills mosquitoes [within 48 hours for up to 28 days]

Chewing Lice

- 6. Kills chewing lice
- 7. Rapid elimination of chewing lice infestation

Adult Fleas

- 8. Kills adult fleas [for up to six weeks]
- 9. Kills Fleas [Up to [4][6] weeks]!
- 10. Kills fleas which may be a source of flea allergy dermatitis

Ticks

- 11. Kills ticks including those that may transmit Lyme disease
- 12. Kills Ticks for Up to [4 weeks] [1 month] [30 days]!
- 13. Kills Deer Ticks [that may carry Lyme disease] for up to [4 weeks] [1 month] [30 days]
- 14. Kills [brown dog ticks [(*Rhipicephalus sanguineus*)]] [American dog ticks,] [and] [lone star ticks][,][and deer ticks] [for up to [4 weeks] [1 month] [30 days]]
- 15. Kills American Dog Ticks [(Dermacentor variabilis)] for up to [4 weeks] [1 month] [30 days]!

Multiple Infestations

- 16. Flea [&] [and] Tick Control for Cats [&] [and] Kittens 8 weeks old and older and weighing over 1.5 lbs
- 17. Kills fleas, flea eggs, ticks, chewing lice [&] [and] [mosquitoes]
- 18. Kills fleas, ticks, [mosquitoes,] chewing lice, flea eggs, [and] flea larvae [and prevents the development of flea pupae]
- 19. Breaks the Flea Life Cycle
- 20. Monthly protection from flea, tick, [mosquito,] chewing lice, and flea egg
- 21. Monthly protection from flea, tick, [mosquito] and chewing lice
- 22. Kills fleas, ticks, [mosquitoes,] flea eggs, and chewing lice
- 23. [Seven][7] Way [Action] [Effectiveness] [Control] kills fleas, ticks, mosquitoes, chewing lice, flea eggs, flea larvae and prevents the development of flea pupae
- 24. [Six][6] Way [Action] [Effectiveness] [Control] kills fleas, ticks, chewing lice, flea eggs, flea larvae and prevents the development of flea pupae
- 25. [Six][6] Way [Action] [Effectiveness] [Control] kills fleas, ticks, mosquitoes, chewing lice, flea eggs & flea larvae
- 26. [Five][5] Way [Action] [Effectiveness] [Control] kills fleas, ticks, chewing lice, flea eggs & flea
- 27. [4 week] [1 month] [30 day] Flea [and] [&] Tick [Application] [Treatment]!
- 28. [[Four] [4] Week] [1 month] Flea, Tick, [Mosquito] and Chewing Lice Control
- 29. Use [Brand name][this product] monthly to break the flea life cycle.
- 30. [[Four][4] Week] [1 month] [30 day] Flea, Tick and Chewing Lice Control
- 31. Use [Brand name][This product] monthly to control ticks and chewing lice
- 32. Monthly protection from flea, tick, [mosquito,] flea egg, flea larvae and chewing lice.
- 33. [4 week] [1 month] [30 day] Flea and Tick Treatment!
- 34. Once A Month Flea, Tick, [Mosquitoes] [and] [Chewing Lice][Application] [Treatment]
- 35. Kills Fleas and Ticks for up to [4 weeks] [1 month] [30 days]!

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- 36. Kills Fleas, Ticks, Flea Eggs & Flea Larvae for up to [4 Weeks] [1 month] [30 days]
- 37. [Brand name][This product provides convenient and effective flea, tick, [and] chewing lice [and] [mosquito] control for cats and kittens over 8 weeks of age and weighing over 1.5 lbs.
- 38. Flea Eggs and Larvae
- 39. Controls flea reinfestation on your cat [for up to six weeks]
- 40. Kills adult fleas, flea eggs, flea larvae, and prevents the development of pupae [for up to six weeks]
- 41. Kills all stages of the flea [adult fleas, flea eggs, flea larvae] and prevents the development of flea pupae
- 42. If cat is at high risk for flea reinfestation apply once a month
- 43. Kills flea eggs [larvae] [and prevents the development of pupae] for up to six weeks
- 44. With (S)-methoprene [Insect Growth Regulator] [IGR] which Breaks the Flea Life Cycle With (S)-methoprene to Break Flea Life Cycle
- 45. With [Insect Growth Regulator] [IGR] to Break Flea Life Cycle
- 46. Dual Action [!]: Fipronil with (S)-methoprene [insect growth regulator] [IGR] Effectively Breaks the Flea Life Cycle
- 47. Kills Flea Eggs & Flea Larvae [for up to six weeks]!
- 48. Prevents Flea Eggs From Developing Into Biting Adults

All Others

- 49. For Cats and Kittens 8 weeks of age or older and weighing over 1.5 lbs.
- 50. Can be used on kittens 8 weeks of age and older and weighing over 1.5 lbs.
- 51. Fast Acting
- 52. Easy to Use [Application]
- 53. Best if used year round!
- 54. Apply monthly
- 55. Once a month treatment
- 56. Apply once every [4 weeks] [month] [30 days]!
- 57. [4 Week Dose!] [1 Month Dose!] [30 Day Dose!]
- 58. [Three Applications] [Six Applications] [Twelve Applications]
- 59. [3 Month Supply][6 Month Supply][12 Month Supply]
- 60. [Four Applications] [Eight Applications] [Twelve Applications]
- 61. [4 Month Supply][8 Month Supply][12 Month Supply]
- 62. Waterproof
- 63. Effective even after bathing
- 64. Effective after bathing and exposure to water and sunlight
- 65. Can be used on breeding, pregnant and lactating [queens], [female] [cats]
- 66. [3][6][12][Applications]
- 67. [4][8][12][Applications]
- 68. Controls and prevents infestation of listed pests for [4 weeks][1 month]
- 69. Lift [here] for more information
- {When used, all three optional statements will appear together.}
- 70. Contains Fipronil and (S)-Methoprene, the active ingredients used in Frontline® Plus For Cats
- 71. Frontline is a registered trademark of Merial
- 72. (Brand Name) is not manufactured or distributed by Merial, seller of Frontline® Plus for Cats

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{Optional graphics below may or may not appear anywhere on finished label}

Ton	Adult Flea	
Ton	Fleas	
785-	Flea eggs	€
つ	Flea Larvae	3
•	Flea Pupae	
*	Ticks	
*	Brown Dog Tick	(S)
	Deer Tick	
*	American Dog Tick	
*	Chewing Lice	(
*	Lone Star Tick	
7	Mosquitoes	8
*	Mite	®

Sublabel 2: Promika ZoGuard Plus for Cats {single applicator}

[text in [] denotes optional language]

{text in {} denotes location of text on packaging, notes to reviewer, text that will not be on final label} (text in () appears on label)

{Front Panel of Foil Pouch; package is single applicator in heat sealed foil pouch}

Promika ZoGuard Plus for Cats [Alternate brand name: Fortress Defense for Cats; Heritage Plus for Cats]

{The word "Cats" in the product name will be 40% of the height of the largest letter in the primary brand name due to the small package size.}

{One of the following statements will appear on the front panel.}

Use ONLY on Cats & Kittens Weighing Over 1.5 lbs. & Over 8 Weeks Old {OR}

Use ONLY on Cats and Kittens Weighing over 1.5 lbs. & Over 8 Weeks old {OR}

ONLY For Cats and Kittens, Older than 8 Weeks & Weighing Over 1.5 lbs. {OR}

ONLY For Cats & Kittens Older Than 8 Weeks & Weighing Over 1.5 lbs. {OR}

ONLY For Cats and Kittens Older Than 8 Weeks and Weighing Over 1.5 lbs. {OR}

ONLY For Cats & Kittens Older Than 8 Weeks and Weighing Over 1.5 lbs.

{Optional Marketing Claim}

[1 Month Supply]

{When used, all three optional statements below will appear together.}

[Contains Fipronil and (S)-Methoprene, the active ingredients used in FRONTLINE® Plus for Cats]

[Frontline is a registered trademark of Merial]

[(Brand Name) is not manufactured or distributed by Merial seller of Frontline® Plus for Cats]

{See optional graphics on pages 18-19 of this label that may or may not appear on front panel of carton}

{The front panel will have a large, clear picture of a cat in the weight range for the product as packaged.}

ACTIVE INGREDIENT:

Fipronil	9.80%
(S)-Methoprene	11.80%
OTHER INGREDIENTS:	
TOTAL	100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION

See Back Panel for Precautionary Statements See Package Insert for First Aid, and Complete Directions for Use

Net Contents: [0.17 fl oz [(mL)]

[[1][One] applicator containing -0.017 fl oz (0.50 mL)]

[1][One] [Application]

{End Front Panel of Foil Pouch}

{BACK PANEL OF FOIL POUCH}

Promika ZoGuard Plus for Cats

[In Case of Emergency, call: XXX-XXX-XXXX] [Non-Emergency, call XXX-XXX-XXXX] [Formulated in the USA]

[Manufactured For][Distributed By]: [Promika, LLC. 5000 CentreGreen Way, Suite 100 Cary, NC 27513]

EPA Reg. No. 91300-6 EPA Est. No. XXXX-XXX

READ ENTIRE PRODUCT LABEL INSIDE THE POUCH BEFORE EACH USE

PRECAUTIONARY STATEMENTS

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, chewing gum, using tobacco or using the toilet.

HAZARDS TO DOMESTIC ANIMALS. For external use on cats only. Individual sensitivities may occur after using any pesticide product on cats. Certain medications can interact with pesticides. Do not treat your cat with more than one pesticide product at a time. Over dosing 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. This product is not a substitute for prescribed Heartworm preventative.

PRODUCT INFORMATION

[Use [Brand name][this product] monthly for control of fleas, ticks [and] chewing lice [and mosquitos]. [Studies show that] [Brand name] [this product] kills adult fleas, flea eggs, flea larvae and prevents development of all flea stages for up to six weeks. Apply monthly if your cat is at high risk for flea reinfestation[, or in a highly infested environment]. Apply monthly to control ticks[,] [mosquitoes] and chewing lice. [Brand name][This product] remains effective, even after bathing, water immersion, or exposure to sunlight. Allow treated area to dry thoroughly. Avoid contact with treated area until dry. Do not reapply for [30 days] [4 weeks][1 month]. [[Brand name][This product] can be used on breeding, pregnant and lactating [queens] [female cats].]

[Brand Name] [This product] may be applied once every [30 days] [4 weeks] [month]. Treatment remains effective, even after bathing, water immersion, or exposure to sunlight. Do not reapply [Brand Name] for [30 days][4 weeks] [1 month].]

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. Do not use on rabbits or animals other than cats.

{The following Side Effects text in a box will be placed in the lower right hand corner of back panel.}

Side Effects (Cats): 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. In some cases, gastrointestinal signs such as vomiting or diarrhea may result. If these or other side effects occur consult your veterinarian or call SafetyCall at 1-844-685-9173. If your cat has an unusual reaction to the initial application, consult a veterinarian before repeating application.

[BAR CODE AREA] [Lot code; onlynumber will appear]

{End BACK PANEL of Foil Pouch}

{Begin Foil Pouch Insert}

Promika ZoGuard Plus for Cats

{One of the following statements will appear on the insert.}

Use ONLY on Cats & Kittens Weighing over 1.5 lbs. & Over 8 Weeks old [OR]

Use ONLY on Cats and Kittens Weighing over 1.5 lbs. & Over 8 Weeks old {OR}

ONLY For Cats and Kittens Older Than 8 Weeks & Weighing Over 1.5 lbs. {OR}

ONLY For Cats & Kittens Older Than 8 Weeks & Weighing Over 1.5 lbs. {OR}

ONLY For Cats and Kittens Older Than 8 Weeks and Weighing Over 1.5 lbs. {OR}

ONLY For Cats & Kittens Older Than 8 Weeks and Weighing Over 1.5 lbs.

ACTIVE INGREDIENT:

Fipronil	9.80%
•	11.80%
OTHER INGREDIENTS:	
TOTAL	$1\overline{00.00\%}$

KEEP OUT OF REACH OF CHILDREN CAUTION

PRECAUTIONARY STATEMENTS

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, chewing gum, using tobacco or using the toilet.

HAZARDS TO DOMESTIC ANIMALS. For external use on cats only. Individual sensitivities may occur after using any pesticide product on cats. Certain medications can interact with pesticides. Do not treat your cat with more than one pesticide product at a time. Over dosing 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 organdysfunction. This product is not a substitute for prescribed Heartworm preventative.

FIRST AID		
If in eyes:	Hold eye open and rinse slowly and gently with water for 15 -20 minutes. Remove contact	
	lenses, if present, after the first 5 minutes, then continue rinsing. Call a Poison Control Center	
	or doctor for treatment advice.	
If swallowed:	Call a poison control center or 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 on skin:	If on skin: 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.	
HOT LINE NUMBER		
Have the product	t container or label with you when calling a poison control center or doctor, or going for treatment.	

For emergency medical treatment information, you may contact SafetyCall at 1-844-685-9173 seven days a week, 24-hours a day.

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. Do not use on rabbits or animals other than cats.

Side Effects (Cats): 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. In some cases, gastrointestinal signs such as vomiting or diarrhea

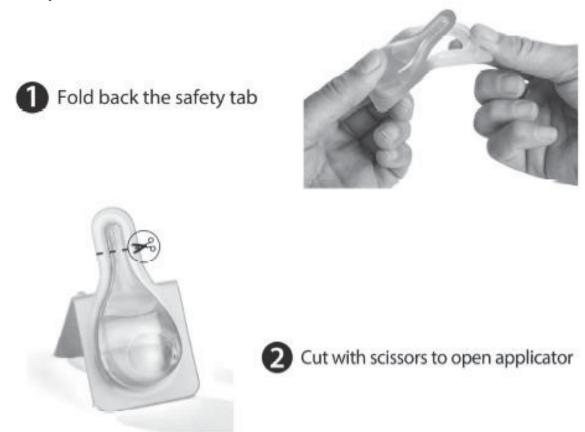
may occur. If these or other side effects occur consult your veterinarian or call SafetyCall at 1-844-685-9173. If your cat has an unusual reaction to the initial application, consult a veterinarian before repeating application.

PRODUCT INFORMATION

[Use [Brand name][this product] monthly for control of fleas, ticks [and] chewing lice [and mosquitos]. [Studies show that] [Brand name] [this product] kills adult fleas, flea eggs, flea larvae and prevents development of all flea stages for up to six weeks. Apply monthly if your cat is at high risk for flea reinfestation[, or in a highly infested environment]. Apply monthly to control ticks[,] [mosquitoes] and chewing lice. [Brand name][This product] remains effective, even after bathing, water immersion, or exposure to sunlight. Allow treated area to dry thoroughly. Avoid contact with treated area until dry. Do not reapply for [30 days] [4 weeks] [1 month]. [[Brand name][This product] can be used on breeding, pregnant and lactating [queens] [female cats].]

[Brand Name] [This product] may be applied once every [30 days] [4 weeks] [month]. Treatment remains effective, even after bathing, water immersion, or exposure to sunlight. Do not reapply [Brand Name] for [30 days] [4 weeks] [1 month].]

How to Open:



How to Apply:

Remove applicator from packaging. Using one applicator, hold the applicator with the narrow end pointing up. [Cut] the applicator tip across the marked line [to allow access to the] [dotted tip] [notches][applicator]]. {OR} [Holding applicator away from your and your cat's eyes, cut the applicator tip [at notched line] to open.] Apply [this product] at a spot between the cat's shoulder blades. Part the hair and place the open end of the applicator just above the skin. Squeeze the entire contents of the applicator and direct the solution in one spot and onto the cat's skin. Allow the area to dry. Use only one applicator per treatment.

Restrictions

Do not apply more frequently than once every [30 days][4 weeks][month].

Be sure your cat is dry before application and keep your cat dry for 24 hours after application.

Do not bathe your cat for 24 hours after application.

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 one applicator on each cat. [Do not split one applicator between two cats.]

Do not apply more than one applicator per treatment for one cat regardless of the cat's weight.

Separate the treated cat from all other cats and dogs for 24 hours after treatment has been applied.

[Optional pictogram]









[WARRANTY]

[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 [Company]. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, [Company] 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 [Company], 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.]

[In Case of Emergency, call: XXX-XXXX-XXXX] [Non-Emergency, call XXX-XXX-XXXX] [Formulated in the USA]

[Manufactured For][Distributed By]: [Promika, LLC. 5000 CentreGreen Way, Suite 100 Cary, NC 27513]

EPA Reg. No. 91300-6 [EPA Est. No. XXXX-XXXX

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE: Do not remove applicator 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.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. **If empty:** 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.

[Optional recycling graphic]



{End Foil Lined Pouch Insert}

{APPLICATOR LABEL}

Promika ZoGuard Plus for Cats
Only for cats over 8 weeks old and
weighing over 1.5 lbs
Fipronil 9.8%, (S)-methoprene 11.8%
0.017 fl. oz. [(0.5 ml)]
EPA Reg. No. 91300-6
Lot/Batch No. {only number will appear}

KEEP OUT OF REACH OF CHILDREN

CAUTION: Read accompanying label before use.

{End Applicator Label}

{Optional Marketing Claims}

- 1. For use ONLY on cats & kittens weighing over 1.5 lbs and over 8 weeks of age
- 2. Only for cats [&][and] kittens over 8 weeks of age and weighing over 1.5 lbs
- 3. Apply to kittens over 8 weeks old and weighing over 1.5 lbs.
- 4. Apply to kittens 8 weeks or older and weighing over 1.5 lbs.

Mosquitoes]

5. Kills mosquitoes [within 48 hours for up to 28 days]

Chewing Lice

- 6. Kills chewing lice
- 7. Rapid elimination of chewing lice infestation

Adult Fleas

- 8. Kills adult fleas [for up to six weeks]
- 9. Kills Fleas [Up to [4][6] weeks]!
- 10. Kills fleas which may be a source of flea allergy dermatitis

Ticks

- 11. Kills ticks including those that may transmit Lyme disease
- 12. Kills Ticks for Up to [4 weeks] [1 month] [30 days]!
- 13. Kills Deer Ticks [that may carry Lyme disease] for up to [4 weeks] [1 month] [30 days]
- 14. Kills [brown dog ticks [(Rhipicephalus sanguineus)]] [American dog ticks,] [and] [lone star ticks][,][and deer ticks] [for

up to [4 weeks] [1 month] [30 days]]

15. Kills American Dog Ticks [(Dermacentor variabilis)] for up to [4 weeks] [1 month] [30 days]!

Multiple Infestations]

- 16. Flea [&] [and] Tick Control for Cats [&] [and] Kittens 8 weeks old and older and weighing over 1.5 lbs.
- 17. Kills fleas, flea eggs, ticks, chewing lice [&] [and] [mosquitoes
- 18. Kills fleas, ticks, [mosquitoes,] chewing lice, flea eggs, [and] flea larvae [and prevents the development of flea pupae]
- 19. Breaks the Flea Life Cycle
- 20. Monthly protection from flea, tick, [mosquito,] chewing lice, and flea egg
- 21. Monthly protection from flea, tick, [mosquito] and chewing lice
- 22. Kills fleas, ticks, [mosquitoes,] flea eggs, and chewing lice
- 23. [Seven][7] Way [Action] [Effectiveness] [Control] kills fleas, ticks, mosquitoes, chewing lice, flea eggs, flea larvae and prevents the development of flea pupae]
- 24. [Six] [6] Way [Action] [Effectiveness] [Control] kills fleas, ticks, chewing lice, flea eggs, flea larvae and prevents the development of flea pupae
- 25. [Six][6] Way [Action] [Effectiveness] [Control] kills fleas, ticks, mosquitoes, chewing lice, flea eggs & flea larvae
- 26. [Five][5] Way [Action] [Effectiveness] [Control] kills fleas, ticks, chewing lice, flea eggs & flea larvae
- 27. [4 week] [1 month] [30 day] Flea [and] [&] Tick [Application] [Treatment]!
- 28. [[Four][4] Week] [1 month] Flea, Tick, [Mosquito] and Chewing Lice Control
- 29. Use [Brand name][this product] monthly to break the flea life cycle.
- 30. [[Four][4] Week] [1 month] [30 day] Flea, Tick and Chewing Lice Control
- 31. Use [Brand name][This product] monthly to control ticks and chewing lice
- 32. Monthly protection from flea, tick, [mosquito,] flea egg, flea larvae and chewing lice.]
- 33. [[4 week] [1 month] [30 day] Flea and Tick Treatment!
- 34. Once A Month Flea, Tick, [Mosquitoes] [and] [Chewing Lice] [Application] [Treatment]
- 35. Kills Fleas and Ticks for up to [4 weeks] [1 month] [30 days]!
- 36. Kills Fleas, Ticks, Flea Eggs & Flea Larvae for up to [4 Weeks] [1 month] [30 days]
- 37. [Brand name][This product provides convenient and effective flea, tick, [and] chewing lice [and] [mosquito] control for cats and kittens over 8 weeks of age and weighing over 1.5 lbs.

Flea Eggs and Larvae

- 38. Controls flea reinfestation on your cat [for up to six weeks]
- 39. Kills adult fleas, flea eggs, flea larvae, and prevents the development of pupae [for up to six weeks]
- 40. Kills all stages of the flea [adult fleas, flea eggs, flea larvae] and prevents the development of flea pupae
- 41. If cat is at high risk for flea reinfestation apply once a month
- 42. Kills flea eggs [larvae] [and prevents the development of pupae] for up to six weeks
- 43. With (S)-methoprene [Insect Growth Regulator] [IGR] which Breaks the Flea Life Cycle
- 44. With (S)-methoprene to Break Flea Life Cycle
- 45. With [Insect Growth Regulator] [IGR] to Break Flea Life Cycle
- 46. Dual Action [!]: Fipronil with (S)-methoprene [insect growth regulator] [IGR]
- 47. Effectively Breaks the Flea Life Cycle
- 48. Kills Flea Eggs & Flea Larvae [for up to six weeks]!
- 49. Prevents Flea Eggs From Developing Into Biting Adults

All Others

- 50. For Cats and Kittens 8 weeks of age or older and weighing over 1.5 lbs.
- 51. Can be used on kittens 8 weeks of age and older and weighing over 1.5 lbs.
- 52. Fast Acting
- 53. Easy to Use [Application]
- 54. Best if used year round!
- 55. Apply monthly
- 56. Once a month treatment
- 57. Apply once every [4 weeks] [month] [30 days]!
- 58. [4 Week Dose!] [1 Month Dose!] [30 Day Dose!
- 59. Waterproof
- 60. Effective even after bathing
- 61. Effective after bathing and exposure to water and sunlight
- 62. Can be used on breeding, pregnant and lactating [queens], [female] [cats]

- 63. 1 Application
- 64. Controls and prevents infestation of listed pests for [4 weeks][1 month]
- 65. Lift [here] for more information
- 66. {When used, all three optional statements will appear together.}
- 67. Contains Fipronil and (S)-Methoprene, the active ingredients used in Frontline® Plus For Cats Frontline is a registered trademark of Merial
- 68. (Brand Name) is not manufactured or distributed by Merial

{Optional graphics below may or may not appear anywhere on finished label}

Too	Adult Flea	
Tipa	Fleas	
476-	Flea eggs	66
つ	Flea Larvae	3
•	Flea Pupae	
*	Ticks	8
*	Brown Dog Tick	(S)
*	Deer Tick	8
*	American Dog Tick	
*	Chewing Lice	
*	Lone Star Tick	
7)	Mosquitoes	8
*	Mite	(A)