

#### U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

NOTICE OF PESTICIDE:

X Registration
Reregistration

(under FIFRA, as amended)

EPA Reg. Number:

Date of Issuance:

93207-4

4/6/22

Term of Issuance:

Conditional, Time-Limited Expires: 04/06/2024

Name of Pesticide Product:

Fipronil+Methoprene Squeeze-on for Cats

Name and Address of Registrant (include ZIP Code):

Jiamin Xu 1942 Broadway Street, Suite 314C Boulder CO 80302 970-999-0028

**Note:** Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/registration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

**Signature of Approving Official:** 

d Herrick

Date:

4/6/22

Jacquelyn Herrick, Product Manager 03

Invertebrate-Vertebrate Branch 1, Registration Division (7505P)

EPA Form 8570-6

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- 2. This registration is time-limited and expires 04/06/2024.
- 3. You must submit quarterly enhanced incident reports and quarterly sales information in doses sold for this product beginning within 3 months of the date the product is first released for shipment, on the first day of the quarter (i.e., January 1, April 1, July 1, or October 1). Please flag any Confidential Business Information as such. Submit enhanced incident reporting and quarterly sales information to the Product Manager's attention. 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
- 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 cats 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 dogs (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 cats 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 cat incidents for each severity code for each pet weight range on the product label, as applicable.
- A summary table for cat weight showing number of incidents for each product weight range. This table should show number of incidents in cats weighing less than that product weight range, number of incidents in cats in lower half of weight range, number of incidents in cats in upper half of weight range, and cats weighing more than the product weight range, as applicable.
- Table showing number of incidents for each cat breed, where provided.
- Table showing number of incidents in cats for each clinical sign.
- Table showing number of incidents in cats 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 pet spot-ons, the Agency will inform registrants. If mitigation measures are necessary, EPA may take regulatory action.

- 5. The data requirements for storage stability and corrosion characteristics (Guidelines 830.6317 and 830.6320) are not satisfied. A one year study is required to satisfy these data requirements. You have 18 months from the date of registration to provide these data.
- 6. Make the following label changes before you release the product for shipment:
  - Revise the EPA Registration Number to read, "EPA Reg. No. 93207-4."
- 7. Submit one copy of the final printed label for the record before you release the product for shipment.

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.

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If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

Please note that the record for this product currently contains the following CSFs:

Basic CSF dated 06/05/2021

If you have any questions, please contact Jamey Shuler by phone at (202) 566-2898, or via email at Shuler.Jamey@epa.gov.

Enclosure

### ACCEPTED

04/06/2022

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 2000 4

93207-4

#### **{START FRONT PANEL}**

Fipronil + S-Methoprene Squeeze on for Cats

Optional text appears in brackets []
Information for reviewer appears in brackets {}

#### {THE FOLLOWING ON FRONT PANEL}

{The word cat to be a minimum of 75% the height of the largest letter in the primary brand name}

Large, clear picture of a cat in the weight range for the product as packaged to be placed on the front panel of the label.



{See ABNs at the end of this label}

{If one of the following two lines are used, both will be used}
[[Apply to [cats and ] kittens [over] 8 weeks [or older] [old] and over 1.5 lbs
[For use ONLY on cats [&] [and] kittens 8 weeks or older and weighing over 1.5 lbs]

#### **ACTIVE INGREDIENTS:**

Fipronil	9.80%
(S)-methoprene	11.80%
OTHER INGREDIENTS:	<u>78.40%</u>
TOTAL	100.00%

## KEEP OUT OF REACH OF CHILDREN CAUTION

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

See [inside flap] [or] [insert] and back panel for complete Directions for Use

Net Contents: 0.017 (0.5 mL) fl oz [Y - 0.017 fl oz (0.5 mL) tubes

{Or}

Net Contents: Z fl oz; Y (-)(or) (x)0.017 (0.5 mL) fl oz tubes

{Note to reviewer: the liquid amount of one tube can either in ml or fl oz; Y is the

number of tubes that are in the carton, [3] [Three][6] [Six][12] [Twelve] [24] [Twenty-Four] Applications {these are the only options for Y}; Z is the sum of the liquid amounts}

#### **{END - FRONT PANEL}**

#### **{THE FOLLOWING ON BACK/SIDE PANEL OF CARTON}**

[[Brand Name] [This product] contains [Fipronil (9.8%) and S-Methoprene (11.8%)] [insect growth regulator] [IGR] to effectively kill fleas. [The active ingredients in [Brand Name][this product] features a formula for long lasting control of fleas, and chewing lice for [1 month] [[4][four] weeks] on cats only.]

## READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON CATS AND KITTENS OVER 8 WEEKS OF AGE AND OVER 1.5 LBS

#### PRECAUTIONARY STATEMENTS

**HAZARDS TO HUMANS. CAUTION.** Harmful if swallowed. Causes 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, 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 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, aged, pregnant or nursing 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	Call a poison control center or doctor immediately for treatment	
swallowed	advice.	
	Have person sip a glass of water if able to swallow.	
	Do not give anything by mouth to an unconscious person.	
	• Do not Induce vomiting unless told to by a poison control center or	
	doctor.	
If on skin or	Take off contaminated clothing.	
clothing:	Rinse skin immediately with plenty of water for 15-20 minutes.	
	Call a poison control center or doctor for treatment advice.	
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.

#### **NOTE TO PHYSICIAN**

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

[Distributed by:] [Manufactured for:] New Thinking Technology Inc. 1942 Broadway Street, Suite 314 C

Boulder CO 80302

EPA Reg. No. 93207-XXX EPA Est. No. XXX-XX-XXX

#### **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** apply more than one tube per treatment for one cat regardless of the cat's weight.

Use entire contents of tube on each cat.

#### **RESTRICTIONS**

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

Do not use on kittens under 8 weeks of age.

**Do not** apply to cats weighing less than 1.5 lbs.

**Do not** split one tube between two cats.

Cat must be dry at the time of application and remain dry for 24 hours after application.

Do not allow your cat to ingest this product.

Separate the treated cat from all other cats and dogs for 24 hours after treatment has been applied to allow product to dry thoroughly.

{The following text in a box will be placed in the lower right-hand corner of back panel immediately above the cat warning text box.}

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 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 call I-XXX-XXX-XXXX. 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.

#### [How to Apply]

[Clip. Part. Squeeze.

Easy-than-ever tube lets you *clip* the tip, *part* the fur and *apply* directly to the skin - Putting proven flea and tick protection where it needs to be.]

- 1. Invert tube over cat and use open end to part cat's hair.
- 2. Squeeze tube firmly to apply all of the solution to the cat's skin [as a spot [on] [to] the cat's back between the shoulder blades.] [or] [from the back of the neck to a point midway between the neck and tail.]
- 3. **Do not** apply more often than once every 4 weeks.

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



[5 Step [Easy] [Spot On] [Squeeze-On] [Topical] Checklist]

- [] Read the label completely and follow directions
- [] Weigh your cat
- [] DO NOT, treat with more than one pesticide product at a time
- [] Separate animals after [treatment] [application] to avoid chance of ingestion
- [] **DO NOT** split tubes between pets and use the ENTIRE tube contents]
- {[] Optional numbers }

#### FREQUENCY OF APPLICATION

Use [Brand Name] [this product] monthly for control of flea and chewing lice infestations. [Studies show that] [Brand Name] [this product] kills adult fleas for one month. Apply monthly if your cat is at high risk for flea reinfestation [, or in a highly infested environment]. Apply monthly to control and chewing lice. [Brand Name] Allow treated area to dry thoroughly for 24 hours. **Do not** reapply for [30 days] [4]

#### STORAGE AND DISPOSAL

DO NOT contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in cool dry location in original container.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Open dumping is prohibited.

**CONTAINER DISPOSAL:** Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into mixing equipment. Then dispose of liner in a sanitary landfill, or incinerate, or, if allowed by state and local authorities, by burning. If burned, Slay out of smoke. If drum Is contaminated and cannot be reused, dispose of in the same manner.

[WARRANTY Read the entire Directions for Use and Warranty before using this Product. By using this product, user or buyer accepts the following warranty. The directions for use of this product are believed to adequate and must be followed carefully. It is impossible to eliminate all risks associated with the use of this product. Unintended consequences may result because of unknown factors. All such risks shall be assumed by the user or buyer. New Thinking Technology Inc is committed to providing high quality products. To the extent consistent with applicable law, New Thinking Technology Inc makes no warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label. To the extent consistent with applicable law, New Thinking Technology Inc, the manufacturer, or the Seller shall not be liable for indirect, special, incidental or consequential damages. To the extent consistent with applicable law, the exclusive remedy of the user or buyer shall not exceed the purchase price paid.]

#### {BACK /SIDE PANEL ENDS}

#### **{TUBE LABEL}**

**Brand Name** 

Only For Cats Weighing 1.5 lbs and 8 weeks over

Fipronil 9.8%, S-methoprene 8.8% [Lot #]

EPA Reg No XX, EPA Est. No XX

**CAUTION** Keep out of reach of children

Use scissors to open, see out package (inserts) for instructions.

#### [Optional marketing statements on outer packages]

#### [Mosquitoes]

[Kills mosquitoes] [and within 48 hours for 28 days]

#### [Chewing Lice]

[Kills chewing lice]

#### [Adult Fleas]

[Kills adult fleas [for 4 weeks]]

[Kills Fleas [[4] weeks]!]

[Kills fleas which may be a source of flea allergy dermatitis] [or flea bite anemia]

#### [Ticks]

[Kills ticks including those that may transmit Lyme disease]

[Kills Ticks for [4 weeks] [1 month] [30 days]!]

[Waterproof]

[Kills Deer Ticks (that may carry Lyme disease) for [4 weeks] [1 month] [30 days]]

[Kills [brown dog ticks], [(Rhipicephalus sanguineus)] [American dog ticks,] [and] [lone star ticks][,][and deer

ticks] [for [4 weeks] [1 month] [30 days]]]

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

#### [Multiple Infestations]

[Flea [&] [and] Tick Control for Cats [&] [and] Kittens 8 weeks old and older [and] over 1.5 lbs]

[Kills fleas, flea eggs, ticks, chewing lice [&] [and] [mosquitoes]

[Kills fleas, ticks, [mosquitoes,] chewing lice, flea eggs, [and] flea larvae [and prevents the development of flea pupae]]

[Breaks the Flea Life Cycle]

[Monthly flea, tick, [mosquito] and chewing lice protection]

[Kills fleas, ticks, [mosquitoes,] flea eggs, and chewing lice]

[[Seven] [7] [Six] [6] Way [Action] [Effectiveness] [Control] kills fleas, ticks, [mosquitoes,] chewing lice, flea eggs, flea larvae and prevents the development of flea pupae]

[[Six] [6] [Five] [5] Way [Action] [Effectiveness] [Control] kills fleas, ticks, [mosquitoes,] chewing lice, flea eggs & flea larvae]

[[4 week] [1 month] [30 day] Flea [and] [&] Tick [Application] [Treatment]!]

[[Four (4) Week] [1 month] [Flea, Tick, [Mosquito] and Chewing Lice Control]

[Use [Brand name][this product] monthly to break the flea life cycle.]

[[Four (4) Week] [1 month] [30 day] [Flea, Tick and Chewing Lice Control]

[Use [Brand name][This product] monthly to control ticks and chewing lice]

[Monthly flea, tick, [mosquito,] flea egg, flea larvae and chewing lice protection.]

[[4 week] [1 month] [30 day] Flea and Tick Treatment!]

[Once A Month Flea, Tick, [Mosquitoes] [and] [Chewing Lice][Application] [Treatment]]

[Kills Fleas and Ticks for [4 weeks] [1 month] [30 days]!]

[Kills Fleas, Ticks, Flea Eggs & Flea Larvae for [4 Weeks] [1 month] [30 days]]

[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] over 1.5 lbs ]

[Flea Eggs and Larvae]

[With (S)-methoprene [Insect Growth Regulator] [IGR] which Breaks the Flea Life Cycle]

[With (S)-methoprene to Break Flea Life Cycle]

[With [Insect Growth Regulator] [IGR] to Break Flea Life Cycle]

[Dual Action [!]: Fipronil with (S)-methoprene [insect growth regulator] [IGR]

Effectively Breaks the Flea Life Cycle]

[Prevents Flea Eggs From Developing Into Biting Adults]

#### [All Others]

[one month][30 days][4 weeks]

[Convenient spot treatment]

[Easy to Use [Application]]

[Best if used year-round!]

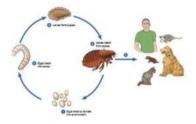
[For year-round protection, apply [Brand Name] monthly]

[(ICON Showing [4 week] [1 month] [30 day] Protection)]



[Apply monthly]

Breaks the flea life cycle (image)



\*The product does not kill pupae and does not protect the home.

{The texts below the flea life cycle diagram will appear with the diagram}

[Prevents reinfestation of listed pests for [4 weeks] [1 month]]

[Apply once every [4 weeks] [month] [30 days]!]

[4 Week Dose!] [1 Month Dose!] [30 Day Dose!]

[Can be used on breeding, pregnant, and lactating [female] [cats]]

[[Free] Calendar Stickers Inside!]

[[Free with purchase] [Free inside] Monthly Application Reminder [Magnet][inside]]

[Fipronil + (S)-methoprene]

[Stops and prevents infestation of listed pests for [4 weeks][1 month]]

[Effective after bathing exposing to sunlight]

[Stops existing infestation and prevents establishment of additional infestation of listed pests]

[Direct to skin tube]

[Easy to Use tube]

[Clean cut [open] tube]

[No-mess [open] tube]

[Clip-tip design tube[!]]

[Satisfaction Guaranteed - If you are not satisfied, we will make it right with a replacement or refund.]

{Below claims will not distract from the mitigation on the front panel}

[Save Now!] [Buy more and save!]

[Value Size] [Club Size] [Bonus Size]

[Great Value] [Better Value]

[Bonus Pack] [(1) + (1) bonus pack!] [Club Pack]

[Buy 2 Get 1 Free] (Free)!] [33% more free]

- [(1) Dose(s) Free!] [(1) Month(s) Free!] [(30) Day(s) of treatment- Free!]
- [(3) Tube(s) Free!] [(3) Application(s) Free!]

{Note to reviewer, the following claims will not be presented in an overly large font, such that the claim is set in a font type no larger than that of the Signal Word on the label. Furthermore, the claim will not be presented with heavily bolded or highlighted type or use coloring to cause the claim to excessively stand out over the rest of the labeling text. The format of the claim will not be in such a way that is causes greater attention than other required precautionary labeling on the label.}

[Contains the same active ingredients [used in] [as] FRONTLINE® Plus for Cats.\*] [Contains the same active ingredients, Fipronil + (S)-methoprene, as FRONTLINE® Plus for Cats.\*]

[[Brand Name] [products] [This product] contain(s) Fipronil + (S)-methoprene , the same active ingredients used in FRONTLINE® Plus for Cats.\*]

[[Brand Name] [products] [This product] contain(s) Fipronil + (S)-methoprene the same active ingredients used in FRONTLINE® Plus for Cats\*]

[\*[Brand Name] [This product] is not manufactured or distributed by [Merial®] [Company name], the makers of [FRONTLINE® Plus for Dogs (or any approved ABN)].]

[\*[Brand Name] [This product][Frontline®] is a registered trademark of [Merial®] [Company name].]

#### [ABNs:]

[Jmxu's [Methoprene] [+] [Fipronil] Squeeze [-] On for Cats] [KingMo [Methoprene] [+] [Fipronil] Squeeze [-] On for Cats]

[Advanllent [Methoprene] [+] [Fipronil] Squeeze [-] On for Cats] [SOBAKEN [Methoprene] [+] [Fipronil] Squeeze [-] On for Cats]

{Inserts are optional}
{START INSERTS}

Fipronil + S-Methoprene Squeeze on for Cats

Optional text appears in brackets []
Information for reviewer appears in brackets {}

#### {THE FOLLOWING ON FRONT PANEL}

{The word cat to be a minimum of 75% the height of the largest letter in the primary brand name}

Large, clear picture of a cat in the weight range for the product as packaged to be placed on the front panel of the label.



{See ABNs at the end of this label}

{If one of the following two lines are used, both will be used}
[[Apply to [cats and ] kittens [over] 8 weeks [or older] [old] and over 1.5 lbs
[For use ONLY on cats [&] [and] kittens 8 weeks or older and weighing over 1.5 lbs]

#### **ACTIVE INGREDIENTS:**

Fipronil	9.80%
(S)-methoprene	11.80%
OTHER INGREDIENTS:	<u>78.40%</u>
TOTAL	

### KEEP OUT OF REACH OF CHILDREN CAUTION

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

See [inside flap] [or] [insert] and back panel for complete Directions for Use

Net Contents: 0.017 (0.5 mL) fl oz [Y - 0.017 fl oz (0.5 mL) tubes

Net Contents: Z fl oz; Y – 0.017 (0.5 mL) fl oz tubes

[3][Three][6][Six][12][Twelve]

{Note to reviewer: the liquid amount of one tube can either in ml or fl oz; Y is the number of tubes that are in the carton, Y must be multiples of 3; Z is the sum of the liquid amounts}

[[Brand Name] [This product] contains [Fipronil (9.8%) and S-Methoprene (11.8%)] [insect growth regulator] [IGR] to effectively kill fleas. [The active ingredients in [Brand Name][this product] features a formula for long lasting control of fleas, and chewing lice for [1 month] [[4][four] weeks] on cats only.]

# READ ENTIRE LABEL BEFORE EACH USE. USE ONLY ON CATS AND KITTENS OVER 8 WEEKS OF AGE AND OVER 1.5 LBS

#### PRECAUTIONARY STATEMENTS

**HAZARDS TO HUMANS. CAUTION.** Harmful if swallowed. Causes 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, 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 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, aged, pregnant or nursing 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	Call a poison control center or doctor immediately for treatment
swallowed	advice.
	Have person sip a glass of water if able to swallow.
	• Do not give anything by mouth to an unconscious person.
	• Do not Induce vomiting unless told to by a poison control center or
	doctor.
If on skin or	Take off contaminated clothing.
clothing:	Rinse skin immediately with plenty of water for 15-20 minutes.

	Call a poison control center or doctor for treatment advice.
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.

#### **NOTE TO PHYSICIAN**

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

[Distributed by:] [Manufactured for:] New Thinking Technology Inc. 1942 Broadway Street, Suite 314 C EPA Est. No. XXX-XX-XXX Boulder CO 80302

EPA Reg. No. 93207-XXX

#### **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 apply more than one tube per treatment for one cat regardless of the cat's weight.

Use entire contents of tube on each cat.

#### **RESTRICTIONS**

Do not use on rabbits or animals other than cats.

Do not use on kittens under 8 weeks of age.

Do not apply to cats weighing less than 1.5 lbs.

Do not split one tube between two cats.

Cat must be dry at the time of application and remain dry for 24 hours after application.

**Do not** allow your cat to ingest this product.

Separate the treated cat from all other cats and dogs for 24 hours after treatment has been applied to allow product to dry thoroughly.

The following text in a box will be placed in the lower right hand corner of back panel immediately above the cat warning text box.}

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 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 call I-XXX-XXX-XXXX. 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.

## [Application Instructions] [How to Open]



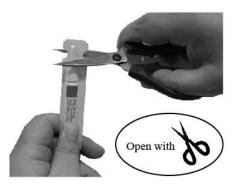
1. Remove product tubes from the package



2. Seperate one tube from others



3. Holding the tube with, pointing end, and away from the face and body.



4. Cut off the narrow end at the notches with scissors.

#### [How to Apply]

[Clip. Part. Squeeze.

Easy-than-ever tube lets you *clip* the tip, *part* the fur and *apply* directly to the skin - Putting proven flea and tick protection where it needs to be.]

- 1. Invert tube over cat and use open end to part cat's hair.
- 2. Squeeze tube firmly to apply all of the solution to the cat's skin [as a spot [on] [to] the cat's back between the shoulder blades.] [or] [from the back of the neck to a

point midway between the neck and tail.]

3. **Do not** apply more often than once every 4 weeks. [Look at the Label (Look at the Label icon) [Easy]



5 Step [Easy] [Spot On] [Squeeze-On] [Topical] Checklist]

- [] Read the label completely and follow directions
- [] Weigh your cat
- [] DO NOT, treat with more than one pesticide product at a time
- [] Separate animals after [treatment] [application] to avoid chance of ingestion
- [] **DO NOT** split tubes between pets and use the ENTIRE tube contents {[] Optional numbers }

#### FREQUENCY OF APPLICATION

Use [Brand Name] [this product] monthly for control of flea and chewing lice infestations. [Studies show that] [Brand Name] [this product] kills adult fleas for one month. Apply monthly if your cat is at high risk for flea reinfestation [, or in a highly infested environment]. Apply monthly to control and chewing lice. [Brand Name] Allow treated area to dry thoroughly for 24 hours. **Do not** reapply for [30 days] [4 weeks].

#### STORAGE AND DISPOSAL

**DO NOT** contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in cool dry location in original container.

**PESTICIDE DISPOSAL:** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility. Open dumping is prohibited.

**CONTAINER DISPOSAL:** Completely empty liner by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into mixing equipment. Then dispose of liner in a sanitary landfill, or incinerate, or, if allowed by state and local authorities, by burning. If burned, Slay out of smoke. If drum Is contaminated and cannot be reused, dispose of in the same manner.

[WARRANTY Read the entire Directions for Use and Warranty before using this Product. By using this product, user or buyer accepts the following warranty. The directions for use of this product are believed to adequate and must be followed carefully. It is impossible to eliminate all risks associated with the use of this product. Unintended consequences may result because of unknown factors. All such risks shall be assumed by the user or buyer. New Thinking Technology Inc is committed to

providing high quality products. To the extent consistent with applicable law, New Thinking Technology Inc makes no warranties, express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond statements on this label. To the extent consistent with applicable law, New Thinking Technology Inc, the manufacturer, or the Seller shall not be liable for indirect, special, incidental or consequential damages. To the extent consistent with applicable law, the exclusive remedy of the user or buyer shall not exceed the purchase price paid.]

#### [Optional marketing statements for inserts]

#### [Mosquitoes]

[Kills mosquitoes] [and within 48 hours for 28 days]

#### [Chewing Lice]

[Kills chewing lice]

#### [Adult Fleas]

[Kills adult fleas [for 4 weeks]]

[Kills Fleas [[4] weeks]!]

[Kills fleas which may be a source of flea allergy dermatitis] [or flea bite anemia]

#### [Ticks]

[Kills ticks including those that may transmit Lyme disease]

[Kills Ticks for [4 weeks] [1 month] [30 days]!]

[Waterproof]

[Kills Deer Ticks (that may carry Lyme disease) for [4 weeks] [1 month] [30 days]]

[Kills [brown dog ticks], [(Rhipicephalus sanguineus)] [American dog ticks,] [and]

[lone star ticks][,][and deer

ticks] [for [4 weeks] [1 month] [30 days]]]

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

#### [Multiple Infestations]

[Flea [&] [and] Tick Control for Cats [&] [and] Kittens 8 weeks old and older [and] over 1.5 lbs]

[Kills fleas, flea eggs, ticks, chewing lice [&] [and] [mosquitoes]

[Kills fleas, ticks, [mosquitoes,] chewing lice, flea eggs, [and] flea larvae [and prevents the development of flea pupae]]

[Breaks the Flea Life Cycle]

[Monthly flea, tick, [mosquito] and chewing lice protection]

[Kills fleas, ticks, [mosquitoes,] flea eggs, and chewing lice]

[[Seven] [7] [Six] [6] Way [Action] [Effectiveness] [Control] kills fleas, ticks,

[mosquitoes,] chewing lice, flea eggs, flea larvae and prevents the development of

flea pupae]

[[Six] [6] [Five] [5] Way [Action] [Effectiveness] [Control] kills fleas, ticks,

[mosquitoes,] chewing lice, flea eggs & flea larvae]

[[4 week] [1 month] [30 day] Flea [and] [&] Tick [Application] [Treatment]!]

[[Four (4) Week] [1 month] [Flea, Tick, [Mosquito] and Chewing Lice Control]

[Use [Brand name][this product] monthly to break the flea life cycle.]

[[Four (4) Week] [1 month] [30 day] [Flea, Tick and Chewing Lice Control]

[Use [Brand name][This product] monthly to control ticks and chewing lice]

[Monthly flea, tick, [mosquito,] flea egg, flea larvae and chewing lice protection.]

[[4 week] [1 month] [30 day] Flea and Tick Treatment!]

[Once A Month Flea, Tick, [Mosquitoes] [and] [Chewing Lice][Application] [Treatment]]

[Kills Fleas and Ticks for [4 weeks] [1 month] [30 days]!]

[Kills Fleas, Ticks, Flea Eggs & Flea Larvae for [4 Weeks] [1 month] [30 days]]

[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] over 1.5 lbs ]

[Flea Eggs and Larvae]

[With (S)-methoprene [Insect Growth Regulator] [IGR] which Breaks the Flea Life Cycle]

[With (S)-methoprene to Break Flea Life Cycle]

[With [Insect Growth Regulator] [IGR] to Break Flea Life Cycle]

[Dual Action [!]: Fipronil with (S)-methoprene [insect growth regulator] [IGR]

Effectively Breaks the Flea Life Cyclel

[Prevents Flea Eggs From Developing Into Biting Adults]

#### [All Others]

[one month][30 days][4 weeks]

[Convenient spot treatment]

[Easy to Use [Application]]

[Best if used year-round!]

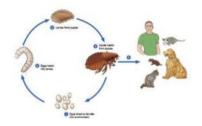
[For year-round protection, apply [Brand Name] monthly]

[(ICON Showing [4 week] [1 month] [30 day] Protection)]



[Apply monthly]

Breaks the flea life cycle (image)



\*The product does not kill pupae and does not protect the home.

{The texts below the flea life cycle diagram will appear with the diagram}

[Prevents reinfestation of listed pests for [4 weeks] [1 month]]

[Apply once every [4 weeks] [month] [30 days]!]

[4 Week Dose!] [1 Month Dose!] [30 Day Dose!]

[Can be used on breeding, pregnant, and lactating [female] [cats]]

{Note to reviewer, for the following two claims, the addition of these claims will not distract from the necessary labeling on the front panel.}

[[Free] Calendar Stickers Inside!]

[[Free with purchase] [Free inside] Monthly Application Reminder [Magnet][inside]]

[Stops and prevents infestation of listed pests for [4 weeks][1 month]]

[Effective after bathing exposing to sunlight]

[Stops existing infestation and prevents establishment of additional infestation of listed pests]

[Direct to skin tube]

[Easy to Use tube]

[Clean cut [open] tube]

[No-mess [open] tube]

[Clip-tip design tube[!]]

[Satisfaction Guaranteed - If you are not satisfied, we will make it right with a replacement or refund.]

{Below claims will not distract from the mitigation on the front panel}

[Save Now!] [Buy more and save!]

[Value Size] [Club Size] [Bonus Size]

[Great Value] [Better Value]

{There can be various numbers in the brackets, but not more than one year worth of supply will be included in one package}

[Bonus Pack] [(1) + (1) bonus pack!] [Club Pack]

[Buy 2 Get 1 Free] [(Free)!] [33% more free]

[(1) Dose(s) Free!] [(1) Month(s) Free!] [(30) Day(s) of treatment- Free!]

[(3) Tube(s) Free!] [(3) Application(s) Free!]

{Note to reviewer, for the following claims, will not be presented in an overly large font, such that the claim is set in a font type no larger than that of the Signal Word on the

label. Furthermore, the claim will not be presented with heavily bolded or highlighted type or use coloring to cause the claim to excessively stand out over the rest of the labeling text. The format of the claim will not be in such a way that is causes greater attention than other required precautionary labeling on the label.}

[Fipronil + (S)-methoprene]

[Contains the same active ingredients [used in] [as] FRONTLINE® Plus for Cats.\*] [Contains the same active ingredients, Fipronil + (S)-methoprene, as FRONTLINE® Plus for Cats.\*]

[[Brand Name] [products] [This product] contain(s) Fipronil + (S)-methoprene , the same active ingredients used in FRONTLINE® Plus for Cats.\*]

[[Brand Name] [products] [This product] contain(s) Fipronil + (S)-methoprene the same active ingredients used in FRONTLINE® Plus for Cats\*]

[\*[Brand Name] [This product] is not manufactured or distributed by [Merial®] [Company name], the makers of [FRONTLINE® Plus for Dogs (or any approved ABN)].]

[\*[Brand Name] [This product][Frontline®] is a registered trademark of [Merial®] [Company name].]

#### [ABNs:]

[Jmxu's [Methoprene] [+] [Fipronil] Squeeze [-] On for Cats] [KingMo [Methoprene] [+] [Fipronil] Squeeze [-] On for Cats] [Advanllent [Methoprene] [+] [Fipronil] Squeeze [-] On for Cats] [SOBAKEN [Methoprene] [+] [Fipronil] Squeeze [-] On for Cats]