U.S. ENVIRONMENTAL PROTECTION AGENCY	EPA Reg. Number:	Date of Issuance:				
U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division (7505P) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460	239-2755	7/12/19				
NOTICE OF PESTICIDE:	Term of Issuance:					
X Registration Reregistration	Conditional					
(under FIFRA, as amended)	Name of Pesticide Product:					
	Bed Bug RTU 2597					
Name and Address of Registrant (include ZIP Code):						
The Scotts Company, LLC 14111 Scottslawn Road Marysville, OH 43041						
Note: Changes in labeling differing in substance from that accepted in connection with this registrati Registration Division prior to use of the label in commerce. In any correspondence on this product a						
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 reco Agency. In order to protect health and the environment, the Admin time suspend or cancel the registration of a pesticide in accordance name in connection with the registration of a product under this Ac registrant a right to exclusive use of the name or to its use if it has b	histrator, on his mo with the Act. The t is not to be const	otion, may at any e acceptance of any trued as giving the				
This product is conditionally registered in accordance with FIFRA with the following conditions:	section 3(c)(7)(A)). You must comply				
 Submit and/or cite all data required for registration/reregistration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data. 						
Signature of Approving Official:	Date:					
Coluba	7/10/10					
Catherine Aubee, Chief Invertebrate-Vertebrate Branch 1, Registration Division (7505P)	7/12/19					
EPA Form 8570-6						
2. You are required to comply with the data requirements descridentified below:	ribed in the DCI of	r EDSP Order				

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- a. Phenothrin GDCI-069005-1285 PDCI-069005-28163
- b. MGK 264 GDCI-057001-1224 GDCI-057001-26616

You must comply with all the data requirements within the established deadlines. If you have questions about the Generic DCI or EDSP Order listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division: http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1

- 3. 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.
- 4. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, "EPA Reg. No. 239-2755."
- 5. 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.

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

- Basic CSF dated 7/2/2018
- Alternate CSF 1 dated 7/2/2018

If you have any questions, please contact Autumn Metzger at 703-305-5314 or <u>Metzger.autumn@epa.gov</u>.

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Enclosure

Bed Bug RTU 2597

Alternate Brand Names:

ORTHO HOME DEFENSE BED BUG & FLEA KILLER1

Not For Use on Humans or Animals For Indoor Use [in Homes, Apartments, Residences]

ACTIVE INGREDIENTS:

Sumithrin	0.40%
*N-Octyl bicycloheptene dicarboximide	1.00%
Imidacloprid	0.05%
OTHER INGREDIENTS	98.55%
	100.00%

* MGK[®] 264, Insecticide Synergist

KEEP OUT OF REACH OF CHILDREN CAUTION

See side/back panel/booklet for additional Precautionary Statements and First Aid.

FIRST AID					
IF SWALLOWED: Call a poison control center or 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 a doctor. 				
	 Do not give anything by mouth to an unconscious person. 				
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For					

additional information on this pesticide product (including health concerns, medical emergencies, or pesticide concerns) you may call 1-877-465-5161.

Sold/Distributed/Manufactured for/by: The Ortho Group P.O. Box 190 Marysville, OH 43040

EPA Reg. No. 239-NEW EPA Est. No. XXXXXXXX [Superscript is first letter of lot number] 20XX© The Ortho Group. World rights reserved.

Net Weight: X fl. Oz. /X gal (X ml/L)

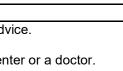
PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Wash hands thoroughly with soap and water after handling and before eating, drinking, and chewing gum, using tobacco, or using the toilet. Wear long-sleeved shirt and long pants, socks, and shoes.

PHYSICAL OR CHEMICAL HAZARDS

Do not apply this product around electrical equipment due to the possibility of shock hazard.



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07/12/2019							
							icide or the

pesticide registered under EPA Reg. No.

239-2755

DIRECTIONS FOR USE

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

[STOP; READ ENTIRE LABEL BEFORE USE]

USE RESTRICTIONS:

- This product is not for use on humans or animals.
- Do not apply as a broadcast surface spray.
- Not intended for commercial applications.
- In the home, all food preparation and eating surfaces and utensils should be covered during treatment, or thoroughly washed before use. Exposed food/ should be covered or removed. Remove pets, birds and cover fish aquariums before spraying.

SHAKE WELL BEFORE EACH USE.

APPLICATION [How to Apply/Use]: Use only as a spot treatment or crack & crevice application in residences. Spray in an inconspicuous area to test for the unlikely possibility of staining or discoloration. Evaluate test area after drying. Hold with applicator aimed away from you. [Twist nozzle on sprayer tip to adjust spray pattern [to either spray or foam]]. Spray [Foam] surfaces with applicator aimed away from you from a distance of 8 to 10 inches until slightly damp. Do not allow children or pets to contact treated areas until surfaces are dry. Allow sprayed articles and surfaces to dry thoroughly before using or replacing bedding.

TO KILL BED BUGS AND BED BUG EGGS: Apply [spray/foam] as a spot treatment to cracks-and-crevices and/or harborages, or where evidence of bed bugs occurs, including bed frames, box springs, inside empty dressers, furniture and clothes closets, carpet edges, high and low wall moldings, behind headboards, pictures, wallpaper edges, and luggage. Spray [Apply to] bed bugs directly when possible. Do not make surface applications to mattresses or bedding. Mattress treatments must be limited to seams, folds, and edges only. Do not treat pillows, bedding, or clothing. Remove linens and wash before reuse. Allow treated mattress to dry thoroughly before remaking bed. Remove all clothes and other articles from dressers or clothes closets before application. [For luggage, be sure to spray/foam seams and pockets.] Allow all treated areas to dry thoroughly before use.

[TO KILL CRAWLING INSECTS (Dust mites, ants (excluding fire, pharaoh, and harvester ants), stink bugs, boxelder bugs, crickets, earwigs, millipedes, silverfish, multicolored Asian lady beetles) **AND SPIDERS** (excluding brown recluse and black widow): Spray as spot or crack & crevice application where insects are harboring, moving, or breeding. Treat feeding or hiding areas such as baseboards, carpet, floor, rugs, under refrigerators, cabinets, sinks, and stoves. Also treat interior entry points such as doors, around windows, and water pipes.]

[**TO KILL BROWN DOG TICKS and FLEAS:** Spray around beds, furniture and pet's habitat. Spray pet sleeping quarters, bedding, carpeting, floor and floor covering where pets are kept. Do not apply to your pet. Use only a registered pet spray on pets.]

Note to reviewer: Below is Storage & Disposal For Non-Refillable containers

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep from freezing. To be stored in original container and placed in areas inaccessible to children.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: 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.

Note to reviewer: Below is Storage & Disposal For Refillable Containers

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep from freezing. To be stored in original container and placed in areas inaccessible to children.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: [Applicator Name] can be reused with [Product Name refill bottle/container]. Follow instructions in the Reuse Directions when reusing [applicator name]]. **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.

PRODUCT APPLICATION INSTRUCTIONS

NOTE TO PM: For all Options below Graphics illustrating a step or group of steps may appear on final printed label

NOTE TO PM: Spray Pattern Descriptor is any word used to describe the pattern such as flat, fan, coarse, or fine. Note to PM: Quotes around Directions are optional (i.e. "ON", "OFF")

Option 1 – Bottle attached trigger sprayer

[Conventional Trigger RTU/Applicator Device/Applicator Name Directions/Instructions]

[HOW TO USE:]

[Spray]

- 1. Turn sprayer nozzle to desired spray pattern/foam/indoor setting/perimeter setting/ "On"/spray pattern descriptor.
- 2. Squeeze trigger repeatedly [to spray.]

[Finish]

1. [Turn sprayer nozzle to "OFF"/X.]

Option 2- Hose attached trigger sprayer

[Conventional Trigger Large RTU/Quick Connect Trigger Sprayer/Applicator/Applicator Name Directions/Instructions]

[HOW TO USE:]

[Spray]

- 1. Remove sprayer/Applicator Name from bottle/holster/holder [by sliding/pulling sprayer up].
- 2. Unwrap/Uncoil hose and insert [[color] hose connector] into [color] spout/knob/opening/lid on [bottle] cap [until it clicks].
- 3. Flip up [color] spout until fully upright / Twist spout/knob to "ON" / Pull spout up.
- 4. Turn sprayer nozzle to desired spray pattern/foam/indoor setting/perimeter setting/ "On"/spray pattern descriptor.
- 5. Squeeze trigger repeatedly [to spray.]

[Finish]

- 1. [Turn sprayer nozzle to "OFF" / X.]
- 2. [DO NOT DISCONNECT HOSE CONNECTOR [FROM SPOUT/CAP/KNOB/OPENING].
- 3. [Place sprayer back into holster/holder.]

<u> Option 3 – Pull 'N Spray</u>

[Pull 'N Spray/Applicator/Applicator Device/Applicator Name Directions/Instructions]

[HOW TO USE:]

[Spray]

- 1. Remove sprayer/Applicator Name from bottle/holster/holder [by sliding/pulling sprayer up].
- 2. Unwrap/Uncoil hose and insert [[color] hose connector] into [color] spout/knob/opening/lid on bottle cap [until it clicks.]
- 3. Flip up [color] spout until fully upright / Twist spout/knob to "ON" / Pull spout up.
- 4. Turn sprayer nozzle to desired spray pattern/foam/indoor setting/perimeter setting/ "On"/spray pattern descriptor.
- 5. Point sprayer away from body. Slowly pull ring at bottom of sprayer until it stops, and hold for two [2] seconds to fill sprayer.
- 6. Press trigger to spray.

[Finish]

- 1. [Turn sprayer nozzle to "OFF" / X.]
- 2. DO NOT DISCONNECT HOSE CONNECTOR [FROM SPOUT/CAP/KNOB/OPENING].
- 3. [Place sprayer back into holster/holder.]

Option 4 – Battery Hose Attached Sprayer

[Battery Powered Wand/Comfort Wand/Comfort Shot Wand/Applicator/Wand/Applicator Name Directions/Instructions]

[HOW TO USE:]

[Prep [Wand]]

- 1. Remove sprayer/Applicator Name from bottle/holster/holder [by sliding/pulling sprayer up].
- 2. [Remove [color] pull strip to activate batteries].
- 3. [Unfold / Flip Open [Applicator Name/applicator/wand] until it clicks/locks into position.]
- 4. [Extend wand/applicator/nozzle] [fully].

[Connect]

- 1. Unwrap/Uncoil hose and insert [[color] hose connector] into [color] spout/knob/opening on bottle cap [until it clicks.]
- 2. Flip up [color] spout until fully upright. / Twist spout/knob to "ON". / Pull spout up.

[Spray]

- 1. Turn sprayer nozzle to desired spray pattern/foam/indoor setting/perimeter setting/ "On"/spray pattern descriptor.
- 2. [Slide [color] switch on trigger to "Unlock"].
- 3. Press trigger to spray.

[Finish]

- 1. [Turn nozzle to "OFF"/X].
- 2. [Slide [color] switch on trigger to "Lock"].
- 3. [Fold [Applicator Name/wand/applicator] closed [and place sprayer/wand back in holster/holder].]

Important Use Information: Do not submerge in water. When storing sprayer for long periods, remove batteries.

[To replace batteries: See marked diagram inside battery compartment.]

Option 5 – Pump Container with Applicator

[Pump 'n Go/EZ Sprayer/Applicator/Applicator Device/Applicator Name Directions/Instructions]

[HOW TO USE:]

[CONNECT]

- 1. Carefully cut the two [color] zip ties securing hose and pump handle with scissors, using caution not to cut [color] hose.
- 2. Unwind hose and insert hose connector into [color] spout/cap/knob/opening on pump [until it clicks.]

[PREP [SPRAYER]]

- 1. Lift sprayer off bottle.
- 2. Push [color] button while pulling out on sprayer nozzle tip.
- 3. Fully extend sprayer until [color] button snaps into SPRAY position. NOTE: [color] trigger will not function until wand is fully extended and [color] button is visible in spray position.
- 4. Make sure handle is screwed on tightly, then pump container 10-20 [X-X] times to pressurize bottle. *NOTE:* A full bottle requires fewer pumps than an empty bottle and pumping to higher range will provide longer spray duration.
- 5. Push pump down and turn handle clockwise to lock into carrying position. NOTE: This bottle is designed to expand under pressure and cannot be over-pressurized.

[SPRAY]

- 1. Aim sprayer.
- 2. Spray by pushing down [color] trigger with thumb.
- 3. Adjust spray pattern by rotating [color] nozzle tip up to one-half rotation.

[FINISH]

- 1. Push [color] button and fold the sprayer until [color] button snaps back into original storage position.
- 2. Place sprayer back onto bottle with nozzle facing down.
- 3. Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure.
- 4. Retighten prior to storing.

OR

[Quick Pump/Applicator/Applicator Name/Applicator Device Directions/Instructions]

[HOW TO USE:]

[PREP [SPRAYER]]

- 1. Remove sprayer from holster and pull hose from storage compartment.
- 2. Turn pump handle clockwise/counterclockwise to make sure pump is tight [and push pop-up pressure indicator completely down] before pumping.
- 3. Turn pump handle clockwise/counterclockwise to tighten, then slightly turn handle clockwise/counterclockwise to release handle for pumping.
- 4. [Pump sprayer] [until pressure indicator pops up about an inch signaling it is ready to spray.] Turn pump handle clockwise/counterclockwise [one-quarter turn] to secure handle for carrying.

[SPRAY]

- 1. Spray by pushing down lever on spray handle.
- 2. Rotate nozzle tip to adjust spray from stream to gentle mist.
- 3. For continuous spray, push lever down and slide forward to lock. Pull back to release.

[FINISH]

- 1. Slowly turn pump handle clockwise/counterclockwise to untighten and release pressure [or turn pressure relief valve clockwise until it snaps; once pressure is released, continue to turn until closed.]
- 2. Then turn back clockwise/counterclockwise to retighten handle.
- 3. Push hose back into storage compartment and put sprayer back in holster [holder].

Option 6 - Squeeze

[Applicator Name/Applicator Directions/Instructions]

[HOW TO USE/APPLY] Alternative Text: [HOW TO ASSEMBLE AND USE INSTRUCTIONS]: [Open:]

- 1. [Twist off cap and remove foil liner.]
- 2. [Replace cap.]
- 3. Flip/Twist/Open Cap

[Spray:]

- 1. To BEGIN spraying, invert the bottle and point/aim/direct [at the insect/or area of application]
- 2. Squeeze the bottle [to initiate the flow of product.]
- 3. Spray only until the surface is wet. / Spray evenly

[Finish:]

- 1. [To STOP spraying, release pressure / turn bottle upright]
- 2. [Flip/twist/close the cap [until you hear an audible snap / until secure].]

<u> Option 7 – Flairosol</u>

[Applicator Name/Applicator Directions/Instructions]

[HOW TO USE:]

[Prep]

- 1. [Before first use prime the trigger by pumping/squeezing it [several/a few times]]
- 2. [Slide/Press [color] switch/button [on trigger] to "Unlock"].

[Spray/Apply]

- 1. Squeeze/pump/pull/press trigger/button to release spray/mist
- 2. [Squeeze/pump/pull/press trigger/button once to/for a short spray/mist]
- 3. [Squeeze/pump/pull/press trigger/button three/several times for a continuous spray/mist]
- 4. Spray [directly] onto/at insects/bugs or onto surfaces

[Finish]

1. [When empty purchase refill bottle & reuse [trigger] sprayer]

Option 8 – Integrated Wand

[Battery Powered/Comfort/Ergo [Shot] Wand/Applicator/Applicator Name Directions/Instructions]

[HOW TO USE:]

[Prep [Wand]]

- 1. [Unsnap/Unsecure/Unlock wand/applicator and Extend wand/applicator [upward/fully][until it clicks into place]
- 2. [Remove [color] pull strip to activate batteries].

[Spray]

- 1. Turn sprayer nozzle to desired spray pattern/foam/indoor setting/perimeter setting/ "On"/spray pattern descriptor.
- 2. [Slide [color] switch on trigger to "Unlock"].
- 3. Press trigger to spray.

[Finish]

- 1. [Turn nozzle to "OFF"/X].
- 2. [Slide [color] switch on trigger to "Lock"].
- 3. Fold [Applicator Name/wand/applicator] closed

Important Use Information: When storing sprayer for long periods, remove batteries.

[**To replace/change batteries:** Remove sprayer head/applicator from botte by rotating clockwise/counterclockwise to access battery compartment. See marked diagram inside battery compartment.]

Optional Troubleshooting Section for Options 4 and 8

Troubleshooting Tips:

Problem: Sprayer does not spray [function].

Possible Cause: Batteries not installed properly.

Solution: See instructions for correct battery placement.

Problem: Sprayer makes a straining noise [Sprayer runs but nothing [no product] comes out].

Possible Cause: Sprayer nozzle is turned off.

Solution: Turn sprayer nozzle to [desired] spray setting [position].

Possible Cause: [Red] [color] hose connector is not flipped up.

Solution: Insert [color] hose connector into [color] spout/knob/opening on bottle cap until it clicks and flip up spout until fully upright.

Possible Cause: Sprayer is not primed.

Solution: Press and hold button on sprayer for about X (10 / 15 / 20 / 30) seconds to prime sprayer.

Problem: Spray pattern is weak [or uneven] [product flow is uneven or dribbles out of nozzle].

Possible Cause: Weak batteries.

Solution: Install fresh set of batteries.

Possible Cause: [Red] [color] hose connector is not flipped up.

Solution: Insert [color] hose connector into [color] spout/knob/opening on bottle cap until it clicks. [Attach coupler to the cap] and flip up spout until fully upright.

Possible Cause: Sprayer nozzle not fully open.

Solution: Turn sprayer nozzle to [desired] spray setting [position].

End of Optional Troubleshooting Section for Options 4 and 8

Refill Options

Option 1 – Applicator Reuse

REFILL/REUSE DIRECTIONS

How to attach applicator name/wand to Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/ bottle/container:

Removing [color] hose/Comfort Wand/Applicator Name from original bottle/container:



Remove the [color] hose connector from the original bottle/container by pulling the [color] plug from the [color] spout on cap.

[To remove the side holster/holder from original bottle/container, pull/lift the bottom tab underneath and slide the holster/holder up.]

Adding [color] hose/Comfort Wand/Applicator Name to Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container:



[Attach the sprayer holster/holder to Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container by sliding the holster/holder down onto the knob.]

Insert [color] hose connector into [color] spout on cap [until it clicks].

OR

REFILL: This container may be refilled with Ortho Home Defense Indoor and Outdoor Insect Killer 2/Product Name. To refill twist/snap Ortho Home Defense Indoor and Outdoor Insect Killer 2/Product Name into spray/applicator nozzle/top.

REFILL/REUSE DIRECTIONS

How to attach Applicator Name/Flairosol to Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container:

Remove sprayer/applicator/top from the empty container by rotating it clockwise/counter clockwise. Place sprayer/applicator/top on the refill container and rotate it clockwise/counter clockwise [until it is secure]. **OR**

Remove sprayer/applicator/top from the empty container by pulling the bottle/container down/out. Place sprayer/applicator/top on the refill container and push up on the bottle [until it is secure].

Option 2 – Integrated Wand Applicator Reuse

REFILL/REUSE DIRECTIONS / How to Reuse/Refill

How to attach Applicator Name/integrated wand to Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container:

- 1. Remove sprayer head/applicator from botte by rotating clockwise/counterclockwise and remove from empty bottle.
- 2. Remove cap/lid from Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container.
- 3. [Remove Seal.]
- 4. Insert tube/straw into Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container.
- 5. Secure the sprayer head/applicator from botte by rotating clockwise/counterclockwise

Option 3 – Refill by pouring in same RTU formula from Bottle

[HOW TO] REFILL

This container may be refilled with Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name. To refill pour Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name into container.

OR

To refill this empty container, pour product carefully and directly from the Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name container designated as the ready-to-use refill container. DO NOT add water.

<u> Option 4 – Refill by pouring same RTU formula from Liquaflex package</u> <u>Design 1</u>

- 1. Do not reuse or refill this pouch. Use this product to refill the empty [Product name] container
- 2. For best pouring experience place bag and refill bottle next to each other at waist height
- 3. Remove cap
- 4. Grasp neck of spout in one hand
- 5. Place other hand underneath the pouch in the triangular cleft for support, directly opposite of the pour spout
- 6. Carefully bend spout until it rests on the lip of the target refill bottle
- 7. Slowly lift the hand supporting the base of the pouch and fill bottle to desired level
- 8. [Optional illustrations may be used in conjunction with the above steps]

<u>Design 2</u>

- 1. Do not reuse or refill this pouch. Use this product to refill the empty [Product name] container
- 2. For best pouring experience place bag and refill bottle next to each other at waist height
- 3. Remove cap
- 4. Grasp handle with dominant hand
- 5. Place the other hand on the front side of the bag for stability
- 6. Carefully pour liquid into target container
- 7. [Optional illustrations may be used in conjunction with the above steps]

Option 5 – Refill by pouring same RTU formula into Pump Container with Applicator

How to refill [Quick Pump/Pump 'N Go/Applicator Name] [using/with] [1.33 Gallon Ready-To-Use Refill/Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fill-up/reload/bottle/container]:

- 1. Remove pump handle on Quick Pump/Pump N Go/Applicator Name by twisting it counterclockwise.
- Remove cap from Ortho Home Defense Indoor and Outdoor Insect Killer2/Product Name/refill/recharge/renew/fillup/reload/bottle/container.
- 3. Pour product carefully and directly into [Quick Pump/Pump 'N Go/Applicator Name] container. Do Not fill above 2"/3"/4" from top of container. DO NOT add water.
- 4. Secure pump handle back on container by twisting it clockwise until tight.

NOTICE: To the extent consistent with applicable law, buyer assumes all risks of use, storage or handling of this product not in accordance with directions.

MARKETING/ADVERTISING CLAIMS

Note to PM: the term insects can be interchanged with any and all instances of bugs, pests and vice versa.

Note to PM: the word "and" can be interchanged with "&" in all instances and vice versa.

Note to PM: When qualified claims are used on the market label, the qualifying statement will appear in close proximity on the same panel to the claim when it does not impact any mandatory language.

Note to PM: Any combination of approved claims may be inserted dependent upon sites listed on the market label and product size

The following Product Facts format is optional and the information may appear inside or outside of a box. Indoor Insect Killer Table

[Product Facts:]

[What it Does:] Kills home invading insects [including] [ants (excluding fire, pharaoh, and harvester ants)], [bed bugs], [spiders (excluding brown recluse and black widow)], [fleas], [earwigs], [silverfish], [millipedes]. (See inside for complete list)

[Where to Use:] Use [with confidence] indoors [[kitchens] [bathrooms], [doors & windows],

[basements]), [garages], [doors & windows], [Bedroom], [Living room]] wherever insects are a reoccurring problem.

[When to use:] Use when there is evidence of insect activity.

[icon] Do not allow people and pets to enter treated areas until spray has dried

Questions & Comments: (phone & computer icon)

Call 1-800-225-2883 or visit our website at <u>www.ortho.com</u>

Bed Bug, & Flea Focused Table

[PRODUCT FACTS:]

[What It Does:] Kills bed bugs at all life stages (including eggs) & keeps killing for up to 16 weeks on non-porous surfaces. [Also kills other listed home invading insects]

[Where to Use:] Use [with confidence][indoors] [in bedrooms] [in closets] [along baseboards] where you see evidence of bed bugs, and around their preferred hiding places [bed frames, mattress

seams/tufts/folds, baseboards, and other cracks and crevices near sleeping areas]]

[When to Use:] Use when there is evidence of bed bug activity. **OR** Use [anytime] as a preventative treatment or long last control for Bed Bugs.

[icon] Do not allow people and pets to enter treated areas until spray has dried

Questions & Comments: [icon phone] [icon computer]

Call 1-800-225-2883 or visit our Website at www.ortho.com

Kill Claims

- 1. Kills [even] the toughest bed bugs¹
- 2. Kills hard to kill bed bugs¹
- 3. Kills the toughest bed bug¹
- 4. Kills resistant bed bugs¹
- 5. Formulated to kill resistant bed bugs
- 6. Formulated to kill the toughest¹ bed bugs
- 7. Formulated to kill hard to kill¹ bed bugs
- 8. Kills bed bugs resistant to some insecticides
- 9. Kills even the toughest bed bugs
- 10. Kills bed bugs some other insecticides won't
- 11. Kills bed bugs other formulas won't
- 12. Kills Dust Mites
- 13. Kills Brown Dog Ticks & Fleas
- 14. Kills bed bugs where they hide
- 15. Kills bed bugs, fleas, dust mites & brown dog ticks
- 16. Bed bug killer
- 17. Bed bug & flea killer
- 18. Flea & Brown Dog Tick Killer
- 19. Kills bed bugs
- 20. Kills: Bed Bugs, Fleas, Brown Dog Ticks, Ants (excluding fire, pharaoh, and harvester ants), Spiders (excluding brown recluse and black widow), Stink Bugs, Boxelder Bugs, Clothes Moths, Dust Mites, Crickets, Earwigs, Millipedes, Moths, Multicolored Asian Lady Beetles, Silverfish
- 21. Also kills Fleas & Dust Mites
- 22. Kills by contact!

¹Pyrethroid-Resistant Bed Bugs

Residual Claims

- Kills/Controls/Protects/Lasts/Works/Effective/Guards [Against] Bed Bugs for up to [8/12/16 weeks]/ [2/3/4 months] on Ceramic (non-porous) Surfaces.
- 24. Kills/Controls/Protects/Lasts/Works/Effective [Against] Bed bugs for up to [1/2 Months]/[4/6/8 Weeks] on Laminated Wood Surfaces
- 25. Kills/Controls/Protects/Lasts/Works/Effective [Against] Bed Bugs for up to [2/3 Weeks]/[14/21 Days] on Carpeted Surfaces
- 26. Keeps killing Bed Bugs for up to [1/2 Months]/[4/6/8 Weeks] on Laminated Wood Surfaces
- 27. Keeps Killing Bed Bugs for up to [2/3/4 Months]/[8/12/16 Weeks] on Ceramic (non-porous) surfaces.
- 28. Keeps Killing Bed Bugs for up to [2/3 Weeks]/[14/21 Days] on Carpeted Surfaces.

- 29. Kills Fast and Keeps killing Bed Bugs for up to [1/2 Months]/[4/6/8 Weeks] on Laminated Wood Surfaces
- 30. Kills Fast and Keeps Killing Bed Bugs for up to [2/3/4 Months]/[8/12/16 Weeks] on Ceramic (non-porous) surfaces.
- 31. Kills Fast and Keeps Killing Bed Bugs for up to [2/3 Weeks]/[14/21 Days] on Carpeted Surfaces.
- 32. Kills Bed Bugs for up to [1/2 Months]/[4/6/8 Weeks] on Laminated Wood Surfaces
- 33. Kills Bed Bugs for up to [2/3/4 Months]/[8/12/16 Weeks] on Ceramic (non-porous) surfaces.
- 34. Kills Bed Bugs for up to [2/3 Weeks]/[14/21 Days] on Carpeted Surfaces.
- 35. Long Lasting Bed Bug Control
- 36. Helps guard/protect against Bed Bug infestations [for up to [8/12/16 weeks]/[2/3/4/ months]]²
- 37. Effective Bed Bug Control²

²Kills Adult Bed Bugs for up to 16 weeks indoors on Ceramic Tile (non-porous surfaces)

Water-based formula claims

- 38. No Stains
- 39. Will Not Stain/Non-Staining on [Water-Safe Fabrics and Surfaces]
- 40. Water-based/Non-staining Formula
- 41. Dries clear
- 42. Unscented
- 43. No lingering odor
- 44. Dries fast
- 45. Water based [formula] [water droplet icon]
- 46. Non-flammable

Site Use Claims

- 47. [Formulated] For use on Mattresses (seams/tufts/folds), Luggage, [wood] Furniture, Headboards, Beds, and as a spot treatment on Carpet.
- 48. Luggage Spray
- 49. Use with confidence in bathrooms, family rooms, attics, garages, basements, closets, storage areas, and bedrooms.
- 50. For Indoor Use in Homes, Apartments and Residences.

General Claims

- 51. [Convenient] Ready to Use
- 52. Defends your home against Bed Bugs
- 53. Synergized Formula
- 54. Part of a complete home defense system
- 55. No Mixing Necessary
- 56. Easy to Use
- 57. People and pets may re-enter treated areas after spray has dried

Dual Ingredient Claims

- 58. Dual Modes of Action
- 59. Two Modes of Action
- 60. Dual Action [Control³]
- 61. Contains two different active ingredients
- 62. Two active ingredients in one product
- 63. [Dual Action] Fast Acting plus Long Residual³
- 64. Works two ways to kill [even resistant] bed bugs
- 65. Works two ways to kill [the toughest¹] bed bugs
- 66. Two active ingredients to kill even resistant bed bugs
- 67. Two active ingredients to kill the toughest¹ bed bugs
- 68. Dual/Two Modes of Action
- 69. Dual-Action [Fast Acting plus Residual³ [Control]]
- 70. Contains two different active ingredients
- 71. Two active ingredients in one product
- 72. Works/Kills [in] 2 ways
- 73. Kills tricky bed bugs by fighting in 2 ways

- 74. Kills even the tough bed bugs¹ by treating them in 2 ways
- 75. Kills the toughest bugs³ with 2 ways to kill
- 76. Two actives to Kill Even Resistant Bed Bugs
- 77. Two actives for two modes of kill
- 78. Two-Way/Dual Kill
- 79. Targets bed bugs in 2 ways
- 80. Targets bed bugs with 2 key ingredients
- 81. Targeted dual-action ingredients
- 82. Engineered to kill even the toughest bed bugs¹
- 83. Formulated with tough bugs¹ in minds
- 84. Dual-active technology
- 85. Double/Dual Defense
- 86. 1-2 Punch
- 87. Double Down Defense
- 88. Double/Dual Assurance
- 89. Two lines of defense for peace of mind

¹Pyrethroid-Resistant Bed Bugs

³For Bed Bugs Only

Speed of Action Claims

- 90. Fast Knockdown and Kill
- 91. Quick Knockdown
- 92. Fact Acting
- 93. Kills Fast
- 94. Kills Bed Bugs Fast/quick

Egg Claims

- 95. Kills bed bug eggs [before they hatch]
- 96. Prevents Bed Bug Eggs from hatching
- 97. Kills hiding bed bugs
- 98. Kills Bed Bugs where they hide
- 99. Kills hard to see Bed Bug Eggs
- 100. Kills difficult to find Bed Bug Eggs
- 101. Kills Emerging Bed Bug Nymphs

Optional claims for foaming trigger applicator

- 102. Spray or Foaming Action
- 103. Foaming Action kills bed bugs where they hide
- 104. Penetrating Foam Kills Quick
- 105. With Penetrating Foam

Applicator Claims

- 106. No [more] tired hands
- 107. Reduces hand fatigue
- 108. No more squeeze, squeeze, squeeze
- 109. No [constant] pumping
- 110. Quick Pump [applicator/sprayer]
- 111. [Quick and] Easy to Use
- 112. No Leaks or Mess
- 113. Precise control for [maximum] accuracy
- 114. Consistent spray [for maximum accuracy]
- 115. Adjustable sprayer [nozzle][for maximum control]
- 116. [Improved⁴] Applicator
- 117. Ġrab & Go
- 118. Pump [illustration]
- 119. Spray [illustration]
- 120. No [constant] pumping
- 121. No more bending/kneeling

- 122. Just attach hose and spray
- 123. Consistent/even coverage
- 124. You're/It's always ready to spray
- 125. The easy/easier way [to spray/to kill insects⁵][Home Defense®]
- 126. Change the way you spray
- 127. Easy to spray
- 128. No Aerosols

⁴vs. previous design/Applicator Name
 ⁵Refer to booklet/back panel for complete list of insects/bugs/pests
 NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests

Pull N Spray Applicator Claims

129. Less/No [more] hand fatigue⁶ [with PNS II/Pull 'N Spray II/Spray Master™/applicator name]

- 130. Just pull
- 131. One pull equals/= 34/X trigger sprays
- 132. One pull delivers 34/X trigger sprays
- 133. One push of the button = 34/X trigger sprays
- 134. For best results, pull out slowly and hold for 2 seconds
- 135. Up to X minutes/mins. of continuous spray
- 136. Over X minutes/mins of continuous spray
- 137. 1 pull equals X trigger sprays
- 138. Pull n Spray –Less/No hand fatigue⁶

⁶vs. trigger sprayer

Refill Claims

- 139. Refill/Recharge/Fill-Up/Reload/Renew [for] Comfort Wand®/Quick Pump/Pump 'N Go/Applicator Name [Illustration]
- 140. Fills Up Quick Pump/Pump 'N Go/Applicator Name [Illustration]
- 141. Fill-Up for Applicator Name/Quick Pump/Pump 'N Go
- 142. Works with Comfort Wand®/Quick Pump/Pump 'N Go/Applicator Name [Illustration]
- 143. Just plug [Comfort Wand®/Applicator name] in and it's ready to spray
- 144. [Plug 'N Play] Refill/Recharge/Reload/Renew [For Comfort Wand]
- 145. Refill/Recharge/Fill-Up/Reload/Renew Available
- 146. [Comfort Wand®/Quick Pump/Pump 'N Go/Applicator Name] Recharge/Refill/Fill-Up/Reload/Renew [cartridge]

Wand Claims

- 147. Reusable [Comfort/Continuous][Spray][Wand]
- 148. Rechargeable
- 149. [Wand/Applicator Name] will last [for] [at least] 20/X bottles!
- 150. [Wand/Applicator Name] will last over 25 gallons!
- 151. [Wand/Applicator Name] will last for years⁷
- 152. Performs like a tank sprayer with no/without pumping
- 153. Equal performance to a tank sprayer with no/without pumping
- 154. Tank sprayer power with no/without pumping
- 155. Spray foundations and baseboards without bending!
- 156. Spray without bending!
- 157. [More⁴] Precise/Accurate spray
- 158. Continuous Spray [and [more/better⁴] precision/accuracy]
- 159. Easily get[s] into hard-to-reach areas
- 160. Precision/Precise/Adjustable Sprayer
- 161. [Wand/Applicator] Reduce[s] [back] bending [and [the continuous spray wand] helps reduce[s] hand fatigue]
- 162. [Wand/Applicator] extends [up to] 2 feet [to reduce [back] bending [and [the continuous spray wand] helps reduce[s] hand fatigue]]
- 163. Wand/Applicator provides precision control [to maximize every spray/get the most out of every spray]
- 164. Fan Spray [for better coverage/for fast[er⁴] application]
- 165. [Now with a] Foaming Spray for crack[s] and crevice[s] [application]

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- 166. [Now with a] Foaming Spray to see where [the product is/was][you] applied
- 167. Foaming spray makes it easier to see where [the product is/was][you] applied
- 168. [Foaming spray] disappears/dissolves when dry [to indicate when to re-enter]
- 169. [Foaming spray] dries clear [to indicate when to re-enter]
- 170. [Foaming spray] makes it easy to tell when the area is dry [and people & pets can re-enter]
- 171. Know/See where [product was] applied
- 172. [2x] Faster Application/Coverage
- 173. Same coverage in half the/50% less time⁴
- 174. Continuous Spray/wand
- 175. Extended Reach
- 176. Continuous [Adjustable] Spray [Wand]
- 177. Longer⁴ wand
- 178. 50% longer⁴ reach
- 179. 2x/twice [the] extended reach⁴
- 180. Easier [than ever] to spray[the home foundation/perimeter, doors, windows, and baseboards]
- 181. [Comfort][Shot] Wand
- 182. Rechargeable
- 183. Powered by Duracell/Battery Brand
- 184. Save[s] time and energy
- 185. Cut your time spraying in half

⁴vs previous design/Applicator Name ⁷based on X applications per year

Flairsol Claims

- 186. Propellant Free
- 187. Continuous Spraying
- 188. Fine Mist
- 189. 360° spraying

Value Claims

- 190. Bonus Size
- 191. Exclusive to Club Stores!
- 192. Exclusive Club [Bonus] Size!
- 193. [Great] Value
- 194. Value Pack/Size
- 195. Refill/Recharge/Renew/Fill-Up/Reload
- 196. Buy Wand & Refill, Get [X%] Free!
- 197. Same formula, better value!
- 198. Save [Money] with the Refill!
- 199. (Over) X% more than X gal size
- 200. Bonus Size
- 201. Combo/Wow Pack
- 202. Value/Bonus Size X-pack/ X-gallons!
- 203. Value/Bonus Size X-pack = X gallons!
- 204. 33% more than 1 gallon size (applies to 1.33 gal. size)
- 205. 10% more bonus size (applies to 1.1 gal. size)
- 206. Look inside [label] for special offer information!
- 207. Go to [www.orthohomedefense.com] now for a special offer! Offer subject to change or expiration.
- 208. New Look, Same Great Results
- 209. New Look, Same [Fast Acting][and][Long Lasting³] Results
- 210. New Look, Now with InvisiSHIELD

³For Bed Bugs only

<u>OTHER</u>

- 211. [icon] Do not all people and pets to enter treated areas until spray has dried
- 212. XX% more than X gallon size
- 213. XX less plastic
- 214. [Company] & Your Environment Your yard is a place for family and pets to enjoy. That's why [company] products are designed with care to provide effective solutions to insect problems. Please follow instructions for appropriate usage, storage and disposal.
- 215. New/Now (The following claim may appear on any label panel for 6 months following commercial introduction)
- 216. Proven performance
- 217. Read Entire label before use
- 218. Recyclable symbol
- 219. Before [illustration]
- 220. After [illustration]
- 221. [For] Indoor Residential use only
- 222. Intended for residential use
- 223. Peel Open for use directions and further information
- 224. OPEN
- 225. Resealable Label for Directions & Precautions
- 226. Peel Open for use directions and further information
- 227. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
- 228. PEEL HERE
- 229. PULL / PEEL HERE [TO REMOVE TAPE]
- 230. Product of -and/or- Made in U.S.A.
- 231. Assembled in the USA
- 232. ©20XX, licensed by [Company/Brand]. World rights reserved.
- 233. QUESTIONS OR COMMENTS [phone icon] 1-800-xxxxxx www.ortho.com [Visit our website] [computer icon]

Guarantees:

- 234. Guaranteed +++
- 235. [Company/Brand] Guarantee[d] +++
- 236. Guaranteed [results] +++
- 237. Guaranteed Kill [or your money back] †††
- 238. [Company/Brand] Satisfaction guaranteed[+++]
- 239. [Company/Brand] [Promise your] satisfaction guaranteed [or your money back]

††† [Company/Brand]Promise: If this [company/brand] product when used for the intended purpose fails to give you complete satisfaction return the item to the [company] store where purchased for free replacement of the same or similar item.

†††The [Company/Brand] Guarantee: If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.

†††Consumer Guarantee: If for any reason you are not satisfied after using this product, simply send us original proof of purchase, and we will refund the purchase price.

Bed Bug System Names/Headings:

NOTE TO PM: The following items will be used in conjunction with the Bed Bug System text.

- 1. [3-Step] [Location based/use area] System for Protection from bed bugs
- 2. [3-Step] Bed Bug [Location based/use area] Treatment [Plan/Program/System]
- 3. [3-Step] Bed Bug [Location based/use area] Solution System/Set
- 4. [3-Step] Bed Bug [Location based/use area] System [for Protection]
- 5. [3-Step] Bed Bug [Location based/use area] Protection [Plan/Program/System]
- 6. Part of the [Ortho Home Defense/Brand name] [3-Step] System for Protection from bed bugs [in 3 steps]
- 7. Part of the [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] Treatment Plan/Program/System [in 3 steps]
- 8. Part of the [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] Solution System/Set [in 3 steps]

- 9. Part of the [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] System [for Protection] [in 3 steps]
- 10. Part of the [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based]/use area] Protection Plan/Program/System [in 3 steps]
- 11. [Ortho Home Defense/Brand name] [3-Step] [Location based/use area] System for [protection from] bed bugs [in 3 steps]
- 12. [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] Treatment Plan/Program/System [in 3 steps]
- 13. [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] [Solution] System/Set [in 3 steps]
- 14. [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] Protection Plan/Program/System [in 3 steps]
- 15. [Ortho Home Defense/Brand name] 3-Step Bed Bug [Location based/use area] [Program/System]
- 16. [Location based/use area] [Home] Bed Bug [system] in 3 steps
- 17. Zones of protection from Bed Bugs [in 3 steps]
- 18. Treat these/this area[s]/location[s] [Large Areas⁸],[Small Areas],[and][Hard-to-Spray[areas]/Hard-to-Reach [areas] / Crack & Crevices for [protection from] Bed Bugs
- 19. Location based Bed Bug treatment /protection [program/system/plan] [in 3 steps]
- 20. For best results use a system to treat Bed Bugs
- 21. For best results treating bed bugs use the entire/full [treatment/solution/protection] system/plan/program
- 22. For best management of bed bugs use the entire/full [treatment/solution/protection] system/plan/program
- 23. For best results, more than one product may/might/could be needed for bed bug treatment
- 24. [Part of a] Bed Bug Treatment System/Program/plan [in 3 steps]
- 25. Step 2
- 26. Ortho Home Defense/Brand Name Home Protection
- 27. Targeted Bed Bug [Location based/use area] Treatment Program/Plan/System [in 3 steps]

⁸Not for broadcast use. Application as a spot treatment on large areas such as carpets or floors.

Additional System Claims

- 1. Part of a system for Home Protection from bed bugs
- 2. [Part of] [Ortho] [Home Defense/Brand Name] Bed Bug system for Home Protection
- [Ortho] Home Defense/Brand Name [provides][products for] zones/areas of bed bug protection[:] inside/indoors/inside your home by [detecting/identifying/detecting and trapping/attracting and trapping [bed bugs] and] treating large areas⁸ [like your carpets/ closets /baseboards / tile/ flooring], small areas [like around bed frames/headboards/box springs/ mattresses(seams/folds/edges)/ beds/ walls/ baseboards/ drawers], and Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices [like electrical outlets/ mattresses creases/ seams/bed frames/baseboards/cracks/crevices].
- 4. Cover all areas with [Ortho] [Home Defense/Brand Name] [treatment] system/program/plan for Home Protection
- 5. [Let] [Ortho] Home Defense/Brand Name [system for Home Protection] [guard(s)/protect(s)] your home from insects/bed bugs
- 6. Part of a home defense system/program/plan for bed bugs
- 7. [System/Program/Plan for] Bed Bug Home Protection [in 3 steps]

⁸Not for broadcast use. Application as a spot treatment on large areas such as carpets or floors

Bed Bug System Language

Note to PM: This product will emphasize or indicate the product is for "Large⁸ areas/Room Treatment/Step 2" on the FPL. ⁸Not for broadcast use. Application as a spot treatment on large areas such as carpets or floors.

Note to PM: Below are the system step call outs. On the FPL, it will either list all 3 steps emphasizing the applicable step (see examples)



OR just the step applying to this product and the corresponding text.



On this label, the following bolded text is what can be used in association with product labels for this registration.

Note to PM: Representative lcons appear at the end of this section.

[Bed bugs are expert biters and expert hiders. They can hide in the tiniest of places [which makes them tough to kill]. Our bed bug system [detects them and] provides treatment options for all areas of your room/bedroom/home.] **OR**

[Bed bugs can hide everywhere [, making them tough to kill]. [Detect and] treat/kill them where they hide with our bed bug-specific system/program/treatments.]

ÓR

[Tackle your problem with our bed bug system of products to [detect them and] provide treatment for all areas of your room/bedroom/home.]

OPTION 1

[Identify/Detect][Kill/Treat][Prevent]

[Step][1][:][Identify] [Attract & Trap][Detect] [Detect & Trap] [Identify & Detect] [Bed Bugs] [icon][*] [Step][2][:] Room Treatment / Large Areas⁸/ Spray Treatment / Spot, Crack & Crevice Spray [icon][**] [Step][3][:] Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat] [icon][***]

[**][Step] [2] [Treat] [:] Room Treatment / Large Areas⁸/ Spray Treatment / Spot, Crack & Crevice Spray [lcons] [:] Spray bed bugs in their hiding spots [like your carpet edges/ closets /baseboards / tile/ flooring]. *OR*

Kills on carpets/furniture/flooring/baseboards/tile/surfaces.

OR

Spot-treat(s)/kills on bed frames/headboards/box springs/ mattresses/ beds/ walls/ baseboards/ drawers/ carpets/closets/tile/flooring/surfaces

⁸Not for Broadcast Use. Application as a spot treatment on large areas such as carpets or floors.

[Use other Ortho/System Products To:] [Visit Ortho.com for more system/treatment/plan/program details]

[*][Step] [1] [:] [Identify [& Detect] / Attract & Trap /Detect [& Trap] [Bed Bugs] [icon] [:] Confirm you have bed bugs by luring them out of hiding and into our secure trap.]

OR

Lure bed bugs out of hiding places

[Use/Look for Ortho [Home Defense/Brand Name] products marked for Identify [& Detect] / Attract & Trap /Detect [& Trap]]

[***] [Step] [3] [Treat] [:] [Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat] [icon] [:]

[Don't forget to] treat places that are difficult to spray [like around electrical outlets/ bed frames/baseboards/cracks/crevices].

OR

Kills in ducts/wall voids/ around electrical outlets/creases/seams/bed frames/baseboards.

[Use/Look for Ortho [Home Defense/Brand Name] products marked for Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat]

<u>OPTION 2</u>

Note to PM: This following option removes the identify/detect portion and focuses on the treatment.

[Kill/ Treat] 239-NEW.20190712

[Step][1][:]Large Areas⁸ [icon] [*]

[Step][2][:] Small Areas [icon] [**]

[Step][3][:] Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Hard To Treat [icon][***]

[*][Step] [1] [Treat] [:] [Large Areas⁸ [icon] [:]

Spray bed bugs in their hiding spots [like your carpet edges/ closets /baseboards / tile/ flooring]. OR Kills on carpets/furniture/flooring/baseboards/tile/surfaces

Kills on carpets/furniture/flooring/baseboards/tile/surfaces. OR

Spot-treat(s)/kills on bed frames/headboards/box springs/ mattresses/ beds/ walls/ baseboards/ drawers/ carpets/closets/tile/flooring/surfaces

⁸Not for broadcast use. Application as a spot treatment on large areas such as carpets or floors.

[Use other Ortho/System Products To:] [Visit Ortho.com for more system/treatment/plan/program details]

[**][Step] [2] [Treat] [:] Small Areas/ Spot Treatment [Icons] [:]

Treat bed bug[s] [in their] hiding spots like around bed frames/headboards/box springs/ mattresses/ beds/ walls/ baseboards/ drawers.

OR

Spot-treat(s)/kills on bed frames/headboards/box

springs/mattresses/beds/walls/baseboards/drawers/furniture/luggage/curtains

[Use/Look for Ortho [Home Defense/Brand Name] products marked for Small Areas/ Spot Treatment]]

[***] [Step] [3] [Treat] [:] Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat [icon] [:] [Don't forget to] treat places that are difficult to spray [like around electrical outlets/ bed frames/baseboards/cracks/crevices].

frames/ba

Kills in ducts/wall voids/around electrical outlets/creases/seams/bed frames/baseboards.

Use/Look for Ortho [Home Defense/Brand Name] products marked for Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat]

Note to PM: Below are representative icons and images for use with this system.



ORTHO Bed Bug Defense Plan/Program Text Based

Note to Reviewer: The following describes/explains the Ortho Bed Bug Defense Plan/Program

[Bed Bug Home Protection Plan] [Bed Bug Home Protection Cycle] [Bed Bug 3-Step Process] [Bed Bug Home Defense Plan] [Ortho Home Defense Bed Bug Plan] [Home Defense Bed Bug Plan] [GRAPHICAL ICON identifying the steps: Detection, Treatment, Prevention]

FOR BEST RESULTS USE THIS PRODUCT AS PART OF A COMPREHENSIVE BED BUG TREATMENT PLAN. Visit our website, www.ortho.com, for more information.

Treating bed bugs systematically is crucial for adequate control. The information below will help you determine where in the system to begin. **DETECTION**

If you have not seen any bed bugs are in prevention mode, and/or want to ensure you are still bed bug free, you can detect bed bugs (if present) using the **Ortho® Home Defense® Bed Bug Trap/Product Name.**

TREATMENT

If you have detected bed bugs by using the products above, are being bitten, or, observe bed bugs, bed bug eggs or excrement in mattress tufts and bedding, you may want to choose from one or more of the Ortho [Home Defense/Brand Name] Bed Bug Products.

PREVENTION

To help prevent the spread of bed bugs, you should use an appropriate mattress and box spring encasement.

Note to Reviewer: The following text is an alternative (or in addition to) the above for a more comprehensive education of the consumer on the steps necessary to approach a bed bug problem. This text may appear on product labels, labeling, point of purchase educational material.

[Bed Bug Home Protection Plan] [Bed Bug Home Protection Cycle] [Bed Bug 3-Step Process][Bed Bug Home Defense System][Bed Bug Home Defense Solution] [Bed Bug Home Defense] [Bed Bug Home Defense Kit] [Home Defense Bed Bug Plan] [Home Defense Bed Bug System] Detection

While bites can be an indicator that you have a bed bug problem, bites alone are not proof you are being bitten by bed bugs since bites from ticks, fleas and mosquitoes can resemble bed bug bites. Additionally, some people do not exhibit a reaction to bed bug bites. The only way to know for sure is to find and identify the bugs. You may do so through inspection or with the Ortho Home Defense Bed Bug Trap that will lure and detect bed bugs in under an hour.

Look for:

- Small, reddish-brown bugs approximately the size of an apple seed
- Small blood stains or dark fecal spots
- Dead bed bugs, shed skins, or small whitish eggs
- A sweet or musty odor in the room

A thorough inspection is mandatory. Bed bugs are cryptic, so be sure to look in places such as:

- mattresses & box springs around seams, creases, tufts, buttons, folds, vent holes & indentations
- bed frames disassemble bed frame to inspect cracks and crevices
- bedding & linens
- headboards & footboards
- nightstand & dresser drawers
- storage boxes, including those under beds
- furniture & upholstered furniture cushions
- pull out couches & sofa beds
- curtains & curtain rods
- rugs & tapestries
- cribs & changing tables
- chairs
- luggage & folding luggage racks
- wooden hangers
- clothing
- shoes & shoe boxes
- picture frames & wall hangings
- loose wallpaper or paneling
- wall voids & outlets behind switch plates
- electrical boxes
- baseboards & floorboards
- carpeting & carpet tack strip

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- crown molding
- door & window casings
- files, papers, books & magazines
- smoke detectors, thermostats, alarm clocks, telephones, radios and other electronics
- stuffed animals and plush toys
- pet carriers

Be thorough! Any crack or crevice can serve as harborage for bed bugs. Often the places they hide are smaller than you may think possible.

Bed bugs prefer to stay close to their food source (you!) and are typically found within 1-6 feet of sleeping areas and furniture that is frequently occupied. However, inspection of entire rooms should be conducted, as bed bugs may be found in areas outside this range.

Detection devices [such as interceptors] [coasters][traps][detectors][glue traps] that are placed anywhere in the room, including under the legs of beds, couches or other furniture can be used to monitor for bed bug activity. You may not notice any bed bug activity unless monitoring/detecting is done. These types of traps can provide a barrier between the floor and bed and can be a very useful as part of an integrated pest management program.

Treatment

Bed bugs are challenging to eliminate because they can hide in many different places. Once detected, several steps must be taken to treat properly. Inspections must be thorough, and elimination, especially of eggs, is not always a certainty. Treating for bed bugs is not the same as treating for other insects such as roaches and ants. Baits typically used to treat for roaches or ants are ineffective because bed bugs must bite and feed on blood. As a result, multiple treatments and treatment steps over several weeks as part of an integrated pest management program are necessary. Non-chemical and chemical options include:

- Declutter: Eliminate all clutter where bed bugs can hide. It is clutter, not uncleanliness that puts you at risk for a bed bug infestation.
- Vacuum: Vacuum the entire area thoroughly, including the underside of the mattress, box spring and furniture, as well as the carpets and floor. Disassemble the bed and vacuum all bed components. Bed bugs and their eggs can be difficult to dislodge, so use the vacuum's suction wand or crevice tool to scrape the infested area. Immediately discard the vacuum contents into a tightly sealed trash bag. Double bag. Discard the double-sealed trash bag in an outdoor receptacle. Vacuuming every 2-3 days for 14 days is recommended. If you are using a dust product it should be reapplied after vacuuming to maintain its effectiveness.
- Heat Treat: Dry-dry-wash-dry. First place clothing, bedding, etc. in the dryer for two full cycles at high temperature (120-140° F). Then, wash and dry all clothing, bedding, etc. at high temperatures (120-140° F). Be careful while stripping the bed so as to not dislodge bed bugs or eggs. Seal in a plastic bag before laundering to avoid spreading bed bugs and again after laundering in a new, clean plastic bag while you finish the treatment process so as to prevent re-infestation. Place toys, shoes, backpacks, etc. in a clothes dryer set on high heat for two full cycles. Wrap items that cannot be put in a washer or dryer in a large plastic bag and place them outdoors in a hot, sunny location. The fewer items packed in each bag, the better. Monitor with a thermometer for a target temperature of at least 120°F.
- Apply Insecticides: One step in eliminating bed bugs is to carefully apply insecticides registered to treat bed bugs [and bed bug eggs] to all areas where bed bugs are detected. Controlling bed bugs using non-chemical means alone is often very difficult, potentially less effective, and usually more time consuming.
 - Carefully read and follow label directions.
 - Allow product to dry completely.
 - Do not sleep directly on treated mattress.
 - We recommend carefully inspecting the area and reapplying insecticides every week to kill bed bugs that later hatch from eggs, along with those that were missed during earlier treatment.
 - Detect with a trap after the second treatment to make sure there are no remaining bed bugs.

o Cracks & Crevices: Use a liquid to treat the cracks and crevices of the bed frame, mattress & box springs, luggage and other hard to reach places, contacting as many of the insects as possible. A dust is best in electrical outlets, wall voids, carpet tack strips and bed frames.

o Spot Treatment: Use an aerosol insecticide for spot treatment of the mattress, box spring & bed frame, baseboards, carpet & tack strips and luggage, contacting as many insects as possible.

o Area Treatment: Use a liquid insecticide with residual activity to treat baseboards and carpet that will continue to kill bed bugs as they come in contact with the area.

o Barrier Treatment: Use a dust to create a barrier around your baseboards, wall voids, electrical outlets and other entrance points.

o Mattress & Household Items: To treat the mattress, box spring, furniture and other large household items that cannot be washed, use a mattress encasement to keep bed bugs where they are and from biting you.

Dispose Infested Items: For items that cannot be treated by vacuuming, heat, laundering or insecticides, tightly wrap and seal in a large plastic bag prior to disposing. Destroy or mark "Infested with Bed Bugs" to prevent someone else from picking them up.

If after one month you are still experiencing a severe bed bug infestation, please contact your local professional pest management company.

Prevention

Proper steps must be taken to prevent an initial introduction or secondary re-infestation. These include:

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Bold, italicized text is information for the reader and is not part of the label.

- [Bracketed information is optional text.] Text separated by / denotes and/or options.
 - **Isolating the Bed:** Move your bed and other furniture away from the wall slightly. Remember, bed bugs do not fly or jump! Making sure the bed skirt and blanket do not touch the floor will make it harder for bed bugs to crawl onto the bed.
 - Sealing Cracks & Crevices: Seal openings in window sills, baseboards, floorboards, furniture, bed frames and where pipes or wires or other utilities enter the home. Fix or take down any peeling wall paper. Tighten loose switch covers. Installing door sweeps will help discourage movement into hallways.

Manage the Environment: Eliminate clutter. Launder bedding and clean furniture routinely. Vacuum often and thoroughly.

Thoroughly inspect purchased furniture before bringing it home, especially if it was purchased used. However, purchasing used furniture should be avoided when possible. Monitor previously infested or likely to be infested sites daily. Remove evidence of previous infestations. Restart treatment process if necessary.

Bed bugs are typically transported from place to place as people travel, so it is important to take proper precautionary steps when traveling. Also make sure any visiting guests are not transporting bed bugs in their luggage.

• Prior to Travel:

o DO Spray luggage and allow to dry completely with a[n aerosol] product with residual activity registered to treat bed bugs [and bed bug eggs] and for use on luggage.

o DO Pack clothing and other items in sealable plastic bags. Bring extra re-sealable plastic bags for soiled clothing.

At Hotel/Destination:

o DO check for signs of bed bugs by examining the cracks and crevices of the mattress, box spring, sheets, bedding, headboard, nightstand & dresser drawers, desks, chairs, and other furniture; behind wallpaper and pictures; in clocks and other electronics; in cracks in wood floors; and under the edge of the carpet. [Carrying a small flashlight such as the [insert product name here] will help you quickly and thoroughly inspect for signs.] Signs of bed bug activity may include the presence of eggs, fecal spots, and shed skins.

- DO change rooms immediately, or change hotels entirely, if you identify bed bugs in your hotel room.
- DO check clothes hangers thoroughly before unpacking. Bed bugs hide in the cracks and crevices of hangers so a thorough inspection is necessary before hanging up clothes, especially if the hangers are wooden.
- DO re-pack luggage contents into sealable plastic bags so you can throw them directly in the dryer when you return home to kill any bed bugs or eggs that may be nestled in the clothing.
- DO use a bed bug trap such as the Ortho Home Defense Bed Bug Trap to lure and detect bed bugs
- DO Spray your luggage and allow it to dry completely with a[n aerosol] product [such as the Ortho Home Defense Dual-Action Bed Bug Killer] registered to treat bed bugs [and bed bug eggs] and for use on luggage.
- DO NOT put your suitcase on the bed. Elevate all luggage off the floor using a luggage rack (inspect first), tabletop or other hard surface. The best place is in the bathtub.
- DO NOT unpack your suitcase contents into dressers.

Returning Home:

- DO remove the items you placed in plastic bags at the hotel, and throw them immediately into the dryer, set on the highest heat setting the fabric can withstand to kill any bed bugs or their offspring that may be nestled in the items.
- DO inspect luggage and clothing for signs of bed bug activity. If signs are found, treat luggage by vacuuming, laundering (scrubbing with hot, soapy water) and/or insecticides.
- DO store luggage in sealed bags and keep them in the garage. If you are exposed to a bed bug infestation, there is no reason to throw out your luggage and clothing unless your infestation is severe. The key is to contain all items suspected of carrying bed bugs in plastic bags until you can treat them.
- DO NOT unpack luggage inside. Unpack luggage outside, or in a garage, laundry room or utility room.

These steps are very important, and must be done carefully, consistently and cyclically. Bed bugs are resilient insects that will not go away without intervention.

A comprehensive, continuous cycle of Detection -> Treatment/System-> Prevention/Detection/Monitoring is the key to gaining control. [Continuing the integrated system creates a better chance of managing bed bugs]