

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Jessica McLaughlin The Scotts Company LLC 14111 Scottslawn Rd. Marysville, OH 43041

IAN 1 1 2012

Dear Ms. McLaughlin:

Subject:

Labeling Amendment; addition of alternate brand names, clarifying directions for use,

and addition of Snap Spreader language

Grubex III

EPA Registration No. 538-306 Submission Date: October 14, 2011

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one (1) final printed copy for the above mentioned label before releasing the product for shipment. Note that the claim "new" is only acceptable for six months after a product with the newly stamped label is released for shipment.

Should you wish to add a reference to the company's website on your label, 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 Assurance.

If you have any questions regarding this label, please contact Dr. Jennifer Urbanski at (703) 347-0156 or <u>urbanski.jennifer@epa.gov</u>.

Sincerely yours,

Venus Eagle

Product Manager (01)

Insecticide-Rodenticide Branch Registration Division (7505P)

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.

EPA Reg. No. 538-306

GRUBEX III

ACTIVE INGREDIENT: 0.08%

Chlorantraniliprole[*] 99.92%

Total 100.00%

[*Chlorantraniliprole belongs to the anthranilic diamide chemical class.]
[(Protected by) US Patent No. X,XXX,XXX (insert appropriate patent number(s))]

For Use on Residential Lawn[s] [and Landscaped Areas] Only Not for sale, use, or distribution in or into Nassau, Suffolk, Kings, or Queens Counties of New York State [[Treats / covers] 5,000 square feet / sq. ft.]

KEEP OUT OF REACH OF CHILDREN [No signal word [required]]

Net Wt. 14.35 lb (6.5 kg)

ACCEPTED JAN 1 1 2012

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

EPA. Reg. No:___

538-306

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EPA Reg. No. 538-306

Optional Company Identifier:

Scotts®

Alternate Brand Names:

Grubex® I

Optional Product Descriptors

Season-Long Grub Killer (for up to 4 months)
Season-Long Grub Control (for up to 4 months)

Season Long Grub Killer & Preventer (for up to 4 months) Season Long Grub Preventer (for up to 4 months) Season Long Grub Prevention (for up to 4 months)

Coverage Examples:

Bag Weight (lbs)	Coverage (lbs / sq.ft.)	A.I. percent	# A.I. per acre
2.87	1,000	0.08	0.10
11.48	4,000	0.08	0.10
14.35	5,000	0.08	0.10

(Container weight and coverage area to be based on application rate of 2.87 pounds of product per 1,000 sq. ft.)

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[Keep Out of Reach of Children]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

When used as directed this product does not present a hazard to humans or domestic animals. Wash hands thoroughly after use. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This product is toxic to aquatic invertebrates, oysters and shrimp. Do not apply directly to water. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Sweeping any product that lands on a driveway, sidewalk or street back onto the treated area will help to prevent run off to water bodies or drainage systems.

Ground Water Advisory

This chemical has properties and characteristics associated with chemicals detected in ground water. The use of this chemical in areas where soils are permeable, particularly where the water table is shallow, may result in ground water contamination.

-Begin Directions for Use-

[KEY PRODUCT FACTS]

DIRECTIONS FOR USE

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

OPTION 1 - QUICK START GUIDE (LAWNS)

Scotts Quick Start Guide

[You're just three [simple] steps away from a beautiful Scotts lawn]

[Icon - Note to PM: this will be a Spreader Dial]

[1.] Set & Fill Spreader [Scotts® Broadcast / Rotary Spreaders [Scotts® Drop Spreaders

X]

Note to PM: See SPREADER SETTINGS AND INFORMATION for additional spreader descriptions and settings

[Scotts® products are designed to work with Scotts® spreaders.]
[For additional spreader settings, [please] call 1-800-543-TURF (8873).]
When using spreaders other than Scotts, calibrate the spreader settings based on the manufacture's recommendations

[Icon - Note to PM: this will be a Spreader / Hose on Lawn]

[2.] Apply

Apply to dry lawn. Water in thoroughly (~ / approximately 1 inch) to activate. Apply 2.87 lbs / pounds of product per 1,000 sq. ft. The maximum number of applications is one [1] per year. In New York State, do not apply within 100 feet of a water body (lake, pond, river, stream,

In New York State, do not apply within 100 feet of a water body (lake, pond, river, stream wetland, or drainage ditch).

[Icon - Note to PM: this will be Broom on Lawn]

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[Bracketed information is optional text]. Text separated by "/" denotes and/or options.

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[3.] Clean-Up Sweeping product from hard surfaces onto lawn keeps product on the grass.

[Icon - Note to PM: this will be Lower Legs stepping onto grass]

You're Done! What's Next?

People or pets may re-enter lawn once grass has dried. Your lawn will be protected from grubs [and other listed insects]

Question? [Call] [now!] 1-800-543-TURF [or] [visit] [www.scotts.com]

Other Things You Should Know
Apply spring to [early] summer.
Do not apply to waterlogged areas.

[[Also for use in] Landscape and / or Ornamental [Fruit and Nut] Tree Plantings Apply as a broadcast to soil / mulch / other substrate and thoroughly (\sim / approximately 1 inch) water to activate. Apply 2.87 lbs. of product per 1,000 sq. ft. - or - 0.287 lbs. product per 100 sq. ft. Do not apply to vegetable gardens or under [ornamental] fruit or nut trees [in landscaped areas] being grown for consumption.]

Note to PM: A list of insects killed / controlled / suppressed by this product will appear on the Final Printed Label. We intend to have either the four lists found on page 6 in their entirety or a portion of the four lists as part of our Directions for Use on our final printed label.

END OF OPTION 1

OPTION 2 – HANDHELD APPLICATOR (LAWNS)

Apply Grubex III / this product anytime between [[the beginning of] April and early August] – or – [spring and [early] summer] for control of white grubs [and other listed insects] – Note to PM: The other insects that will appear in this sentence will be from Insect List 1 and 2 of turf damaging pests found on page 6.

Easy to Follow Instructions

Step 1 – Flip [Icon – Note to PM: this will be a Shaker Bottle with the top flipped open]: Remove seal under cap. Flip spout from cap.

Step 2 – Tilt [Icon – Note to PM: this will be a Shaker Bottle being tilted]: Tilt bottle to a 90° angle.

Step 3 - Feed [Icon - Note to PM: this will be a Shaker Bottle with granules coming out of the bottle]: Walk at a steady pace and shake bottle side-to-side using your wrist. For uniform coverage apply product in rows as you move across the lawn overlapping the rows a few inches. For best results maintain a 90° angle during application at all times.

Step 4 - [Icon - Note to PM: this will be a Spreader / Hose on Lawn]:

Apply to dry lawn. Water in thoroughly (~ / approximately 1 inch) to activate. Apply 2.87 lbs / pounds of product per 1,000 sq. ft. The maximum number of applications is one [1] per year. In New York State, do not apply within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch)

Step 5 – Clean-up [*Icon* – *Note to PM: this will be Broom on Lawn*]: Sweeping product from hard surfaces onto lawn keeps product on the grass.

Step 6 - People or pets may re-enter lawn once grass has dried.

[TIP: 1,000 sq ft (20 x 50 ft) is approximately half the size of a tennis court [image]]

Do not apply to vegetable gardens or under [ornamental] fruit or nut trees [in landscaped areas] being grown for consumption. Do not apply to waterlogged areas.

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Note to PM: A list of insects killed / controlled / suppressed by this product will appear on the Final Printed Label. We intend to have either the four lists found on page 6 in their entirety or a portion of the four lists as part of our Directions for Use on our final printed label.

END OF OPTION 2

OPTION 3 -For Use in Landscape and / or Ornamental [Fruit and Nut] Tree Plantings

Note to PM: A list of insects killed / controlled / suppressed by this product will appear on the Final Printed Label. We intend to have either the four lists found on page 6 in their entirety or a portion of the four lists as part of our Directions for Use on our final printed label.

[Apply]

Apply as a broadcast to soil / mulch / other substrate and [thoroughly (~ / approximately 1 inch)] water in to activate.

Apply 2.87 lbs. of product per 1,000 sq. ft.

-or- 0.287 lbs. product per 100 sq. ft.

-or- 0.0287 lbs product per 10 sq. ft.

The maximum number of applications is one [1] per year

In New York State, do not apply within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch)

Do not apply to vegetable gardens or under [ornamental] fruit or nut trees [in landscaped areas] being grown for consumption. Do not apply to waterlogged areas. Permeable weed barriers need not be removed.

END OF OPTION 3

-End of Directions for Use-

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store in a clean, dry place. Reseal opened bag by folding top down and securing. **PESTICIDE DISPOSAL AND CONTAINER HANDLING:** If empty: Non-refillable container. Do not reuse or refill this container. 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.

OPTIONAL PRODUCT EFFICACY CLAIMS

[Turf Damaging Pests]

List 1.

Kills / Controls [the following] [additional] insects [Icon – Note to PM: this will be of a White Grub, a Japanese Beetle and / or another insect listed in lines 1 – 11] [Spring / Summer Application]

- (1) White grubs (including larvae of):
- (2) Japanese beetles
- (3) Asiatic garden beetles
- (4) Black turfgrass ataenius
- (5) Aphodius spp.
- (6) European chafers

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- (7) Green June beetles
- (8) May / June beetles
- (9) Northern masked chafers
- (10) Oriental beetles
- (11) Southern masked chafers

List 2.

Kills / Controls [the following] [additional] insects [Icon – Note to PM: this will be of an Annual Bluegrass Weevil, a Billbug and / or a Caterpillar] [Spring / Summer Application]

- (1) Annual bluegrass weevils
- (2) Billbug grubs / larvae
- (3) Caterpillars [including:]
 - i. Armyworms
 - ii. Cutworms
 - iii. Sod webworms

List 3.

Kills / Controls [the following] [additional] insects [Icon – Note to PM: this will be of a Crane Fly and / or a European Crane Fly]
[Fall application]

(1) Crane fly larvae (including European Crane Flies)

List 4

[Also] Suppresses [the following] [additional] insects [Icon – Note to PM: this will be of a Chinchbug] Spring / Summer Application

(1) Chinchbugs

[What GrubEx III does:]

[Annual bluegrass weevils can cause damage by feeding on grass blades and stems. **GrubEx III** controls these turf damaging insects and prevents damage.]

[Billbug grubs feed on roots, stolons, stems, and crowns. Infested turf may look drought damaged and the grass blades break off at the crown. **GrubEx III** prevents turf damage by killing grubs [when they are young] [and] [before they can cause damage to your turf.]]

[Caterpillars such as armyworms, cutworms and sod webworms can cause damage by feeding on grass blades and stems. *GrubEx III* controls these turf damaging insects and prevents damage.

[Crane fly larvae cause damage by feeding on grass blades, stems, crowns and roots. *GrubEx III* controls these turf damaging insects and prevents damage.]

[White grubs can cause extensive damage to turf by feeding on grass roots. Infested turf turns brown and is easily pulled up by hand. *GrubEx III* prevents turf damage by killing grubs [when they are young] [and] [before they can cause damage to your turf.]]

[Grubs and other listed insects can cause extensive damage to lawns by feeding on grass and its roots. [*GrubEx III* kills / controls listed turf damaging insects and prevents damage.] [Infested turf turns brown and is easily pulled up by hand.] [*GrubEx III* prevents turf damage by killing grubs] [when they are young] [and] [before they can cause damage to your turf.]]

[[Treats / covers] X,XXX square feet (sq. ft.)]]

[SPREADER SETTINGS [AND INFORMATION]]

Spreader	Setting	
Scotts Drop Spreaders	X	
(insert trade names from List 2. as appropriate)		

NOTE: EPA Reg. No. 538-306 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. Scotts Broadcast / Rotary Spreader X (insert trade names from List 2. as appropriate) Scotts GrubEx III cartridge applicator / spreader X (insert trade names from List 2. as appropriate) X Scotts Broadcast Tractor Spreader (insert trade names from List 2. as appropriate) Appropriate spreader settings and coverage will be inserted on Final Printed Label to replace "X" Drop Spreader Trade Names and Descriptions (to be entered above as appropriate) Scotts AccuGreen [Drop] Scotts Basic [Rotary] XXXXX Scotts Deluxe EdgeGuard [Rotary] Scotts EasyGreen [Rotary] Scotts Lawn Pro [Rotary] Scotts SpeedyGreen [Rotary] Scotts Broadcast Tractor Spreader

[Scotts® products are designed to work with Scotts® spreaders.] [For additional spreader settings, [please] call 1-800-543-TURF (8873).]

When using spreader other than Scotts, calibrate the spreader settings based on manufacturer's recommendations.

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OPTIONAL MARKETING CLAIMS - The following claims may appear on any label panel

PESTICIDAL CLAIMS

- (1) [Annual use can] help[s] control Japanese Beetle [infestations][populations]
- (2) Apply anytime spring through early summer
- (3) Apply in Spring or early Summer
- (4) Apply between spring and early summer
- (5) [Apply] Spring to [early] Summer
- (6) Apply Fall [Oct Dec] to control Crane fly larvae (including European Crane fly)
- (7) Apply [anytime] [early] April to early August
- (8) Controls key [lawn damaging] grubs
- (9) Control / kills grubs for up to 4 months
- (10) Corrects lawn problems caused by grubs
- (11) Kills / Controls Insert any insect from List 2 and / or List 3 found on page 6
- (12) Defends against grubs
- (13) Defends against grubs [[plus] [to] help[s] turf recover]
- (14) Four month soil insect protection
- (15) Guaranteed kill or your money back
- (16) GrubEx III also kills grubs in landscaped ornamental areas that contain flowers, groundcovers, shrubs and trees
- (17) GrubEx III prevents turf damage by killing grubs when they are newly hatched, before they can cause damage
- (18) GrubEx III prevents turf damage by killing grubs [when they are young] [and] [before they can cause damage to your turf.]
- (19) GrubEx III works best when applied before grubs hatch
- (20) Helps prevent root damage caused by insects for a healthier / stronger lawn
- (21) Keeps [on] killing [for four [4] months] [guaranteed] [all season long] Note: Scotts No Quibble Guarantee on pg. 10 of master label will be used in conjunction with this claim.
- (22) Kills / controls / prevents / stops [lawn damaging] grubs
- (23) Kills / controls / prevents / stops Insert any insect from List 1 found on page 6.
- (24) Kills / controls / prevents / stops lawn damaging insects
- (25) Kills / controls / prevents / stops grubs below the ground / soil / surface
- (26) Kills / controls / prevents / stops grubs so the lawn can repair itself
- (27) Kills / controls / prevents / stops grubs with a single application
- (28) Kills / controls / prevents / stops grubs / listed lawn insects
- (29) Prevents lawn damage for a healthier / stronger lawn
- (30) Kills / controls / prevents / stops 2 more grubs [species] [types] versus original Grubex [Green June beetle and Aphodius spp.]
- (31) Kills / controls / prevents / stops grubs [keeps on killing] [for four months guaranteed] [all season long] Note: Scotts No Quibble Guarantee on pg. 10 of master label will be used in conjunction with this claim.
- (32) Kills / controls / prevents / stops grubs before they become beetles
- (33) Kills / controls / prevents / stops grubs now and prevents them [all season] [() for up to 4 months [)] **Note to PM:** If the optional portion of this claim "all season" is used it will be followed by the language "for up to 4 months" in parenthesis.
- (34) Kills / controls / prevents / stops more species of [grubs / pest / insects] vs. original GrubEx
- (35) Improved / better killing power versus original Grubex
- (36) Lawn protection [against / from] grubs
- (37) Long lasting grub control guaranteed [all season long –] for up to 4 months Note: Scotts No Quibble Guarantee on pg. 10 of master label will be used in conjunction with this claim.
- (38) Kills 2 more grub species versus original Grubex
- (39) Kills / controls [Insert any insect from List 2 found on page 6] too
- (40) Kills 25% More Grub species / types versus original GrubEx
- (41) One application kills and protects [for four months / all season] [guaranteed] Note: Scotts No Quibble Guarantee on pg. 10 of master label will be used in conjunction with this claim.
- (42) [One application] kills and prevents [grubs / lawn insects] [for four months / all season] [guaranteed] Note: Scotts No Quibble Guarantee on pg. 10 of master label will be used in conjunction with this claim.
- (43) One application stops [grubs / lawn insects] [all season long] [() for up to 4 months [)] Note to PM: If the optional portion of this claim "all season long" is used it will be followed by the language "for up to 4 months" in parenthesis.
- (44) Penetrates deep [in the soil] to kill lawn [damaging] grubs

NOTE: EPA Reg. No. 538-306

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- (45) Prevents [lawn damaging] grubs [all season long] [(] for up to 4 months [)] Note to PM: If the optional portion of this claim "all season long" is used it will be followed by the language "for up to 4 months" in parenthesis.
- (46) Promotes root growth by killing [lawn damaging] grubs

(47) Protects the lawn [against / from] grubs

- (48) Protect [s] / revitalize [s] / regenerate [s] / renew [s] / rejuvenate [s] / refresh [es] your lawn by killing [lawn damaging] grubs
- (49) Provides protection to keep grubs away [all season] [()] for up to 4 months [()] Note to PM: If the optional portion of this claim "all season" is used it will be followed by the language "for up to 4 months" in parenthesis.

(50) Season-long grub killer (for up to 4 months)

- (51) Season-long grub control / prevention / protection (for up to 4 months)
- (52) Stops grubs from further damaging your lawn

PESTICIDAL CLAIMS (cont.)

(53) [Stops / kills] grubs allowing the lawn to repair itself

(54) Sub-surface ingredient specifically targets turf larvae (grubs)

(55) Suppresses Insert any insect from List 4 found on page 6

- (56) The active ingredient in GrubEx III will remain in the root zone of the turf until the grub eggs hatch. [Young, newly hatched grubs are very susceptible to GrubEx III and are killed before they become large enough to cause turf damage.]
- (57) Use in landscape beds to protect shrubs, flowers and ground cover from Insert any insect from List 1 found on page 6
- (58) Use GrubEx III every year to control grub populations in your lawn

NON-PESTICIDE CLAIMS

(59) Ready-to-spread granules

- (60) Don't forget to feed your lawn. A strong root system will also help your lawn defend against grub[s] [damage]
- (61) Easy to apply / use [granules]

(62) From the leader in lawn care

(63) Kills / controls / prevents grubs to help build a healthier / stronger lawn

(64) Kills / controls / prevents grubs so lawn can restore / repair [itself] [from damage]

(65) Kills / controls / prevents grubs to help your lawn stay strong during stressful summer months

(66) Most trusted brand in lawn care

(67) Now with [quick-release] [quick-dissolve] [Eco®] granule [ingredient]

(68) [Grubex III is [Made] [with Eco® Granule] [to] add[s] back organic matter to [your] soil

(69) Eco® Granule is biodegradable

(70) Specially formulated for lawns

(71) Guaranteed Results Note: Scotts No Quibble Guarantee on pg. 10 of master label will be used in conjunction with this claim.

(72) From the Experts at Ortho

[GRAPHIC – Note to PM: this will be a picture of lawn damaged by insects listed in lists 1 – 4 found on page 6] – UNTREATED / BEFORE / Grub Infested Turf

[GRAPHIC - Note to PM: this will be a picture of lawn treated with Grubex III] - TREATED / AFTER / Lawn Protected by Grubex III

Dedicated To A Beautiful World™

Trusted by generations of homeowners, Scotts® is dedicated to helping enhance and protect the beauty of your home environment. –Scotts®

Scotts & Your Environment [Icon - Note to PM: this will be of a tree and the sky]

We Care - Scotts products are designed with care to grow thicker, greener lawns.

[Because] A Green Lawn is a Good Lawn - A healthy lawn can clean the air, produce oxygen and prevent runoff and soil erosion.

[You Can] Make a Difference - Help keep our water resources clean. Apply this product only to your lawn, and sweep any product that lands in the driveway, sidewalk or street back on to your lawn.

GRUB LIFECYCLE

[Stop the Destructive Cycle]

[Scotts GrubEx III kills grubs as they develop, BEFORE they cause damage to your lawn]

[Apply GrubEx III spring to [early] summer.]

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Graphics – Note to PM: this will be a picture depicting the grub lifecycle through spring, summer and fall (e.g., egg, pupa, grub, beetle)

Spring	Summer	Fall
Grubs come out of winter hibernation and start to eat your lawn's roots.	Adult beetles surface to feed on your garden and lay eggs back in your lawn. Eggs hatch into new grubs, which will begin to feed on	Between the summer stress and the feeding grubs, your lawn can be severely damaged. After feeding in the fall, grubs will
By late spring, grubs enter the pupa stage to transform into beetles.	your lawn's roots	hibernate during the winter and resume the destructive cycle in the spring.

Lawn products work effectively when used correctly. Read and follow all instructions for use and restrictions.

Tips for Lawncare Success

- Feed Regularly For Your Best Lawn. [Fertilizing regularly / Regular feedings will help grow a lawn you and your family can enjoy. Fertilizing / feeding provides the nutrients your lawn needs to look its best and withstand the stresses of weeds, heat, drought and family activity.]
- Mow Your Lawn. [Mowing high allows the grass to develop a deep root system & helps your lawn use water more effectively.]
- Leave The Grass Clippings On Your Lawn. [This recycles the plant nutrients back into the soil.]
- Conserve Water. [Your lawn will begin to wilt when water is needed. As much as possible, take advantage of nature's sprinkler and rely on the rain to water your lawn.]

Questions / Information

[Icon - Note to PM: this will be of a phone]

Phone toll-free -or- Consumer Helpline -or- [toll-free] consumer hotline - 1-800-543-TURF (8873)

[Icon - Note to PM: this will be of a computer mouse or of a computer]

[Visit [our website]] - www.scotts.com

[Icon - Note to PM: this will be an icon of the Scotts Miracle-Gro - New York Stock Exchange]

[Manufactured / Distributed / Sold / Guaranteed by / for:]

The Scotts Company, [LLC,]

14111 Scottslawn Rd.

Marysville, OH 43041

Questions? Call 1-800-543-TURF (8843)

Scotts [No-Quibble] Guarantee[™]

If for any reason you, the [consumer or customer], are not satisfied [with the results] after using this product, you are entitled to get your money back. Simply send us evidence of purchase and we will mail you a refund check promptly.

Get expert advice for your lawn. [NOW]

Want information on what to use and when?

Sign up today to get free expert advice specifically for your lawn.

Consumer Helpline / Call [now] 1-800-543-TURF (8873)

Contact the Experts / Learn more at www.scotts.com [or 1-800-543-TURF (8873)] Scotts®... the lawn people Marysville, Ohio 43041

"Lawn success made easy" [Call 1-800-543-TURF (8873)]

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

EPA Reg. No. 538-306

EPA Est. No. XXX-XX-X [Superscript used is first letter of run code on end of container]

@20XX, [Licensed by] The Scotts Company, LLC. World rights reserved.

[Made in / Product of _____]

120914

NOTE:

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EPA Reg. No. 538-306

NOTE TO PM: This is a label subset to the main GRUBEX III label above. All the language below is specific to Scotts SNAP and will only be used on packaging that is sold for use with the Scotts SNAP spreader system.

Alternate Brand Names:

SNAP Pac GrubEx® SNAP Pac Grub Control

-Begin Directions for Use-

[KEY PRODUCT FACTS]

DIRECTIONS FOR USE

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

This package applies 2.87 lbs / pounds of product per 1,000 sq. ft.

Restrictions

- People or pets may re-enter lawn once grass has dried
- The maximum number of applications is one [1] per year
- In New York State, do not apply within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch)
- Do not apply to vegetable gardens or under [ornamental] fruit or nut trees [in landscaped areas] being grown for consumption.
- · Do not apply to waterlogged areas

When to Apply

· Apply anytime between April to early August for best results

Where to Apply

Apply to lawns

How to Apply

- Apply to dry lawn
- Water in thoroughly to activate with at least 1" of water [for maximum effectiveness]
- Sweep product from hard surfaces onto the lawn keeping the product on the grass

Note to PM: A list of insects killed / controlled / suppressed by this product will appear on the Final Printed Label. We intend to have either the four lists found on page 6 in their entirety or a portion of the four lists as part of our Directions for Use on our final printed label.

-End Directions for Use-

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store product in clean, dry place for your next application. Product can be used until empty.

PESTICIDE DISPOSAL AND CONTAINER HANDLING:

If empty: Non-refillable container. Do not reuse or refill this container. 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.

EPA Reg. No. 538-306

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[GrubEx III]

[Just pop it on, flip the lever and go!]

[Icon - Note to PM: this will be of the Cartridge snapping into the Spreader System]: Connect / Snap [Place into Spreader]

[Icon - Note to PM: this will be of a Hand locking the Cartridge into place]: Lock [Flip lever to lock in place]

[Icon - Note to PM: this will be of the Cartridge set into the Spreader System and the System being pushed]: Apply / Go [You're ready to go]

[Icon - Note to PM: this will be of the EdgeGuard feature on the Spreader System]: [EdgeGuard / Feature / Control1

[Icon - Note to PM: this will be of the Cartridge being removed from the Spreader System]: [[Finish] [&] [Store]]

See back panel for Setup Guide

- [Lock / Snap & Go] [Snap™ Pac / cartridge connects directly to the [insert name] spreader / applicator] [There's no cutting / no pouring / no spilling] [from heavy bags] [Simply place snapTM pac / cartridge into the spreader / applicator]
- [Flip the lever to lock Snap™ Pac / cartridge into place] [Snap™ Pac / cartridge automatically sets the proper application rate]
- [Easy to apply: Follow Directions for Use below / above]
- [Easy to control] [The new & improved / exclusive EdgeGuard feature directs product only where you want it]
- [Easy to finish & store] [Just flip the lever back to remove the snapTM pac / cartridge.] [It self-seals for no mess / no touch / no-waste / easy clean-up & storage.]

Note to PM: If the product is sold for use only with the SNAP Spreader Application system, the SNAP Spreader Application system will calibrate to the correct amount of product automatically. Because of the SNAP Spreader Application system, spreader settings are not required on the SNAP Pac final printed label.

CARTRIDGE / SNAP SPREADER APPLICATOR CLAIMS

- A snap / easy to start / apply / finish / store
- (2)
- Available in your choice of [x] formulas / cartridges / snapTM pacs [Insert product name(s)]
 Cartridge / snapTM pac locks into place [and automatically sets the proper feeding / application rate]
 Compact size fits easily in storage areas (3)
- (4)
- Easy / simple to use (5)
- Flip the lever to lock cartridge into place [Icon Note to PM: this will be of a Hand locking the (6)Cartridge into place
- Insert / connect new cartridge / snapTM pac [s] [lock into place] [and go] [and continue applying] [lcon -(7)Note to PM: this will of the Cartridge and / or the Spreader System or a Hand locking the Cartridge into place
- [Insert product name / Self-contained / Lock / Snap & Go] cartridge / system [connects directly to the (8) spreader / applicator] [locks into place] [and] automatically sets the proper application rate.
- It's easy to get started
- [It's / Insert product name is] the revolutionary / patented / specially designed / exclusive / lightweight / (10)self-contained / no-mess / no touch / no guess / guess-proof / mess-proof / lock / snap & go [lawn care] [cartridge / snapTM pac / application / applicator / spreader] system.
- (11)It's easy / easier [than ever before] [to get the [right application rate] [great results]]
- (12) Leave the old way of killing grubs / lawn care behind
- Lock / snap & Go (13)
- (14) No burn application
- (15)No guess / mess application
- No manual spreader / applicator settings [to adjust] (16)
- (17)No mess / guess / hassle

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No mess start / finish

No touch / spill / waste storage [with the [unique / self-sealing] cartridge / snapTM pac / system]. (19)

[Now] [there's] [a / the] quick / quicker / fast / faster way to kill grubs / care for your lawn (20)

[Now] [there's a / the] revolutionary [new] way to take care of your lawn Once empty, [*Insert product name*] cartridges / snapTM pacs cannot be reused (21)

(22)

Proper application rate is set automatically [with the [Insert product name] / self-contained / Lock / Snap (23)& Gol [cartridge / system]

Reduces the mess / inconvenience / effort / hassle of killing grubs / lawn care (24)

SnapTM Pac / Cartridge

[The] [self contained] [Grub control] [lock / snap & go] [Insert product name] cartridge / snap TM pac connects directly to [Insert product name] spreader / applicator [so / it means / there's] [no cutting / no pouring / no spilling / no opening] [from heavy bags]] / [no need to cut open or pour from heavy bags]

[The] self-sealing cartridge / snap pac [makes clean-up and storage a snap] / [means [a] no waste / no spill / no touch] [clean up / storage]

[The] [exclusive / patented / specially designed / revolutionary / lock / snap & go] [cartridge / applicator / (28)

system] automatically sets the proper application rate [so] [there are no manual spreader / applicator settings [required / to adjust.]]

[The] [Insert product name] [cartridge / snapTM pac / system] [automatically] self-seals [upon removal] (29)making clean up and storage a snap / easy / easier [The] [Insert product name] [cartridge / snapTM pac / system] [automatically] self-seals [upon removal] for

no touch / no waste / no mess / easy clean-up / storage

The [no-mess / guess / touch / pour] grub control application system

- [There's] no cutting / pouring / spilling / opening [from heavy bags] [with the [unique / self-contained] cartridge / snapTM pac] (32)
- [The] [Insert product name] cartridge / spreader / applicator / system improves / reinvents the grub killing / lawn application experience
- [The] [Insert product name] [lock / snap & go] Cartridge / SnapTM Pac works exclusively with the [Insert product name] [Cartridge / SnapTM Pac] spreader / applicator / system [Icon Note to PM: this will of the Cartridge and / or the Spreader System]
- The [insert product name] [lock / snap & go] cartridge is designed to be used only in the [exclusive / (35)specially designed / patented / revolutionary] [Insert product name] cartridge / spreader / applicator / system [Icon - Note to PM: this will of the Cartridge and / or the Spreader System]
 [The] [Insert product name] cartridge / snap TM pac snaps / locks easily into place [Icon - Note to PM:

this will be of a Hand locking the Cartridge into place

The [guess / mess proof] [self-contained] [lock / snap & go] [lawn care / grub control] [cartridge / application] system [that] [takes the guesswork out of lawn care]

The [no guess / mess] [self-contained] [lock / snap & go] [lawn care / grub control] [cartridge / application] system [that] [takes the guesswork out of lawn care]

(39)The [guess-proof / mess proof / no guess / no mess] [self-contained] [lock / snap & go] [lawn care / grub control] [cartridge / application] system [that] [makes great results easy / easier / a snap]

- The [quess-proof / mess proof / no guess / no mess] [self-contained] [lock / snap & go] [lawn care / grub control] [cartridge / application] system [that] / [[gives you [the right application rate / great results]] [from start to finish]
- The EdgeGuard feature on the [Insert product name] cartridge / spreader / applicator allows for onesided spreading so product is not wasted / released on [unwanted] [areas like] driveways / sidewalks / flowerbeds [Icon - Note to PM: this will be of the EdgeGuard feature on the Spreader System]
- The EdgeGuard feature on the [Insert product name] cartridge / spreader / applicator lets you close off application on one side of spreader so product is not wasted / released on [unwanted] [areas like] driveways / sidewalks / flowerbeds [Icon - Note to PM: this will be of the EdgeGuard feature on the Spreader System]
- Use [this] [Insert product name] [lock / snap & go] [cartridge / snap TM pac] only with the [new] [specially designed / exclusive / patented / revolutionary] [Insert product name] [Cartridge / spreader / applicator] system [Icon - Note to PM: this will of the Cartridge and / or the Spreader System]
- Your hands don't have to touch the product

(45)The easier way to apply grub control

- A beautiful lawn without the Mess and Guesswork (46)
- Lawn Care without the Mess and Guesswork (47)
- Takes the Mess and Guesswork out of lawn care / caring for your lawn