



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

September 6, 2018

Karen Warkentien  
Director, Regulatory Affairs  
Certis USA LLC  
9145 Guilford Road  
Columbia, MD, 21046

Subject: Label Amendment – Removal of public health insects from label  
Product Name: Trilogy® XL RTU  
EPA Registration Number: 70051-74  
Application Date: 05-Jan-2018  
Decision Number: 537313

Dear Ms. Warkentien:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

Page 2 of 2  
EPA Reg. No. 70051-74  
Decision No. 537313

with FIFRA section 6. If you have any questions, please contact Matthew Aubuchon by phone at 703-347-0477, or via email at [Aubuchon.Matthew@epa.gov](mailto:Aubuchon.Matthew@epa.gov).

Sincerely,



for

Product Manager 3  
Invertebrate & Vertebrate Branch 1  
Registration Division (7505P)  
Office of Pesticide Programs

Enclosure

# Trilogy® XL RTU

FUNGICIDE/MITICIDE/INSECTICIDE

{Alternate Brand Names: None}

Ready-To-Use

Broad Spectrum Insecticide, Fungicide, and Miticide

For Control of Listed Insects, Diseases, and Mites on Vegetables, Fruits, Nuts, Herbs, Spices,  
Roses, Flowers, and Shrubs Around The Home

Can be Used Up to Day of Harvest

**ACTIVE INGREDIENTS:**

Pyrethrins .....	0.02%
Piperonyl Butoxide* .....	0.20%
Clarified Hydrophobic Extract of Neem Oil.....	0.90%

<b>OTHER INGREDIENTS:</b> .....	<b>98.88%</b>
<b>Total:</b>	<b>100.00%</b>

\*(Butyl carbityl)(6-propylpiperonyl)ether and related compounds

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

See [[Back] [Side] Panel] [[Back] [Front] Panel Booklet] for Additional  
Precautionary Statements

**MANUFACTURED BY:**

Certis USA LLC  
9145 Guilford Road, Suite 175  
Columbia MD 21046

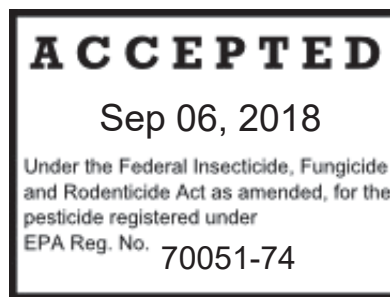
**EPA Reg. No. 70051-74**

**EPA Est. No. \_\_\_\_\_**

**Lot Number: \_\_\_\_\_**



**Net Contents: [1 pint] [1 quart] [other size]**



{ } Symbolizes explanatory text to the reviewer  
[ ] Indicates optional text  
Indicates inserted text  
~~Indicates deleted text~~

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION:** Harmful if inhaled. Avoid breathing spray mist. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Remove and wash contaminated clothing before reuse. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

**FIRST AID:**

- If inhaled: Move the person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. Call a poison control center or doctor for further treatment advice.
- If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
- If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
- If 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 doctor. Do not give anything by mouth to an unconscious person.

Hotline Number: [1-800-255-3924.] Have the product container or label with you when calling a poison control center or doctor or going for treatment.

**ENVIRONMENTAL HAZARDS:** This pesticide is toxic to aquatic organisms including fish and invertebrates. 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. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems.

**BEE HAZARD:** This product is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are foraging the treatment area.

**PHYSICAL AND CHEMICAL HAZARDS:** Do not use or store near heat or open flame.

### **DIRECTIONS FOR USE**

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

#### **GENERAL PRECAUTIONS:**

SHAKE WELL BEFORE AND DURING USE.

[[Product Name] {or} [This product] is a] [m]ulti-purpose insecticide/fungicide/miticide. Kills eggs, larval, and adult stages of listed insects. Prevents fungal attack of plants' tissues. Not for use in food-handling areas. Do not apply to wilted or otherwise stressed plants, or to newly transplanted material prior to root establishment. When using in conjunction with beneficial insects, conduct a small trial to assure compatibility before using on a large scale. As with other products that contain oils, take care in timing applications to early morning/late afternoon/early evening to minimize the potential for leaf burn. Use with care on plants with tender tissue. Do not apply to known spray sensitive plant species such as: impatiens flowers, fuchsia flowers, hibiscus flowers, some rose flowers, ornamental olive trees, red maples, some carnation varieties or similar plants without prior testing. Keep unprotected persons out of treated areas until sprays have dried.

---

{USE DIRECTIONS LAYOUTS—CHOOSE ONE}

---

{NOTE TO REVIEWER: The use directions/application instructions will include one set of the following directions. The layout used will be pertinent to the pesticide use type(s) and site(s) as presented in the options below.}

---

{OPTION #1}

---

**FUNGICIDE USE:** For use on FRUITS, NUTS, VEGETABLES, HERBS, SPICES, ROSES, HOUSEPLANTS, FLOWERS, ORNAMENTALS, AND SHRUBS

**Application Instructions:** [Product Name] {or} [This product] is an effective fungicide for the prevention and control of various fungal diseases including powdery mildew, black spot, downy mildew, anthracnose, rust, leaf spot, botrytis, needle rust, scab and flower, twig and tip blight. As a preventative, apply [Product Name] {or} [this product] on a 7 to 14-day schedule until the potential for disease development is no longer present. To control disease already present, apply [Product Name] {or} [this product] on a 7-day schedule until disease pressure is eliminated. Then continue spraying on a 14-day schedule to prevent the disease from recurring. To prevent rust leaf spot diseases, anthracnose and scab, begin applications at the first sign of spring budding. To prevent powdery mildew, apply in mid-summer or when disease is first detected. Continue applications until disease pressure no longer exists. Thoroughly spray all plant leaf surfaces (including undersides of leaves) until foliage is uniformly wet, but not dripping. Excessive application is unnecessary and to be avoided.

**INSECTICIDE USE:** For use on FRUITS, NUTS, VEGETABLES, HERBS, SPICES, ROSES, HOUSEPLANTS, FLOWERS, ORNAMENTALS, AND SHRUBS

**Application Instructions:** Apply [Product Name] {or} [this product] at first sign of listed insects/mites. For control of the following: aphids, spider mites, scales, mealybugs, whiteflies, beetles (including Japanese), loopers, leafminers, leafrollers, armyworms, webworms, weevils, tent caterpillars, fungus gnats, leafhoppers, cabbageworms, squash bugs, squash vine borer, stink bugs, thrips, tomato hornworm, lace bugs, boxelder bugs, grasshoppers, crickets, ants (except Carpenter, Harvester, Pharaoh, and Fire ants), earwigs, chinch bugs, and other listed insect pests. [Product Name] {or} [this product] is most effective when applied on a 7 to 14-day schedule. For heavy insect populations, spray on a 7-day schedule. Thoroughly spray all plant surfaces (including undersides of leaves) until foliage is uniformly wet, but not dripping. Excessive application is unnecessary and to be avoided.

---

{OPTION #2}

---

Fungicide [[Use] {and/or} [Application]]

Where to [[Use] {and/or} [Apply]]: [On] FRUITS, NUTS, VEGETABLES, HERBS, SPICES, ROSES, HOUSEPLANTS, FLOWERS, ORNAMENTALS, AND SHRUBS

Diseases [[Treated] {and/or} [Prevented] {and/or} [Controlled]]: powdery mildew, black spot, downy mildew, anthracnose, rust, leaf spot, botrytis, needle rust, scab and flower, twig and tip blight

How to [Use] {and/or} [Apply]: [Product Name] {or} [this product] is an effective fungicide for the prevention and control of various fungal diseases [including powdery mildew, black spot, downy

{ } Symbolizes explanatory text to the reviewer

[ ] Indicates optional text

Indicates inserted text

~~Indicates deleted text~~

mildew, anthracnose, rust, leaf spot, botrytis, needle rust, scab and flower, twig and tip blight.] As a preventative, apply [Product Name] {or} [this product] on a 7 to 14-day schedule until the potential for disease development is no longer present. To control disease already present, apply [Product Name] {or} [this product] on a 7-day schedule until disease pressure is eliminated. Then continue spraying on a 14-day schedule to prevent the disease from recurring. To prevent rust leaf spot diseases, anthracnose and scab, begin applications at the first sign of spring budding. To prevent powdery mildew, apply in mid-summer or when disease is first detected. Continue applications until disease pressure no longer exists. Thoroughly spray all plant leaf surfaces (including undersides of leaves) until foliage is uniformly wet, but not dripping. Excessive application is unnecessary and to be avoided.

Insecticide [[Use] {and/or} [Application]]

Where to [[Use] {and/or} [Apply]]: [On] FRUITS, NUTS, VEGETABLES, HERBS, SPICES, ROSES, HOUSEPLANTS, FLOWERS, ORNAMENTALS, AND SHRUBS

Insects [[Controlled] {and/or} [Killed]]: {If Column 1 and 2 have the same insect listed it may appear only once on final product label. If Column 2 has listed species, all or some may appear. If appearing in a text format, Column 2 species may start with “including”. Kills XX insect type claims will be determined by how many of the below in Column 1 and 2 appear on the label.}

{Column 1            Column 2}

<b>Ants</b>	Acrobat, Argentine, Bigheaded, Cornfield, Crazy, Field, Ghost, Odorous House, Pavement, and Thief, (excluding Harvester, Fire, Pharaoh, and Carpenter)
<b>Beetles &amp; Grubs</b>	Asian Cerambycid Beetle, Asian Lady Beetle, Asparagus Beetle, Bean Beetles, Billbugs, Black Turfgrass Ataenius (adult), Blister Beetles, Blue Grass Billbug (adult), Brown Spruce Longhorn Beetle, Cadelles, Carrion Beetle, Catorama Beetles, Cone beetles, Cottonwood Borer, Cottonwood Leaf Beetles, Colorado Potato Beetle, Cucumber Beetle (adult), Corn rootworm (adult), Dermestid Beetles, Dung Beetles, Elmleaf Beetles, Emerald Ash Borer, European Chafer, Flatheaded Borer, Flea Beetles (Dichondra Flea Beetles), Fungus Beetles (Hairy Fungus Beetles, Black Fungus Beetles), Fuller Rose Beetles, Ground Beetles, Hoptia Beetles, Japanese Beetle, June Beetles, Locust Borer, Murmidius Beetles, Pine Bark Beetles (Black Turpentine Beetles, Southern Pine Beetles), Pine Engraver, Red Lily Beetles, Red Oak Borer, Rose Chafers, Rootworms, Spider Beetles (Brown Spider Beetles), Southern Chafer, Sycamore Leaf Beetle, Trogoderma Beetles, Virburnum Leaf Beetle, Weevils (Black Vine, Boll, Clover, Hyperodes (adult), Yellow Poplar, Plum Curculio, Rose Curculios, Pepper), White Grubs, Willow Leaf Beetles

<b>Caterpillars &amp; Moths</b>	Asian Pine Tip Moths, Armyworms (Fall Armyworms), Artichoke Plume Moth, Bagworms, Browntail Moths, Budworms (Jackpine, Spruce, Western Spruce), Cabbageworms, Cankerworms (Fall Cankerworms), Catapla Sphinx, Clearwing Borer, Codling Moth, Corn Earworm/Tomato Fruitworm, Cutworms (Climbing, Dingy (adult)), Diamondback Moth (adults and larvae), Douglas Fir Tussock Moth, Elm Spanworms, European Corn Borer, European Pine Shoot Moth, European Pine Tip Moth, Filbertworm, Green Fruitworm, Greenstriped Mapleworms, Gypsy Moths (adult and larvae), Heliothis spp., Holly Budmoth, Hornworms (Poinsettia Hornworms, Tomato Hornworm), Inchworm, Iris Borer, Jeffery Pine Needleminers, Leafminers (Spotted tentiform leafminer, Azelea Leafminers, Oak Leafminers), Leafrollers, (Fruittree Leafrollers, Redbanded Leafroller, White Apple Leafroller,), Leaf Tiers, Lesser Peach Tree Borer, Loopers, (Western Hemlock Loopers, Imported Cabbage Lopper), Maple Leafcutters, Melon Worm, Nantucket Pine Tip Moth, Navel Orangeworm, Oak Leaf Skeletonizer, Oakworm complex (California, Orangestriped, Redhumped), Oleander Caterpillars, Orange Tortrix, Oriental Fruit Moth, Peach Twig Borer, Pickleworm, Pink Scavenger Caterpillar, Pinworms (Tomato Pinworm), Pitch Pine Tip Moth, Ponderosa Pine Needleminer, Potato Tuberworm, Puss Caterpillar, Rindworm, Saddled Prominent Caterpillar, Spiny Elm Caterpillar, Spruce Needleminer, Squash Vine Borer, Subtropical Pine Tip Moth, Tent Caterpillars (Eastern, Forest), Walnut Caterpillar, Webworms (Garden, Sod, Tropical, Lawn Moths, Fall, Mimosa), Western Pine Tip Moth
<b>Earwigs</b>	Earwigs
<b>Flies</b>	Australian Sod Flies, Boxwood Leafminers, Chrysanthemum Leafminer, Crane Flies, Douglas Fir Midge, Fruit Fly/Small Fruit Flies, Gall Midges, Holly Leafminers, Love Bugs, Maggots (Apple Maggots, Onion Maggot (adult)), Phorid Flies, Sciarid Flies (Mushroom Flies, Fungus Gnats), Walnut Husk Fly
<b>Grasshoppers &amp; Crickets</b>	Crickets (Field Crickets, Mole Crickets (nymphs and young adult)), Grasshoppers, Katydid
<b>Mites</b>	Clover Mites, European Red Mites, Eriophyid Mite, McDaniel Spider Mites, Pearleaf Blister Mites, Plant Mites, Spider Mites (Conifer Spider Mites (adult), Pacific Mites, Southern Red Mite (adult), Strawberry Mites, Two-spotted spider mites)
<b>Thrips</b>	Greenhouse Thrips, Madrone Thrips, Onion Thrips, Western Flower Thrips



<b>True Bugs</b>	Aphids (Apple Aphid, Green Apple Aphids, Elm Leaf Aphid, Root Aphids, Rose Aphids, Rosy Apple Aphids, Woolly Apple Aphid), Box Elder Bugs, Campyloomma Bugs, Chinch Bugs (Southern Chinch Bugs), Cicadas (Periodical Cicadas), Glassy-winged Sharpshooter, Hackberry Nipplegall Makers, Harlequin Bugs, Lace Bugs, Leafhoppers (Rose Leafhoppers, White Apple Leafhoppers), Lygus Bug (Tarnished Plant Bug), Mealybugs, Mired Bug, Pear psylla, Psyllids (Red Gum Lerp Psyllid, Potato Psyllid), Royal Palm Bugs, Scale, Seedbugs, Stink bugs (Green Bugs), Spittlebug (Pine Spittlebug), Squash Bugs, Thorn Bugs, Whiteflies (Greenhouse, Sweet Potato)
<b>Wasps</b>	Birch Leafminers, Gall Wasps, Raspberry Horntail, Sawflies (Pear Sawflies, Pine Sawflies, Rose Slugs)
<b>Other Arthropods</b>	Firebrats, Millipedes, Pillbugs, Silverfish, Sowbugs, Spiders (excluding black widow and brown recluse), Springtails

How to [Use] {and/or} [Apply]: Apply [Product Name] {or} [this product] at first sign of listed insects/mites. [For control of the following: aphids, spider mites, scales, mealybugs, whiteflies, beetles (including Japanese), loopers, leafminers, leafrollers, armyworms, webworms, weevils, tent caterpillars, fungus gnats, leafhoppers, cabbageworms, squash bugs, squash vine borer, stink bugs, thrips, tomato hornworm, lace bugs, boxelder bugs, grasshoppers, crickets, ants (except Carpenter, Harvester, Pharaoh, and Fire ants), earwigs, chinch bugs, and many other insect pests.] [Product Name] {or} [this product] is most effective when applied on a 7 to 14-day schedule. For heavy insect populations, spray on a 7-day schedule. Thoroughly spray all plant surfaces (including undersides of leaves) until foliage is uniformly wet, but not dripping. Excessive application is unnecessary and to be avoided.

## {USE RESTRICTIONS—ALL LABELS}

---

{NOTE TO THE REVIEWER: The following section is common to all layout alternatives.}

### **Use Restrictions**

**Entry restrictions:** Do not allow adults, children, or pets to enter the treated area until sprays have dried.

**Application Restrictions:** Do not apply this product in a way that will contact adults, children, or pets, either directly or through drift. Remove pets, birds, and cover fish aquariums before spraying. Not for use in outdoor misting systems. Do not make applications during rain. Do not water the treated area to the point of run-off.

---

**{STORAGE & DISPOSAL STATEMENTS—CHOOSE ONE}**

---

{NOTE TO REVIEWER: Only one of the following statements will be used on the final label based upon the type of container used.}

---

**{OPTION #1: NONREFILLABLE 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.

{For containers equal to or less than 5 gallons}

**If empty:** Place in trash or offer for recycling if available.

**If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

{For containers greater than 5 gallons—may be necessary for bulk transport; not for retail sale}

Triple rinse as follows: Empty the remaining contents into application equipment of a mix tank. Fill the container ¼ full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. Then offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

---

**{OPTION #2: CONVENTIONAL TRIGGER SMALL RTU OR SQUEEZE}**

---

**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]. 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.

{OPTION #3: CONVENTIONAL TRIGGER LARGE RTU, PULL 'N SPRAY® II, OR  
BATTERY POWERED WAND/COMFORT WAND}

---

**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]]. 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.

## {OPTIONAL PRODUCT APPLICATOR INSTRUCTIONS}

---

{NOTE TO REVIEWER: The following instructions are optional and may or may not appear on the final label. Only one Option will appear on any one distinct final-printed label. For all Options below, Graphics illustrating a step or group of steps may appear on final printed label.}

### {OPTION #1: CONVENTIONAL TRIGGER SMALL RTU}

---

[[Applicator] {or} [Device] {or} [Applicator Name]] [[Directions] {and/or} [Instructions]]

#### HOW TO USE:

##### Spray

1. Turn sprayer nozzle to desired spray.
2. Squeeze trigger repeatedly to spray.

##### Finish

1. Turn sprayer nozzle to [{"OFF"} {and/or} [X]].

### {OPTION #2: CONVENTIONAL TRIGGER LARGE RTU}

---

[[Applicator] {or} [Device] {or} [Applicator Name]] [[Directions] {and/or} [Instructions]]

#### HOW TO USE:

##### Spray

1. Remove sprayer from bottle [{"by sliding"} {and/or} [pulling sprayer up]].
2. [{"Unwrap"} {and/or} [uncoil] {and/or} [extend] hose and] insert [color] hose connector into [color] [{"spout"} {and/or} [opening] {and/or} [lid]] on bottle [{"cap"} {and/or} [knob]] until it clicks.
3. [Flip up [color] spout until fully upright] {or} [Twist [{"spout"} {and/or} [lid] {and/or} [cap]] to "ON" {or} [Pull [{"spout"} {and/or} [lid] {and/or} [cap]] up].
4. Turn sprayer nozzle to desired spray.
5. Squeeze trigger repeatedly to spray.

##### Finish

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

---

{OPTION #3: PULL 'N SPRAY® II}

---

[[Applicator] {or} [Device] {or} [Applicator Name]] [[Directions] {and/or} [Instructions]]

**HOW TO USE:**

**Spray**

1. Remove sprayer from [[holster] {and/or} [holder]].
2. [[Unwrap] {and/or} [uncoil] {and/or} [extend] hose and] insert [color] hose connector into [color] [[spout] {and/or} [opening] {and/or} [lid]] on bottle [[cap] {and/or} [knob]] until it clicks.
3. [Flip up [color] spout until fully upright] {or} [Twist [[spout] {and/or} [lid] {and/or} [cap]] to "ON"] {or} [Pull [[spout] {and/or} [lid] {and/or} [cap]] up].
4. Turn sprayer nozzle to desired spray.
5. Point sprayer away from body. Slowly pull ring at bottom of sprayer until it stops, and hold for [two] {and/or} [2] seconds to fill sprayer.
6. Press trigger to spray.

**Finish**

1. Turn sprayer nozzle to [{"OFF"}] {and/or} [X].
2. DO NOT DISCONNECT HOSE CONNECTOR FROM SPOUT.
3. Place sprayer back into [[holster] {and/or} [holder]].

---

{OPTION #4: BATTERY POWERED WAND/COMFORT WAND}

---

[[Applicator Name] [[Applicator {and/or} [Wand]] Directions]

**HOW TO USE:**

**Prep [Wand]**

1. Remove sprayer [Applicator Name] from [[holster] {and/or} [holder]].
2. [Remove [color] pull strip to activate batteries].
3. [[Unfold] {and/or} [Flip-open]] [[Applicator Name] {and/or} [wand]] until it [[clicks] {and/or} [locks]] into position.

**Connect**

1. [[Unwrap] {and/or} [uncoil] {and/or} [extend] hose and] insert [color] hose connector into [color] [[spout] {and/or} [opening] {and/or} [lid]] on bottle [[cap] {and/or} [knob]] until it clicks.
2. [Flip up [color] spout until fully upright] {or} [Twist [[spout] {and/or} [lid] {and/or} [cap]] to "ON"] {or} [Pull [[spout] {and/or} [lid] {and/or} [cap]] up].

**Spray**

1. Turn sprayer nozzle to desired spray.
2. [Slide [color] switch on trigger to "Unlock" [illustration]].
3. Press trigger to spray.

**Finish**

{ } Symbolizes explanatory text to the reviewer  
[ ] Indicates optional text  
Indicates inserted text  
~~Indicates deleted text~~

1. Turn nozzle to [{"OFF"}] {and/or} [X].
2. [Slide [color] switch on trigger to "Lock" [illustration]].
3. Fold [Applicator Name] wand closed and place sprayer back in [{"holster"}] {and/or} [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 #4A: OPTIONAL TROUBLESHOOTING SECTION FOR BATTERY-POWERED  
APPLICATOR DIRECTIONS}

---

Troubleshooting Tips:

Problem: Sprayer does not [[spray] {and/or} [function]].

Possible Cause: Batteries not installed properly.

Solution: See instructions for correct battery placement.

Problem: Sprayer makes a straining noise [Sprayer runs but [{"nothing"}] {and/or} [no product] comes out].

Possible Cause: Sprayer nozzle is turned Off.

Solution: Turn sprayer nozzle to [desired] spray [{"setting"}] {and/or} [position].

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

Solution: Insert [color] hose connector into [color] [{"spout"}] {and/or} [knob] {and/or} [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] {and/or} [product flow is uneven or dribbles out of nozzle].

Possible Cause: Weak batteries.

Solution: Install fresh set of batteries.

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

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

Possible Cause: Sprayer nozzle not fully open.

Solution: Turn sprayer nozzle to [desired] spray [setting] {and/or} [position].

---

OPTION 5 – SQUEEZE

---

[[Applicator Name] [Applicator/Wand] Directions]

[HOW TO USE/APPLY] {or} [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 plant/leaf/leaves/stems/branches/or area of application]
2. Squeeze the bottle [to initiate the flow of product.] 6.Spray only until the surface [of the plant] 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].



## {OPTIONAL REFILLABLE CONTAINER INSTRUCTIONS}

---

{NOTE TO REVIEWER: The following instructions are optional and may or may not appear on the final label. Only one Option will appear on any one distinct final-printed label. Text chosen will correspond to the type of container and applicator used. For all Options below, Graphics illustrating a step or group of steps may appear on final printed label.}

### {OPTION #1: DEDICATED REFILL BOTTLE (NO APPLICATOR ATTACHED) DIRECTIONS – TO POUR CONTENTS INTO RTU BOTTLE—CHOOSE ONE}

---

#### {OPTION #1A}

---

**How to Refill:** Do not reuse or refill this container. Use this product to refill the empty [Product Name] container by pouring product carefully and directly into the container. DO NOT add water. Do not refill [Product Name] with any other product.

---

#### {OPTION #1B}

---

Use this product to refill the empty [Product Name] container by pouring product carefully and directly into the container. DO NOT add water.

---

### {OPTION #2: READY-TO-USE CONTAINER (WITH APPLICATOR) DIRECTIONS – TO REFILL FROM DEDICATED REFILL BOTTLE}

---

#### HOW TO REFILL

To refill this empty container, pour product carefully and directly from the [Product Name] container designated as the ready-to-use refill container. DO NOT add water.

---

### {OPTION #3: PULL 'N SPRAY® II—CHOOSE ONE}

---

#### {OPTION #3A}

---

#### [[Refill] {and/or} [Reuse]] Directions

The [Applicator Name] [[applicator] {and/or} [sprayer] {and/or} [wand]] may be reused with the available [Product Name] refill [[bottle] {and/or} [container]]. Read and follow instructions in Reuse Directions to reuse the applicator.]

{OPTION #3B}

**[[Refill] {and/or} [Reuse]] Directions**

How to attach the [Applicator Name] [[applicator] {and/or} [sprayer] {and/or} [wand]] to [Product name] [refill bottle]:

Remove [color] hose from original bottle/container:

	<p>[To remove the side [[holster] {and/or} [holder]] from original [[bottle] {and/or} [container]], [[pull] {and/or} [lift]] the bottom tab underneath and slide the [[holster] {and/or} [holder]] up.]</p>
	<p>[Attach the sprayer [[holster] {and/or} [holder]] to [Product Name] refill [[bottle] {and/or} [container]] by sliding the [[holster] {and/or} [holder]] down onto the knob.]</p>
	<p>Insert [color] hose connector into [color] [[spout] {and/or} [lid] {and/or} [opening]] on cap [until it clicks].</p>

{OPTION #4: BATTERY POWERED WAND/COMFORT WAND}

{OPTION #4A}

**Refill/Reuse Directions**

[The Comfort Wand/Applicator Name [applicator/sprayer/wand] may be reused with Product Name refill bottle/container. Read and follow instructions in Reuse Directions to reuse the applicator.]

{OPTION #4B}

**Refill/Reuse Directions**

How to attach the [Comfort Wand/Applicator Name] [applicator/sprayer/wand] to Product Name [refill bottle]:

Remove [color] hose connector from original bottle/container:

	<p>[To remove the side [[holster] {and/or} [holder]] from original [[bottle] {and/or} [container]], [[pull] {and/or} [lift]] the bottom tab underneath and slide the [[holster] {and/or} [holder]] up.]</p>
	<p>[Attach the sprayer [[holster] {and/or} [holder]] to [Product Name] refill [[bottle] {and/or} [container]] by sliding the [[holster] {and/or} [holder]] down onto the knob.]</p>
	<p>Insert [color] hose connector into [color] spout/opening on cap [until it clicks].</p>

---

---

{WARRANTY STATEMENTS—CHOOSE ONE}

---

---

{OPTION #1}

---

**WARRANTY**

Certis USA, LLC warrants that the material contained herein conforms to the description on the label and is reasonably fit for the purposes referred to in the directions for use. Timing and method of application, weather, watering practices, nature of soil, the insect problem, condition of the crop, incompatibility with other chemicals not specifically recommended, and other influencing factors in the use of this product are beyond the control of the seller. To the extent consistent with applicable law, buyer assumes all risks of use, storage or handling of this material not in strict accordance with directions given herein. NO OTHER EXPRESS OR IMPLIED WARRANTY OF THE FITNESS OF MERCHANTABILITY IS MADE.

{OPTION #2}

---

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

## {OPTIONAL MARKETING CLAIMS}

---

{NOTE TO REVIEWER: The following instructions are optional and may or may not appear on the final label.}

### PRODUCT CLAIMS

---

1. Broad Spectrum Insecticide, Fungicide, and Miticide [[for {and/or} for use on] Fruit(s) {and/or} Flower(s) {and/or} Vegetable(s) {and/or} Edible(s) {and/or} Floral(s) {and/or} Floral Gardens {and/or} Roses {and/or} Rose Gardens {and/or} Flowers {and/or} Flower Gardens]
2. For Control of Listed Insects, Diseases, and Mites on Vegetables, Fruits, Nuts, Herbs, Spices, Roses, Flowers, and Shrubs Around The Home
3. For Control of Listed Insects, Diseases, and Mites [on [Fruit(s)] {and/or} [Flower(s)] {and/or} [Vegetable(s)] {and/or} [Edible(s)] {and/or} [Floral(s)] {and/or} [Floral Gardens] {and/or} [Roses] {and/or} [Rose Gardens] {and/or} [Flowers] {and/or} [Flower Gardens]]
4. Insecticide, Fungicide, and Miticide [[for [use on] Fruit(s) {and/or} Flower(s) {and/or} Vegetable(s) {and/or} Edible(s) {and/or} Floral(s) {and/or} Floral Gardens {and/or} Roses {and/or} Rose Gardens {and/or} Flowers {and/or} Flower Gardens]]
5. Can be Used Up to Day of Harvest
6. For use up to day of harvest
7. 3 in 1 [Insecticide, Fungicide and Miticide]
8. [[Controls] {and/or} [Prevents] {and/or} [defends against]] [[Black Spot] {and/or} [Powdery Mildew] {and/or} [Rust]]
9. [[Protect] {and/or} [Defend] {and/or} [Guard] {and/or} [Safeguard]] your [[landscape] {and/or} [garden] {and/or} [roses] {and/or} [edibles] {and/or} [fruits] {and/or} [vegetables]] {and/or} [florals] {and/or} [ornamentals] {and/or} [flowers] {and/or} [roses and flowers]] from listed invading insects
10. Kills [up to] [1, 2, 3... XXX] Listed [[Garden] {and/or} [Landscape]] [[bugs] {and/or} [insects] {and/or} [pests]] as listed
11. Ready To Use {and/or} No Mixing {and/or} No Measuring
12. Water-Based Insect, Mite and Fungicide Killer Formula
13. Kills Listed Insect Pests on Contact
14. Use Indoors or Outdoors
15. [May Be Used on Vegetables Up To Day of Harvest] {and/or} [Controls “Last Minute” Vegetable Garden Pests Before Harvest]
16. Contains [[Pyrethrum] {and/or} [Pyrethrins]], Derived from Chrysanthemum Flower[s]
17. Controls Listed Flying and Crawling Pests in the [[Home and Garden] {and/or} [Home Greenhouses]]
18. Indoors/Outdoors

{ } Symbolizes explanatory text to the reviewer

[ ] Indicates optional text

Indicates inserted text

~~Indicates deleted text~~

19. Listed Flying Insects {and/or} Crawling Insects
20. For Use On Roses, Flowers, Trees, Shrubs, and Vines
21. For Use On [[landscapes] {and/or} [gardens] {and/or} [edibles] {and/or} [fruits] {and/or} [vegetables] {and/or} [roses] {and/or} [florals] {and/or} ornamentals] {and/or} [flowers] {and/or} [roses and flowers] {and/or} [shrubs] {and/or} [trees]]
22. Use to Control Rose and Ornamental {and/or} Flower Pests as Listed
23. Use to Control Fruit and Vegetable Pests as Listed
24. Do not spray outdoors in heat of the day
25. Kills Stink Bugs, Brown Marmorated Stink Bugs (BMSB), Asian Lady Beetles and Boxelder Bugs
26. [[May be] {or} [Can be]] used up until the day before harvest
27. Insecticide, Fungicide and Miticide
28. Home and Garden [[Insecticide] {and/or} [Fungicide] {and/or} [Miticide]]
29. For [home] {and/or} [outdoor] residential use only
30. Can be used in vegetable gardens
31. For use in vegetable gardens
32. For use on fruits and vegetables
33. No mixing
34. Kills on Contact
35. Kills listed [insects] {and/or} [pests] on contact
36. For Home [[Vegetable] {and/or} [Fruit]] Gardens, Nurseries, Home Greenhouses, and Orchards
37. For Home [[Roses] {and/or} [Flower]] Gardens, Nurseries, Home Greenhouses, and Orchards
38. Got [listed insect]? Get [Product Name]!
39. Convenient
40. Easy To Use
41. Kills all accessible {and/or} life stages of listed insects
42. Kills “last minute” vegetable garden pests when applied the day before harvest
43. Kills [[[more than] {or} [over] 240]] {or} [240+] [types of] listed insects [on] [[edibles] {and/or} [fruits] {and/or} [vegetables] {and/or} [roses] {and/or} [florals] {and/or} ornamentals] {and/or} [flowers] {and/or} [roses and flowers] {and/or} [shrubs] {and/or} [trees]]
44. For use [Indoors] {and/or} [Outdoors]
45. For [home] {and/or} [outdoor] {and/or} [indoor] residential use only
46. Kills listed insects on common houseplants

{ } Symbolizes explanatory text to the reviewer  
[ ] Indicates optional text  
Indicates inserted text  
~~Indicates deleted text~~

47. Formulated [for use on] {and/or} [especially for] {and/or} [uniquely for] {and/or} [specifically for] Vegetables {and/or} Edibles {and/or} Edible plants

---

#### APPLICATOR CLAIMS

---

48. Stay dry  
49. No messy clean-up  
50. One-handed operation [use] [spraying]  
51. [Requires] no measuring, [no mixing]  
52. [The] Easy way to spray  
53. [Ergonomic] {and/or} [Comfort] [grip {and/or} [handle]]  
54. Ready-To-Use®/Ready To Use/Applicator name  
55. [Applicator name]  
56. Convenient [simple] design  
57. Easy [and simple] to use  
58. Quick & Easy [to use]  
59. Save[s] time [and energy]  
60. No Spreading – No complicated mixing  
61. The fast, easy way of insect control  
62. Easy To Use spray [application] {and/or} [nozzle]  
63. Ready to use spray nozzle  
64. Convenient because it is premixed  
65. Easy-To-Use  
66. No Mess  
67. NO MIXING  
68. No mixing, no measuring, no mess  
69. Ready-To-Use  
70. Powered by [Battery Brand]  
71. Twist Cap

---

#### COMFORT WAND CLAIMS

---

72. Continuous spray {and/or} [wand]  
73. Comfort wand  
74. The easy way [to spray] {and/or} [to kill [bugs] {and/or} [mites] {and/or} [diseases]]  
75. Saves time and energy

{ } Symbolizes explanatory text to the reviewer  
[ ] Indicates optional text  
Indicates inserted text  
~~Indicates deleted text~~

- 76. Extended Reach
- 77. No more bending/kneeling
- 78. Reusable [Comfort] [Continuous Spray] [Wand]
- 79. Rechargeable
- 80. [Wand] {or} [Applicator Name] will last [for] {and/or} [at least] [X] bottles!
- 81. [Wand] {or} [Applicator Name] will last over 25 gallons! [Wand] {or} [Applicator Name] will last for years\* \*based on [X] applications per year


### POP CLAIMS

---

- 82. Value [pack] {and/or} [size] {and/or} [buy]
- 83. Bonus [[value] {and/or} [size] {and/or} [offer] {and/or} [package] {and/or} [pack] {and/or} [buy]]
- 84. Exclusive [item] {and/or} [size]
- 85. Special [[buy] {and/or} [offer] {and/or} [size] {and/or} [item]]
- 86. Limited time offer
- 87. [X]% more than [X] size
- 88. Save [money]
- 89. Free sample
- 90. [X]% more [free]
- 91. Combo pack
- 92. Great value
- 93. Bottle in [a] box

### OTHER

---

- 94. [XX]% more than [X] [[fluid ounce] {or} [pint] {or} [gallon]] size
- 95. [XX] less plastic
- 96. [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.
- 97. [New] {or} [Now] (The following claim may appear on any label panel for 6 months following commercial introduction)
- 98. Proven performance
- 99. Read Entire label before use
- 100. [Recyclable symbol] 

101. Takes the guesswork out of insect, mite and disease control [[in the garden {and/or} [landscape]]
102. Insect, mite and disease control for your [garden] {and/or} [landscape]
103. Insect, mite and disease control made easy
104. Be in control of listed insects, mites and diseases in your garden/landscape
105. Before [illustration] / After [illustration]
106. For a beautiful [insect, mite and disease free] garden/landscape
107. [[For] {or} [Get]] an insect, mite and disease-free [garden] {and/or} [landscape]
108. For Home [[Garden] {and/or} [Landscape]] Care
109. For Home [[Garden] {and/or} [Landscape]] Use [only]
110. From the garden care experts at [Company Name]
111. From the insect experts at [Company Name]
112. Help[s] [keep] the [garden] {and/or} [landscape] look[ing] beautiful
113. Helps keep [gardens] {and/or} [landscapes] insect-free
114. [For] Indoor & Outdoor Residential use only
115. Intended for residential use
116. Peel Open for use directions and further information
117. OPEN
118. Resealable Label for Directions & Precautions
119. Peel Open for use directions and further information
120. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
121. PEEL HERE / PRESS TO RESEAL
122. Packaged in USA
123. Assembled in the USA
124. ©[year], licensed by [Company/Brand]. World rights reserved.
125. QUESTIONS OR COMMENTS - [phone icon] 1-800-xxxxxxx {and/or} www.xxxx.com  
[Visit our website] [computer icon]

## GUARANTEES

---

126. Guaranteed+++
127. [Company/Brand] Guarantee[d] +++
128. Guaranteed [results] +++
129. [Company/Brand] Satisfaction guaranteed[+++]
130. [Company/Brand] [Promise your] satisfaction guaranteed [or your money back]

{ } Symbolizes explanatory text to the reviewer  
[ ] Indicates optional text  
Indicates inserted text  
~~Indicates deleted text~~



131. ††† [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.
132. ††† 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.
133. ††† 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.

---

#### REFERRAL STATEMENTS


---

134. See [side][back][right][left][inside][other] panel for [additional] [[precautionary] [and] [first aid] statements] [[use] directions [for use]]
135. See [attached] [booklet] [book] for [additional] [[precautionary] [and] [first aid] statements] [[use] directions [for use]]
136. Refer to [inside of] label booklet for [additional] [precautionary] [first aid] information [and] [[Directions] for Use] [including] [First Aid] [and] [Storage and Disposal]
137. Peel [back] [book] [booklet] [label] [here] [▶] [→] {may be accompanied by an arrow or other indicator}

---

#### HOTLINE NUMBER TEXT

---

138. In the event of a medical or chemical emergency, [] contact North America 1-800-255-3924 or Worldwide Intl. +01-813-248-0585.

---

#### PRN 97-4 ACCESS NUMBERS/WEBSITE REFERENCES

---

139. [Visit us at:] [company website address]
140. [Product] Questions[?] [company phone number]
141. Comments[?]: [company phone number and/or website address]
142. Questions, Comments or Medical Information: Company phone #, company website

---

#### OTHER MISCELLANEOUS ITEMS

---

143. Barcodes/SKUs
144. Label revision numbers
145. Allow the insertion of “this product” in place of the product name everywhere it appears in the directions for use.