

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

July 21, 2020

Prachi Pandya Federal Regulatory Affairs Associate SBM Life Science 1001 Winstead Drive, Suite 500 Cary, NC 27513

Subject: Notification per PRN 98-10 – Delete Pest & Marketing Claims/ Add Brackets Around People & Pest/Add Notes to "PM" Product Name: 16INS005 Insecticide RTU EPA Registration Number: 92564-74 Application Date: May 8, 2020 Decision Number: 564593

Dear Ms. Pandya:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

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 have any questions, you may contact please contact Melody Banks at (703) 305-5413 or by email at <u>Banks.Melody@epa.gov</u>.

Sincerely,

Herrick

Jacquelyn Herrick, Product Manager 03 Invertebrate & Vertebrate Branch 1 Registration Division (7505P) Office of Pesticide Programs

16INS005 Insecticide RTU

[ABN: Natria Multi-Insect Killer Ready-To-Use; Natria Multi-Purpose Insect Killer Ready-To-Use; Natria Ant & Roach Killer Plus Ready-To-Use; Natria Ant, Roach + Spider Killer ; Natria Bed Bug Killer Ready-To-Use; Natria Home Pest Control Ready-To-Use; Natria Home Protect Insect Killer Ready-To-Use; Natria HomeGuard Insect Killer Ready-To-Use; Natria HouseGuard Insect Killer Ready-To-Use; Natria HomeShield Insect Killer Ready-To-Use]

FOR RESIDENTIAL USE ONLY [For Residential][Indoor][and][Outdoor][Use Only]

Editorial Note – [Bracketed text] is optional language

Active Ingredient:

*Pyrethrins	0.06%
Other Ingredients	
Total	100.000/

*Contains 0.0003 lb Pyrethrins per gallon

CAUTION

KEEP OUT OF REACH OF CHILDREN

FIRST AID	
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.
NOTE: Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may contact 877-229-3763 for emergency medical treatment information.	

NOTIFICATION

92564-74

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

07/21/2020

EPA Reg No. 92564-74

See Back Panel for Precautionary Statements

NET CONTENTS: [4 fl oz (118 mL), 8 fl oz (236 mL), 10 fl oz (295 mL), 16 fl oz (473 mL), 24 fl oz (709 mL), 32 fl oz (946 mL), 64 fl oz (1892 mL),128 fl oz [1 gal] (3785 mL), 141 fl oz [1.1 gal] 4164 mL), 170 fl oz [1.33 gal] (5027 mL)]

(BACK PANEL)

This product kills listed[*] insects for up to 1 month indoors with a single application and can be applied around the home both indoors and outdoors. Convenient and easy to use, controlling listed[*] insect pests in and around your home has never been easier.

QUICK FACTS

- Contains pyrethrins, a botanical insecticide derived from the Chrysanthemum flower
- Kills by contact and through residual action (indoors only)
- Kills [ants] [bed bugs] [carpenter bees] [cockroaches] [fleas] [flies] [hornets] [pantry pests] [spiders] [ticks] [wasps]
- · Can be used indoors against general listed[*] household pests and outdoors for lawn and perimeter pests
- Provides effective knockdown and residual control (indoors only)
- Contains 0.0003 pounds of pyrethrins per gallon

[Note to PM: May choose any claim from above and from marketing claims list.]

[16INS005 INSECTICIDE]	[An emulsifiable concentrate formulation containing 0.0003 pounds of pyrethrins per gallon. A highly versatile product designed for use both indoors and outdoors. This product provides effective knockdown and residual control (indoors only) of the pests listed on this label. For residential control of major nuisance and public health pests listed on the label. [For residential control of major nuisance and listed[*] public health pests in residential areas.]]
CONTROLS	Indoor, General Household Listed[*] Pests Outdoor, Perimeter Listed[*] Pests For a list of specific pests, see inside
WHERE TO APPLY	Apply where listed[*] pests have been seen or found or can find shelter. In and around buildings and structures. Apply as general surface, spot treatments or as crack & crevice sprays.
HOW TO APPLY	General surface applications, spot treatments, crack & crevice sprays, or void injections (sprays or mists). Shake well. Hold sprayer 12 inches from surface being sprayed.
RE-APPLY	Treatments may be applied at 7-day intervals.
RE-ENTRY	Do not allow children or pets to re-enter until sprays have dried.
[🕿 🖵]	Questions, comments, or medical information call 1-877-229-3724 or visit our website at <u>www.natria.com</u> .

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Avoid contact with skin or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Wash all contaminated clothing with soap and hot water before reuse.

ENVIRONMENTAL HAZARDS

This product 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

This product is highly toxic to bees exposed to direct treatment on blooming plants. Do not apply or allow to drift to blooming crops or weeds while bees are actively visiting the treatment area.

PHYSICAL- CHEMICAL HAZARDS

Do not mix or allow coming in contact with oxidizing agent. Hazardous chemical reaction may occur.

NOTICE: Research and testing have determined that the "Directions for Use" are appropriate for the proper use of this product under expected conditions. To the extent consistent with applicable law, the Buyer assumes responsibility for lack of performance or safety if not used according to the directions.

DIRECTIONS FOR USE It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **BEFORE USE RESTRICTIONS:** Do not contaminate food or feedstuffs. Read and follow all Do not make applications during rain. label directions. Do not allow excessive dripping to occur when treating vertical or overhead surfaces. Do not allow children or pets to re-enter until sprays have dried. All food preparation surfaces and utensils should be covered during treatment or thoroughly washed before use. Remove pets, birds, and cover fish aquariums before spraying. Outdoor applications are limited to spot or crack-and-crevice treatments only, except for the following permitted uses, to soil or vegetation around structures • to lawn, turf, and other vegetation . to building foundation, up to a maximum height of 3 feet; Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches and structural surfaces (such as windows, doors, and eaves) are limited to spot and crack-and-crevice applications, only. Application of this product is prohibited directly into sewers or drains, or to any area like a gutter where drainage can to storm sewers, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.

INDOOR

Indoor applications to residential buildings and structures; apply this product as a general surface, spot, crack and crevice or void treatment. The following indoor insects are controlled:

5		
Ants (non-porous surfaces only)	Dermestids	Leather beetles
Blow flies	Earwigs	Midges
Bed bugs	Elm Leaf beetles	Millipedes
Blue/Green bottle flies	Face flies	Multi-colored Asian lady beetles
Boxelder bugs	Fleas	Pantry pests, beetles & moths
Brown marmorated stink bugs	Firebrats	Phorid flies
Carpet beetles	Flies	Sciarid flies (fungus gnats)
Clothes moths	Fruit flies	Silverfish
Cluster flies	Gnats	Spiders (non-porous surfaces only)
Cockroaches (non-porous surfaces only)	Hide beetles	Ticks
Crickets	Hornets	Wasps
Darkling beetles	House flies	Yellowjackets
	Kudzu bugs	
WHERE TO APPLY	 Areas where listed[*] pests have beer 	n seen or can find shelter.
	 Areas where listed[*] pests normally f 	eed or hide, such as baseboards,
	corners, around water pipes, behind a	and under refrigerators, cabinets, sinks
	and stoves.	
		s, in and around cabinets, between, behind,
	and beneath appliances, window and	door frames, around plumbing, sinks, cracks
	and crevices and other possible pest harborage sites.	
	 Broadcast or spot treatments to floors 	s, floor coverings, carpets or rugs for flea and
	tick control.	
WHEN TO APPLY	Begin applications when pests are noticed. Tre	eatments may be applied at 7 day intervals.

HOW TO APPLY	EPA Reg No. 92564-74 For Cockroaches, Ants, Crickets, Silverfish, Firebrats, Millipedes, Clothes Moths,
(APPLICATION FOR INDOOR PESTS)	Earwigs, and Spiders: Apply as a general surface application, spot treatment or crack and crevice spray. Pay attention to dark corners of rooms and closets, cracks and crevices in walls, along and behind baseboards, beneath and behind sinks, stoves, refrigerators, and cabinets, around plumbing and utility installations, doors, windows and in attics.
	For Carpenter ants, Pharaoh ants, and other nuisance ants: Apply to trails, around doors and windows and areas where ants inhabit or enter premises. Follow trails of foraging worker ants and inspect for likely nest sites. Spray into cracks & crevices, or spray into voids where ants or their nests are present. Use enough spray to cover the area.
	For Flying Insect Pests - Flies, Gnats, Midges, or Mosquitoes: Apply directly to walls, ceilings, window screens and other resting areas as a residual surface treatment. May be used inside residential buildings, as well as in and around carports, garages, storage sheds, unoccupied barns, stables, or pet kennels.
	For Pantry Pests - (adult and accessible immature stages of insects such as lesser grain borers, grain weevils, flour beetles, saw-toothed grain beetles, cigarette beetl merchant grain beetles, Angoumois grain moths, Mediterranean flour moths and Indian meal moths): Apply to cupboards, shelving and storage areas. Remove all foodstuffs, all utensils, shelf paper, and objects before spraying and allow the surface to dry before replacing.
	For Carpet beetles (black, furniture, and varied), hide beetles, or leather beetles: Apply to infested areas at a rate of 1 gallon per 1,000 square feet. Apply under the edge of carpets, floor coverings and furniture as well as along baseboards, in closets and to infest areas of shelving or storage areas.
	For Clothes moths: Remove infested articles, brush them thoroughly and air-dry them in sunlight for several hours, or have them professionally dry cleaned. Do not return infested articles until they have been cleaned or disinfected. Apply as a crack and crevice treatment to empty chest bureaus, closets and other storage sites.
	For Bed Bugs: Remove and sanitize infested bedding (pillows and linens), clothing, or items. Apply or mattresses as a spot treatment to mattress seams, edges, and tufts of bed only. Allow mattress to dry thoroughly before replacing pillows and/or bed linens.
	Do not:
	 use directly on pillows, bed linens or clothes. saturate the mattress
	 treat entire surface area of mattress. With upholstered furniture apply spot treatments to tufts, seams, folds, and edges only. In not saturate the upholstered surfaces; and do not treat entire surface of upholstery.
	Bed bugs may also harbor in areas away from the bed. Apply as a crack & crevice or spo application where evidence of bed bugs occurs. This includes bed frames, box springs, inside empty drawers and clothes closets, night stands and other furniture in the room, carpet edges, high and low wall moldings (such as floor molding or window casings), wal voids, behind wall hangings and mirrors, wallpaper edges and popcorn ceilings.
	Remove all clothes and other articles from dressers or closets before application. Take be apart. Treat joints and channels if hollow, such as square or round tubing, and see that interior framework is treated. Apply as a surface application to carpeting, drapes, and flooring. Allow all treated areas to dry thoroughly before use.
	For Fleas and Ticks (including ticks that may transmit Lyme Disease and Rocky Mountain Spotted Fever): Vacuum infested areas prior to treatment and discard the vacuum cleaner bag in an outdo trash container upon completion. Infested pet bedding should be cleaned or replaced.
	Apply thoroughly to infested areas - pet bedding and resting quarters, nearby cracks & crevices, carpets, rugs and similar floor coverings (including under their edges), between

and under the cushions of upholstered furniture and other areas where the pests may be present. If treating the entire surface of carpets or rug, thoroughly treat the surface with a volume of 1 gallon of spray dilution per 1,000 square feet. Do not allow adults, children, or pets to enter the treated area until treated surfaces are dry.

For Kennels, stables, and barns:

To kill listed [*] crawling and flying insects in and around these structures, apply as a general surface and/or crack and crevice spray. Apply only to areas of facility where animals are not present. Allow spray to dry before allowing re-entry of animals into treated areas.

OUTDOOR/PERIMETER

Use to kill listed[*] outdoor pests by application as a general surface spray, perimeter treatment, spot treatment or crack and crevice treatment. The following outdoor insects are controlled:

Ants	Face flies	Millipedes
Blow flies	Fleas	Mosquitoes
Blue/Green bottle flies	Firebrats	Multi-colored Asian lady beetles
Boxelder bugs	Flesh flies	Pill bugs
Brown marmorated stink bugs	Flies	Silverfish
Carpenter ants	Gnats	Sow bugs
Carpet bees	Ground beetles	Spiders
Clover mites	Hornets	Springtails
Cluster flies	House flies	Stable flies
Cockroaches	Kudzu bugs	Ticks
Crickets	Midges	Wasps
Elm leaf beetles		Yellowjackets
WHERE TO APPLY	 and-crevice treatment, to surfaces of other structures, around doors and points, soffit areas and other exterior drilled holes) where pests enter the find shelter. Treat the outside of the structure ind and beneath eaves and soffits where Treat the soil, turf, or other ground of up to 10 feet wide) where pests are 	erimeter treatment, spot treatment or crack- on building exteriors, porches, patios, and windows, eaves and attic vents, utility entry or openings (including foundation cracks or structure, where they have been seen or can cluding walls, around door and window frames, e pests are active or may enter orhide. covering adjacent to the structure (in a band seen, have been found, or can findshelter.
WHEN TO APPLY	structure as described above. For more diffic direct contact spray may be required for effect areas.	nd/or perimeter treatment around the infested ult to kill pests, such as large cockroaches, ctive control. Thoroughly treat mulched
HOW TO APPLY	For Carpenter ants and other nuisance an	
(APPLICATION FOR LISTED[*] OUTDOOR PESTS)	Locate and treat ant nests if possible. Follow likely nest sites. If ants are nesting in soil, dre	
	Apply around doors and windows and other p crevices, or voids where ants or their nests a area. Remove or prune away any shrubbery, structure which may allow ants the ability to a	re present. Use enough spray to cover the bushes or tree branches touching the
	For Spiders: Spray directly to spiders and their webbing, a webs (interior surfaces in garages, sheds, or exterior surfaces of buildings, porches or pat	attics, basements, crawlspaces and to
	Listed [*] Occasional/fall invading pests leaf beetles, multi- colored Asian lady be bugs, kudzu bugs: Apply directly to listed [*] insects that have co similar areas where they may enter the struct treatments as described above.	eetles, brown marmorated stink

EPA Reg No. 92564-74
 For Flies: House flies, stable flies, cluster flies, and other flying pests: Apply to outside surfaces of barns, buildings, fences, garages, porches, patios, sheds, stables, and areas where flies rest. Cluster Flies: Treat in late summer or fall, just before cluster flies begin looking
 For Fleas and Ticks (including ticks that may transmit Lyme Disease and
Rocky Mountain Spotted Fever): Apply to areas where fleas and ticks are likely to be found, such as dog houses, runways, along paths or trails, under plants, shrubs, bushes, trees, or other shaded, moist areas. For Mosquitoes:
Treat under decks, around building foundations and other places where mosquitoes may rest. For Hornets, wasps, and yellowjackets;
Apply directly to the entire surface of the exposed nest. To reduce sting threat, make applications in the evening when the listed[*] insects are inside the nest. Remove and destroy treated nests to prevent emergence of newly emerged adults. If removal is not possible, retreat nests as needed.
For Carpenter bees: Apply directly into gallery entrance holes. Leave entrance open to be sure that returning adult carpenter bees are killed. When there is no longer any activity, the entrance hole may be sealed with a suitable sealant. Apply to exterior wood surfaces where carpenter bees have been active or to temporarily prevent nest cavity excavation by adult carpenter bees. Apply early in the spring to prevent carpenter bees from invading wood.

[1.3 Gallon ERGO-GRIP™ Sprayer Directions:]

Remove ERGO-GRIP™ spray wand from pocket. Remove protective battery strip from sprayer handle.



CONNECT HOSE TO CAP

- Remove wrap from coiled hose.
- In down position, insert plug at end of hose into flip-spout opening on cap until it snaps into place.
- Flip up spout until fully upright. Spout must remain upright while spraying.



OPEN SPRAY WAND

- **Unfold** spray wand until it snaps into place
- Point spray nozzle away from body.
- Adjust spray nozzle to desired setting.



TURN POWER ON

ON position.

Slide OFF-ON switch to



SQUEEZE

- Squeeze trigger to dispense product.
 Sprayer may require several seconds to prime before product is released.
- Release trigger to stop spraying.

Storage

Slide OFF-ON switch to OFF position Return flip spout on cap to the down position. Do not unplug hose. Turn spray nozzle to the off position Fold spray wand down against sprayer handle Return ERGO-GRIP[™] spray wand to pocket for storage.

4 AA Batteries Included

For important battery information – see booklet.

To Replace Batteries

Open battery compartment [with a small screwdriver]

Remove used batteries and replace with new batteries in correct position

as indicated inside battery compartment

Securely close battery compartment door [and screw closed]

Proper use of Batteries

Never mix old batteries with new batteries. Do Not mix Alkaline with Standard (carbon zinc) or Rechargeable (nickel cadmium) batteries. When storing sprayer for long periods, remove batteries to prevent leakage. Dispose of used batteries according to manufacturer's instructions or in household trash.

[Nested Sprayer Directions for Use:]



[REVISED Directions for 1 Gallon Nested Sprayer]

Attach Spraver

- 1. Remove sprayer from bottle
- 2. Remove twist tie
- 3. Pull down and extend hose
- 4. Open flip-cap on bottle
- 5. Insert hose and plug into flip-cap opening until it snaps into place
- 6. Move tab to open position

<u>Sprav</u>

- 1. Adjust nozzle to stream or spray position
- 2. Point sprayer downward and squeeze trigger repeatedly until liquid is released

After Use

- 1. Turn sprayer nozzle to X (off) position
- 2. Do not unplug hose
- 3. Return sprayer to bottle. Sprayer will snap into place

STORAGE AND DISPOSAL Do not contaminate water, food, or feed by storage or disposal	
Pesticide Storage	The storage area must be dry, well-lit, and well-ventilated. Keep pesticide storage areas clean. Clean up any spills promptly.
Pesticide Disposal and Container Handling [Î	If empty: Non-refillable container. Do not refill or reuse container. Place in trash or offer for recycling, if available. If partly filled: Call your local solid waste agency or toll free 1-877-229-3724 [1- 800 CLEAN-UP] for disposal instructions. Never place unused product down any indoor or outdoor drain.

Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

Natria[®] is a trademark of SBM Life Science Corp. Ergo-Grip[™] is a trademark of SBM Life Science Corp.

PRODUCED FOR: [DISTRIBUTED BY:] [GUARANTEED BY:]

SBM Life Science Corp. 1001 Winstead Drive Suite 500 Cary, NC 27513

16INS005 Insecticide 02/20/2020 05/08/2020

Note to PM

*listed {Note to PM: The word "listed" can appear as a footnote on each page of marketplace label where the symbol appears}

{Note to PM: Batch code to be added at time of production}

{Note to PM: Product name "16INS005 Insecticide RTU" will be replaced with marketed Alternate Brand Name}

{Note to PM: Marketing may choose any pests from the list}

Marketing Claims

Residual Claims

2

- 1. Up to [1 Month] [4 Weeks] [28 Days] control/protection*
 - [applies to] [for] Ants, Roaches, & Spiders indoors on non-porous surfaces
 - Kills/Controls [for] up to [1 month] [4 weeks] [28 days]*
 - [applies to] [for] American Cockroach/Palmetto Bug/Waterbug, Carpenter Ant, Pharaoh Ant, Striped Tail Scorpion, Black Widow Spider, Brown Recluse Spider indoors on treated non-porous surfaces within minutes of exposure.
- 3. Control that lasts for [1 month] [4 weeks] [28 days] or longer (indoors only)
- 4. Controls fleas for [14 days] [2 weeks] (indoors only)
- 5. Kills by contact and through residual action (indoors only)
- 6. Kills (Bed Bugs) (Ants) (Roaches) (Spiders) (on non-porous surfaces only) for up to (1 Month) (4 Weeks) (28Days)
- 7. Controls [Argentine ants (on non-porous surfaces only)] [blow flies] [stable flies] [carpet beetles] for up to [7 days][1 week].
- 8. Controls [Argentine ants (on non-porous surfaces only)] [stable flies] for up to [14 days][2 weeks].
- 9. Controls [Argentine ants (on non-porous surfaces only)] for up to [28 days][1 month][4 weeks].

General Claims

- 1. Guaranteed
- 2. Guaranteed Kill [or your money back ≠]
- 3. Money Back Guarantee ≠
- 4. Ready to Use
- 5. No Mixing Necessary
- 6. Easy to Use
- 7. Kills by Contact!
- 8. 10% more bonus size (applies to 1.1 gal size)
- 9. 33% more than 1 gallon size (applies to 1.33 gal size)

Water Based Claims

- 1. Non-Staining
- 2. No Stains
- 3. Dries Clear
- 4. Odorless
- 5. Odor-Free
- 6. Fragrance-Free
- 7. Unscented
- 8. Dries Fast
- 9. Water based [formula] [water droplet icon]
- 10. Non-flammable
- 11. Dries in minutes
- 12. Leaves no residue [behind]

Location of Use Claims

- 1. Apply along [baseboards] [foundations]
- 2. Use with confidence in [bathrooms], [kitchens], [family rooms], [pantries], [attics], [garages], [basements], [closets], [storage areas], and [bedrooms].
- 3. Designed to/for use in kitchens &/ pantries
- 4. Use in garages[s] and/or basement[s] and/or attic[s]
- 5. Use/Can be used in garage[s] and/or basement[s] and/or attic[s]
- 6. Use with confidence in garage[s] and/or basement[s] and/or attic[s]
- 7. [Formulated] [For] Indoor Use
- 8. Indoor/Outdoor [Formula]
- 9. [Formulated] [For] Indoor/Outdoor Use
- 10. Apply along [baseboards][foundations]
- 11. For use in Kitchens, Pantries & Food-Preparation Areas
- 12. For use on (bed frames), (box springs), (mattress), & (luggage)
- 13. Spot Treat Mattress, Tufts, Folds, Vent Holes & Seams

Perimeter Treatment Claims

- 1. Apply [as] a barrier
- 2. Apply as a border around your home
- 3. Creates a listed[*] [bug]barrier
- 4. Creates a listed[*] [bug]border
- 5. Creates a perimeter treatment

- 6. Keeps listed[*] insects out of your home
- 7. Kills listed[*] insects around and inside your home

Kill Claims

- 1. Kills listed[*] insects, Spiders, and Ticks*
- Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish, Scorpions, Black Widow Spiders, and other listed[*] insects
- 3. Kills Listed [*] Home invading insects [*]
- 4. Kills [cockroaches], [ants], [flies], [and] [spiders]
- 5. Kills [bed bugs], [fleas] [and] [ticks]
- 6. Kills [black widow] [and] [brown recluse spiders]
- 7. Kills most common household listed[*] insect pests
- 8. Kills the listed[*] insects you see, kills the ones you don't see
- 9. Kills [ants] [and] [cockroaches] in seconds
- 10. Kills by contact
- 11. Kills listed[*] insects in seconds
- 12. Kills fast
- 13. Also Kills Ticks (including Ticks that may transmit Lyme Disease)
- 14. Kills mosquitoes that may transmit West Nile Virus
- Kills listed[*] bugs inside. Keeps listed[*] bugs out(side)*
- 16. Visible activity against listed[*] bugs within minutes§
- 17. Starts killing/activity within minutes§
- 18. Kills [1...72] Listed[*] Insects*
- 19. Kills [the] listed[*] bugs you see and/& [the] listed[*] [ones] bugs you don't [see]
- 20. Kills the toughest listed [*] home invading bugs
- 21. Kills/Controls [both] listed[*] crawling and/& flying insects
- 22. Kills/Controls [all] listed[*] common household bugs
- 23. (Bed Bug), (Flea) & Tick Killer
- 24. Kills (Bed Bugs) (Fleas) (Ticks) for up to (28 Days) (4 Weeks) (1 Month)
- 25. Kill Bed Bugs Where They Hide

[§]Applies to/for: Carpenter Ants, Harvester Ants, Oriental and German Cockroaches
 *Refer 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")

Other Claims

- 1. Contains Botanical Insecticides
- 2. Derived from Chrysanthemum Flowers
- 3. Plant Based Active Ingredient
- 4. Contains pyrethrins, a botanical insecticide derived from Chrysanthemum Flower
- 5. Plant-Based Spray

ART

