

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

April 14, 2017

Chris Zemanek Analyst, Regulatory Affairs The Scotts Company LLC 14111 Scottslawn Road Marysville, OH 43041

Subject: Label and CSF Amendment – Revised directions for use and two new alternate

CSFs

Product Name: ROSE PRIDE ROSE & FLOWER INSECT KILLER - 0.012%

EPA Registration Number: 239-2668

Application Date: 12/12/2016 Decision Number: 525488, 525491

Dear Mr. Zemanek:

The amended label and CSF(s) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are 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.

Please note that the record for this product currently contains the following CSF(s):

- Basic CSF dated 03/05/1998
- Alternate CSF A dated 07/06/1998
- Alternate CSF B dated 10/17/2016
- Alternate CSF C dated 10/31/2016

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,

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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 with FIFRA section 6. If you have any questions, you may contact Elizabeth Fertich at 703-347-8560 or via email at fertich.elizabeth@epa.gov.

Sincerely,

Kable Bo Davis, Product Manager 3 Invertebrate and Vertebrate Branch 1 Registration Division (7505P) Office of Pesticide Programs

Enclosure

[Bracketed information is optional text.] Text separated by / denotes and/or options. Master label formatted according to EPA Smart label style guide - items on the first page does not mean they will appear on front panel

Rose Pride Rose & Flower Insect Killer - 0.012%

ACTIVE INGREDIENT:

Bifenthrin*......0.012% OTHER INGREDIENTS:99.988%

KEEP OUT OF REACH OF CHILDREN CAUTION

See back[panel/label/booklet] for additional precautionary statements

Manufactured for / Sold by/Distributed By: The ORTHO Group P.O. Box 190 Marysville, OH 43040 EPA Reg. No. 239-2668 EPA Est. 239-MS-001^M, XXX-XX-X [Superscript used is first letter of lot number]

Alternate Brand Names:

Ortho Ready-To-Use Rose & Flower Insect Killer₁

Ortho Rose & Flower Ready To Use₁

Ortho Rose & Flower Ready To Use Insect Killer

Ortho Rose and Flower Insect Killer Ready-to-Use

Ortho Garden Defense Rose & Flower Insect Killer

Ortho Garden Defense Rose & Flower Insect Ready To Use

Ortho Rose Pride Insect Killer

Ortho Rose Pride Insect Killer Ready To Use

Ortho Rose Defense Insect Killer

Ortho Rose Defense Insect Killer Ready To Use

Ortho Flower Defense

Ortho Flower Defense Ready To Use

Ortho Rose and Flower Shield Insect Killer

Ortho Rose Shield Insect Killer

Ortho Flower Shield Insect Killer

ACCEPTED

04/14/2017

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 239-2668

NET CONTENTS 32 FL OZ /1 QT (946 mL) / 30 FL OZ /0.93 QT(887 mL) / X FL OZ/X QT (X mL)

FIRST AID		
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	
Hotline Number		
Have the product container or label with you when calling a poison control center or doctor, or going for		
treatment. You may also contact 1-800-225-2883 for Emergency Assistance.		
Note To Physician: Emergency Information call 1-800-225-2883		

^{*} Cis isomers 97% minimum, trans isomers 3% maximum

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PRECAUTIONARY STATEMENTS Hazard to Human & Domestic Animals

Caution: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

ENVIRONMENTAL HAZARDS: This pesticide is extremely toxic to fish and aquatic invertebrates. Drift and run-off from treated areas may be hazardous to aquatic organisms in neighboring areas. Care should be used when spraying to avoid fish and reptile pets in/around ornamental ponds. This product is highly toxic to bees exposed to direct treatment of residues on blooming crops or weeds. Do not apply this product or allow to drift to blooming crops if bees are foraging the treatment area. 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.

PHYSICAL OR CHEMICAL HAZARDS: Do not apply this product in or on electrical equipment due to the possibility of shock hazard.

DIRECTIONS FOR USE

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

Restrictions:

- For indoor and outdoor residential use only
- For use only on non-edible plants. DO NOT use on edible plants/Fruits and Vegetables.
- Do not water the treated area to the point of run-off. Do not make applications during rain.
- DO NOT use on impervious surfaces such as sidewalks, driveways, patios, porches and structural surfaces (such as windows, doors, and eaves). [For applications on or around impervious surfaces use other Ortho products labeled accordingly.]
- Application is prohibited directly into sewers or drains, or to any area like a gutter where drainage
 to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow the product to
 enter any drain during or after application.
- [Reentry icon] People and pets: Do not enter treated area until application has dried.

Application Precautions

- If temperature is expected to exceed 85°F spray in early morning or late afternoon when it is cooler [and dew has evaporated]
- Spray when air is calm to avoid drift

Note to reviewer: Below is Storage & Disposal For Option 1, Conventional Trigger Small RTU

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.

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Note to reviewer: Below is Storage & Disposal For Options 2,3 and 4 - Conventional Trigger large RTU, Pull 'N Spray® II & 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.

Product Application Instructions

NOTE TO PM: For all Options below Graphics illustrating a step or group of steps may appear on final printed label. Illustrations contained below may change to accurately represent the applicator design.

NOTE TO PM: Spray Pattern Descriptor is any word used to describe the pattern such as flat, fan, coarse, or fine.

Option 1: Conventional Trigger Small RTU

[Applicator (Device) (Applicator Name) Directions/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" / X.

Option 2: Conventional Trigger Large RTU

[Applicator (Device) (Applicator Name) Directions/Instructions]

HOW TO USE:

Spray

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

Finish

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

Option 3 - Pull 'N Spray® II

[Applicator (Device) (Applicator Name) Directions/Instructions]

HOW TO USE:

Spray

- 1. Remove sprayer from holster/holder.
- 2. [Unwrap/uncoil/extend hose and] insert [color] hose connector into [color] spout/knob/opening/lid on bottle cap [until it clicks].

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- 3. [Flip up [color] spout until fully upright]/[Twist spout/knob/lid/cap to "ON"] / [Pull spout/knob/cap/lid up].
- 4. Turn sprayer nozzle to desired spray /spray pattern descriptor [spray pattern icon].
- 5. Point sprayer away from body. Slowly pull ring/handle at bottom of sprayer until it stops, and hold for two [2] seconds to fill sprayer.
- 6. Press trigger to spray.

Finish

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

Optional:

Refill/Reuse Directions

[The Pull 'N Spray II/Applicator Name [applicator/sprayer/wand] may be reused with the available Product Name refill bottle/container. Read and follow instructions in Reuse Directions to reuse the applicator.]

Refill/Reuse Directions

How to attach the [Pull 'N Spray II/Applicator Name] [applicator/sprayer/wand] to Product name [refill bottle]:

Remove [color] hose from original bottle/container:



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



[Attach the sprayer holster/holder to [Product Name] refill bottle/container by sliding the holster/holder down onto the knob/spout.]

Insert [color] hose connector into [color] spout/lid/knob/opening on cap [until it clicks].

Option 4 – Battery Powered Wand/Comfort Wand

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

HOW TO USE:

Prep [Wand]

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

Connect

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

Spray

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

Finish

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

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

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

Optional Troubleshooting Section for [Battery Powered] [Comfort Wand] [Comfort Shot Wand] [Pump 'N Go] [EZ Sprayer] Applicator [Applicator Name] Directions]

Troubleshooting Tips:

Problem: Sprayer does not spray [function]. Possible Cause: Batteries not installed properly.

Solution: See instructions for correct battery placement.

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

Possible Cause: Sprayer nozzle is turned Off.

Solution: Turn sprayer nozzle to [desired] spray setting [position]. Possible Cause: [Red] [color] hose connector is not flipped up.

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

up spout until fully upright.

Possible Cause: Sprayer is not primed.

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

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

Possible Cause: Weak batteries. Solution: Install fresh set of batteries.

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

Solution: Insert [color] hose connector into [color] spout/knob/opening on bottle cap [until it clicks.] [Attach

coupler to the cap] and flip up spout until fully upright. Possible Cause: Sprayer nozzle not fully open.

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

End of Optional Troubleshooting Section for [Battery Powered] [Comfort Wand] [Comfort Shot Wand]

Optional Applicator Transfer to Refill Bottle Directions: 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.]

Refill/Reuse Directions

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

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



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

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

Adding [Comfort Wand/Applicator Name] to Refill [bottle/container]:



[Attach the sprayer holster/holder to [Product Name] refill bottle/container by sliding the holster/holder down onto the knob.]

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

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Optional Pour Refill into RTU bottle Refill Directions:

Refill text for Refill Container:

[How to Refill: Do not reuse or refill this container. Use this product to refill the empty [EPA Reg. No. 239-2668: Rose Pride Rose & Flower Insect Killer – 0.012%] container by pouring product carefully and directly into the container. DO NOT add water. Do not refill [EPA Reg. No. 239-2668] with any other product.]

Or:

[Use this product to refill the empty [insert brand name for 239-2668: Rose Pride Rose & Flower Insect Killer – 0.012%] container by pouring product carefully and directly into the container. DO NOT add water.

RTU Label: For Ready-To-Use Containers with Applicators Intended to be Reused/Refilled [HOW TO REFILL

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

Option 5 – Squeeze

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

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

Open:

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

Sprav:

- 4. To BEGIN spraying, invert the bottle and point/aim/direct [at the plant/leaf/leaves/stems/branches/or area of application]
- 5. Squeeze the bottle [to initiate the flow of product.]
- 6. Spray only until the surface [of the plant] is wet. / Spray evenly

[Finish:]

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

METHODS OF USE AND GENERAL APPLICATION INSTRUCTIONS

[How It Works/Product Information]

Product Name/This Product can be used to control more than forty listed pests – including aphids, spider mites, caterpillars and beetles. The fast-acting formula quickly kills sprayed insects and keeps killing for up to two weeks. Reapply Product Name/ this product as directed for healthier, more beautiful roses, flowers, [shrubs and small trees].

Or

Product Name/This Product controls hard to kill listed pests – including whiteflies, mealybugs and scales. This odor-free formula is fast acting and keeps killing insects for up to two weeks. Reapply Product Name/this product as directed for healthier, more beautiful plants.

Or

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Product Name/This product kills/controls all major listed garden/foliage insects/bugs/pests. Quickly kills sprayed insects/bugs/pests and continues killing insects/bugs/pests that contact or feed on treated plants for up to 2 weeks.

HOW TO APPLY/USE:

Rose & Flower [shrub and small trees] Application

Hold sprayer 12 inches from the plant. Spray to uniformly cover the upper and lower leaf surfaces, stems and branches. When treating potted plants lightly spray the soil surface.

When to Apply/Use

At first sign of insect damage / You see evidence of insect activity Apply as necessary, waiting 7-14 days between [each] application[s]. Hard to control/kill pests/insects/bugs may require 2 to 3 applications

Where To Apply/Use:

On Roses, Flowers [Shrubs, Small Trees and Houseplants]
Or

On Houseplants, Flower Boxes, Potted Plants and Hanging Planters.

Insects/Bugs/Pests Controlled/Killed:

- 1. Ants (except carpenter, fire, harvester and pharaoh ants)
- 2. Aphids
- 3. Armyworms
- 4. Bagworms
- 5. Black Vine Weevils
- 6. Budworms
- 7. Cabbage Loopers
- 8. Cankerworms
- 9. Casebearers
- 10. CatalpaSphinx Moth
- 11. Caterpillars
- 12. Cherry Laurel Leaftiers
- 13. Crane Flies
- 14. Elm Leaf Beetles
- 15. Fungus Gnats
- 16. Grasshoppers
- 17. Greenbugs
- 18. Green Striped Mapleworms
- 19. Gypsy Moths
- 20. Hornworms
- 21. Japanese Beetles
- 22. Lacebugs
- 23. Leafhoppers
- 24. Leafminers

- 25. Leafrollers
- 26. Omnivorous Leaftiers
- 27. Maple Shoot Moths
- 28. Mealybugs
- 29. Mimosa Webworms
- 30. Mites (Including Spider Mites)
- 31. Oak Webworm
- 32. Orange Striped Oakworms
- 33. Poplar Tentmakers
- 34. Rose Midges
- 35. Sawflies
- 36. Scales(crawlers)
- 37. Sod Webworms
- 38. Sowbugs
- 39. Spittlebugs
- 40. Spiders (except brown recluse and black widow spiders)
- 41. Sunflower Moths
- 42. Tent Caterpillars
- 43. Thrips
- 44. Tip Moths
- 45. Webworms
- 46. Weevils
- 47. Willow Leafbeetles
- 48. Whiteflies

Warranty/Disclaimer Statement

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.

MARKETING/ADVERTISING CLAIMS

(claims may appear on any or all label panel(s))

Note To PM: Insect/Pest/Bug may be used interchangeably in claims

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Product Claims

- 1. Up to 14 day protection
- 2. Protects up to 2 weeks
- 3. Kills 40+ Insects on contact
- 4. Now! Effective Spider Mite Control
- 5. Won't harm plants or blooms
- 6. Tough on Insects, Gentle on Plants*
- 7. For Roses, Flowers, Houseplants, Shrubs and Small Trees
- 8. Indoor and Outdoor Plant protection
- 9. Protect[s] Indoor & Outdoor Plants
- Kills Aphids, Leafhoppers, Caterpillars, Japanese Beetles, Spider Mites Whiteflies and/& Other listed Garden/Foliage Pests/Insects
- 11. Kills Mealybugs, Mites, Whiteflies & other listed insects
- 12. Kills Insects and Mites
- 13. Now Also Kills [Spider] Mites
- 14. Kills [Spider] Mites
- 15. Kills All major listed garden/foliage pest/insects
- 16. Kills 48 [Major] listed Garden Pests/Insects/Bugs
- 17. Protects Plants from All major listed garden/foliage Pests/Insects/Bugs
- 18. Protects Plants from 48 [Major] listed Garden Pests/Insects/Bugs
- 19. Now Controls/Kills More Bugs/Insects/Pests
- 20. Helps Maintain Healthy Roses/Plants/Flowers
- 21. Helps Maintain Healthy Plants Indoor and/& Out
- 22. Apply Anytime During [the] Growing Season
- 23. Now Protects Houseplants from Insects/Pests/Bugs [and/& [Spider] mites]
- 24. No Fuss Formula
- 25. No Mixing Necessary
- 26. Now Improved Formula
- 27. Now Exclusive Formula
- 28. Long Residual
- 29. Long Lasting Control/Protection
- 30. Long Lasting, odor free formula Up to 2 weeks Pest/Insect Control
- 31. Fast Acting, Long Lasting
- 32. Easy-to-Use
- 33. Non-Staining
- 34. Broad Spectrum
- 35. Odor Free
- 36. Virtually Odor Free
- 37. Low Odor Formula
- 38. [ICON] Water Based
- 39. READY-TO-USE
- 40. [ICON] INDOOR & OUTDOOR RESIDENTIAL USE ONLY

Applicator Claims

- 41. stay dry
- 42. No messy clean-up
- 43. Hands One-handed operation [use] [spraying]
- 44. [Requires] no measuring, [no mixing]
- 45. [The] Easy way to spray
- 46. [Ergonomic] [Comfort] grip [handle]
- 47. Ready-To-Use®/Ready To Use/Applicator name
- 48. [Applicator name]
- 49. Convenient [simple] design
- 50. Easy [and simple] to use
- 51. Quick & Easy [to use]
- 52. Save[s] time [and energy]

^{*}when used as directed

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- 53. No Spreading No complicated mixing
- 54. The fast, easy way of insect control
- 55. Easy To Use spray application/nozzle
- 56. Ready to use spray nozzle
- 57. Convenient because it is premixed
- 58. Easy-To-Use
- 59. No Mess
- 60. NO MIXING
- 61. No mixing, no measuring, no mess
- 62. Ready-To-Use
- 63. Powered by Duracell/Battery Brand
- 64. Twist Cap

Comfort Wand Claims

- 65. Continuous [adjustable] spray [wand]
- 66. Comfort wand
- 67. Faster Application
- 68. The easy way [to spray] [to kill bugs/mites/diseases]
- 69. Saves time and energy
- 70. Extended Reach
- 71. No more bending/kneeling
- 72. Reusable [Comfort] [Continuous Spray][Wand]
- 73. Rechargeable
- 74. [Wand] [Applicator Name] will last [for] [at least] 20/X bottles!
- 75. [Wand] [Applicator Name] will last over 25 gallons! [Wand] [Applicator Name] will last for years* *based on X applications per year

POP Claims

- 76. Value [pack/ size/buy]
- 77. Bonus [value/ size/offer/package/pack/buy]
- 78. Exclusive item [size]
- 79. Special [buy/offer/size/item]
- 80. Limited time offer
- 81. X% more than X size
- 82. Save [money]
- 83. Free sample
- 84. X% more [free]
- 85. Combo pack
- 86. Great value
- 87. Bottle in [a] box

OTHER

- 88. XX% more than X gallon size
- 89. XX less plastic
- 90. [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.
- 91. New/Now (The following claim may appear on any label panel for 6 months following commercial introduction)
- 92. Proven performance
- 93. Read Entire label before use
- 94. [Recyclable symbol]
- 95. Takes the guesswork out of insect control [in the garden/landscape]
- 96. Insect control for your garden/landscape
- 97. Insect control made easy
- 98. Be in control of insects in your garden/landscape

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- 99. Before [illustration] / After [illustration]
- 100. For a beautiful [insect free] garden/landscape
- 101. [For] [Get] a insect free garden/landscape
- 102. For Home Garden/Landscape Care
- 103. For Home [Garden/Landscape] Use [only]
- 104. From the garden care experts at [Company Name]
- 105. From the insect experts at [Company Name]
- 106. Help[s] [keep[s]] the garden/landscape look[ing] beautiful
- 107. Helps keep gardens/landscapes insect free
- 108. [For] Indoor & Outdoor Residential use only
- 109. Intended for residential use
- 110. Peel Open for use directions and further information
- 111. OPEN
- 112. Resealable Label for Directions & Precautions
- 113. Peel Open for use directions and further information
- 114. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
- 115. PEEL HERE / PRESS TO RESEAL
- 116. Product of -and/or- Made in U.S.A.
- 117. Assembled in the USA
- 118. ©20XX, licensed by [Company/Brand]. World rights reserved.
- 119. QUESTIONS OR COMMENTS [phone icon] 1-800-xxxxxxx <u>www.ortho.com</u> [Visit our website] [computer icon]

Guarantees:

- 120. Guaranteed†††
- 121. [Company/Brand] Guarantee[d] †††
- 122. Guaranteed [results] †††
- 123. [Company/Brand] Satisfaction guaranteed[†††]
- 124. [Company/Brand] [Promise your] satisfaction guaranteed [or your money back]
- 125. ††† [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.
- 126. †††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.
- 127. †††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.

PRODUCT FACTS	
KILLS/CONTROLS	[optional insect illustration]
Insects	Note To PM – Any insects from label may appear and ended with "and others/many others/other listed insects"
WHERE TO USE/APPLY	[optional use site illustration] For indoor & outdoor residential use only On Roses, Flowers, [Shrubs, Small Trees and Houseplants] For Use only on Non-edible plants
HOW TO APPLY/USE [optional illustration / trigger sprayer] WHEN TO APPLY/USE	 Spray to uniformly cover upper and lower leaf surfaces, stems and branches At first signs of insect damage