



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 3, 2018

Chris Zemanek
The Scotts Company d/b/a The Ortho Group
P.O. Box 190
Marysville, OH 43040

Subject: Notification per PRN 98-10 – Marketing statements
Product Name: ROSE PRIDE ROSE & FLOWER INSECT KILLER - 0.012%
EPA Registration Number: 239-2668
Application Date: 11/1/2017
Decision Number: 535884

Dear Mr. Zemanek:

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 Angela Hollis at 703-347-0216 or via email at hollis.angela@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kable Bo Davis", enclosed in a simple oval scribble.

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

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Rose Pride Rose & Flower Insect Killer – 0.012%

ACTIVE INGREDIENT:

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

* Cis isomers 97% minimum, trans isomers 3% maximum

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]

NOTIFICATION

239-2668

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:

01/03/2018

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 **Killer** 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

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	

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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:

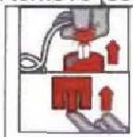
Refill/Reuse Directions

[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.]

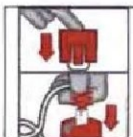
Refill/Reuse Directions

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]:

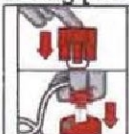
Removing [Comfort Wand/Applicator Name] from original bottle:



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

Spray:

- 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) | 25. Leafrollers |
| 2. Aphids | 26. Omnivorous Leaf tiers |
| 3. Armyworms | 27. Maple Shoot Moths |
| 4. Bagworms | 28. Mealybugs |
| 5. Black Vine Weevils | 29. Mimosa Webworms |
| 6. Budworms | 30. Mites (Including Spider Mites) |
| 7. Cabbage Loopers | 31. Oak Webworm |
| 8. Cankerworms | 32. Orange Striped Oakworms |
| 9. Casebearers | 33. Poplar Tentmakers |
| 10. Catalpa Sphinx Moth | 34. Rose Midges |
| 11. Caterpillars | 35. Sawflies |
| 12. Cherry Laurel Leaf tiers | 36. Scales (crawlers) |
| 13. Crane Flies | 37. Sod Webworms |
| 14. Elm Leaf Beetles | 38. Sowbugs |
| 15. Fungus Gnats | 39. Spittlebugs |
| 16. Grasshoppers | 40. Spiders (except brown recluse and black widow spiders) |
| 17. Greenbugs | 41. Sunflower Moths |
| 18. Green Striped Mapleworms | 42. Tent Caterpillars |
| 19. Gypsy Moths | 43. Thrips |
| 20. Hornworms | 44. Tip Moths |
| 21. Japanese Beetles | 45. Webworms |
| 22. Lacebugs | 46. Weevils |
| 23. Leafhoppers | 47. Willow Leaf beetles |
| 24. Leafminers | 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.

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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

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. Formulated for Roses/Flowers/Houseplants/Shrubs/Small Trees
9. Indoor and Outdoor Plant protection
10. Protect[s] Indoor & Outdoor Plants
11. Kills Aphids, Leafhoppers, Caterpillars, Japanese Beetles, Spider Mites Whiteflies and/& Other listed Garden/Foliage Pests/Insects
12. Kills Mealybugs, Mites, Whiteflies & other listed insects
13. Kills Insects and Mites
14. Now Also Kills [Spider] Mites
15. Kills [Spider] Mites
16. Kills All major listed garden/foilage pest/insects
17. Kills 48 [Major] listed Garden Pests/Insects/Bugs
18. Protects/Defends Roses from [13/major] listed pests
19. Protects/Defends Flowers from [13/major] listed pests
20. Protects/Defends Roses from aphids, Japanese beetles, mites, thrips, scales, leafhoppers, caterpillars, grasshoppers, sawflies, leafminers, mealybugs, rose midges and whiteflies
21. Protects/Defends Flowers from aphids, Japanese beetles, mites, thrips, scales, leafhoppers, caterpillars, grasshoppers, leafminers, mealybugs, whiteflies, spittlebugs, budworms
22. Protects/Defends Plants from All major listed garden/foilage Pests/Insects/Bugs
23. Protects/Defends Plants from 48 [Major] listed Garden Pests/Insects/Bugs
24. Defend[s]/Protect[s] plants/roses/flowers/blooming plants [from listed insects/insects/bugs]
25. Controls/Kills listed insects/insects/bugs/pests on roses/flowers/blooming plants
26. Now Controls/Kills More Bugs/Insects/Pests
27. Helps Maintain Healthy Roses/Plants/Flowers
28. Helps Maintain Healthy Plants Indoor and/& Out
29. Apply Anytime During [the] Growing Season
30. Now Protects Houseplants from Insects/Pests/Bugs [and/& [Spider] mites]
31. No Fuss Formula
32. No Mixing Necessary
33. Now Improved Formula
34. Now Exclusive Formula
35. Long Residual
36. Long Lasting Control/Protection
37. Long Lasting, odor free formula Up to 2 weeks Pest/Insect Control
38. Fast Acting, Long Lasting
39. Easy-to-Use
40. Non-Staining
41. Broad Spectrum
42. Odor Free
43. Virtually Odor Free
44. Low Odor Formula
45. [ICON] Water Based
46. READY-TO-USE
47. [ICON] INDOOR & OUTDOOR RESIDENTIAL USE ONLY

*when used as directed

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Applicator Claims

48. stay dry
49. No messy clean-up
50. Hands One-handed operation [use] [spraying]
51. [Requires] no measuring, [no mixing]
52. [The] Easy way to spray
53. [Ergonomic] [Comfort] grip [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/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 Duracell/Battery Brand
71. Twist Cap

Comfort Wand Claims

72. Continuous [adjustable] spray [wand]
73. Comfort wand
74. Faster Application
75. The easy way [to spray] [to kill bugs/mites/diseases]
76. Saves time and energy
77. Extended Reach
78. No more bending/kneeling
79. Reusable [Comfort] [Continuous Spray][Wand]
80. Rechargeable
81. [Wand] [Applicator Name] will last [for] [at least] 20/X bottles!
82. [Wand] [Applicator Name] will last over 25 gallons![Wand] [Applicator Name] will last for years*
*based on X applications per year

POP Claims

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

OTHER

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95. XX% more than X gallon size
96. XX less plastic
97. [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.
98. New/Now (The following claim may appear on any label panel for 6 months following commercial introduction)
99. Proven performance
100. Read Entire label before use
101. [Recyclable symbol]
102. Takes the guesswork out of insect control [in the garden/landscape]
103. Insect control for your garden/landscape
104. Insect control made easy
105. Be in control of insects in your garden/landscape
106. Before [illustration] / After [illustration]
107. For a beautiful [insect free] garden/landscape
108. [For] [Get] a insect free garden/landscape
109. For Home Garden/Landscape Care
110. For Home [Garden/Landscape] Use [only]
111. From the garden care experts at [Company Name]
112. From the insect experts at [Company Name]
113. Help[s] [keep[s]] the garden/landscape look[ing] beautiful
114. Helps keep gardens/landscapes insect free
115. [For] Indoor & Outdoor Residential use only
116. Intended for residential use
117. Peel Open for use directions and further information
118. OPEN
119. Resealable Label for Directions & Precautions
120. Peel Open for use directions and further information
121. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
122. PEEL HERE / PRESS TO RESEAL
123. Product of –and/or- Made in U.S.A.
124. Assembled in the USA
125. ©20XX, licensed by [Company/Brand]. World rights reserved.
126. QUESTIONS OR COMMENTS - [phone icon] 1-800-xxxxxxx www.ortho.com [Visit our website] [computer icon]
127. [American Rose Society] Endorsed/Recommended [by [the] American Rose Society [to help protect/defend [your] plants/roses/flowers/blooming plants [from listed insects/insects/bugs]
128. [American Rose Society logo]



Guarantees:

129. Guaranteed+++
130. [Company/Brand] Guarantee[d] +++
131. Guaranteed [results] +++
132. [Company/Brand] Satisfaction guaranteed[+++]
133. [Company/Brand] [Promise your] satisfaction guaranteed [or your money back]
134. +++ [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.
135. +++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.

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

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136. †††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 Insects	<i>[optional insect illustration]</i> Note To PM – Any insects from label may appear and ended with "and others/many others/other listed insects"
WHERE TO USE/APPLY	<i>[optional use site illustration]</i> 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 <i>[optional illustration / trigger sprayer]</i>	<ul style="list-style-type: none"> Spray to uniformly cover upper and lower leaf surfaces, stems and branches
WHEN TO APPLY/USE	<ul style="list-style-type: none"> At first signs of insect damage