

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Mandy Slacks
The Scotts Company
1411 Scottslawn Road
Marysville, Ohio 43041

JUL 1 4 2011

Product Name:

Triticonazole Concentrate Fungicide

EPA Reg. No.:

239-2700

Subject:

Your notification dated: June 15, 2011

EPA Decision Number:

451141

Dear Ms. Slack,

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

The Agency acknowledges your request for 1) the alternate brand names "Ortho Rose & Flower Disease Control Concentrate" and "Ortho Rose & Flower Disease Control Ready-Spray", the addition of minor label language.

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 Assurance. As an alternative, you may refer consumers to the company's phone number or provide an email address.

EPA Reg. No. 239-2700 Product Name Page 2 of 2

The label submitted with the application has been stamped "Notification" and will be placed in our records. If you have any questions, please contact Shaunta Hill ay 703-347-8961 or by email at hill.shaunta@epa.gov or myself at 703-308-3194 or joyner.shaja@epa.gov.

Sincerely,

Shaja B/Joyner

Product Manager 20 Fungicide Branch

Registration Division (7504P)

30415

Please read instructions on reverse before completing form. Form Approved. JMB No. 2070-0060. Approval expires 0 Identifier Number Registration United States **EPA Environmental Protection Agency** Amendment Washington, DC 20460 Other Application for Pesticide - Section I 1. Company/Product Number 2. EPA Product Manager 3. Proposed Classification The Scotts Company LLC d/b/a The Ortho Group / 239-2700 Shaja B. Joyner Company/Product (Name) PM# None Restricted The Ortho Group / Triticonazole Concentrate Fungicide 6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(I), my 5. Name and Address of Applicant (Include ZIP Code) product is similar or identical in composition and labeling to: The Scotts Company LLC d/b/a The Ortho Group EPA Reg. No. PO Box 190 Marysville, OH 43040 Product Name Check if this is a new address Section II Amendment - Explain below. Final printed labels Resubmission in response to Agency letter dated "Me Too" Application Other - Explain below. Notification - Explain below. Explanation: Use additional page(s) if necessary. (For section I and Section II.) Added Alternate Brand Names: Ortho Rose & Flower Disease Control Concentrate and Ortho Rose & Flower Disease Control Ready-Spray. Additional changes per PR Notice 98-10. "This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under section 12 and 14 of FIFRA. Section III 1. Material This Product Will Be Packaged In: Unit Packaging Water Soluble Packaging 2. Type of Container Child-Resistant Packaging Metal Yes Yes Yes\* Plastic Nο No No If "Yes' No. per If "Yes" No. per Glass Unit Packaging wgt. Container Package wgt. Container \*Certification must Paper be submitted Other (Specify) 3. Location of Net Contents Information 4. Size(s) Retail Container 5. Location of Label Directions On Label 16 fl oz to 40 fl oz Label Container On Labeling accompanying product Lithograph 6. Manner in Which Label is Affixed to Product Other Paper glued Stenciled **Section IV** 1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application) Telephone No. (Include Area Code), Title Name Mandy Slack Analyst, Regulatory Affairs (937) 644-7187 6. Date Application Certification 'Rec'aived I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I (Stamped) acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law. 2. Signature The Scotts Company LLC 3. Title Mandy Stack Analyst, Regulatory Affairs 5. Date 4. Typed Name

June 15, 2011

Mandy Slack



#### The Scotts Company LLC

and Subsidiaries

June 15, 2011

Shaja B. Joyner, PM 20 Document Processing Desk (NOTIF) Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202

SUBJECT:

The Scotts Company LLC d/b/a The Ortho Group

Triticonazole Concentrate Fungicide (EPA Reg. No. 239-2700)

**Submission of Label Notification** 

Dear Ms. Joyner:

The Scotts Company LLC d/b/a The Ortho Group, hereafter "Scotts", is submitting a label notification for Triticonazole Concentrate Fungicide (EPA Reg. No. 239-2700) to add Alternate Brand Names: Ortho Rose & Flower Disease Control Concentrate and Ortho Rose & Flower Disease Control Ready-Spray. In addition, Scotts has made changes per PR Notice 98-10:

- Added "Dedicated to a Beautiful World" verbiage for sub-registrant;
- Added "No-Quibble Guarantee" statement for sub-registrant;
- Added "Where To Use" as alternate text for "On These Plants";
- Added "lawns" to several efficacy claims.

The following materials are enclosed to support this application:

- One (1) fully executed Form 8570-1;
- One (1) "mark up" copy of the label highlighting changes; and
- One (1) copy of the revised master label.

If you have any questions concerning this correspondence please contact me by phone: 937.644.7187 or email at amanda.slack@scotts.com.

Sincerely,

Mandy Slack

Analyst, Regulatory Affairs

Mandy Slack

**Enclosures** 

### **Triticonazole Concentrate Fungicide**

NOTIFICATION
JUL 14 2011

Alternate Brand Names

Ortho® Max<sup>TM</sup> Rose Pride® Disease Control
Ortho® Max<sup>TM</sup> Garden Disease Control
Ortho® Rose Pride® Disease Control
Ortho® Disease Control
Ortho® Max<sup>TM</sup> Lawn Disease Control
Ortho® Lawn Disease Control
Ortho® Rose & Flower Disease Control Concentrate
Ortho® Rose & Flower Disease Control Ready-Spray®

[ICON] For Residential [Indoor and] Outdoor Use Only

**ACTIVE INGREDIENT:** 

| Triticonazole     | 1.0%   |
|-------------------|--------|
| OTHER INGREDIENTS | 99.0%  |
| Total             | 100.0% |

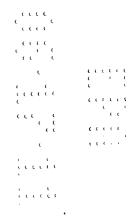
Contains 0.079 lbs. Triticonazole per U.S. gallon

### KEEP OUT OF REACH OF CHILDREN CAUTION

See side or back panel for First Aid statements and additional precautionary statements.

Net Contents: 1 qt. (32 fl oz.) / (946 ml.)

[PEEL HERE]
[OPEN RESEALABLE LABEL FOR DIRECTIONS & PRECAUTIONS]
[PRESS TO RESEAL]



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|---|-----|----|
|---|-----|----|

| FIRST AID   |  |
|---|--|
| IF ON SKIN OR CLOTHING  | Take off contaminated clothing.  |
|   | <ul> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> </ul>                           |
|   | Call a poison control center or doctor for treatment advice.   |
| IF SWALLOWED  | <ul> <li>Call a poison control center or doctor immediately for<br/>treatment advice.</li> </ul>             |
|   | <ul> <li>Have person sip a glass of water if able to swallow.</li> </ul>                                     |
|   | <ul> <li>Do not induce vomiting unless told to do so by a poison<br/>control center or doctor.</li> </ul>    |
|   | <ul> <li>Do not give anything by mouth to an unconscious person.</li> </ul>                                  |
| IF IN EYES  | <ul> <li>Hold eye open and rinse slowly and gently with water for 15-<br/>20 minutes.</li> </ul>             |
|   | <ul> <li>Remove contact lenses, if present, after the first 5 minutes,<br/>then continue rinsing.</li> </ul> |
|   | Call a poison control center or doctor for treatment advice.   |
| For Medical Emergencies, Call 24 Hours a Day 1-800-225-2883   |  |
| Have the product container or label with you when calling a poison control center or doctor or going for treatment. |  |
| NOTE TO PHYSICIAN: Treat symptomatically.   |  |

#### PRECAUTIONARY STATEMENTS

### HAZARDS TO HUMANS & DOMESTIC ANIMALS CAUTION

Harmful if swallowed or absorbed through the skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, and drinking, or using tobacco. Wear long sleeved shirt, long pants, socks, shoes and gloves. Remove / PPE clothing. Then wash thoroughly and change into clean clothing.

#### **ENVIRONMENTAL HAZARDS**

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 pesticide is toxic to wildlife. This product is toxic to bees exposed to direct treatment. Do not apply this product while bees are actively visiting the treated area.

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.

#### **IMPORTANT APPLICATION INFORMATION**

- For [indoor and] outdoor residential use only.
- Do not apply this product in a way that causes the spray to contact people, either directly or through drift.
- Keep children and pets out of treated areas until sprays have thoroughly dried.
- When applying outdoors:
  - Do not apply if wind speed exceeds 10 mph.
  - Always stand "up wind" when applying this product.

| LAWNS                                     |   |
|---|---|
| TO TREAT<br>THESE<br>DISEASES             | Brown Patch, Anthracnose, Melting out leaf spot (Grey leaf spot), Dollar spot, Take-<br>all patch, Red thread, Helmithosporum leaf spot, Brown ring patch (Waitea patch),<br>Fusarium patch, Pink patch, Grey snow mold, Pink snow mold, Necrotic ring spot,<br>Red leaf spot, Large patch, Zoysia patch, Yellow spot, Rust   |
|   | Also suppresses algae growth!   |
| ON<br>THESE<br>PLANTS/<br>WHERE<br>TO USE | Lawns   |
| USE THIS<br>AMOUNT                        | LIGHT INFESTATIONS  2 oz. per gallon of water for each 100 sq. ft. of lawn Ortho® Dial 'N Spray® setting is 2 oz.  32 oz. bottle will treat 1600 sq. ft.  HEAVY INFESTATIONS  4 oz. per gallon of water for each 100 sq. ft. of lawn Ortho® Dial 'N Spray® setting is 4 oz.  32 oz. bottle will treat 800 sq. ft.  Do not apply more than 120 oz. per 1000 sq. ft. per year (3.36 lbs of active ingredient / Acre / Year) |
| WHEN TO APPLY                             | Apply as soon as disease problems are noticed. Wait 2 to 4 weeks to re-apply if disease problems reappear.  |

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

#### "How to Apply" Instructions - Specific option appearing on label depends on packaging and applicator

#### Option 1 for Ready-To-Spray Hose End Applicator

#### FOR BEST RESULTS

Shake container gently before using.

[Measure the total [entire] [lawn] area to be sprayed. For rectangular areas, multiply the length by width to obtain total square feet.]

#### Connect: [illustration]

- Connect/Attach/Sprayer/bottle to end of hose
- Turn on water
- Extend hose to farthest area of lawn to be treated

#### **HOW TO APPLY**

#### Spray: [illustration]

- To begin spraying, [disengage safety lock and] point nozzle in the direction you want to spray.
- Slide thumb activation switch forward to ON position.
- Spray evenly over measured area

#### Finish: [illustration]

- To STOP spraying, slide thumb activation switch backward to OFF position.
- Turn off water.
- Relieve water pressure by sliding thumb switch to ON [WATER] [WATER ONLY] position until water slows to a drip. Then, slide switch back to OFF position [and engage safety lock].
- Disconnect the sprayer from hose.

#### Do not use hose end applicator indoors

#### Option 2 for Ready-To-Spray Hose End Applicator

#### FOR BEST RESULTS

Shake container gently before using.

 [Measure the total [entire] [lawn] area to be sprayed. For rectangular areas, multiply the length by width to obtain total square feet.]

#### Connect: [illustration]

- Connect/Attach Sprayer/bottle to end of hose
- Turn on water
- Extend hose to farthest area of lawn to be treated

### HOW TO APPLY

#### Spray: [illustration]

- Hold/Direct/Point sprayer towards the area to be treated.
- Bend small plastic tab back and turn knob clockwise to ON position.
- Spray evenly over measured area.

#### Finish: [illustration]

- To stop spraying, turn the knob to the OFF position.
- Turn off water.
- To relieve water pressure, turn knob to ON position until water slows to a drip.
   Turn the knob back to the OFF position.
- Disconnect the sprayer from hose.

#### Do not use hose end applicator indoors

#### Tank Sprayer

#### FOR BEST RESULTS

Shake container gently before using.

### HOW TO APPLY

 [Measure the total [entire] [lawn] area to be sprayed. For rectangular areas, multiply the length by width to obtain total square feet.]

#### Spray: [illustration]

- For light infestations mix 2 oz of product per gallon of water.
- For heavy infestations mix 4 oz of product per gallon of water.
- Plan to begin spraying the farthest area of lawn to be treated, working your way back
- Direct/Point sprayer towards area to be treated.
- Spray evenly over measured area. Each gallon treats 100 sq. ft.

|                 | Ortho <sup>®</sup> Dial 'N Spray <sup>®</sup> Applicator   |
|-----------------|--|
|                 | FOR BEST RESULTS Shake container gently before using.  |
| -               | Prepare applicator: [illustration]  Set dial to 2 fl oz. for light infestations and 4 fl oz. for heavy infestations  Add 16 fl oz. to sprayer jar  DO NOT add water.   |
|                 | Connect: [illustration]  Attach hose to the sprayer.   |
| HOW TO<br>APPLY | <ul> <li>Spray: [illustration]</li> <li>Extend hose to farthest area of lawn to be treated.</li> <li>Point nozzle in direction you want to spray.</li> <li>For light infestations, spray evenly over 800 sq. ft. (40 ft. x 20 ft. area) until jar is empty</li> <li>For heavy infestations, spray evenly over 400 sq. ft. (20 ft. x 20 ft. area) until jar is empty</li> </ul> |
|                 | <ul> <li>Finish: [illustration]</li> <li>Pour unused product back into its original container.</li> <li>Rinse jar with water</li> <li>Clean sprayer by squeezing and releasing trigger in 2 short bursts</li> <li>Turn off water. Squeeze trigger to relieve water pressure.</li> <li>Disconnect hose.</li> </ul>  |
|                 | Do not use Ortho <sup>®</sup> Dial 'N Spray <sup>®</sup> Applicator indoors  |

#### End of lawns section

| GARDENS                       |   |
|-------------------------------|---|
| TO TREAT<br>THESE<br>DISEASES | Black spot, Powdery mildew, Rust, Leaf spots, Anthracnose   |
| ON<br>THESE<br>PLANTS         | Ornamentals, Roses, Flowers, Trees, Shrubs  |
| USE THIS AMOUNT               | 2 oz. per gallon<br>Ortho <sup>®</sup> Dial 'N Spray <sup>®</sup> setting is 2 oz.  |
| WHEN TO<br>APPLY              | Apply as soon as disease problems are noticed. Wait 2 to 4 weeks to re-apply if disease problems reappear. Each gallon is intended to treat 100 sq ft of garden area. Do not apply more than 5 times in a season. (2.28 lbs of active ingredient / Acre / Year) |

## "How to Apply" Instructions – Specific option appearing on label depends on packaging and applicator

|                 | Option 1 for Ready-To-Spray Hose End Applicator   |
|-----------------|---|
| HOW TO<br>APPLY | FOR BEST RESULTS Shake container gently before using.   |
|                 | Connect: [illustration]  Connect/Attach/Sprayer/bottle to end of hose  Turn on water  |
|                 | <ul> <li>Spray: [illustration]</li> <li>To begin spraying, [disengage safety lock and] point nozzle in the direction you want to spray making sure that the end of the nozzle is 8 to 12 inches away from the plants.</li> <li>Slide thumb activation switch forward to ON position.</li> <li>Direct spray toward the upper and lower leaf surfaces and stems.</li> <li>Spray until the surface of the foliage is wet.</li> </ul> |
|                 | Finish: [illustration]  To STOP spraying, slide thumb activation switch backward to OFF position.  Turn off water.  |
|                 | <ul> <li>Relieve water pressure by sliding thumb switch to ON [WATER] [WATER ONLY] position until water slows to a drip. Then, slide switch back to OFF position [and engage safety lock].</li> <li>Disconnect the sprayer from hose.</li> </ul>  |
|                 | Do not use hose end applicator indoors  |
|                 | Option 2 for Ready-To-Spray Hose End Applicator FOR BEST RESULTS Shake container gently before using.   |
| HOW TO<br>APPLY | Connect: [illustration] Connect/Attach Sprayer/bottle to end of hose Turn on water  |
|                 | <ul> <li>Spray: [illustration]</li> <li>Hold/Direct/Point sprayer towards the area to be treated making sure that the end of the nozzle is 8 to 12 inches away from the plants.</li> <li>Bend small plastic tab back and turn knob clockwise to ON position.</li> <li>Direct spray toward the upper and lower leaf surfaces and stems.</li> <li>Spray until the surface of the foliage is wet.</li> </ul>                         |
|                 | Finish: [illustration]  To stop spraying, turn the knob to the OFF position.  Turn off water.   |
|                 | <ul> <li>To relieve water pressure, turn knob to ON position until water slows to a drip.         Turn the knob back to the OFF position.     </li> <li>Disconnect the sprayer from hose.</li> </ul>  |
| 11014/ TO       | Do not use hose end applicator indoors  |
| HOW TO          | Tank Sprayer  2011 06 10 NOTIE  Page 7 of 11  |



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**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.

| APPLY  | FOR BEST RESULTS   |
|--------|--|
|        | Shake container gently before using.   |
|        |  |
|        | Spray [illustration]   |
|        | <ul> <li>Mix 2 oz of product per gallon of water.</li> </ul>                           |
|        | <ul> <li>Hold sprayer 8 to 12 inches from the area to be treated.</li> </ul>           |
|        | <ul> <li>Direct spray toward the upper and lower leaf surfaces and stems.</li> </ul>   |
|        | Spray only until the surface of the foliage is wet.                                    |
|        | Ortho <sup>®</sup> Dial 'N Spray <sup>®</sup> Applicator                               |
| -      | FOR BEST RESULTS   |
|        | Shake container gently before using.   |
|        | Chake contained gently before doing.   |
|        | Prepare applicator: [illustration]   |
|        | Set dial to 2 fl oz.   |
|        | <ul> <li>Add 16 fl oz. to sprayer jar</li> </ul>                                       |
|        | <ul> <li>DO NOT add water.</li> </ul>  |
|        | Connect: [illustration]  |
| ном то | <ul> <li>Attach hose to the sprayer.</li> </ul>  |
| APPLY  | Spray: [illustration]  |
|        | <ul> <li>Hold sprayer 8 to 12 inches from the area to be treated.</li> </ul>           |
|        | <ul> <li>Direct spray toward the upper and lower leaf surfaces and stems.</li> </ul>   |
|        | <ul> <li>Spray only until the surface of the foliage is wet.</li> </ul>                |
|        | Finish: [illustration]   |
|        | Pour unused product back into its original container.                                  |
|        | Rinse jar with water   |
|        | <ul> <li>Clean sprayer by squeezing and releasing trigger in 2 short bursts</li> </ul> |
|        | <ul> <li>Turn off water. Squeeze trigger to relieve water pressure.</li> </ul>         |
|        | Disconnect hose.   |
|        | Do not use Ortho <sup>®</sup> Dial 'N Spray <sup>®</sup> Applicator indoors            |

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| HOUSEPLANTS [INDOORS]         |   |
|-------------------------------|---|
| TO TREAT<br>THESE<br>DISEASES | Black spot, Powdery mildew, Rust, Leaf spots, Anthracnose   |
| ON<br>THESE<br>PLANTS         | Houseplants   |
| USE THIS AMOUNT               | 2 oz of product per gallon of water   |
| WHEN TO APPLY                 | Apply as soon as disease problems are noticed. Wait 2 to 4 weeks to re-apply if disease problems reappear. Do not apply more than 5 times in a season.  |
|                               | Tank Sprayer  |
| HOW TO<br>APPLY               | FOR BEST RESULTS Shake container gently before using.  Mix 2 oz of product per gallon of water. Hold sprayer 8 to 12 inches from the area to be treated. Direct spray toward the upper and lower leaf surfaces and stems. Spray only until the surface of the foliage is wet. |

#### STORAGE AND DISPOSAL

**STORAGE:** Keep from freezing. Keep pesticide in original container. Do not put into food or drink containers. Avoid contamination of feed and foodstuffs. Store in a cool, dry place; preferably in a locked storage area.

**DISPOSAL:** 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.

#### [phone icon]

Questions, Comments or Medical Information? ¿Preguntas, Comentarios o Información Médica? 1-800-225-2883

#### www.ortho.com [computer icon]

Ortho & Your Environment – Your home and yard are places for family and pets to enjoy. That's why Ortho<sup>®</sup> products are designed with care to provide effective solutions to pest problems inside and outside your home. For best results please follow instructions for appropriate usage, storage and disposal.

#### The ORTHO 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.

#### Dedicated to a Beautiful World®

Trusted by generations of [homeowners/gardeners], [Insert Subregistrant Company Name] is dedicated to helping you enhance and protect the beauty of your home environment.

#### [Insert Subregistrant Company Name] NO-QUIBBLE GUARANTEE®

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

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

© 2010, Licensed by The ORTHO Group. World rights reserved.

Made in USA

Sold By: The Ortho Group

P.O. Box 190 Marysville, OH 43040

EPA Reg. No. 239-2700

EPA Est. 239-IA-3<sup>I</sup>, 52251-OR-005<sup>K</sup>, 58996-MO-1<sup>A</sup> 239-MS-1<sup>M</sup> [(Superscript is first letter of lot

number)]

#### **Additional Marketing Claims**

#### **Efficacy**

- 1. For control of listed diseases on plants/lawns
- 2. Rescues plants/lawns from listed diseases
- 3. Systemic fungicide works through the leaves and stems to protect
- 4. Controls and protects from the inside out
- 5. Cures listed diseases and restores beauty to plants
- 6. Rainproof/Rainfast protection won't wash off once it is dry
- 7. Controls/ Stops/Prevents listed [garden] [lawns] diseases [insert any combination of listed diseases].
- 8. For effective control of a broad spectrum of listed diseases [commonly] found on Lawns/Roses/Flowers/Ornamentals/Trees/[&]Shrubs.
- 9. Controls/ Stops/Prevents [common] listed diseases on Lawns/Roses/Flowers/Ornamentals/Tree/ [&] Shrubs.
- 10. Controls and prevents [the three major listed diseases for roses] [Black Spot, Powdery Mildew and Rust] [and other listed ornamental diseases.]
- 11. Systemic action can't be washed off by rain once dried
- 12. Protects the whole plant [including the new shoots]
- 13. Prevents rose defoliation caused by listed diseases
- 14. Fights existing infection of listed diseases
- 15. Protects new growth
- 16. Defend What's Yours™ for [up to 4] weeks

#### Speed

- 17. Starts working by contact
- 18. Starts working within [24] hours

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#### Residual

- 19. Provides [up to 4] weeks of control
- 20. Prevents/Controls for [up to 4] weeks [against] listed [Lawn/Rose/Flower/Ornamental/Tree/[&]Shrub diseases]
- 21. Longer-lasting protection (up to 4 weeks control of listed diseases)\*
- 22. Protects twice as long\*
- 23. Protects 2 [two] times longer, [up to 4 weeks!], [Guaranteed]\*
- 24. Control(s)/ Stop(s)/Prevent(s) [up to] [3 times] more diseases with [up to] [75%] less chemicals/active ingredient\*
- 25. Control(s)/ Stop(s)/Prevent(s) [up to] [3 times] more diseases with [one-third [1/3] the chemicals/active ingredient\*
- \*vs. original Ortho Rose Pride Disease Control (6.5% Triforine)

#### Usage

- 26. Will not harm Roses/(&) Flowers [or foliage] /Lawns/Ornamentals/ Trees/Shrubs
- 27. Defense/Protection/Safeguard for roses.
- 28. Safe for roses
- 29. Does not stain flowers and leaves
- 30. Enjoy the full beauty of plants, without white residue!
- 31. [Leaves] no white residue
- 32. Perfect/Ideal/Developed/Formulated/Designed for Lawns/Roses/Flowers/Ornamentals/Trees/[&]Shrubs

#### **Applicator Claims**

- 33. Ready to Spray Hose-end applicator
- 34. Gentle shower applicator- won't harm plants [or blooms]
- 35. Gentle shower applicator- won't damage plants [or blooms]
- 36. One-handed operation
- 37. Ergonomic [design]
- 38. Ready-Spray® [Ready-to-Spray] [Applicator Name]
- 39. [Simply] attach to [garden] hose and spray [go]
- 40. No mixing required (claim for use with hose-end sprayers that automatically mix)
- 41. Gentle shower [applicator] [spray pattern]
- 42. Broadcast [applicator] [spray pattern]
- 43. Easy [to use]
- 44. Simple [and easy] [to use]
- 45. Convenient
- 46. Economical use to cover large areas
- 47. Easily cover large areas
- 48. Hand doesn't get wet [Hand stays dry]
- 49. Easy grip [control]
- 50. Includes water [only] setting [option]

#### Houseplants

- 51. Controls your Indoor and/& Outdoor Plants from listed diseases
- 52. Controls Houseplants from listed diseases
- 53. Non-staining