



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 15, 2017

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

Subject: Label Amendment – Add Disease Claim for Powassan (POW) transmitted by
Deer Ticks
Product Name: ORTHO LAWN INSECT CONTROL
EPA Registration Number: 239-2726
Application Date: May 22, 2017
Decision Number: 529982

Dear Ms. Rothwell:

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

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

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

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

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with FIFRA section 6. If you have any questions, please contact Maggie Rudick by phone at 703-347-0257, or via email at rudick.maggie@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gene Benbow".

Gene Benbow, Acting Product Manager 4
Invertebrate & Vertebrate Branch 1
Registration Division (7505P)
Office of Pesticide Programs

NOTE:

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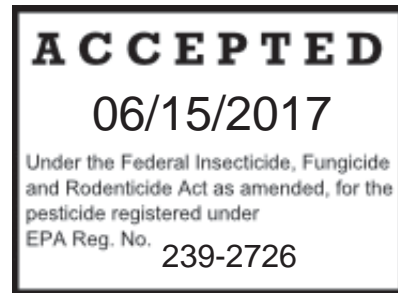
Italicized text is information for the reviewer and is not part of the label.

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

Ortho Lawn Insect Control

Alternate Brand Names

- Ortho Bug B Gon Insect Killer for Lawns (3)
- Ortho Home and Perimeter Insect Killer Granules(3)
- Ortho Home Defense Home Perimeter Insect Killer(3)
- Ortho Home Defense Insect Killer for Home Perimeter(3)
- Ortho Home Defense Insect Killer for Outdoor Perimeter(3)
- Ortho Home Defense Insect Killer Granules (3)
- Ortho Home Defense Perimeter Insect Killer(3)
- Ortho Home Invading Insect Killer Granules(3)
- Ortho Perimeter Insect Killer Granules(3)
- Ortho Lawn Insect Killer
- Ortho Lawn Insect Killer Granules
- Ortho Insect Killer Granules
- Ortho Insect Killer Granules for Lawns
- Ortho Outdoor Insect Killer
- Ortho Outdoor Insect Killer Granules
- Ortho Perimeter Insect Killer
- Ortho Perimeter Insect Killer Granules
- Ortho Bug B Gon Lawn Insect Killer
- Ortho Bug B Gon Lawn Insect Killer Granules
- Ortho Home Defense Insect Killer for Lawns Granules
- Ortho Home Defense Lawn Insect Killer Granules
- Ortho Home Defense Lawn Insect Killer
- Ortho Home Defense Insect Killer for Lawns



Note to PM: If any of these ABNS below are used –with “Home and Ranch”, the restriction “Do not allow animals to graze on treated areas.” will be included on the fpl-see Directions for Use for placement

- Ortho Home & Ranch Insect Killer for Lawns
- Ortho Bug B Gone Home & Ranch Insect Killer for Lawns
- Ortho Home & Ranch Insect Killer Granules
- Ortho Insect Killer for Home & Ranch Granules

For Residential Lawn, Home Perimeter, Ornamental & Flower Garden, and Home Garden Use Only [tree icon]

ACTIVE INGREDIENT:

Bifenthrin 0.115%

OTHER INGREDIENTS:..... 99.885%

TOTAL: 100.000%

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

May contain peanut by-products

Net weight statement: xxxx lbs. / xxxxx kg

KEEP OUT OF REACH OF CHILDREN

CAUTION

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See side/back [panel][booklet][bag] for additional precautionary statements [and directions for use].

PRECAUTIONARY STATEMENTS [icon][exclamation point]



HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Causes moderate eye irritation. Do not get in eyes or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

FIRST AID	
If in eyes:	<ul style="list-style-type: none"> • 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	
This product is a pyrethroid. If large amounts have been ingested, milk, cream, or other digestible fats and oils may increase absorption and so should be avoided. For Information Regarding the Use of this Product Call 1-(800)-225-2883.	

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to fish and aquatic 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. Sweeping any product that lands on a driveway, sidewalk, or street, back onto the treated area of the lawn or garden will help to prevent run off to water bodies or drainage systems.

PHYSICAL AND CHEMICAL HAZARDS

Do not mix or allow contact with oxidizing agents. Hazardous chemical reaction may occur.

STORAGE AND DISPOSAL [icon][trash can]



PESTICIDE STORAGE: Keep out of reach of children and animals. Store in original bag/container only. Store in a clean, dry, well ventilated place and avoid excess heat. For bags/containers after partial use, reseal opened bag/container [by folding top down and securing].

PESTICIDE DISPOSAL AND CONTAINER HANDLING: 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.

DIRECTIONS FOR USE

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

Apply this product directly to the lawn or garden area or non-hard surfaces around the perimeter of your home. Water treated area as directed on this label. Do not water to the point of run-off. Do not make applications during rain.

Do not apply to hard surfaces such as sidewalks, driveways and streets where the product is likely to wash off into sewers and waterways.

Apply early/proactively [in the Spring/Summer/Fall] to prevent infestation.

[Otherwise, apply when insect activity or damage is first observed in the lawn (lawn thins and turns brown or moths fly from the grass when you mow)

Do not treat just the browned area of lawn. To prevent further damage, treat entire lawn.]

Repeat application is necessary only if there are signs of renewed insect activity.

In New York State, this product may NOT be applied to any grass or turf area (lawns) within 100 feet of a

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water body (lake, pond, river, stream, wetland, or drainage ditch).

In New York State, do make a single repeat application of this product if there are signs of renewed insect activity, but not sooner than two weeks after the first application.

Do not allow people or pets to re-enter lawn until dry.

Note to PM: Optional text above starting with “Otherwise” to “lawn” will be omitted unless the lawns use site appears on the product label

Note to PM: If ABNS for “Home and Ranch” are used, the additional restriction: “Do not allow animals to graze on treated areas” will appear here.”

Note to PM: The List beginning “Use Ortho Lawn Insect Control to kill and provide 3 month residual control of” will be referred to as Table 1 in the Claims Section. The List beginning “Ortho Lawn Insect Control also kills” will be referred to as Table 2 in the Claims section. When Expanded Kills claims are used the claims section provides instruction on when the “Also Kills” list will appear on the FPL.

[PRODUCT FACTS]

Insects Killed/Controlled for 3 Months

[Table1]

Use Ortho lawn insect control/product name to kill and provide 3 month residual control of:

Aphids	Greenbug		
Ants	Acrobat Allegheny Mound Argentine Big Headed Black Turf Citronella Cornfield	Crazy Ghost Fire Ant Foragers Little Black Odorous Pavement Pyramid	Red Harvester Small Honey Sugar Thief White Footed
Armyworms	Fall	Lawn	
Beetles & Larvae	Billbugs (Bluegrass & Hunting) Black Turfgrass Ataenius Dichondra Flea Ground	Lady Beetles (Asian, Convergent, Seven-Spotted, Thirteen-Spotted & Twice-Stubbed) Weevils (Annual Bluegrass)	
Bristletails			
Caterpillars	Cutworms (Black, Bronzed, Granulate, & Variegated)	Fiery Skipper Striped Grassworm	Webworms (Sod & Tropical Sod)
Chinch Bugs			
Crickets	Arizona Common Short Tailed Eastern Striped Fall Field House Indies Short Tailed	Northern Wood Sand Field Southeastern Field Southern Wood Spring Field Texas Field	Tropical Variable Field Vocal Field Western Striped
Earwigs			
Firebrats			
Flies	European Crane (larvae)	Frit	
Grasshoppers			
Leafhoppers			
Mealybugs			
Millipedes			
Mites	Chigger		
Mole Crickets (adult)	Southern	Tawny	
Moths	Lucerne		

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Pillbugs & Rollie Pollies			
Scorpions	Arizona Stripetail California Common Eastern Sand	Lesser Stripetail Northern Southern Unstriped	Yellow Ground
Seed Maggots			
Sowbugs			
Spiders	Brown Recluse Burrowing Wolf Longbodied Cellar	Marbled Cellar Pirate Wolf Shortbodied Cellar	Thinlegged Wolf
Spittle Bugs	Two Lined		
Ticks***	American Dog	Brown Dog	
***including those that transmit Lyme Disease			
Wireworms			

[Table 2]			
Insects Killed/Controlled:			
[Ortho Lawn Insect Control/product name Also Kills]:			
Ants	Carpenter	Pharaoh	
Aphids			
Beetles	Asiatic Garden European Chafers Green June	Masked Chafers May/June Oriental	Sugarcane
Caterpillars	Bagworms		
Centipedes			
Fleas			
Flies	European Crane (adult)	Fruit	
Fungus Gnat Larvae			
Leafrollers	Omnivorous		
Mites			
Whiteflies			
Mole Crickets (nymphs)			
Plant Bugs			
Scale			
Springtails			
Thrips			
Weevils	Annual Bluegrass (larvae)	Black Vine (larvae)	Root (larvae)
For grub control, apply [Scotts GrubEx _[1] Season-long Grub Control/product name] [anytime] from early April to August [spring to (late) summer].			

WHERE TO APPLY/USE
Lawns / Around Home Foundations [Perimeter Treatment] [Outdoor perimeter] / Ornamental [and] Flower Gardens / Vegetable Gardens
WHEN TO APPLY/USE

Italicized text is information for the reviewer and is not part of the label.

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

Apply early/proactively [in the Spring/Summer/Fall] to prevent infestation. Otherwise, apply at the first sign of insect activity or damage.

HOW TO APPLY/USE

For best results, treated area should be thoroughly watered immediately after application.

On Lawns [Illustration]

- [Using a spreader designed for application of granular materials], uniformly apply 1 to 2 lbs over 1000 sq. ft.

Note to PM: for products packaged in 5lbs or less, spreader language will be optional

- Leave a one-foot wide untreated strip of lawn next to hard surfaces (such as sidewalks and driveways) and sewer drains to prevent potential run-off into sewers and waterways.

[Illustration]

- For season long, (3 month) control, apply 4 lbs of product for every 1000 sq. ft./1 lb of product for every 250 sq. ft.
- [A 10(20)(xx) pound bag will treat up to 10,000(20,000) (xxxx) sq. ft. of lawn]
- [A 5 pound bag will treat up to 5,000 sq. ft. of lawn]
- [For centipedes, millipedes, pavement ants- uniformly apply 4 lbs over a 1,000 sq. ft. area./2 lbs over a 500 sq. ft. area]
- [For mole cricket control, apply 2 to 4 lbs of product over 1000/ ½ to 1 l b over 250 sq. ft. area. For best results, treat in late spring and water thoroughly immediately after application.]
- [For fire ant mounds, apply 1 tablespoon or 3 teaspoons** of granules to the surface of each mound.] [For best results, 1) apply in cool weather, 65 to 80 ° F, in early morning or late evening hours. 2) Avoid disturbing ants. 3) Treat mounds as they appear. 4) Thoroughly water the treated area after application.]

[** Food utensils such as tablespoons/teaspoons must not be used for food purposes after use in measuring pesticide.]

Note to PM: When product is labeled for mound treatment, label must state the following: "Season long (3 month) residual control applies to broadcast treatments only."

On Ornamentals & Flowers [Illustration]

- Apply 0.5 to 1 lb. of product evenly over each 500 sq. ft. area. Repeat if there are signs of renewed insect activity.
- Product can be applied just before planting or after plants emerge.

Vegetable Gardens [Illustration]

- A single application may be applied just prior to planting or after plants emerge and worked into the top 4 to 6 inches of soil. Use 1.0 lb of product for a 500 sq ft area.

Home Foundation/Barrier Treatment [Illustration]

- Evenly apply a 2 foot wide band next to the house/home foundation.
- Use 0.5 to 1.0 lb of product for each 500 sq. ft. (2 ft. x 250 ft.).
- For 3 month control, apply 2 lbs of product for every 500 sq. ft./1 lb of product for every 250 sq. ft. Re-apply after 3 months if necessary.
- [For best results, treated area should be thoroughly watered immediately after application.]

[Ortho lawn insect control can be applied to the vegetables listed below:] [optional table]

CROP	DAYS TO WAIT TO HARVEST
Tomatoes , Sweet corn	1
Artichoke	5
Green peas, sugar snap peas, snow peas, green beans (wax beans, snap beans), dry beans (black-eyed peas, cow pea), cucumber, gourds, muskmelon, pumpkin, squash, and watermelon	3
Broccoli, Chinese broccoli, cabbage, cauliflower, kohlrabi,	7

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mustard greens, eggplant, head lettuce, peppers (bell and non-bell)	
---------------------------------------------------------------------	--

Note to PM: Models and Application Rate may be changed to reflect Current Product Offerings:

SPREADER SETTING INFORMATION Note to PM: The following are optional formats to present spreader setting information. Appropriate spreader settings, spreader brand names, and coverage will be inserted on Final Printed Label

Note to PM- Spreader settings are optional for products packaged in 5 lbs or less.

SPREADER TIPS/SPREADING TIPS/APPLICATION TIPS				
For best results, Use a Scotts Spreader				
Spreader	Spreader Settings [Covers xxxx sq. ft.]			Directions
	Pounds of product per XX SQ FT XX lb XX lb XX lb			
Scotts® AccuGreen® Drop Spreader	XX	XX	XX	[Align hopper arrow with previous wheel track] [to ensure even coverage.] Mow lawn first if grass is tall enough to touch the bottom of the spreader. First apply two header strips. Operate spreader the longest way of the lawn. Overlap wheel marks to ensure uniform coverage. Shut off spreader when you have reached the header strips or stopped.
Scotts Broadcast/Rotary Spreader, Scotts SpeedyGreen®, EdgeGuard®, Scotts Basic™, Standard™, Deluxe™, EdgeGuard®, Lawn Pro®	XX	XX	XX	Shut off spreader anytime you stop. For complete coverage make each pass about five (5) feet from the wheel track so that some overlapping occurs. [For even application, walk at a steady pace slightly overlapping each pass.]

[1 lb/1,000 sq ft is equivalent to 0.5 lb/500 sq.ft.]

[When using other spreaders, calibrate the spreader settings based on the manufacturer's recommendations.]

[Spreader (Application) Tips]

[Spreader settings are approximate. You may need to adjust for proper coverage. Apply header strips. Then apply product in the longest direction of lawn. For best results, use a Scotts® spreader.]

[For best results], use a Scotts spreader/[Use [only] with Scotts spreaders/Scotts products are designed to work with Scotts spreaders.]

(Illustrations to correspond with application tips)

Snap APPLICATOR SET UP [AND INFORMATION]

[Just pop it on, flip the lever and go!]

[Icon]: Connect/Snap/Place into Spreader

Italicized text is information for the reviewer and is not part of the label.

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[Icon]: Lock/Flip lever to lock in place

[Icon]: Apply/Go/You're ready to go

[Icon]: [EdgeGuard/Feature/Control]

[Icon]: [[Finish] [&] [Store]]

See back panel for Setup Guide

- **Lock/Snap & Go/Snap, Lock, Go/Cartridge/Snap / Pac connects directly to the [insert name] spreader/applicator** [There's no cutting/no pouring/no spilling] [from heavy bags]/[Simply place Snap / Pac/cartridge into the spreader/applicator]
- **Flip the lever to lock cartridge/Snap / Pac into place** [Cartridge/Snap / Pac automatically sets the proper application rate]
- **Easy to apply**/Follow Directions for Use below
- **[Easy to control]** [The new & improved/exclusive EdgeGuard feature directs product only where you want it]
- **[Easy to finish & store]** [Just flip the lever back to remove the Snap / Pac/cartridge.] [It self-seals for no mess/no touch/no-waste/easy clean-up & storage.]

Note to PM: Alternative applicator directions based on the applicator/container type (jug/bag). For products packaged in 5 lbs or less.

Option 1 (for the jug)

[APPLICATION DIRECTIONS]

- Step 1.** Remove cap by rotating counter clockwise. [graphic of cap]
- Step 2.** Remove seal from bottle. [graphic of bottle]
- Step 3.** Replace cap by rotating clockwise until tight. [graphic of cap]
- Step 4.** Flip open spout. [graphic of cap]
- Step 5.** While holding bottle parallel to ground shake in a side to side motion to dispense product. [graphic of bottle with hand] [See illustration below for correct application].
- Step 6.** For storage, flip spout closed.

Option 2 (for the bag with a spout)

[APPLICATION DIRECTIONS]

- Step 1.** Remove cap by rotating counter clockwise. [graphic of cap]
- [Step 2.]** [Remove seal.]
- Step 3.** Tilt spout toward the ground and gently disperse the product. [graphic of bag with hand] [See illustration for correct application].
- Step 4.** For storage, replace cap by rotating clockwise until tight. [graphic of cap]

OPTIONAL RE-ENTRY STATEMENTS



[If watering in, allow area (lawn) (yard) to dry before re-entering]

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

†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.

[ORTHO AND YOUR ENVIRONMENT

Your home and yard are places for family and pets to enjoy. That's why Ortho products are designed with care to provide effective solutions to insect problems [inside] and [outside] your home. [For best results] [and a healthy environment], please follow instructions for appropriate usage, storage and disposal.]

[phone icon]  Questions or Comments

[call] 1-800-225-2883 www.ortho.com [computer icon] 

20XX, [Licensed by] the Ortho Group. World rights reserved.

[Product of U.S.A.]

Manufactured for [by] /Sold by:

The Ortho Group

P.O. Box 190

Marysville, Oh 43040

EPA Reg. No. 239-2726

EPA Est. No. 239-IA-3¹, 58996-MO-1^A, 84064-IA-1^P, 85652-OH-1^W, 239-MS-001^M

[Superscript is first letter of lot number.]

Optional Claims Section

Note to PM: Optional Marketing Claims: claims may appear on any or all label panels:

Note to PM: insects, bugs, pests may be used interchangeably

Note to PM: Any or all listed bugs may be represented graphically on Final Printed Labeling [bug icon]



Note to PM: Any combination of approved claims from the master label may be inserted dependent upon sites listed on the market label and product size. Representation below.

[Brand] [Sub-Brand]	Ortho Bug B Gon Insect Killer for Lawns (or alternate brand name)
	Guaranteed kill or your money back
[Claims]	<ol style="list-style-type: none"> 1. Kills 139 insects 2. Kills by Contact 3. Treats up to 10,000 [20,000] [25,000] [x,xxx] sq. ft

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

	[insert approved claim(s) from master label]
[Product Facts:] [What it Does] [Where to Use/Apply] [When to use/Apply]	Product Facts: What it Does: Kills 139 insects including ants, fleas, ticks, cutworms, chinch bugs, mole crickets, sod webworms, and spiders (see inside for complete list). Where to Use/Apply: Use on lawns, ornamentals, home perimeter/foundation, listed edibles/listed vegetables (in vegetable gardens), and flower beds/gardens When to use/Apply: Apply at first signs of insect damage or activity [insert people and pets statement] Questions & Comments: (phone & computer icon) Call 1-800-225-2883 or visit our website at www.ortho.com
[Ortho] Guarantee	The ORTHO Guarantee: If for any reason you are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.
[UPC]	<i>UPC Placeholder</i>
[Standard Copy]	© 2015 The ORTHO Group. World rights reserved. Sold by The ORTHO Group PO Box 190, Marysville, OH

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	43040
[EPA Info]	EPA Reg. No. 239-XXXX EPA Est. XXX, XXX, XXX, XXX, XXX, XXX Superscript is first letter of lot number.
[Component Number]	<i>Component # Placeholder</i>
[Other]	(Recycle Symbol) Open Resealable Label For Directions and/ & Precautions (Spanish page XX)

GENERAL CLAIMS

1. Kills lawn [destroying] [invading] insects* [by/through contact] [after watering/irrigating [in]
2. Easy-to-use/apply [granules]
3. Ready-to-spread granules
4. Low odor [formula]
5. Apply at first sign(s) of insect damage or activity
6. Light and Easy to Apply
7. [SATISFACTION] [GUARANTEED][Kill] [OR YOUR MONEY BACK] [†]
8. Not harmful to/on lawn grasses/lawns
9. Helps protect your [house/home] from invading insects*
10. Protects your [lawn/backyard/garden/playground/outdoor living spaces] from insects* [so you
[and your kids/pets/dog] can enjoy your
[event/party/barbeque/birthday/party/playtime/home/yard]
11. Keeps bugs* from coming inside [the house]
12. Dual Action Formula: (1) Kills and (2) Controls
13. 2 in 1 Action/Formula: (1) Kills and (2) Controls
14. [Dual Action Formula] Starts Killing fast and lasts long
15. 2 in 1 Action/Formula: (1) Starts Killing fast and (2) lasts long
16. Protects lawns [all weekend long] from pests*
17. Creates a barrier to keep insects* from coming in through [your] neighbor's yard
18. Creates a barrier to keep /insects* out of your yard/lawn/home/property
19. Water/Rain [or Rain] activated
20. Activated by water/watering/rain [or Rain]

Qualifier: * *Refer to booklet/back panel for [complete] insect lists

Note to PM: If qualifier is not used, then the word "listed" will be inserted before bugs/insects/pests

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EFFICACY CLAIMS

General Kills (*Listed Insects may be any combination of the insects in Table 1 and 2; if insect appears on Table 2 then Table 2 must be present on FPL*)

1. Kills all listed home invading Insects*
2. Kills home invading Insects*
3. Kills insects* by contact
4. Fast Acting [Formula] [against/kills] [any combination of insects*]
5. Starts [killing/to kill/working/to work on] insects* [immediately] ∞ ∞ after watering in/after irrigating
6. Starts [killing/to kill/working/to work on] insects* [immediately] ∞ ∞by/through contact
 - a. Kills insects* [immediately]∞ ∞ after watering in/ after irrigating)
 - b. Kills insects*[immediately]∞ ∞by/through contact
 - c. Starts to kill immediately ∞ ∞ after watering in /after irrigating
7. Kills outdoor pests* in lawns and around homes [and many other lawn insects*]
8. Kills [insects*] by contact
9. [Provides] Contact Kill
10. Kills lawn-damaging insects,* spiders, fleas and ticks.
11. For grub control, apply "Scotts GrubEX_[1] Season-long Grub Control"[insert product name] [anytime] from early April to August [spring to (late) summer].
12. Kills mole crickets
13. Kills (controls) European Crane Fly [Larvae]
14. Kills ticks that may transmit Lyme Disease
15. Kills [insert any combination of insects on label]and many other lawn insects* on label]
16. Kills all insects* [like...insert any combination of insects on label] [that commonly harm flowers/shrubs/listed edibles/listed fruits/listed vegetables/ornamentals/lawns]
17. Kills ants (except pharaoh and carpenter) [and] spiders [and many other insects*]
18. Kills [lawn-damaging] [invading] insects* that cause your lawn to thin and turn brown
19. Kills chinch bugs, mole crickets, cutworms, billbugs, European crane fly larvae, [other lawn damaging/destroying insects*] [by/through contact]
20. Kills insects* [which destroy lawns/ flowers/ listed edibles] [and/or] [which] [annoy people/pets.]
21. Kills above and/& below [the] surface/ground
22. Kills Fleas that may transit Flea Allergy Dermatitis (FAD)/ Flea-Bite Anemia/ Tapeworms/ Haemobartonellosis [to cats/dogs]
23. Kills Fleas that may transit Bartonellosis [to cats/dogs/people]
24. Kills Fleas that may transit Mycoplasma [to cats]
25. Kills Ticks that may transmit Haemobartonellosis/ Anaplasma phagocytophilum [to cats/dogs]
26. Kills Ticks that may transmit Cytauxzoonosis/ Tularemia [to cats]
27. Kills Ticks that may transmit Anaplasma/ Babesiosis/ Ehrlichiosis/ Lyme borreliosis/ Rocky Mountain spotted fever/ Hemoplasmosis/ Mycoplasma [to dogs]
28. Kills ticks that may transmit [the] Powassin/POW disease/virus

Qualifier: * *Refer to booklet/back panel for [complete] insect lists

Note to PM: If qualifier is not used, then the word "listed" will be inserted before bugs/insects/pests

General Kills with mandatory Table 2 inclusion on FPL (*If any claim from the following list are used any where on a FPL then Table 2 must be present*)

1. Kills [1,2,3...100...120...125...139][over 100...125..130][100...139][up to 139] [+] insects*
2. Kills Insects* [Fleas & Ticks]
3. [Effective in killing] [Fast acting against] insects*, spiders, fleas, and ticks

Qualifier: * *Refer to booklet/back panel for [complete] insect lists

Italicized text is information for the reviewer and is not part of the label.

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

Note to PM: If qualifier is not used, then the word "listed" will be inserted before bugs/insects/pests

GENERAL

Kills and Control: (*Listed insects can be any combination of insects from Table 1 and Table 2*)

1. Kills/Controls* [insert any combination of insects][and many other lawn insects*]
2. Kills/Controls* [all] insects [like...insert any combination of insects] [that commonly harm flowers/shrubs/listed edibles/listed fruits/listed vegetables/ornamentals/lawns]
3. Protects/Controls* [against][damaging insects] [any combination of listed use sites]
4. Controls* ants (except pharaoh and carpenter) [any combination of ants from table 1 and table 2], (fire ants), chinch bugs, sod webworms (lawn moth), European crane fly [larvae], fleas, ticks (including ticks that may transmit Lyme Disease), mole crickets and many other lawn insects*
5. Controls* chinch bugs, sod webworms (lawn moth), fleas, ticks (including ticks that may transmit Lyme Disease), and other lawn pests
6. Kills/controls* insects [which destroy lawns/ flowers/ listed edibles] [and/or] [which] [annoy people/kids/pets.]
7. Kills/Controls insects* outdoors [outside] before they can come indoors [inside]
8. Kills/Controls outdoor insects* by contact so you and your family can enjoy your home
9. Kills/controls insects* on [insert any combination of listed use sites]
10. Kills/Controls insects * outdoors before they can come indoors/inside.
11. [Plus] Kills/controls [insert any combination of insects appearing on label].

*Qualifier: ** *Refer to booklet/back panel for [complete] insect lists

Note to PM: If qualifier is not used, then the word "listed" will be inserted before bugs/insects/pests

RESIDUAL:

(Listed Insects for 3 month claims can only refer to those listed in Table 1) (Insects Killed/Controlled for 3 Months)

1. Provides Long Lasting Control [on 105 insects]**
2. Provides 3 Month Control/ Creates a 3 Month Bug Barrier [on 105 insects]**
3. Starts [working/killing][quick/fast] [and creates a 3 month bug barrier/provides 3 month control/ lasts for 3 months] [for/on 105 insects]**
4. [One (1) application/apply once] [for] [provides] 3 month control [on 105 insects] **
5. Three (3) month control on/for [a wide variety of insects 105 insects] **
6. One (1) application kills/controls 105 insects for [up to] 3 months**
7. [Long lasting!] [up to] 3 month control [on 105 insects] ** [Guaranteed†]
8. Kills and/& controls/protects [105 insects] for [up to] 3 months**
9. [Kills and/&] / Keeps [on] killing [105 insects] for [up to] 3 months**
10. Keeps [on] killing [105] for [up to] 3 months**
11. [Up to] 3 month control [on 105 insects]/ [on a [many types of insects]] **
12. Creates/Provides a 3 Month Bug Barrier [against/on 105 insects]**
13. One application keeps killing lawn bugs for 3 months**
14. One application keeps [105] bugs away/out [for up to 3 months**][guaranteed†]!
15. Keeps [105] bugs out for up to 3 months**
16. Provides a protective barrier to keep bugs away 3 months**
17. Creates a barrier that [will kill] [kills] the bugs you have and control(s) new bugs from coming [in] [inside your home]**
18. Kills/controls/repels and/& prevents [105 insects] for [up to] 3 months**
19. Create(s) a long-lasting [bug] [barrier/perimeter/border/residual treatment] for/on insects**
20. Starts to kill/killing/working within/in minutes/quick/fast [and creates a 3 month bug barrier/ provides 3 month control/and lasts for 3 months] **
21. Provides residual control for [up to] 3 months [outdoors] **
22. Kills/controls [insects] [outdoors] for [up to] 3 months**

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

23. [One application] [Up to] three/3 month control/protection [outdoors] **
24. Kills [Controls] [Protects] [for] up to 3 months [outdoors] **
25. Guards/Defends/Shields/Safeguards/Protects flowers from bugs for [up to] 3 months**
26. Guards/Defends/Shields/Safeguards/Protects gardens and landscapes from bugs for [up to] 3 months**

Qualifier: ** ** Refer to booklet/back panel for the Insects Killed/Controlled for 3 Months

SPEED CLAIMS

1. Starts Creating A Bug Barrier In Minutes
2. Fast Acting, [Long Lasting] [Insect Control]

Qualifier: * *Refer to booklet/back panel for [complete] insect lists

USAGE CLAIMS

1. [For] [Use on] lawns, ornamentals, home perimeter/foundation, listed edibles/listed vegetables (in vegetable gardens), and flower beds/gardens
2. [For] [Use on] residential lawns, home perimeters, ornamental & flower gardens, and listed edibles/listed vegetables (in vegetable gardens)
3. Use on lawns, [listed edibles/listed vegetables][vegetable gardens] [&] [as a barrier (perimeter) treatment around home foundations]
4. Can be used on listed edibles/listed vegetables
5. Kills [nuisance] insects* around home foundations
6. Use around [outside of homes] [porches and/& patios] [home foundation]
7. Use as an outdoor perimeter treatment
8. For residential lawn use only
9. Formulated for lawns
10. (outdoor) (perimeter) granules
11. [Formulated for] Outdoor[use] [formula]
12. Home perimeter granules
13. Creates an exterior [home perimeter] bug barrier for/on insects*
14. Create an exterior [home perimeter] bug [perimeter/border/residual treatment] for insects*
15. Creates a protective perimeter/barrier/border/residual treatment that keeps listed insects* from coming in the house
16. Formulated for [use on] Vegetables/Edibles/[Edible plants]
17. Can be used [use in/on/around] Vegetables/[&] Edibles/[&] Edible plants]
18. [Now with a] low dust/no dust formula
19. [Now provides] more even coverage [in lawns]!

Qualifier: * *Refer to booklet/back panel for [complete] insect lists

Note to PM: If qualifier is not used, then the word "listed" will be inserted before bugs/insects/pests

VALUE CLAIMS

1. X% more than X size!
2. Bonus Size
3. Combo Pack
4. Wow (Pack)
5. Exclusive to Club Stores!
6. Exclusive Club (Bonus) Size!
7. Value/Bonus Size – 2-pack!
8. Value size/pack
9. Great Value

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COVERAGE CLAIMS

- 1 A XX lb bag treats up to XXXX sq. ft.
- 2 A 10lb (20lb) bag treats up to 10,000 sq.ft. (20,000 sq. ft.)
- 3 Treats up to XXXX sq. ft. – [up to/over] XX% / X times/x more than XXX sq. ft. bags
- 4 Treats up to 10,000 sq.ft. — 100%/twice/2 times/2x/ more than 5,000 sq.ft. bags (for 10# bag)
- 5 Treats up to 20,000 sq.ft. — 100%/twice/2 times/2x/ more than 10,000 sq.ft. bags (for 20# bag)
- 6 X x more coverage* - *vs. standard XXXX sq. ft. bags
- 7 2X More Coverage* - *vs. Standard 5,000 sq. ft. bags. (10# bag)
- 8 2X More Coverage* - *vs. Standard 10,000 sq. ft. bags. (20# bag)
- 9 Treats (up to) 5,000 (10,000 / 20,000) square feet for insect control
- 10 For Large/Rural/Countryside Lawns
- 11 For Larger/Rural/Countryside Acreage
- 12 Ideally Suited for Larger/Rural/Countryside Lawns
- 13 Home & Ranch [Value] Size
- 14 Treats/Covers up to 1/2 Acre (or other coverage dependent on package size)
- 15 Contains Bifenthrin

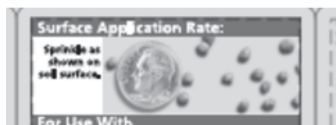
[illustrations]Outdoor Perimeter Insect Killer only *[illustrations will be accompanied by approved claim]* See representation below

1. 1 Bottle/bag = 2 Homes [Illustration] to exemplify the claim “Treats the average 2,000 sq. ft. 2 story home over 2 times!
2. 1 Bottle/bag = 3 Homes [Illustration] to exemplify the claim “Treats the average 1,800 sq ft. home up to 3 times”
3. Calendar depicting 3 months to exemplify the claims “3 Month Control of Home Invading Listed Insects”
4. Image of granules in relation to a quarter which will depict the proper application rate for consumers

[Outdoor Perimeter Insect Killer specific]

1. Treats the average 2,000 sq ft 2-story home over 2 times! (Applies to 2.5lb size)
2. Treats the average X sq ft X-story home over X times!
3. Treats the average 1,800 sq ft home up to 3 times

(representations only)



Note – graphic
lb per 1000 sq

Note to PM- Illustrations are an example, not to scale.



applied at a rate of 1
ft.

[Use the diagram above as a guide for uniform distribution of granules. Apply evenly, as shown.]