



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

September 29, 2025

Chris Zemanek
Regulatory Principal, Regulatory Affairs
The Scotts Miracle-Gro Company
Marysville, OH 43040

Subject: Label Amendment - Registration Review Mitigation for Bifenthrin
Product Name: Ortho Lawn Insect Control
EPA Registration Number: 239-2726
Application Date: February 17, 2021
Case Number: 478038

Dear Chris Zemanek:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Bifenthrin Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

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.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. 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 12 months from the date of this letter. After 12 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.

If you have any questions about this letter, please contact Andrew Muench by phone at 202-566-2355, or via email at muench.andrew@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Cathryn Britton". The signature is fluid and cursive, with the first name "Cathryn" and last name "Britton" clearly distinguishable.

Cathryn Britton
Chief, Risk Management and Implementation
Branch V
Pesticide Re-evaluation Division (7508M)
Office of Pesticide Programs

ENCLOSURE: Stamped label

NOTE:

EPA Reg. No. 239-2726

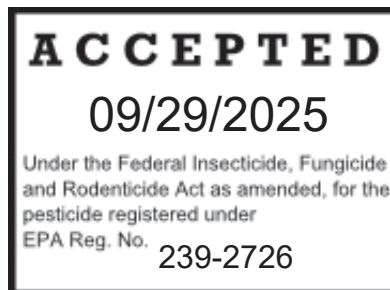
Italicized text is information for the reviewer and is not part of the label.

[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: xxxx lbs. / xxxxx kg

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

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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-(877)-465-5161 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-(877)-465-5161.	

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.

- For soil or foliar applications, do not apply by ground within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries and commercial fish farm ponds.
- Do not apply the product into fish pools, ponds, streams, or lakes. Do not apply directly to sewers or to storm drains, or to any area like a drain or 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.
- Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios.
- Do not apply or irrigate to the point of runoff.
- Do not make applications during rain.

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Do not allow to enter indoor or outdoor drains. No permita la entrada a desagües internos o externos. Follow proper disposal procedures on this label. Siga las indicaciones del etiquetado para el desecho apropiado del producto.

Apply this product directly to the lawn or garden area.

Water treated area as directed on this label.

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 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	Crazy	Red Harvester
	Allegheny Mound	Ghost	Small Honey
	Argentine	Fire Ant Foragers	Sugar
	Big Headed	Little Black	Thief
	Black Turf	Odorous	White Footed
	Citronella	Pavement	
	Cornfield	Pyramid	
Armyworms	Fall	Lawn	
Beetles & Larvae	Billbugs (Bluegrass & Hunting)	Lady Beetles (Asian, Convergent, Seven-Spotted, Thirteen-Spotted & Twice-Stabbed)	
	Black Turfgrass Ataenius	Weevils (Annual Bluegrass)	
	Dichondra Flea		
	Ground		
Bristletails			
Caterpillars	Cutworms (Black, Bronzed, Granulate, & Variegated)	Fiery Skipper	Webworms (Sod & Tropical Sod)
		Striped Grassworm	
Chinch Bugs			

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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		
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	Deer
***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			
Grubs*			
Leafrollers	Omnivorous		
Mites			
Whiteflies			
Mole Crickets (nymphs)			

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Plant Bugs	
Scale	
Springtails	
Thrips	
Weevils	Annual Bluegrass (larvae) Black Vine (larvae) Root (larvae)
[For lawn grub control, apply [Scotts GrubEx _[1] Season-long Grub Control/product name]l [anytime] from early April to August [spring to (late) summer].]	

*in [home][vegetable] gardens

WHERE TO APPLY/USE

Lawns

/ Around Home Foundations [Perimeter Treatment] [Outdoor perimeter]

/ Ornamental [and] Flower Gardens

/ Vegetable Gardens

WHEN TO APPLY/USE

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

- [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.
- 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

- 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

- 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.

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Home Foundation

- 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, mustard greens, eggplant, head lettuce, peppers (bell and non-bell)	7

Note to PM: Spreader Models and Settings 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.]		
	Pounds of product per 1000 SQ FT 1 lb 2 lb 4 lb		
Scotts® AccuGreen® Drop Spreader / Applicator Name	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® / Applicator Name	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.]

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[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!]



[]: Connect/Snap/Place into Spreader



[]: Lock/Flip lever to lock in place



[]: Apply/Go/You're ready to go
[EdgeGuard/Feature/Control]



[]: [[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 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.

Step 2. Remove seal from bottle.

Step 3. Replace cap by rotating clockwise until tight.

Step 4. Flip open spout.

Step 5. While holding bottle parallel to ground shake in a side to side motion to dispense product. [See illustration below for correct application]. ***NOTE to PM: See page 13 for image***

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.

[Step 2.] [Remove seal.]

Step 3. Tilt spout toward the ground and gently disperse the product. [See illustration for correct application].

NOTE to PM: See page 13 for image

Step 4. For storage, replace cap by rotating clockwise until tight.

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OPTIONAL RE-ENTRY STATEMENTS



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

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 [or] [visit] [our website at][www.]ortho.com



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-3^l, 58996-MO-1^A, 84064-IA-1^P, 85652-OH-1^w, 239-MS-001^M

[Superscript is first letter of lot number.]

[Batch/Lot Code]

Note To PM – Batch/Lot code maybe printed directly on the packaging and not on the product label.

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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]	Ortho
[Sub-Brand]	Bug B Gon Insect Killer for Lawns (or alternate brand name)
	Guaranteed kill or your money back
[Claims]	Kills 139 insects Kills by Contact Treats up to 10,000 [20,000] [25,000] [100030000] sq. ft [insert approved claim(s) from master label]
	Product Facts: What it Does: Kills 139 insects including ants, fleas, ticks, grubs, 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 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]	UPC Placeholder
[Standard Copy]	© 20XX The ORTHO Group. World rights reserved. Sold by The ORTHO Group PO Box 190, Marysville, OH 43040
[EPA Info]	EPA Reg. No. 239-2726 EPA Est. No. XXX, XXX, XXX, XXX, XXX, XXX [Superscript is first letter of lot number.]
[Component Number]	Component # Placeholder
[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

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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*

*** Start to kill after watering in and provides 3 month control **OR** Starts to kill in minutes and provides 3 month control

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 (except black widows), fleas and ticks.
11. For lawn 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(except black widows) [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]

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.

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*

** Starts to kill immediately after watering in **OR** Starts to kill in minutes

General Kills with mandatory Table 2 inclusion on FPL (If any claim from the following list are used anywhere 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 [1,2,3...100...120...125...139][over 100...125..130][100...139][up to 139] [+] insects* including [insert any combination of insects]
3. Kills Insects* [Fleas & Ticks]
4. [Effective in killing] [Fast acting** against] insects*, spiders (except black widows), fleas, ticks and grubs
5. Kills Surface & Sub-Surface Insects*
6. Kills grubs & mole crickets
7. Kills Grubs

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*

** Starts to kill immediately after watering in **OR** Starts to kill in minutes

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].
12. [Now] kills/controls grubs

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] **

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

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**]
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**
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]
3. Fast Acting, Long Lasting [Insect Control]***

* Starts to kill immediately after watering in **OR** Starts to kill in minutes

** 3 month control

*** Start to kill after watering in and provides 3 month control **OR** Starts to kill in minutes and provides 3 month control

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] [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]!

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

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

COVERAGE CLAIMS

- 1 A 1.....30 lb bag treats up to 1000.....30,000 sq. ft.
- 2 A 10lb (20lb) bag treats up to 10,000 sq.ft. (20,000 sq. ft.)
- 3 Treats up to 10,000 sq.ft. — 100%/twice/2 times/2x/ more than 5,000 sq.ft. bags (for 10# bag)
- 4 Treats up to 20,000 sq.ft. — 100%/twice/2 times/2x/ more than 10,000 sq.ft. bags (for 20# bag)
- 5 2X More Coverage* - *vs. Standard 5,000 sq. ft. bags. (10# bag)
- 6 2X More Coverage* - *vs. Standard 10,000 sq. ft. bags. (20# bag)
- 7 Treats (up to) 5,000 (10,000 / 20,000) square feet for insect control
- 8 For Large/Rural/Countryside Lawns
- 9 For Larger/Rural/Countryside Acreage
- 10 Ideally Suited for Larger/Rural/Countryside Lawns
- 11 Home & Ranch [Value] Size
- 12 Treats/Covers up to 1/2 Acre (or other coverage dependent on package size)
- 13 Treats up to 1000....30,000 sq. ft.

Amount of Product (Rate of Active ingredient is 0.2 lb. per acre)	Treats xx sq. ft
0.004 lb	1 sq. ft.
4 lb	1000 sq. ft.
Amount of Product (Rate of Active ingredient is 0.1 lb. per acre)	Treats xx sq. ft
0.002 lb	1 sq. ft.
2 lb	1000 sq. ft.
Amount of Product (Rate of Active ingredient is 0.05 lb. per acre)	Treats xx sq. ft
0.001 lb	1 sq. ft.
1 lb	1000 sq. ft.

[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 1,800 sq ft home up to 3 times

(representations only)

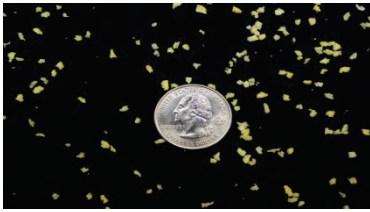


NOTE:

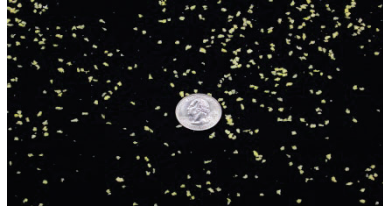
EPA Reg. No. 239-2726

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*Note – graphic
ft.*



applied at a rate of 1 lb per 1000 sq

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

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

Value Claims:

1. [Great] Value
2. Value/Combo/Wow Pack
3. X pack
4. Same formula, better value!
5. X% more [Free]!
6. Home & Ranch [Value] Size
7. [Over] X% more than X oz./lb. size
8. Bonus/Value Size
9. Exclusive to Club Stores!
10. Exclusive Club [Bonus] Size!
11. Value/Bonus Size – 2-pack!
12. Value/Bonus Size – X pounds!
13. Value/Bonus Size – 2-pack = X pounds!
14. Value/Bonus Size – X-pack/ X pounds!
15. Value/Bonus Size – X-pack = X pounds!
16. 33% more than X pounds/ oz. size
17. 10% more bonus size
18. Look inside [label] for special offer information!
19. Go to www.orthohomedefense.com now for a special offer! Offer subject to change or expiration.
20. New Look, Same Great Results
21. New Look, Same [Fast Acting*] [Long Lasting**] Results
22. New Look, Same[Fast Acting, Long Lasting Results***]

* Starts to kill immediately after watering in **OR** Starts to kill in minutes

** 3 month control

*** Start to kill after watering in and provides 3 month control **OR** Starts to kill in minutes and provides 3 month control

Other

1. For Large/Rural/Countryside Lawns
2. For Larger/Rural/Countryside Acreage
3. Ideally Suited for Larger/Rural/Countryside Lawns
4. Ideally Suited for Larger/Rural/Countryside Lawns
5. Home & Ranch [Value] Size
6. Treats/Covers up to 1/2 Acre (or other coverage dependent on package size)
7. Contains Bifenthrin
8. Easy to Use
9. [icon] People and pets may re-enter treated areas after spray has dried
10. XX% less plastic*
11. [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.
12. Proven performance
13. Read Entire label before use
14. [Recyclable symbol]
15. Before [illustration] / After [illustration]

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

16. [For] Outdoor Residential use only
17. Intended for residential use
18. Peel Open for use directions and further information
19. OPEN
20. Resealable Label for Directions & Precautions
21. Peel Open for use directions and further information
22. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
23. PEEL HERE / PRESS TO RESEAL
24. PULL / PEEL HERE [TO REMOVE TAPE]
25. Product of –and/or- Made in U.S.A.
26. Assembled in the USA
27. ©20XX, licensed by [Company/Brand]. World rights reserved.
28. QUESTIONS OR COMMENTS - [phone icon][Call][company/brand phone number] [or][Visit our website]
[www.\[company/brand website\].com](http://www.[company/brand website].com) [computer icon]

*vs. previous bottle/container/packaging

Guarantees:

1. Guaranteed+++
2. [Company/Brand] Guarantee[d] +++
3. Guaranteed [results] +++
4. Guaranteed Kill [or your money back] +++
5. [Company/Brand] Satisfaction guaranteed[+++]
6. [Company/Brand] [Promise your] satisfaction guaranteed [or your money back]
 +++ [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.
 +++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.
 +++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.

Multiple Insects System Names/Headings:

NOTE TO PM: The following items will be used in conjunction with the Multiple Insect System text.

1. [3-Step] [location based/use area] System for Home Protection from insects*
2. [3-Step] Home/Insect* [location based/use area] Treatment/Control [Plan/Program/System]
3. [3-Step] Home/Insect* [location based/use area] Solution System/Set
4. [3-Step] Home/Insect* [location based/use area] System [for Protection]
5. [3-Step] Home/Insect* [location based/use area] Protection [Plan/Program/System]
6. 3-Step Home/Insect* [location based/use area] Control [Program/System]
7. Part of the [Ortho Home Defense/Brand name] [3-Step] [location based/use area] System for Home Protection from insects* [in 3 steps]
8. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect* [location based/use area] Treatment Plan/Program/System [in 3 steps]
9. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect* [location based/use area] Solution System/Set [in 3 steps]
10. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect* [location based/use area] System [for Protection] [in 3 steps]
11. Part of the [Ortho Home Defense/Brand name] [3-Step] Home/Insect* [location based/use area] Protection Plan/Program/System [in 3 steps]
12. Part of the [Ortho Home Defense/Brand name] 3-Step Home/Insect* [location based/use area] Control [Program/System] [in 3 steps]
13. [Ortho Home Defense/Brand name][3-Step] [location based/use area] System for [protection from] Insects* [in 3 steps]
14. [Ortho Home Defense/Brand name][3-Step] Home/Insect* [location based/use area] Treatment Plan/Program/System [in 3 steps]
15. [Ortho Home Defense/Brand name] [3-Step] Home/Insect* [location based/use area] [Solution] System/Set [in 3 steps]
16. [Ortho Home Defense/Brand name][3-Step] Home/Insect* [location based/use area] Protection Plan/Program/System [in 3 steps]

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

17. [Ortho Home Defense/Brand name] 3-Step Home/Insect* [location based/use area] Control [Program/System] [in 3 steps]
18. [Location based/use area] Home Insect* Control [system] [in 3 steps]
19. Zones of protection from Insects* [in 3 steps]
20. Treat these/this area[s]/location[s] [Inside/Indoors],[Perimeter],[and][Outdoors/Outside/Lawn] for [control of/protection from] Insects*
21. Location based Insect* treatment/control/protection [program/system/plan] [in 3 steps]
22. For best results use a system to treat/control insects*
23. For best results to control insects* use the entire/full [treatment/solution/protection] system/plan/program
24. For best control of insect* use the entire/full [treatment/solution/protection] system/plan/program
25. For best control of insects* use the full [treatment/solution/protection] system/plan/program
26. For best results to control insects* use the full [treatment/solution/protection] system/plan/program
27. For best results, use the full [treatment/solution/protection] system/plan/program to control insects*
28. For best results, more than one product may/might/could be needed for insect/bug control
29. [Part of a] Insect* Treatment/Control System/Program/plan [in 3 steps]
30. Use as a system for control of Insects*
31. Insect* Control in 3 Steps
32. Step 3
33. Ortho Home Defense Home Protection
34. Targeted Insect* [location based/use area] Treatment/Control Program/Plan/System [in 3 steps]
35. Insect* [location based/use area] Protection Program/Plan/System [in 3 steps]

*Refer to booklet/back panel for complete list of insects/bugs/pests

(NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests")

Additional System Claims

1. Part of a system for Home Protection from insects**
2. [Part of] [Ortho] [Home Defense] Insect** system for Home Protection
3. [Ortho] Home Defense [provides][products for] zones/areas of home protection[:] inside/indoors/in your home/in the home/inside your home/home perimeter/ around the home/around your home, and outdoors/outside/the lawn/your lawn/lawn
4. Extend your bug** barrier further with [Ortho] [Home Defense] [treatment/control] system/program/plan for Home Protection
5. [Let] [Ortho] Home Defense [system for Home Protection] [guard(s)/protect(s)] your home from insects**
6. Part of a home defense system/program/plan from insects**
7. [System/Program/Plan for] Insect** Home Protection [in 3 steps]
8. [Part of the] [Home Defense/Brand name] Protection Program

**Refer to booklet/back panel for complete list of insects/bugs/pests

(NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests")

Multiple Bug System Language

Note to PM: This products main intent is to emphasize or indicate the product is for "Lawn/Outdoors/Outside".

Note to PM: This product is not intended for use in Step 1, nor is it labeled for indoor use. This product will always be noted as Step 3 in the system language

Note to PM: System will use a system name from "Multiple Insects System Names/Headings". This name will appear in the vicinity of the following text.

[Treat [your home] for many of the most common [crawling] insects** with a system that protects in all areas of your home/space.]

OR

[Treat [your home] for many of the most common [crawling] insects** with a system that protects in all areas in and around your home/space.]

OR

[Treat [your home] for many of the most common [crawling] insects** with a system that protects in all areas where your family spends time/lives each day.]

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.

****Refer to booklet/back panel for complete list of insects/bugs/pests**

(NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests")

Note to PM: Below are the system step call outs. On the FPL, the system step will be emphasized if all of the system steps below appear on the label. The FPL could also display just the step(s) applying to the product and the corresponding text.

Note to PM: Representative icons appear at the end of this section.

[Step][1-][Kill/Control/Treat:] Indoors/Inside [icon]^a

[Step][2-][Kill/Control/Treat:] Perimeter [icon]^b

[Step][3-][Kill/Control/Treat:] Lawn/Outdoors/Outside [icon]^c

^c [Step 3/Kill/Control/Treat:] Lawn/Outdoors/Outside [icon]: Extend your protection by killing bugs** in your yard/lawn/grass where your family[‡]/kids & pets[‡]/loved ones[‡] plays/play/spend time. OR Kill the [crawling] bugs** in your yard/lawn [where your children play] before they [even] start a/to journey [into your home]. OR Kill and control the [crawling] bugs** in your lawn/yard before they begin their/to journey [in/into your home]. [Use/Look for Ortho [Home Defense] products marked for Lawn/Outdoors/Outside.]

[‡]Always read and follow label directions

[Use other Ortho/System Products To:][Visit Ortho.com for more system/treatment/plan/program details]

^a[Step 1/Kill/Control/Treat] Indoors/Inside [icon]: See a bug** [inside]? Spray it to kill it. OR [Crawling] bug**/bugs** make its/their way in [to your home]? Spray it/them to kill it/them. OR See a straggler/lone bug**/bug**/survivor that made its way in/into [your home]? Spray it to kill it. [Use/Look for Ortho [Home Defense] products marked for Indoors/Inside.]

^b [Step 2/Kill/Control/Treat:] Perimeter [icon]: Create a barrier of [bug**] protection [around your home]. OR Create a barrier of protection around your home to keep [crawling] bugs** out of [your home / where your family spends time]. OR Create a [bug**] barrier of protection around [the perimeter of] your home. [Use/Look for Ortho [Home Defense] products marked for Perimeter.]

****Refer to booklet/back panel for complete list of insects/bugs/pests**

(NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests")

NOTE to PM: Below are representative icons arranged Step 1 to 3 from left to right.

