

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

March 24, 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: BED BUG & INSECT INDOOR RTU

EPA Registration Number: 239-2746 Application Date: February 17, 2021

Decision Number: 571036 Case Number: 477397

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

Page 2 of 2 EPA Reg. No. 239-2746 Decision No. 571036

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 Meaghan Caruso by phone at 202-566-0169, or via email at caruso.meaghan@epa.gov.

Sincerely,

Cathryn Britton

Cathuy Sutter

Chief, Risk Management and Implementation

Branch V

Pesticide Re-evaluation Division (7508M)

Office of Pesticide Programs

ENCLOSURE: Stamped label

BED BUG & INSECT INDOOR RTU

 $Sublabel\ A-STANDARD\ RTU\ SPRAYER$

Sublabel B - BOV PACKAGING

SUBLABEL A – STANDARD RTU SPRAYER

Alternate Brand Names:

- Ortho® Ant, Roach & Spider Killer2
- Ortho® Ant & Roach Killer2
- Ortho® Bed Bug & Flea Killer Ready to Use
- Ortho® Bed Bug & Flea Killer Refill
- Ortho® Bed Bug Killer for Indoor
- Ortho® Bed Bug Killer for Indoor Refill
- Ortho® Bed Bug Killer Ready To Use
- Ortho® Bed Bug Killer Refill
- Ortho® Home Defense® Ant, Roach & Spider Killer₄
- Ortho® Home Defense® Ant & Roach Killer3
- Ortho® Home Defense® Bed Bug, Flea & Tick Killer2
- Ortho® Home Defense® Bed Bug Killer Ready to Use
- Ortho® Home Defense® Bed Bug Killer Refill
- Ortho® Home Defense® Dual-Action Bed Bug Killer2
- Ortho® Home Defense® Dual-Action Bed Bug Killer2 Ready to Use
- Ortho® Home Defense® Dual-Action Bed Bug Killer Refill
- Ortho® Home Defense® Flea & Tick Killer
- Ortho® Home Defense® Max Bed Bug Killer
- Ortho® Home Defense® Max Bed Bug, Flea & Tick Killer
- Ortho® Home Defense Indoor Insect Killer
- Ortho® Home Defense Multi-Insect Killer

FOR INDOOR USE ONLY

ACTIVE INGREDIENT:

Bifenthrin*	0.250%
Imidacloprid	0.050%
Piperonyl Butoxide	0.450%
OTHER INGREDIENTS:	99.250%
TOTAL	100.000%

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

KEEP OUT OF REACH OF CHILDREN CAUTION

See back/panel/booklet for additional first aid and precautionary statements

Manufactured By / Distributed By / Sold By: The Ortho Group P.O. Box 190 Marysville, OH 43040 EPA Reg. No. 239-2746 EPA Est. No. XXXX [Superscript is first letter of lot number]

NET CONTENTS: x fl oz. / gal. (X ml / X L)

ACCEPTED

03/24/2025

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under

EPA Reg. No. 239-2746

1000409685_902_000_0300acf prddi5 MMCLAIN1 2021-02-16T08:00:29 1.000

239-2746.20210218.Amendment Page 1 of 45

Master label formatted according to EPA Smart label style guide - items on the first page does not

mean they will appear on front panel

FIRST AID

If swallowed Call poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by the poison control center or doctor.

Do not give anything by mouth to an unconscious person.

[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

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION. Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

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.

USE RESTRICTIONS

- Do not apply to bed linens or surfaces that will be in direct contact with occupants of the bed.
- Do not apply to stuffed animals or toys.
- Do not apply as a broadcast surface spray.
- Not intended for commercial applications.
- Do not allow people or pets to re-enter the treated area until after spray has dried.
- Not for use on humans or animals.

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.

Note to reviewer: Below is Storage & Disposal For Non-Refillable containers

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep from freezing. To be stored in original container and placed in areas inaccessible to children.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling if available. If partly filled: Do not pour or dispose down-the-drain or sewer. Call your local solid waste agency for local disposal options.

Note to reviewer: Below is Storage & Disposal For Refillable Containers

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep from freezing. To be stored in original container and placed in areas inaccessible to children.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: [Applicator Name] can be reused with [Product Name refill bottle/container]. Follow instructions in the Reuse Directions when reusing [applicator name]]. If empty: Place in trash or offer for recycling if available. If partly filled: Do not pour or dispose down-the-drain or sewer. Call your local solid waste agency for local disposal options.

PRODUCT APPLICATION INSTRUCTIONS

NOTE TO PM: For all Options below Graphics illustrating a step or group of steps may appear on final printed label NOTE TO PM: Spray Pattern Descriptor is any word used to describe the pattern such as flat, fan, coarse, or fine. Note to PM: Quotes around Directions are optional (i.e. "ON", "OFF")

Option 1 – Bottle attached trigger sprayer

[Conventional Trigger RTU] / [Applicator (Device) (Applicator Name) Directions/Instructions]

[HOW TO USE:]

239-2746.20210218.Amendment Page 2 of 45

Master label formatted according to EPA Smart label style guide - items on the first page does not

mean they will appear on front panel

[Spray]

- Turn sprayer nozzle to [desired spray pattern] [foam] [indoor setting] [for indoor use] [or] [fan] [perimeter setting] [On] [spray pattern descriptor].
- Squeeze trigger repeatedly [to spray.]

[Finish]

[Turn sprayer nozzle to "OFF" [X].]

Option 2- Hose attached trigger sprayer

[Conventional Trigger Large RTU] [QUICK CONNECT TRIGGER SPRAYER] / [APPLICATOR [APPLICATOR NAME] DIRECTIONS] / [Applicator (Device) (Applicator Name) Directions/Instructions]

[HOW TO USE:]

[Spray]

- Remove sprayer/Applicator Name from bottle/holster/holder [by sliding/pulling sprayer up].
- Unwrap/Uncoil hose and insert [[color] hose connector] into [color] spout/knob/opening/lid on [bottle] cap [until it clicks].
- Flip up [color] spout until fully upright / Twist spout/knob to "ON" / Pull spout up.
- Turn sprayer nozzle to [desired spray pattern] [foam] [indoor setting] [for indoor use] [or] [fan] [perimeter setting] [On] [spray pattern descriptor].
- Squeeze trigger repeatedly [to spray.]

[Finish]

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

Option 3 - Pull 'N Spray

[PULL 'N SPRAY] [APPLICATOR [APPLICATORY NAME] DIRECTIONS] / [Applicator (Device) (Applicator Name) Directions/Instructions]

[HOW TO USE:]

[Spray]

- Remove sprayer/Applicator Name from bottle/holster/holder [by sliding/pulling sprayer up].
- Unwrap/Uncoil hose and insert [[color] hose connector] into [color] spout/knob/opening/lid on bottle cap [until it clicks.]
- Flip up [color] spout until fully upright / Twist spout/knob to "ON" / Pull spout up.
- Turn sprayer nozzle to [desired spray pattern] [foam] [indoor setting] [for indoor use] [or] [fan] [perimeter setting] [On"] [spray pattern descriptor].
- Point sprayer away from body. Slowly pull ring at bottom of sprayer until it stops, and hold for two [2] seconds to fill sprayer.
- Press trigger to spray.

[Finish]

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

Option 4 – Battery Hose Attached Sprayer

[BATTERY POWERED WAND] [COMFORT WAND] [COMFORT SHOT WAND]/[APPLICATOR [APPLICATOR NAME] DIRECTIONS] [Applicator Name] [Applicator/Wand] Directions]

[HOW TO USE:]

[Prep [Wand]]

Remove sprayer/Applicator Name from bottle/holster/holder [by sliding/pulling sprayer up].

1000409685_902_000_0300acf prddi5 MMCLAIN1 2021-02-16T08:00:29 1.000

Master label formatted according to EPA Smart label style guide – items on the first page does not mean they will appear on front panel

- 2. [Remove [color] pull strip to activate batteries].
- 3. [Unfold / Flip Open [Applicator Name/applicator/wand] until it clicks/locks into position.]
- [Extend wand/applicator/nozzle [fully]]

[Connect]

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

[Spray]

- Turn sprayer nozzle to [desired spray pattern] [foam] [indoor setting] [for indoor use] [or] [fan] [perimeter setting] [On] [spray pattern descriptor].
- 2. [Slide [color] switch on trigger to "Unlock" [illustration]].
- 3. Press trigger to spray.

[Finish]

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

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

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

Option 5 – Pump Container with Applicator

[Pump 'n Go] [EZ Sprayer] [APPLICATOR [APPLICATOR NAME] DIRECTIONS] [Applicator (Device) (Applicator Name) Directions/Instructions]

[HOW TO USE:]

[CONNECT]

- 1. Carefully cut the two [color] zip ties securing hose and pump handle with scissors, using caution not to cut [color] hose.
- 2. Unwind hose and insert hose connector into [color] spout/cap/knob/opening on pump [until it clicks.]

[PREP [SPRAYER]]

- 1. Lift sprayer off bottle.
- 2. Push [color] button while pulling out on sprayer nozzle tip.
- 3. Fully extend sprayer until [color] button snaps into SPRAY position. NOTE: [color] trigger will not function until wand is fully extended and [color] button is visible in spray position.
- 4. Make sure handle is screwed on tightly, then pump container 10-20 [X-X] times to pressurize bottle. NOTE: A full bottle requires fewer pumps than an empty bottle and pumping to higher range will provide longer spray duration.
- 5. Push pump down and turn handle clockwise to lock into carrying position. NOTE: This bottle is designed to expand under pressure and cannot be over-pressurized.

[SPRAY]

- Aim sprayer.
- 2. Spray by pushing down [color] trigger with thumb.
- 3. Adjust spray pattern by rotating [color] nozzle tip up to one-half rotation

[FINISH]

- 1. Push [color] button and fold the sprayer until [color] button snaps back into original storage position.
- 2. Place sprayer back onto bottle with nozzle facing down.
- Push pump handle all the way down and turn pump handle and cap counter-clockwise to relieve pressure.
- Retighten prior to storing.

OR

[OTHER PUMP STYLE] [Quick Pump] [APPLICATOR (DEVICE) [APPLICATOR NAME] DIRECTIONS] ---- [Applicator (Device) (Applicator Name) Directions/Instructions]

[HOW TO USE:]

1000409685_902_000_0300acf prddi5 MMCLAIN1 2021-02-16T08:00:29 1.000

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

Highlighted Text is New. Strikethrough Text is deleted.

Master label formatted according to EPA Smart label style guide - items on the first page does not

mean they will appear on front panel

[PREP [SPRAYER]]

- Remove sprayer from holster and pull hose from storage compartment.
- Turn pump handle clockwise/counterclockwise to make sure pump is tight [and push pop-up pressure indicator completely down] before pumping.
- 3. Turn pump handle clockwise/counterclockwise to tighten, then slightly turn handle clockwise/counterclockwise to release handle for pumping.
- 4. [Pump sprayer] [until pressure indicator pops up about an inch signaling it is ready to spray.] Turn pump handle clockwise/counterclockwise [one-quarter turn] to secure handle for carrying.

[SPRAY]

- 1. Spray by pushing down lever on spray handle.
- 2. Rotate nozzle tip to adjust spray from stream to gentle mist.
- For continuous spray, push lever down and slide forward to lock. Pull back to release.

[FINISH]

- 1. Slowly turn pump handle clockwise/counterclockwise to untighten and release pressure [or turn pressure relief valve clockwise until it snaps; once pressure is released, continue to turn until closed.]
- Then turn back clockwise/counterclockwise to retighten handle.
- Push hose back into storage compartment and put sprayer back in holster [holder].

Option 6 - Squeeze

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

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

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

[Spray:]

- 1. To BEGIN spraying, invert the bottle and point/aim/direct [at the insect/or area of application]
- Squeeze the bottle [to initiate the flow of product.] 2.
- Spray only until the surface is wet. / Spray evenly

[Finish:]

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

Option 7 – Flairosil

[[Applicator Name] [Applicator] Directions]

[HOW TO USE:]

[Prep]

- [[Before first use] [prime the trigger by pumping/squeezing it] [several/a few] times]]
- [[Slide/press] [color] [switch/button] [on trigger] to "Unlock" [illustration]].

[Spray/Apply]

- 1. Squeeze/pump/pull/press trigger/button to release spray/mist
- 2. [Squeeze/pump/pull/press trigger/button once to/for a short spray/mist]
- [Squeeze/pump/pull/press trigger/button three/several times for a continuous spray/mist]
- 4. Spray [directly] onto/at insects/bugs or onto surfaces

[Finish]

[When empty purchase refill bottle & reuse [trigger] sprayer]

Master label formatted according to EPA Smart label style guide - items on the first page does not

mean they will appear on front panel

Option 8 – Integrated Wand

[BATTERY POWERED WAND] [COMFORT/ERGO WAND] [COMFORT/ERGO SHOT WAND]/[APPLICATOR [APPLICATOR NAME] DIRECTIONS]

[HOW TO USE:]

[Prep [Wand]]

- [Unsnap/Unsecure/Unlock wand/applicator and Extend wand/applicator [upward/fully][until it clicks into place]
- [Remove [color] pull strip to activate batteries].

[Spray]

- 1. Turn sprayer nozzle to [desired spray pattern] [foam] [indoor setting] [for indoor use] [or] [fan] [perimeter setting] ["On"] [spray pattern descriptor].
- [Slide [color] switch on trigger to "Unlock" [illustration]]. 2.
- Press trigger to spray. 3

[Finish]

- [Turn nozzle to "OFF" [X]]. 1.
- 2. [Slide [color] switch on trigger to "Lock" [illustration]].
- Fold [Applicator Name/wand/applicator] closed

Important Use Information: When storing sprayer for long periods, remove batteries.

[To replace/change batteries: Remove sprayer head/applicator from bottle by rotating clockwise/counterclockwise to access battery compartment. See marked diagram inside battery compartment.]

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

Troubleshooting Tips:

Problem: Sprayer does not spray [function].

Possible Cause: Batteries not installed properly.

Solution: See instructions for correct battery placement.

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

Possible Cause: Sprayer nozzle is turned Off.

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

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

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

Possible Cause: Sprayer is not primed.

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

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

Possible Cause: Weak batteries.

Solution: Install fresh set of batteries.

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

Solution: Insert [color] hose connector into [color] spout/knob/opening on bottle cap until it clicks. [Attach coupler to the cap] and flip up

spout until fully upright.

Possible Cause: Sprayer nozzle not fully open.

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

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

Refill Options

Note to PM: All of the applicator options can have a refill. Options below are selected by refill strategy.

Option 1 – Applicator Reuse

Master label formatted according to EPA Smart label style guide – items on the first page does not

mean they will appear on front panel

REFILL/REUSE DIRECTIONS

How to attach [applicator name] [wand] to [Bed Bug & Insect Indoor RTU] Refill/Recharge/Renew/Fill-Up/Reload] [Product name] [refill bottle/container]:

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



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

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

Adding [[color] hose]/[Comfort Wand]/[Applicator Name] to [Bed Bug & Insect Indoor RTU] Refill/Recharge/Renew/Fill-Up/Reload][Product name]:



[Attach the sprayer holster [holder] to [Bed Bug & Insect Indoor RTU] Refill/Recharge/Renew/Fill-Up/Reload] [Product name][refill bottle/container] by sliding the holster [holder] down onto the knob.]

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

Option 2 - Integrated Wand Applicator Reuse

REFILL/REUSE DIRECTIONS / How to Reuse/Refill

How to attach [applicator name] [integrated wand] to [Bed Bug & Insect Indoor RTU] Refill/Recharge/Renew/Fill-Up/Reload] [Product name] [refill bottle/container]:

Remove sprayer head/applicator from botte by rotating clockwise/counterclockwise and remove from empty bottle. Remove cap/lid from [Bed Bug & Insect Indoor RTU] Refill/Recharge/Renew/Fill-Up/Reload] [Product name] [refill bottle/container]. [Remove Seal.] Insert tube/straw into [Bed Bug & Insect Indoor RTU] Refill/Recharge/Renew/Fill-Up/Reload] [Product name] [refill bottle/container]. Secure the sprayer head/applicator from botte by rotating clockwise/counterclockwise

Option 3 – Refill by pouring in same RTU formula from Bottle

[HOW TO] REFILL

This container may be refilled with [product name]. To refill pour [Bed Bug & Insect Indoor RTU][product name] into container.

OR

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

<u>Option 4 – Refill by pouring same RTU formula from Liquaflex package</u> <u>Design 1</u>

- 1. Do not reuse or refill this pouch. Use this product to refill the empty [Product name] container
- 2. For best pouring experience place bag and refill bottle next to each other at waist height
- 3. Remove cap
- 4. Grasp neck of spout in one hand
- 5. Place other hand underneath the pouch in the triangular cleft for support, directly opposite of the pour spout
- 6. Carefully bend spout until it rests on the lip of the target refill bottle
- 7. Slowly lift the hand supporting the base of the pouch and fill bottle to desired level
- 8. [Optional illustrations may be used in conjunction with the above steps]

Design 2

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

Highlighted Text is New. Strikethrough Text is deleted.

Master label formatted according to EPA Smart label style guide – items on the first page does not mean they will appear on front panel

- 1. Do not reuse or refill this pouch. Use this product to refill the empty [Product name] container
- 2. For best pouring experience place bag and refill bottle next to each other at waist height
- 3. Remove cap
- 4. Grasp handle with dominant hand
- 5. Place the other hand on the front side of the bag for stability
- 6. Carefully pour liquid into target container
- 7. [Optional illustrations may be used in conjunction with the above steps]

Option 5 – Refill by pouring same RTU formula into Pump Container with Applicator

How to refill [Quick Pump] [Pump 'N Go] [Applicator Name]:[using/with]:

[1.33 Gallon Ready-To-Use Refill]/ [Bed Bug & Insect Indoor RTU] Refill/Recharge/Renew/Fill-Up/Reload] [Product name] [refill bottle/container]:

- 1. Remove pump handle on Quick Pump/Pump N Go/Applicator Name by twisting it counterclockwise.
- Remove cap from [Bed Bug & Insect Indoor RTU] Refill/Recharge/Renew/Fill-Up/Reload][product name] / [refill bottle/container].
- 3. Pour product carefully and directly into [Quick Pump/Pump 'N Go/Applicator Name] container. Do Not fill above 2"/3"/4" from top of container. DO NOT add water.
- 4. Secure pump handle back on container by twisting it clockwise until tight.

METHODS OF USE AND GENERAL APPLICATION INSTRUCTIONS

[PRODUCT FACTS]

Kills

Note to PM: any or all of the following insects may appear on the product label

Bed Bugs (all life stages)	<u> </u>	ay appear on the product label	
Fleas	Cat	Dog	
Ticks			
Lice			
Ants	Argentine	Pavement	Red/Western Harvester
	Carpenter	Pharaoh/Sugar	
	Foraging Fire Ants	Pyramid	
Aphids	Apple	Greenbug	Rose
	Black Cherry	Pea	Rosy Apple
	Buckhorn	Pecan	Walnut
Bees			
Beetles	Billbugs	Japanese (Adults)	Sap
	Carpet	Lady Beetles (including Asian	
	Elm Leaf	Lady Beetle Eggs)	
	Flea	Pine Shoot	
Boxelder Bugs			
Bristletails			
Centipedes			
Cockroaches	American/Palmetto	Asian	German
	Bug/Waterbug	Oriental	
Crickets			
Earwigs			
Firebrats			
Flies	Biting Flies	European Crane (Adult)	House
Fungus Gnats			
Grasshoppers			
Hornets			
Leafhoppers			
Midges			
Millipedes			
Mites	Clover		
Mole Crickets			
Mosquitoes			

239-2746.20210218.Amendment Page 8 of 45

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.

Highlighted Text is New. Strikethrough Text is deleted.

Master label formatted according to EPA Smart label style guide – items on the first page does not mean they will appear on front panel

Moths	
Periodical Cicada	
Pillbugs & Rollie	
Pollies	
Scorpions	
Silverfish	
Sowbugs	
Spiders	Black Widow Hobo
	Brown Recluse Wolf
Springtails	
Stink Bugs	Brown Marmorated Kudzu
Stored Product Pests	
Thrips	
Termites	
Wasps	
Whiteflies	
Yellowjackets	
[Where to Apply/Use]	[Indoor Surfaces, Pantries, around baseboards, floorboards, headboards, walls, bed frame, mattress (tufts, seams, edges, and vent holes) and box spring and any other joint, behind pictures/wall hangings, along and underneath carpet edges, and other articles/furniture in the bedroom or sleeping area, floors/floor coverings (rugs, carpet, tile, vinyl & wood),luggage]
When to Apply/Use	When there is evidence of bed bug [or insect] activity.
	[For long-lasting control (except bed bugs).]
Before You	Cover or Remove Exposed Food (Including Pet Food)
Apply/Use	Cover All Food Processing Surfaces and Utensils
,	[Remove all items from pantry and clean pantry thoroughly]
	Shake Well
How To Apply/Use	To treat bed bugs and bed bug eggs: Spray bed bugs and their eggs. Treat for hidden bugs and eggs by applying as a spot treatment to cracks and crevices in the sleeping area in places such as baseboards, crown molding behind pictures/wall hangings, along and underneath carpet edges, and other articles/furniture in the bedroom or sleeping areas where bed bugs may be hidden. To locate hidden bed bugs, disassemble the bed frame and remove bedding. Do not apply product directly to bedding. Apply this product to the bed frame, mattress (tufts, seams, edges, and vent holes), box springs, and other joints where bed bugs are harboring. Do not saturate or treat the entire surface of the mattress or box spring. Allow the spray to dry before using the mattress and/or box spring. Do not apply to stuffed animals or toys.
	Continue to inspect treated areas and repeat applications every 2 weeks, while bed bugs and their eggs are present.
	For persistent bed bug activity, consult a pest management professional.
	When treating luggage: Remove the contents and spray bed bugs and their eggs. Also spray areas that may hide them by focusing on the corners, pockets, and seams. Allow luggage to dry before reuse.
	Image of typical Bed Bug Areas Application [Baseboards] [Bedrooms]

Page 9 of 45 239-2746.20210218.Amendment

Master label formatted according to EPA Smart label style guide – items on the first page does not

mean they will appear on front panel

Fleas and Ticks (Including ticks that may transmit Lyme Disease / Any tick disease approved on label)

Do not Spray Animals

Pet resting quarters may be treated with this product when animals are not present.

How to Apply: For best results, contact as many pests as possible. Spray around beds, furniture and pet's habitat. Spray pet sleeping quarters, bedding, floor and floor covering where pets are kept. Spot treat infested areas such as pet resting quarters and localized areas of floors/floor coverings (rugs, carpet, tile, vinyl & wood) where pests may be present. Old pet bedding should be removed and replaced with clean, fresh bedding after treatment of pet area. To control the source of flea infestation, pets inhabiting the treated premises should themselves be treated with a product registered for application to animals.

For Control of Indoor Insects (except bed bugs)

- [Set spray nozzle to indoor [sprayer icon] setting.]
- Hold sprayer 12 inches from surface being sprayed.
- Apply a 4-inch wide band along the surfaces being treated / Apply a 4-inch wide band along the interior of your home in areas where insects are a re-occurring problem.
- Spray cracks and crevices [and along shelves in pantries.]
- Spray until slightly wet without soaking.
- [For Pantries, replace non-infested items once spray has dried.]

Image of typical Indoor Application

[Pantry]

. [Kitchens]

[Bathrooms]

[Doors & Windows]

[Basements]

[Bedrooms]

[After You Apply/Use]

[reentry icon] Do not allow people and pets to re-enter treated area until after spray has dried.

- [Thoroughly wash all food processing surfaces and utensils with soap and water before reuse]
- [For long-lasting residual control of listed insects (not including bed bugs) leave spray undisturbed. The product will keep on killing for up to 12 months [*]] Note to PM: * goes to the 12 month claim section for qualifying statement which will appear here-options 1,2,3, or 4 or qualifier will continue the sentence.

WARRANTY/DISCLAIMER STATEMENT

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.

MARKETING/ADVERTISING CLAIMS

Note to PM: the term cockroach can be interchanged with any and all instances of roaches and vice versa.

Note to PM: the term insects can be interchanged with any and all instances of bugs, pests and vice versa.

Note to PM: the word "and" can be interchanged with "&" in all instances and vice versa.

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

The following two Product Facts formats are optional and the information may appear inside or outside of a box. Indoor Insect Killer Table/Non-Bed Bug Focused product

[Product Facts:]

Follow all use directions appearing elsewhere on this label

[What it Does:] Kills home invading insects [including ants, cockroaches, spiders, fleas, ticks, scorpions, beetles, earwigs, silverfish, centipedes, [and] millipedes]. (See inside for complete list)

[Where to Use:] Use [with confidence] indoors for spot and crack and crevice application in[[kitchens] [bathrooms], [doors & windows], [basements]), [garages], [doors & windows], [Bedroom], [Living room]] wherever insects are a re-occurring problem.

[When to use:] Use [anytime] as a preventative treatment or after [you see] evidence of insect activity for long-lasting control* Note to PM: * goes to the 12 month claim section for qualifying statement which will appear here-options 1,2,3, or 4

[icon] Do not allow people and pets to enter treated areas until spray has dried

1000409685_902_000_0300acf prddi5 MMCLAIN1 2021-02-16T08:00:29 1.000

Master label formatted according to EPA Smart label style guide - items on the first page does not mean they will appear on front panel

Questions & Comments: (phone & computer icon)

Call 1-800-225-2883 or visit our website at www.ortho.com

Bed Bug, Flea & Tick Focused Table

[PRODUCT FACTS:] Follow all use directions appearing elsewhere on this label.

[What It Does:] Kills bed bugs at all life stages (including eggs). [Also kills Fleas, Ticks] [and other listed insects]

[Where to Use:] Use [with confidence][indoors] as a spot and crack and crevice treatment [in bedrooms] [in closets] [along baseboards] where you see evidence of bed bugs, and around their preferred hiding places [:bed frames, mattress seams/tufts/folds, baseboards, and other cracks and crevices near sleeping areas]].

[When to Use:] Use when there is evidence of bed bug [or other insect] activity.

[icon] Do not allow people and pets to enter treated areas until spray has dried

Questions & Comments: [icon phone] [icon computer]

Call 1-800-225-2883 or visit our Website at www.ortho.com

General and Count Kill Claims

- 1. Kills Home invading Insects¹
- 2. Kills [1...84] Insects¹
- 3. Kills [the] bugs¹ you see & [the] [ones] bugs you don't [see]
- 4. Kills the toughest home invading bugs1
- 5. Kills [both] crawling & flying insects1
- 6. Kills [all] common household bugs1
- 7. Kills [1...80][plus/+] insects
- 8. Kills home invading insects/bugs¹
- 9. Kills by contact!
- 10. Apply/Spray every 2 weeks when Bed Bugs are present
- 11. Patrol/Inspect/Monitor/Examine [area/rooms] & Apply/Spray Every 2 weeks while bed bugs are present

1Refer 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")

Insect Kill List Claims

- 12. [Also] Kills [any combination of insects listed on master label][and many others2]
- 13. Kills: Bed Bugs, Fleas, Brown Dog Ticks, Ants (including fire, pharaoh, and harvester ants), Spiders (including brown recluse and black widow), Stink Bugs, Box Elder Bugs, Mites, Crickets, Earwigs, Millipedes, Moths, Asian Lady Beetles, and Silverfish
- 14. Kills insects²
- 15. Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish, Scorpions, Black Widow Spiders, and other insects2
- 16. Kills ants [and many other pests/insects²]!]
- 17. Kills ants [and] roaches [and many other pests/insects²]!]
- 18. Kills ants, roaches [and] spiders [and many other pests/insects²]!]
- 19. [Also] kills Fleas & Dust Mites
- 20. [Also] Kills Ticks (including ticks that may transmit Lyme Disease)
- 21. Bed bug & flea killer
- 22. Flea & Brown Dog Tick Killer
- 23. Kills Dust Mites
- 24. Kills Brown Dog Ticks & Fleas

Master label formatted according to EPA Smart label style guide - items on the first page does not

mean they will appear on front panel

25. Kills bed bugs, fleas, dust mites & brown dog ticks

2Refer 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")

Bed Bug Specific Kill Claims

- 26. Kills [even] the toughest bed bugs³
- 27. Kills hard to kill bed bugs³
- 28. Kills resistant bed bugs³
- 29. Formulated to kill [resistant3 /the toughest3/ hard to kill3] bed bugs
- 30. Bed bug killer
- 31. Kills bed bug eggs [before they hatch]
- 32. Prevents bed bug nymphs from hatching
- 33. Break(s) the bed bug life cycle⁴
- 34. Spray & Kill where Bed Bugs Hide*
- 35. Spray Where Bed Bugs Hide & Kill Them*
- 36. Kill Bed bugs where they hide*
- 37. Contact Bed Bugs Where they hide*
- 38. Spray & Kill Bed Bugs Where they Hide*
- 39. Spray Where Bed Bugs Hide*

³Pyrethroid-Resistant Bed Bugs

⁴Kills bed bugs at all life stages

*Kills by Contact

General Residual Control claims

- 40. Forms/Creates/Establishes a perimeter treatment⁵
- 41. Forms/Creates/Establishes a [bug/insect] barrier⁵
- 42. Create(s) a [bug] border/barrier/perimeter [treatment⁵]
- 43. Create [a] bug barrier[s] 5
- 44. Apply [as] a barrier⁵
- 45. Apply as a border in your home⁵
- 46. Apply as a perimeter/border/residual treatment⁵
- 47. Long lasting [bug] perimeter treatment/barrier/border⁵
- 48. Creates a barrier that will kill/kills the bugs you have and prevent[s] new bugs from coming in/ inside your home⁵
- 49. Guards against the bugs you can't/don't see⁵
- 50. Provides residual control against listed home invading insects⁵
- 51. Keeps [on] killing with residual action, even after you spray/ spray has dried⁵
- 52. Keeps on killing after spray has dried⁵
- 53. Kills and prevents [insects inside your home⁵]

5Excludes Bed Bugs. Refer to booklet/back panel for list of insects/bugs/pests

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

Other Insect Residual Claims

Note To PM: 12, 6, 5, 4, and 3 month claim sections will only use the qualifiers indicated at the bottom of their sections. Residual claims do not apply to bed bugs.

12-Month Claims

54. Up to 12 month control/protection⁶

Master label formatted according to EPA Smart label style guide - items on the first page does not mean they will appear on front panel

- - 55. Kills/Controls/Protects [for] up to 12 months⁶
 - 56. Kills [[home invading] bugs] all year6
 - 57. Kills indoor bugs all year⁶
 - 58. Creates a barrier that will kill bugs you have and control/prevent new bugs for up to 12 months⁶.
 - 59. Creates a perimeter/border/residual treatment that will kill bugs you have and control/prevent new bugs for up to 12 months^{6.}
 - 60. Protects⁶ your home in/with just 1 application a year[!]
 - 61. Year Long Protection/Defense⁶
 - 62. Season Long [Home] Protection/Defense⁶

Qualifier Option 1: ⁶ [applies to] [for] Ants, Roaches / Palmetto bug / Water bug, & Spiders indoors on non-porous surfaces Qualifier Option 2: 6 [applies to] [for] American Cockroach / palmetto bug / water bug, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider indoors on treated non porous surfaces within minutes of

Qualifier Option 3: 6 [applies to] [for] American Cockroach / palmetto bug / water bug, German cockroach, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider indoors on treated non porous surfaces after 2 hour continuous exposure.

Qualifier Option 4: 6 [applies to] [for] American Cockroach / palmetto bug / water bug, German cockroach, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider, centipedes indoors on treated non porous surfaces after 24 hour continuous exposure.

6-Month Claims

63. Kills bugs [indoors] for 6 months⁷

7Applies to [for] spiders (excluding black widow, brown recluse, hobo)

5-Month Claims

- 64. Keeps bugs away for up to 5 months 8
- 65. [One application provides] up to 5 month control 8
- 66. Provides up to 5 months protection 8
- 67. [One application] kills [bugs/insects] up to 5 months 8
- 68. [One application] kills ants, roaches [and spiders] for up to 5 months 8
- 69. Keeps ants, roaches [and spiders] away for up to 5 months8

8 Up to 5 month control on: Ants (including Western Harvester), Carpet Beetles, Crickets, Firebrats, Moths, Silverfish and Spiders on treated non-porous surfaces after 5 minutes continuous exposure to residues. 5 month control on German Cockroaches after 30 minutes continuous exposure to residues.

4-Month Claims

70. Kills bugs [indoors] for 4 months9

9 Applies to/for spiders (excluding black widow, brown recluse, hobo)

3-Month Claims

71. Kills bugs [indoors] for 3 months¹⁰

10 Applies to [for] spiders (excluding black widow, brown recluse), harvester ants, / crickets, grasshoppers

- 72. Keeps [bugs/insects] away for up to 3 months 11
- 73. [Provides] up to 3 month control of insects 11
- 74. Provides up to 3 months protection 11
- 75. [One application] kills ants, roaches [and spiders] for up to 3 months 11

- mean they will appear on front panel
 - 76. [One application] kills [bugs/insects] up to 3 months 11
 - 77. Keeps ants, roaches [and spiders] away [out] for up to 3 months 11
 - 78. [One application] kills roaches [and spiders] for up to 3 months 11
 - 79. Keeps ants, roaches [and spiders] away [out] for up to 3 months 11
- 11 Up to 3 month control on: Ants (including Western Harvester), Carpet Beetles, German Cockroaches, Crickets, Firebrats, Moths, Silverfish and Spiders on treated non-porous surfaces after 5 minutes continuous exposure to residues. 3 month control on German Cockroaches after 30 minutes continuous exposure to residues.

Other Insect Egg Killing Claims

- 80. Kills Asian Lady Beetles and their eggs
- 81. [Plus] kills insects and their eggs¹³
- 82. Kills insect eggs¹³
- 83. Prevents insect eggs from hatching!13
- 84. Up to 12 month control* plus kills insect eggs¹³
 - 13 Applies to [for] Asian Lady Beetles

Efficacy/Disease Related Claims

- 85. Kills Fleas that may transmit Flea Allergy Dermatitis (FAD)/ Flea-Bite Anemia/ Tapeworms/ Haemobartonellosis [to cats/dogs]
- 86. Kills Fleas that may transmit Bartonellosis [to cats/dogs/people]
- 87. Kills Fleas that may transmit Mycoplasma to cats
- 88. Kills roaches/cockroaches that may carry disease causing bacteria
- 89. Kills roaches/cockroaches that may carry [Salmonella typhimurium], [Entamoeba histolytica], [E. coli/ Escherichia Coli], [Staphylcoccous spp.], [Pseudomonas aeruginosa], [Klebsiella pneumoniae], [the poliomyelitis virus].
- 90. Kills roaches/cockroaches that may produce allergens
- 91. Kills roaches/cockroaches that may carry disease causing bacteria
- 92. Kills roaches/cockroaches that contribute to asthma [in children]
- 93. Kills roaches/cockroaches that may produce asthma-causing allergens [in children]
- 94. Kills roaches/cockroaches that may produce allergens that cause asthma [in children]
- 95. Kills roaches/cockroaches that are a leading contributor/cause of asthma [in/among children]
- 96. Kills Ticks that may transmit [the] Powassan/POW virus
- 97. Kills Ticks that may transmit Haemobartonellosis/ Anaplasma phagocytophilum [to cats/dogs]
- 98. Kills Ticks that may transmit Cytauxzoonosis/ Tularemia to cats
- 99. Kills Ticks that may transmit Anaplasma/ Babesiosis/ Ehrlichiosis/ Lyme borreliosis/ Rocky Mountain spotted fever/ Hemoplasmosis/ Mycoplasma [to dogs]
- 100. Kills Ticks that may transmit Lyme Disease

Formula claims

- 101. No Stains
- 102. Non-staining
- 103. Will Not Stain/Non-Staining on [Water-Safe Fabrics and Surfaces]
- 104. Does not stain [fabrics, floors, wood, surfaces]
- 105. Water-based/Non-staining Formula



- 106. Water based [formula] [
- 107. Unscented
- 108. [Convenient] Ready to Use
- 109. Synergized Formula

Master label formatted according to EPA Smart label style guide - items on the first page does not mean they will appear on front panel

- 110. No Mixing Necessary
- 111. Easy to Use
- 112. No odor/Odor Free
- 113. Fragrance-Free
- 114. [Leaves] no odor
- 115. No lingering [chemical] odor
- 116. [Virtually] odor free
- 117. Odorless
- 118. Dries clean/clear
- 119. No oily residue
- 120. No [sticky] mess
- 121. Dries fast/in minutes [for fast/quick re-entry]
- 122. No greasy residue [mess]
- 123. No need to wipe up
- 124. Leaves no residue [behind]
- 125. Indoor [Formula]

Area/Use Site Claims

- 126. [Formulated] For use on Mattresses (seams/tufts/folds) [Luggage] [[Wood]Furniture] [Headboards] [Beds] [and] [as a spot treatment on Carpet]
- 127. Luggage Spray
- 128. Use [with confidence] in [bathrooms], [family rooms], [attics], [garages], [basements], [closets], [storage areas], [kitchens] and [bedrooms] [to keep/kill listed bugs [from entering your home]](except bed bugs)
- 129. Ideal/great for large[r]* /small[er] jobs/areas/spaces/rooms
- 130. Use inside your home!
- 131. Use in [kitchens], [garages], [basements] [and] [attics] [to kill listed bugs/insects].
- 132. [Can be] Use[d] in [bathrooms], [kitchens], [family rooms], [pantries], [attics], [garages], [basements], [closets], [storage areas], and [bedrooms]
- 133. Use with confidence in [bathrooms], [kitchens], [family rooms], [pantries], [attics], [garages], [basements], [closets], [storage areas], and [bedrooms]
- 134. [Illustrations of kitchen, bathroom, home perimeter/foundation, garage, windows and doorways, basement, attic, porches and patios]
- 135. Designed to/for use in kitchens and pantries
- 136. Apply along [and behind/between] baseboards [and][appliances]
- 137. Apply beneath [and behind] sinks
- 138. Apply in other areas where listed insects [are often found/appear]

Dual Action/Mode of Action Claims

- 139. Dual/Two Modes of Action
- 140. Contains two different active ingredients
- 141. Two active ingredients in one product
- 142. Works two ways to kill [even resistant¹⁴ / the toughest¹⁴] bed bugs
- 143. Two active ingredients to kill [even resistant / the toughest¹⁴] bed bugs
- 144. [Kills two/2 ways] / [Dual Action]: 1) Kills listed insects [by contact] and 2) Keeps¹⁵ killing even after spray has dried
- 145. Dual-action
- 146. Works/Kills [in] 2 ways

^{*}Not for broadcast use

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

Highlighted Text is New. Strikethrough Text is deleted.

Master label formatted according to EPA Smart label style guide – items on the first page does not mean they will appear on front panel

- 147. Kills even the tough bed bugs¹⁴ by treating them in 2 ways
- 148. Kills the toughest bugs* with 2 ways to kill
- 149. More control¹⁵ in one bottle
- 150. Dual-Actives for Ensured Kill¹⁵
- 151. Two actives for two modes of kill
- 152. Two-Way/Dual Kill
- 153. Targets bed bugs in 2 ways
- 154. Targets bed bugs with 2 key ingredients
- 155. Targeted dual-action ingredients
- 156. Engineered to kill even the toughest bed bugs¹⁴
- 157. Formulated with tough bugs¹⁴ in mind
- 158. Two ways to actively kill
- 159. Double/Dual Defense
- 160. 1-2 Punch
- 161. Double Down Defense
- 162. Double/Dual Assurance
- 163. Two lines of defense for peace of mind
- 14 Pyrethroid-Resistant Bed Bugs
- 15 except bed bugs

Speed of Action Claims

- 164. Starts killing listed bugs¹⁶ in seconds
- 165. Starts killing bugs¹⁶ fast
- 166. Kills by contact [Guaranteed]

16 except bed bugs

General Applicator Claims

- 167. Consistent spray for maximum accuracy
- 168. Consistent/even coverage
- 169. You're /It's always ready to spray
- 170. The easy/easier way [to spray][to kill bugs][to kill insects] [Home Defense®]
- 171. Change the way you spray
- 172. No [more] tired hands
- 173. Reduces hand fatigue
- 174. No more squeeze, squeeze, squeeze
- 175. No [constant] pumping
- 176. Save[s] time and energy
- 177. Quick Pump [applicator][sprayer]
- 178. [Quick and] Easy to Use
- 179. No Leaks or Mess
- 180. Precise control [for maximum accuracy]
- 181. Adjustable sprayer [nozzle] [for maximum control]
- 182. Cut your time spraying in half
- 183. [Improved*] Applicator
- 184. Grab & Go
- 185. Pump [illustration]
- 186. Spray [illustration]
- 187. No more bending/kneeling
- 188. Just attach hose and spray

Master label formatted according to EPA Smart label style guide – items on the first page does not mean they will appear on front panel

- 189. Easy to spray
- 190. No Aerosols

PNS Claims

- 191. Less/No [more] hand fatigue* [with PNS II/Pull 'N Spray II/Spray Master™/applicator name]
- 192. Just pull
- 193. One pull[= / delivers / equals] 34/X trigger sprays
- 194. One push of the button = 34/X trigger sprays
- 195. For best results, pull out slowly and hold for 2 seconds (applies to Pull 'N Spray)
- 196. Up to/Over X minutes (mins) of continuous spray
- 197. Pull n Spray -Less/No hand fatigue*

Refill Claims

- 198. Refill/Recharge/Fill-Up/Reload/Renew for [Comfort Wand®] [Quick Pump] [Pump 'N Go] [Applicator Name] [Illustration]
- 199. Refills/Recharges/Reloads/Renews [Comfort Wand®] [Quick Pump] [Pump 'N Go] [Applicator Name] [Illustration]
- 200. Fills Up [Quick Pump] [Pump 'N Go] [Applicator Name] [Illustration]
- 201. Fill-Up for [Applicator Name] [Quick Pump] [Pump 'N Go]
- 202. Works with [Comfort Wand®] [Quick Pump] [Pump 'N Go] [Applicator Name] [Illustration]
- 203. Just plug [Comfort Wand®] [Applicator name] in and it's ready to spray
- 204. [Plug 'N Play] Refill/Recharge/Reload/Renew [For Comfort Wand]
- 205. Refill/Recharge/Fill-Up/Reload/Renew Available
- 206. [Comfort Wand®] [Quick Pump] [Pump 'N Go] Recharge/Refill/Fill-Up/Reload/Renew
- 207. [Comfort Wand®] [Applicator Name] Refill/Recharge/Reload/Renew Cartridge

Wand Claims

- 208. Reusable [Comfort] [Continuous Spray][Wand]
- 209. Rechargeable
- 210. [Wand] [Applicator Name] will last [for] [at least] 20/X bottles!
- 211. [Wand] [Applicator Name] will last over 25 gallons!
- 212. [Wand] [Applicator Name] will last for years* *based on X applications per year
- 213. Performs like a tank sprayer with no/without pumping
- 214. Equal performance to a tank sprayer with no/without pumping
- 215. Tank sprayer power with no/without pumping
- 216. Spray [foundations][&/and][baseboards]without bending!
- 217. [More*] Precise/Accurate spray
- 218. Continuous Spray &/AND [More/Better*] Precision/Accuracy
- 219. Easily get[s] into hard-to-reach areas
- 220. [Precision/Precise/Adjustable] Sprayer
- 221. [Wand/Applicator] [extends up to 2 feet] [to] Reduce[s] [back] bending [and the] [continuous spray wand helps reduce[s] hand fatigue]
- 222. [Wand/Applicator] [provides] precision control [to maximize every spray/get the most out of every spray]
- 223. Fan Spray [for better coverage] / [for fast[er*] application]
- 224. [Now with a] Foaming Spray [for crack[s] and crevice[s]] [application] / [to see where [the product] applied]
- 225. Foaming spray makes it easier to see where [the product was] applied
- 226. [Foaming spray] disappears/dissolves when dry [to indicate when to re-enter]
- 227. [Foaming spray] dries clear [to indicate when to re-enter]
- 228. [Foaming spray] makes it easy to tell when the area is dry [and people & pets can re-enter]

^{*}vs. previous design/Applicator Name

^{*}vs. trigger sprayer

Master label formatted according to EPA Smart label style guide - items on the first page does not mean they will appear on front panel

- 229. Know/See where [product was] applied
- 230. [2x] Faster Application/Coverage*
- 231. Same coverage in [half the] [50% less] time*
- 232. Continuous Spray/wand
- 233. Extended Reach
- 234. Continuous (Adjustable) Spray (Wand)
- 235. Longer* wand/50% longer* reach
- 236. 2x/twice [the] extended reach*
- 237. Easier [than ever] to spray[the home/foundation/perimeter] [doors],[windows], [&] [baseboards]
- 238. Continuous adjustable spray
- 239. Continuous spray wand
- 240. [Comfort][Shot] Wand
- 241. Rechargeable
- 242. Powered by Duracell/Battery Brand
- 243. Save[s] time and energy
- 244. Cut your time spraying in half

Flairsol Claims

- 245. Propellant Free
- 246. Continuous Spraying
- 247. Fine Mist
- 248. 360° spraying

Sales Claims

- 249. Bonus Size
- 250. Exclusive to Club Stores!
- 251. Exclusive Club [Bonus] Size!
- 252. [Great] Value
- 253. Value Pack
- 254. Refill/Recharge/Renew/Fill-Up/Reload
- 255. Buy Wand & Refill, Get [X%] Free!
- 256. Same formula, better value!
- 257. Save [Money] with the Refill!
- 258. (Over) X% more than X gal size
- 259. Bonus Size
- 260. Combo/Wow Pack
- 261. Value/Bonus Size X-pack/ X-gallons!
- 262. Value/Bonus Size X-pack = X gallons!
- 263. Value Size
- 264. 33% more than 1 gallon size (applies to 1.33 gal. size)
- 265. 10% more bonus size (applies to 1.1 gal. size)
- 266. Look inside [label] for special offer information!
- 267. Go to [www.orthohomedefense.com] now for a special offer! Offer subject to change or expiration.
- 268. New Look, Same Great Results
- 269. New Look, Same [Fast Acting] [Long Lasting] Results¹⁷

17 except bed bugs

^{*}vs previous design/Applicator Name

Master label formatted according to EPA Smart label style guide - items on the first page does not

mean they will appear on front panel

OTHER

- 270. [icon] People and pets may re-enter treated areas after spray has dried
- 271. XX% more than X gallon size
- 272. XX% less plastic*
- 273. [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.
- 274. New/Now (The following claim may appear on any label panel for 6 months following commercial introduction)
- 275. Proven performance
- 276. Read Entire label before use
- 277. [Recyclable symbol]
- 278. Before [illustration] / After [illustration]
- 279. [For] Indoor Residential use only
- 280. Intended for residential use
- 281. Peel Open for use directions and further information
- 282. OPEN
- 283. Resealable Label for Directions & Precautions
- 284. Peel Open for use directions and further information
- 285. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
- 286. PEEL HERE / PRESS TO RESEAL
- 287. PULL / PEEL HERE [TO REMOVE TAPE]
- 288. Product of -and/or- Made in U.S.A.
- 289. Assembled in the USA
- 290. ©20XX, licensed by [Company/Brand]. World rights reserved.
- 291. QUESTIONS OR COMMENTS [phone icon] 1-800-xxxxxxx www.ortho.com [Visit our website] [computer icon]

Guarantees:

- 292. Guaranteed†††
- 293. [Company/Brand] Guarantee[d] †††
- 294. Guaranteed [results] †††
- 295. Guaranteed Kill [or your money back] †††
- 296. [Company/Brand] Satisfaction guaranteed[†††]
- 297. [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
- †††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.

Sustainable

- 298. [Eco-Friendly] [Sustainable] Refill
- 299. Go Green/Be Sustainable Refill [Reuse]!
- 300. REFILL A more sustainable way to keep bugs out!

1000409685_902_000_0300acf prddi5 MMCLAIN1 2021-02-16T08:00:29 1.000

Page 19 of 45 239-2746.20210218.Amendment

^{*}vs. previous bottle/container/packaging

Master label formatted according to EPA Smart label style guide - items on the first page does not

mean they will appear on front panel

Bed Bug System Names/Headings:

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

- 1. [3-Step] [Location based/use area] System for Protection from bed bugs
- 2. [3-Step] Bed Bug [Location based/use area] Treatment [Plan/Program/System]
- 3. [3-Step] Bed Bug [Location based/use area] Solution System/Set
- 4. [3-Step] Bed Bug [Location based/use area] System [for Protection]
- 5. [3-Step] Bed Bug [Location based/use area] Protection [Plan/Program/System]
- Part of the [Ortho Home Defense/Brand name] [3-Step] System for Protection from bed bugs [in 3 steps]
- 7. Part of the [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] Treatment Plan/Program/System [in 3 steps]
- 8. Part of the [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] Solution System/Set [in 3
- 9. Part of the [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] System [for Protection] [in 3 steps]
- 10. Part of the [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based]/use area] Protection Plan/Program/System [in 3 steps]
- 11. [in 3 steps]
- 12. [Ortho Home Defense/Brand name] [3-Step] [Location based/use area] System for [protection from] bed bugs [in 3
- 13. [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] Treatment Plan/Program/System [in 3 steps]
- 14. [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] [Solution] System/Set [in 3 steps]
- 15. [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] Protection Plan/Program/System [in
- 16. [Ortho Home Defense/Brand name] 3-Step Bed Bug [Location based/use area] [Program/System]
- 17. [Location based/use area] [Home] Bed Bug [system] in 3 steps
- 18. Zones of protection from Bed Bugs [in 3 steps]
- 19. Treat these/this area[s]/location[s] [Large Areas*],[Small Areas],[and][Hard-to-Spray[areas]/Hard-to-Reach [areas] / Crack & Crevices for [protection from] Bed Bugs
- 20. Location based Bed Bug treatment /protection [program/system/plan] [in 3 steps]
- 21. For best results use a system to treat Bed Bugs
- 22. For best results treating bed bugs use the entire/full [treatment/solution/protection] system/plan/program
- 23. For best management of bed bugs use the entire/full [treatment/solution/protection] system/plan/program
- 24. For best results, more than one product may/might/could be needed for bed bug treatment
- 25. [Part of a] Bed Bug Treatment System/Program/plan [in 3 steps]
- 26. Step 2
- 27. Ortho Home Defense/Brand Name Home Protection
- 28. Targeted Bed Bug [Location based/use area] Treatment Program/Plan/System [in 3 steps]

Additional System Claims

- 1. Part of a system for Home Protection from bed bugs
- 2. [Part of] [Ortho] [Home Defense/Brand Name] Bed Bug system for Home Protection
- 3. [Ortho] Home Defense/Brand Name [provides][products for] zones/areas of bed bug protection[:] inside/indoors/inside your home by [detecting/identifying/detecting and trapping/attracting and trapping [bed bugs] and] treating large areas*[like your carpets/ closets /baseboards / tile/ flooring], small areas [like around bed frames/headboards/box springs/ mattresses/ beds/ walls/ baseboards/ drawers], and Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices [like electrical outlets/ mattresses creases/ seams/bed frames/baseboards/cracks/crevices].
- 4. Cover all areas with [Ortho] [Home Defense/Brand Name] [treatment] system/program/plan for Home Protection
- 5. [Let] [Ortho] Home Defense/Brand Name [system for Home Protection] [guard(s)/protect(s)] your home from insects/bed bugs

^{*}Not for broadcast use

Master label formatted according to EPA Smart label style guide – items on the first page does not

mean they will appear on front panel

- 6. Part of a home defense system/program/plan for bed bugs
- 7. [System/Program/Plan for] Bed Bug Home Protection [in 3 steps]

*Not for broadcast use

Bed Bug System Language

Note to PM: This product will emphasize or indicate the product is for "Large* areas/Room Treatment/Step 2" on the FPL. *Not for broadcast use

Note to PM: Below are the system step call outs. On the FPL, it will either list all 3 steps emphasizing the applicable step (see examples)



OR just the step applying to this product and the corresponding text.



On this label, the following bolded text is what can be used in association with product labels for this registration.

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

[Bed bugs are expert biters and expert hiders. They can hide in the tiniest of places [which makes them tough to kill]. Our bed bug system [detects them and] provides treatment options for all areas of your room/bedroom/home.]

OR

[Bed bugs can hide everywhere [, making them tough to kill]. [Detect and] treat/kill them where they hide with our bed bug-specific system/program/treatments.]

OR

[Tackle your problem with our bed bug system of products to [detect them and] provide treatment for all areas of your room/bedroom/home.]

OPTION 1

[Identify/Detect][Kill/Treat][Prevent]

[Step][1][:][Identify] [Attract & Trap][Detect] [Detect & Trap] [Identify & Detect] [Bed Bugs] [icon][*]

[Step][2][:] Room Treatment / Large Areas^A/ Spray Treatment / Spot, Crack & Crevice Spray [icon][**]

[Step][3][:] Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat] [icon][***]

[**][Step] [2] [Treat] [:] Room Treatment / Large Areas^A/ Spray Treatment / Spot, Crack & Crevice Spray [Icons] [:] Spray bed bugs in their hiding spots [like your carpet edges/ closets /baseboards / tile/ flooring].

OR

Kills on carpets/furniture/flooring/baseboards/tile/surfaces.

OR

Spot-treat(s)/kills on bed frames/headboards/box springs/ mattresses/ beds/ walls/ baseboards/ drawers/ carpets/closets/tile/flooring/surfaces

^ANot for Broadcast Use

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

1000409685_902_000_0300acf prddi5 MMCLAIN1 2021-02-16T08:00:29 1.000

Master label formatted according to EPA Smart label style guide - items on the first page does not

mean they will appear on front panel

Confirm you have bed bugs by luring them out of hiding and into our secure trap.]

OR

Lure bed bugs out of hiding places

[Use/Look for Ortho [Home Defense/Brand Name] products marked for Identify [& Detect] / Attract & Trap /Detect [& Trapll

[***] [Step] [3] [Treat] [:] [Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat] [icon] [:]

[Don't forget to] treat places that are difficult to spray [like electrical outlets/ mattresses creases/ seams/bed frames/baseboards/cracks/crevices].

OR

Kills in ducts/wall voids/electrical outlets/creases/seams/bed frames/baseboards/mattresses.

[Use/Look for Ortho [Home Defense/Brand Name] products marked for Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat]

OPTION 2

Note to PM: This following option removes the identify/detect portion and focuses on the treatment.

[Kill/ Treat][Prevent]

[Step][1][:]Large Areas^A [icon] [*]

[Step][2][:] Small Areas [icon] [**]

[Step][3][:] Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Hard To Treat [icon][***]

[*][Step] [1] [Treat] [:] [Large Areas^A [icon] [:]

Spray bed bugs in their hiding spots [like your carpet edges/ closets /baseboards / tile/ flooring].

OR

Kills on carpets/furniture/flooring/baseboards/tile/surfaces.

OR

Spot-treat(s)/kills on bed frames/headboards/box springs/ mattresses/ beds/ walls/ baseboards/ drawers/ carpets/closets/tile/flooring/surfaces

ANot for broadcast use

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

[**][Step] [2] [Treat] [:] Small Areas/ Spot Treatment [lcons] [:]

Treat bed bug[s] [in their] hiding spots like around bed frames/headboards/box springs/ mattresses/ beds/ walls/ baseboards/ drawers.

OR

Spot-treat(s)/kills on bed frames/headboards/box

springs/mattresses/beds/walls/baseboards/drawers/furniture/luggage/curtains

[Use/Look for Ortho [Home Defense/Brand Name] products marked for Small Areas/ Spot Treatment]]

[***] [Step] [3] [Treat] [:] Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat [icon] [:]

[Don't forget to] treat places that are difficult to spray [like electrical outlets/ mattresses creases/ seams/bed frames/baseboards/cracks/crevices].

OR

Kills in ducts/wall voids/electrical outlets/creases/seams/bed frames/baseboards/mattresses.

Master label formatted according to EPA Smart label style guide - items on the first page does not mean they will appear on front panel

Use/Look for Ortho [Home Defense/Brand Name] products marked for Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat]

Note to PM: Below are representative icons and images for use with this system.



ORTHO Bed Bug Defense Plan/Program Text Based

Note to Reviewer: The following describes/explains the Ortho Bed Bug Defense Plan/Program

[Bed Bug Home Protection Plan] [Bed Bug Home Protection Cycle] [Bed Bug 3-Step Process] [Bed Bug Home Defense Plan] [Ortho Home Defense Bed Bug Plan] [Home Defense Bed Bug Plan]

[GRAPHICAL ICON identifying the steps: Detection, Treatment, Prevention]

FOR BEST RESULTS USE THIS PRODUCT AS PART OF A COMPREHENSIVE BED BUG TREATMENT PLAN. Visit our website, www.ortho.com, for more information.

Treating bed bugs systematically is crucial for adequate control. The information below will help you determine where in the system to begin. **DETECTION**

If you have not seen any bed bugs are in prevention mode, and/or want to ensure you are still bed bug free, you can detect bed bugs (if present) using the Ortho® Home Defense® Bed Bug Trap/Product Name.

TREATMENT

If you have detected bed bugs by using the products above, are being bitten, or, observe bed bugs, bed bug eggs or excrement in mattress tufts and bedding, you may want to choose from one or more of the Ortho [Home Defense/Brand Name] Bed Bug Products.

PREVENTION

To help prevent the spread of bed bugs, you should use an appropriate mattress and box spring encasement.

Note to Reviewer: The following text is an alternative (or in addition to) the above for a more comprehensive education of the consumer on the steps necessary to approach a bed bug problem. This text may appear on product labels, labeling, point of purchase educational material.

[Bed Bug Home Protection Plan] [Bed Bug Home Protection Cycle] [Bed Bug 3-Step Process] [Bed Bug Home Defense System] [Bed Bug Home Defense Solution] [Bed Bug Home Defense] [Bed Bug Home Defense Kit] [Home Defense Bed Bug Plan] [Home Defense Bed Bug System] Detection

239-2746.20210218.Amendment Page 23 of 45

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. Highlighted Text is New. Strikethrough Text is deleted. Master label formatted according to EPA Smart label style guide – items on the first page does not

While bites can be an indicator that you have a bed bug problem, bites alone are not proof you are being bitten by bed bugs since bites from ticks, fleas and mosquitoes can resemble bed bug bites. Additionally, some people do not exhibit a reaction to bed bug bites. The only way to know for sure is to find and identify the bugs. You may do so through inspection or with the Ortho Home Defense Bed Bug Trap that will lure and detect bed

Look for:

- Small, reddish-brown bugs approximately the size of an apple seed
- Small blood stains or dark fecal spots
- Dead bed bugs, shed skins, or small whitish eggs
- A sweet or musty odor in the room

A thorough inspection is mandatory. Bed bugs are cryptic, so be sure to look in places such as:

- mattresses & box springs around seams, creases, tufts, buttons, folds, vent holes & indentations
- bed frames disassemble bed frame to inspect cracks and crevices
- bedding & linens

mean they will appear on front panel

- headboards & footboards
- nightstand & dresser drawers
- storage boxes, including those under beds
- furniture & upholstered furniture cushions
- pull out couches & sofa beds
- curtains & curtain rods
- rugs & tapestries
- cribs & changing tables
- luggage & folding luggage racks
- wooden hangers
- clothing
- shoes & shoe boxes
- picture frames & wall hangings
- loose wallpaper or paneling
- wall voids & outlets behind switch plates
- electrical boxes
- baseboards & floorboards
- carpeting & carpet tack strip
- crown molding
- door & window casings
- files, papers, books & magazines
- smoke detectors, thermostats, alarm clocks, telephones, radios and other electronics
- stuffed animals and plush toys
- pet carriers

Be thorough! Any crack or crevice can serve as harborage for bed bugs. Often the places they hide are smaller than you may think possible.

Bed bugs prefer to stay close to their food source (you!) and are typically found within 1-6 feet of sleeping areas and furniture that is frequently occupied. However, inspection of entire rooms should be conducted, as bed bugs may be found in areas outside this range.

Detection devices [such as interceptors] [coasters] [traps] [detectors] [glue traps] that are placed anywhere in the room, including under the legs of beds, couches or other furniture can be used to monitor for bed bug activity. You may not notice any bed bug activity unless monitoring/detecting is done. These types of traps can provide a barrier between the floor and bed and can be a very useful as part of an integrated pest management program.

Treatment

Bed bugs are challenging to eliminate because they can hide in many different places. Once detected, several steps must be taken to treat properly. Inspections must be thorough, and elimination, especially of eggs, is not always a certainty. Treating for bed bugs is not the same as treating for other insects such as roaches and ants. Baits typically used to treat for roaches or ants are ineffective because bed bugs must bite and feed on blood. As a result, multiple treatments and treatment steps over several weeks as part of an integrated pest management program are necessary. Non-chemical and chemical options include:

Declutter: Eliminate all clutter where bed bugs can hide. It is clutter, not uncleanliness that puts you at risk for a bed bug infestation.

Page 24 of 45

- Vacuum: Vacuum the entire area thoroughly, including the underside of the mattress, box spring and furniture, as well as the carpets and floor. Disassemble the bed and vacuum all bed components. Bed bugs and their eggs can be difficult to dislodge, so use the vacuum's suction wand or crevice tool to scrape the infested area. Immediately discard the vacuum contents into a tightly sealed trash bag. Double bag. Discard the double-sealed trash bag in an outdoor receptacle. Vacuuming every 2-3 days for 14 days is recommended. If you are using a dust product it should be reapplied after vacuuming to maintain its effectiveness.
- Heat Treat: Dry-dry-wash-dry. First place clothing, bedding, etc. in the dryer for two full cycles at high temperature (120-140° F). Then, wash and dry all clothing, bedding, etc. at high temperatures (120-140° F). Be careful while stripping the bed so as to not dislodge bed bugs or eggs. Seal in a plastic bag before laundering to avoid spreading bed bugs and again after laundering in a new, clean plastic bag while you finish the treatment process so as to prevent re-infestation. Place toys, shoes, backpacks, etc. in a clothes dryer set on high heat for two full cycles. Wrap items that cannot be put in a washer or dryer in a large plastic bag and place them outdoors in a hot, sunny location. The fewer items packed in each bag, the better. Monitor with a thermometer for a target temperature of at least 120°F.
- Apply Insecticides: One step in eliminating bed bugs is to carefully apply insecticides registered to treat bed bugs [and bed bug eggs] to all areas where bed bugs are detected. Controlling bed bugs using non-chemical means alone is often very difficult, potentially less effective, and usually more time consuming.
 - o Carefully read and follow label directions.
 - o Allow product to dry completely.
 - o Do not sleep directly on treated mattress.
 - We recommend carefully inspecting the area and reapplying insecticides every week to kill bed bugs that later hatch from eggs, along with those that were missed during earlier treatment.
 - Detect with a trap after the second treatment to make sure there are no remaining bed bugs.
- o Cracks & Crevices: Use a liquid to treat the cracks and crevices of the bed frame, mattress & box springs, luggage and other hard to reach places, contacting as many of the insects as possible. A dust is best in electrical outlets, wall voids, carpet tack strips and bed frames.
- o Spot Treatment: Use an aerosol insecticide for spot treatment of the mattress, box spring & bed frame, baseboards, carpet & tack strips and luggage, contacting as many insects as possible.
- o Area Treatment: Use a liquid insecticide with residual activity to treat baseboards and carpet that will continue to kill bed bugs as they come in contact with the area.
- o Barrier Treatment: Use a dust to create a barrier around your baseboards, wall voids, electrical outlets and other entrance points.
- o Mattress & Household Items: To treat the mattress, box spring, furniture and other large household items that cannot be washed, use a mattress encasement to keep bed bugs where they are and from biting you.
- □ **Dispose Infested Items:** For items that cannot be treated by vacuuming, heat, laundering or insecticides, tightly wrap and seal in a large plastic bag prior to disposing. Destroy or mark "Infested with Bed Bugs" to prevent someone else from picking them up.

If after one month you are still experiencing a severe bed bug infestation, please contact your local professional pest management company.

Prevention

Proper steps must be taken to prevent an initial introduction or secondary re-infestation. These include:

- o **Isolating the Bed:** Move your bed and other furniture away from the wall slightly. Remember, bed bugs do not fly or jump! Making sure the bed skirt and blanket do not touch the floor will make it harder for bed bugs to crawl onto the bed.
- Sealing Cracks & Crevices: Seal openings in window sills, baseboards, floorboards, furniture, bed frames and where pipes or wires or
 other utilities enter the home. Fix or take down any peeling wall paper. Tighten loose switch covers. Installing door sweeps will help
 discourage movement into hallways.

Manage the Environment: Eliminate clutter. Launder bedding and clean furniture routinely. Vacuum often and thoroughly.

Thoroughly inspect purchased furniture before bringing it home, especially if it was purchased used. However, purchasing used furniture should be avoided when possible. Monitor previously infested or likely to be infested sites daily. Remove evidence of previous infestations. Restart treatment process if necessary.

Bed bugs are typically transported from place to place as people travel, so it is important to take proper precautionary steps when traveling. Also make sure any visiting guests are not transporting bed bugs in their luggage.

Prior to Travel:

o DO Spray luggage and allow to dry completely with a[n aerosol] product with residual activity registered to treat bed bugs [and bed bug eggs] and for use on luggage.

o DO Pack clothing and other items in sealable plastic bags. Bring extra re-sealable plastic bags for soiled clothing.

At Hotel/Destination:

o DO check for signs of bed bugs by examining the cracks and crevices of the mattress, box spring, sheets, bedding, headboard, nightstand & dresser drawers, desks, chairs, and other furniture; behind wallpaper and pictures; in clocks and other electronics; in cracks in wood floors; and under the edge of the carpet. [Carrying a small flashlight such as the [insert product name here] will help you quickly and thoroughly inspect for signs.] Signs of bed bug activity may include the presence of eggs, fecal spots, and shed skins.

- DO change rooms immediately, or change hotels entirely, if you identify bed bugs in your hotel room.
- DO check clothes hangers thoroughly before unpacking. Bed bugs hide in the cracks and crevices of hangers so a thorough inspection is necessary before hanging up clothes, especially if the hangers are wooden.

239-2746.20210218.Amendment Page 25 of 45

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

Master label formatted according to EPA Smart label style guide – items on the first page does not mean they will appear on front panel

- DO re-pack luggage contents into sealable plastic bags so you can throw them directly in the dryer when you return home to kill any bed bugs or eggs that may be nestled in the clothing.
- DO use a bed bug trap such as the Ortho Home Defense Bed Bug Trap to lure and detect bed bugs
- DO Spray your luggage and allow it to dry completely with a[n aerosol] product [such as the Ortho Home Defense Dual-Action Bed Bug Killer] registered to treat bed bugs [and bed bug eggs] and for use on luggage.
- DO NOT put your suitcase on the bed. Elevate all luggage off the floor using a luggage rack (inspect first), tabletop or other hard surface. The best place is in the bathtub.
- DO NOT unpack your suitcase contents into dressers.

Returning Home:

- DO remove the items you placed in plastic bags at the hotel, and throw them immediately into the dryer, set on the highest heat setting the fabric can withstand to kill any bed bugs or their offspring that may be nestled in the items.
- DO inspect luggage and clothing for signs of bed bug activity. If signs are found, treat luggage by vacuuming, laundering (scrubbing with hot, soapy water) and/or insecticides.
- DO store luggage in sealed bags and keep them in the garage. If you are exposed to a bed bug infestation, there is no reason to throw out your luggage and clothing unless your infestation is severe. The key is to contain all items suspected of carrying bed bugs in plastic bags until you can treat them.
- DO NOT unpack luggage inside. Unpack luggage outside, or in a garage, laundry room or utility room.

These steps are very important, and must be done carefully, consistently and cyclically. Bed bugs are resilient insects that will not go away without intervention.

A comprehensive, continuous cycle of Detection -> Treatment/System-> Prevention/Detection/Monitoring is the key to gaining control. [Continuing the integrated system creates a better chance of managing bed bugs]

END OF SUBLABEL A – STANDARD RTU SPRAYER

SUB LABEL B - BOV PACKAGING

Alternate Brand Names:

- Ortho® Ant, Roach & Spider Killer2
- Ortho® Ant & Roach Killer2

Master label formatted according to EPA Smart label style guide – items on the first page does not mean they will appear on front panel

- Ortho® Bed Bug & Flea Killer Ready to Use
- Ortho® Bed Bug & Flea Killer Refill
- Ortho® Bed Bug Killer for Indoor
- Ortho® Bed Bug Killer for Indoor Refill
- Ortho® Bed Bug Killer Ready To Use
- Ortho® Bed Bug Killer Refill
- Ortho® Home Defense® Ant, Roach & Spider Killer4
- Ortho® Home Defense® Ant & Roach Killer3
- Ortho® Home Defense® Bed Bug, Flea & Tick Killer2
- Ortho® Home Defense® Bed Bug Killer Ready to Use
- Ortho® Home Defense® Bed Bug Killer Refill
- Ortho® Home Defense® Dual-Action Bed Bug Killer2
- Ortho® Home Defense® Dual-Action Bed Bug Killer2 Ready to Use
- Ortho® Home Defense® Dual-Action Bed Bug Killer Refill
- Ortho® Home Defense® Flea & Tick Killer
- Ortho® Home Defense® Max Bed Bug Killer
- Ortho® Home Defense® Max Bed Bug, Flea & Tick Killer
- Ortho® Home Defense Indoor Insect Killer
- Ortho® Home Defense Multi-Insect Killer

FOR INDOOR USE ONLY

ACTIVE INGREDIENT:

Bifenthrin*	0.250%
Imidacloprid	0.050%
Piperonyl Butoxide	0.450%
OTHER INGREDIENTS:	99.250%
TOTAL	100.000%

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

KEEP OUT OF REACH OF CHILDREN CAUTION

See back/panel/booklet for additional precautionary statements

Manufactured By / Distributed By / Sold By: The Ortho Group

P.O. Box 190 Marysville, OH 43040

EPA Reg. No. 239-2746 EPA Est. No. XXXX

[Superscript is first letter of lot number]

NET WEIGHT: x oz (X g)

NET CONTENTS: x fl oz. / gal. (X ml / X L)

FIRST AID If swallowed

Call poison control center or doctor immediately for treatment advice.

Have person sip a glass of water if able to swallow.

Do not induce vomiting unless told to do so by the poison control center or doctor.

Do not give anything by mouth to an unconscious person.

[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 877-465-5161 for Emergency Assistance.

1000409685_902_000_0300acf prddi5 MMCLAIN1 2021-02-16T08:00:29 1.000

Master label formatted according to EPA Smart label style guide - items on the first page does not mean they will appear on front panel

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION. Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

PHYSICAL OR CHEMICAL HAZARDS: Do not apply this product in or on electrical equipment due to the possibility of shock hazard. Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

DIRECTIONS FOR USE

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

USE RESTRICTIONS

- Do not apply to bed linens or surfaces that will be in direct contact with occupants of the bed.
- Do not apply to stuffed animals or toys.
- Do not apply as a broadcast surface spray.
- Not intended for commercial applications.
- Do not allow people or pets to re-enter the treated area until after spray has dried.
- Not for use on humans or animals.

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.

STORAGE AND DISPOSAL

PESTICIDE STORAGE Store in a cool dry area. Always store pesticides in the original container. Store away from food and pet food.

PESTICIDE DISPOSAL AND CONTAINER HANDLING Do Not Puncture or Incinerate! Nonrefillable container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling if available. If partly filled: Do not dispose down-the-drain or sewer. Call your local solid waste agency for local disposal options.

METHODS OF USE AND GENERAL APPLICATION INSTRUCTIONS

[PRODUCT FACTS]

Kills

Note to PM: any or all of the following insects may appear on the product label

Bed Bugs (all life			
stages)			
Fleas	Cat	Dog	
Ticks			
Lice			
Ants	Argentine	Pavement	Red/Western Harvester
	Carpenter	Pharaoh/Sugar	
	Foraging Fire Ants	Pyramid	
Aphids	Apple	Greenbug	Rose
•	Black Cherry	Pea	Rosy Apple
	Buckhorn	Pecan	Walnut
Bees			
Beetles	Billbugs	Japanese (Adults)	Sap
	Carpet	Lady Beetles (including Asian	
	Elm Leaf	Lady Beetle Eggs)	
	Flea	Pine Shoot	
Boxelder Bugs			
Bristletails			
Centipedes			
Cockroaches	American/Palmetto	Asian	German

Page 28 of 45 239-2746.20210218.Amendment

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.

Highlighted Text is New. Strikethrough Text is deleted.

Master label formatted according to EPA Smart label style guide – items on the first page does not mean they will appear on front panel

	Bug/Waterbug Oriental
Crickets	
Earwigs	
Firebrats	
Flies	Biting Flies European Crane (Adult) House
Fungus Gnats	
Grasshoppers	
Hornets	
Leafhoppers	
Midges	
Millipedes	
Mites	Clover
Mole Crickets	
Mosquitoes	
Moths	
Periodical Cicada	
Pillbugs & Rollie Pollies	
Scorpions	
Silverfish	
Sowbugs	
Spiders	Black Widow Hobo Brown Recluse Wolf
Springtails	
Stink Bugs	Brown Marmorated Kudzu
Stored Product Pests	
Thrips	
Termites	
Wasps	
Whiteflies	
Yellowjackets	
[Where to Apply/Use]	[Indoor Surfaces, Pantries, around baseboards, floorboards, headboards walls, bed frame, mattress (tufts, seams, edges, and vent holes) and box spring and any other joint, behind pictures/wall hangings, along and underneath carpet edges, and other articles/furniture in the bedroom or sleeping area, floors/floor coverings (rugs, carpet, tile, vinyl & wood),luggage]
When to Apply/Use	 When there is evidence of bed bug [or insect] activity. [For long-lasting control (except bed bugs).]
Before You	Cover or Remove Exposed Food (Including Pet Food)
Apply/Use	Cover of Remove Exposed Food (including Fet Food) Cover All Food Processing Surfaces and Utensils
11. 7	[Remove all items from pantry and clean pantry thoroughly]
	Shake Well
How To Apply/Use	To treat bed bugs and bed bug eggs: Spray bed bugs and their eggs. Treat for hidden bugs and eggs by applying as a spot treatment to cracks and crevices in the sleeping area in places such as baseboards, crown molding behind pictures/wall hangings, along and underneath carpet edges, and other articles/furniture in the bedroom or sleeping areas where bed bugs may be hidden.
	To locate hidden bed bugs, disassemble the bed frame and remove bedding. Do not apply product directly to bedding. Apply this product to the bed frame, mattress (tufts, seams, edges, and vent holes), box springs, and other joints where bed bugs are harboring. Do not saturate or treat the entire surface of the mattress or box spring. Allow the spray to dry before using the mattress and/or box spring. Do not apply to stuffed animals or toys.
	Continue to inspect treated areas and repeat applications every 2 weeks, while bed bugs and their eggs are present.
	For persistent bed bug activity, consult a pest management professional.
	When treating luggage: Remove the contents and spray bed bugs and their eggs. Also spray areas that may hide them by focusing on the corners, pockets, and seams. Allow luggage to dry before
239-2746.20210218.Amendme	ent Page 29 of 45

Master label formatted according to EPA Smart label style guide – items on the first page does not

mean they will appear on front panel

reuse.

Image of typical Bed Bug Areas Application

[Baseboards]

[Bedrooms]

Fleas and Ticks (Including ticks that may transmit Lyme Disease / Any tick disease approved on label)

Do not Spray Animals

Pet resting quarters may be treated with this product when animals are not present.

How to Apply: For best results, contact as many pests as possible. Spray around beds, furniture and pet's habitat. Spray pet sleeping quarters, bedding, floor and floor covering where pets are kept. Spot treat infested areas such as pet resting quarters and localized areas of floors/floor coverings (rugs, carpet, tile, vinyl & wood) where pests may be present. Old pet bedding should be removed and replaced with clean, fresh bedding after treatment of pet area. To control the source of flea infestation, pets inhabiting the treated premises should themselves be treated with a product registered for application to animals.

For Control of Indoor Insects (except bed bugs)

- [Set spray nozzle to indoor [sprayer icon] setting.]
- Hold sprayer 12 inches from surface being sprayed.
- Apply a 4-inch wide band along the surfaces being treated / Apply a 4-inch wide band along the interior of your home in areas where insects are a re-occurring problem.
- Spray cracks and crevices [and along shelves in pantries.]
- · Spray until slightly wet without soaking.
- [For Pantries, replace non-infested items once spray has dried.]

Image of typical Indoor Application

[Pantry]

[Kitchens]

[Bathrooms]

[Doors & Windows]

[Basements]

[Bedrooms]

[After You Apply/Use]

[reentry icon] Do not allow people and pets to re-enter treated area until after spray has dried

- [Thoroughly wash all food processing surfaces and utensils with soap and water before reuse]
- [For long-lasting residual control/action (not including bed bugs) leave spray undisturbed.
 The product will keep on killing for up to 12 months [*]] Note to PM: * goes to the 12 month claim section for qualifying statement which will appear here-options 1,2,3, or 4 or qualifier will continue the sentence.

WARRANTY/DISCLAIMER STATEMENT

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.

MARKETING/ADVERTISING CLAIMS

Note to PM: the term cockroach can be interchanged with any and all instances of roaches and vice versa.

Note to PM: the term insects can be interchanged with any and all instances of bugs, pests and vice versa.

Note to PM: the word "and" can be interchanged with "&" in all instances and vice versa.

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

The following two Product Facts format is optional and the information may appear inside or outside of a box. Indoor Insect Killer Table/Non-Bed Bug Focused product

[Product Facts:]

Refer to label for full use directions

[What it Does:] Kills home invading insects [including ants, cockroaches, spiders, fleas, ticks, scorpions, beetles, earwigs, silverfish, centipedes, [and] millipedes]. (See inside for complete list)

1000409685_902_000_0300acf prddi5 MMCLAIN1 2021-02-16T08:00:29 1.000

239-2746.20210218.Amendment Page 30 of 45

Master label formatted according to EPA Smart label style guide - items on the first page does not mean they will appear on front panel

[Where to Use:] Use [with confidence] indoors for spot, crack and crevice application in[[kitchens] [bathrooms], [doors & windows], [basements]), [garages], [doors & windows], [Bedroom], [Living room]] wherever insects are a re-occurring problem. This product is for spot and crack and crevice application.

[When to use:] Use [anytime] as a preventative treatment or after [you see] evidence of insect activity for long-lasting control* Note to PM: * goes to the 12 month claim section for gualifying statement which will appear here-options 1,2,3, or 4

[icon] Do not allow people and pets to enter treated areas until after spray has dried

Questions & Comments: (phone & computer icon)

Call 1-800-225-2883 or visit our website at www.ortho.com

Bed Bug, Flea & Tick Focused Table

[PRODUCT FACTS:] Refer to label for full use directions

[What It Does:] Kills bed bugs at all life stages (including eggs). [Also kills Fleas, Ticks] [and other listed

[Where to Use:] Use [with confidence][indoors] as a spot, crack and crevice treatment [in bedrooms] [in closets] [along baseboards] where you see evidence of bed bugs, and around their preferred hiding places [bed frames, mattress seams/tufts/folds, baseboards, and other cracks and crevices near sleeping areas]]

[When to Use:] Use when there is evidence of bed bug [or other insect] activity.

[icon] Do not allow people and pets to enter treated areas until spray has dried

Questions & Comments: [icon phone] [icon computer]

Call 1-800-225-2883 or visit our Website at www.ortho.com

General and Count Kill Claims

- Kills Home invading Insects¹
- 2. Kills [1...84] Insects¹
- 3. Kills [the] bugs1 you see & [the] [ones] bugs you don't [see]
- 4. Kills the toughest home invading bugs1
- Kills [both] crawling & flying insects¹
- 6. Kills [all] common household bugs1
- 7. Kills [1...80][plus/+] insects
- 8. Kills home invading insects/bugs¹
- 9. Kills by contact!
- 10. Apply/Spray every 2 weeks when Bed Bugs are present
- 11. Patrol/Inspect/Monitor/Examine [area/rooms] & Apply/Spray Every 2 weeks while bed bugs are present

1Refer 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")

Insect Kill List Claims

- 12. [Also] Kills [any combination of insects listed on master label][and many others2]
- 13. Kills: Bed Bugs, Fleas, Brown Dog Ticks, Ants (including fire, pharaoh, and harvester ants), Spiders (including brown recluse and black widow), Stink Bugs, Box Elder Bugs, Mites, Crickets, Earwigs, Millipedes, Moths, Asian Lady Beetles, and Silverfish
- 14. Kills insects²
- 15. Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish, Scorpions, Black Widow Spiders, and other insects²
- 16. Kills ants [and many other pests/insects²]!]
- 17. Kills ants [and] roaches [and many other pests/insects²]!]

Master label formatted according to EPA Smart label style guide - items on the first page does not mean they will appear on front panel

- 18. Kills ants, roaches [and] spiders [and many other pests/insects²]!]
- 19. [Also] kills Fleas & Dust Mites
- 20. [Also] Kills Ticks (including ticks that may transmit Lyme Disease)
- 21. Bed bug & flea killer
- 22. Flea & Brown Dog Tick Killer
- 23. Kills Dust Mites
- 24. Kills Brown Dog Ticks & Fleas
- 25. Kills bed bugs, fleas, dust mites & brown dog ticks

2Refer 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")

Bed Bug Specific Kill Claims

- 26. Kills [even] the toughest bed bugs³
- 27. Kills hard to kill bed bugs³
- 28. Kills resistant bed bugs³
- 29. Formulated to kill [resistant3 /the toughest3/ hard to kill3] bed bugs
- 30. Bed bug killer
- 31. Kills bed bug eggs [before they hatch]
- 32. Prevents bed bug nymphs from hatching
- 33. Break(s) the bed bug life cycle⁴
- 34. Spray & Kill where Bed Bugs Hide*
- 35. Spray Where Bed Bugs Hide & Kill Them*
- 36. Kill Bed bugs where they hide*
- 37. Contact Bed Bugs Where they hide*
- 38. Spray & Kill Bed Bugs Where they Hide*
- 39. Spray Where Bed Bugs Hide*

3Pyrethroid-Resistant Bed Bugs

4Kills bed bugs at all life stages

*Kills by Contact

General Residual Control claims

- 1. Forms/Creates/Establishes a perimeter treatment⁵
- 2. Forms/Creates/Establishes a [bug/insect] barrier⁵
- 3. Create(s) a [bug] border/barrier/perimeter [treatment⁵]
- 4. Create [a] bug barrier[s] 5
- 5. Apply [as] a barrier⁵
- 6. Apply as a border in your home⁵
- 7. Apply as a perimeter/border/residual treatment⁵
- 8. Long lasting [bug] perimeter treatment/barrier/border⁵
- 9. Creates a barrier that will kill/kills the bugs you have and prevent[s] new bugs from coming in/ inside your home⁵
- 10. Guards against the bugs you can't/don't see⁵
- 11. Provides residual control against listed home invading insects⁵
- 12. Keeps [on] killing with residual action, even after you spray/ spray has dried5
- 13. Keeps on killing after spray has dried⁵
- 14. Kills and prevents [insects inside your home⁵]

5Excludes Bed Bugs. Refer to booklet/back panel for list of insects/bugs/pests

Master label formatted according to EPA Smart label style guide - items on the first page does not

mean they will appear on front panel

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

Other Insect Residual Claims

Note To PM: 12, 6, 5, 4, and 3 month claim sections will only use the qualifiers indicated at the bottom of their sections. Residual claims do not apply to bed bugs.

12-Month Claims

- 40. Up to 12 month control/protection⁶
- 41. Kills/Controls/Protects [for] up to 12 months⁶
- 42. Kills [[home invading] bugs] all year6
- 43. Kills indoor bugs all year⁶
- 44. Creates a barrier that will kill bugs you have and control/prevent new bugs for up to 12 months⁶.
- 45. Creates a perimeter/border/residual treatment that will kill bugs you have and control/prevent new bugs for up to 12 months⁶
- 46. Protects⁶ your home in/with just 1 application a year[!]
- 47. Year Long Protection/Defense⁶
- 48. Season Long [Home] Protection/Defense⁶

Qualifier Option 1: ⁶ [applies to] [for] Ants, Roaches / Palmetto bug / Water bug, & Spiders indoors on non-porous surfaces Qualifier Option 2: 6 [applies to] [for] American Cockroach / palmetto bug / water bug, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider indoors on treated non porous surfaces within minutes of

Qualifier Option 3: 6 [applies to] [for] American Cockroach / palmetto bug / water bug, German cockroach, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider indoors on treated non porous surfaces after 2 hour continuous exposure.

Qualifier Option 4: 6 [applies to] [for] American Cockroach / palmetto bug / water bug, German cockroach, carpenter ant, pharaoh ant, striped tail scorpion, black widow spider, brown recluse spider, centipedes indoors on treated non porous surfaces after 24 hour continuous exposure.

6-Month Claims

49. Kills bugs [indoors] for 6 months⁷

7Applies to [for] spiders (excluding black widow, brown recluse, hobo)

5-Month Claims

- 50. Keeps bugs away for up to 5 months 8
- 51. [One application provides] up to 5 month control 8
- 52. Provides up to 5 months protection 8
- 53. [One application] kills [bugs/insects] up to 5 months 8
- 54. [One application] kills ants, roaches [and spiders] for up to 5 months 8
- 55. Keeps ants, roaches [and spiders] away for up to 5 months8

8 Up to 5 month control on: Ants (including Western Harvester), Carpet Beetles, Crickets, Firebrats, Moths, Silverfish and Spiders on treated non-porous surfaces after 5 minutes continuous exposure to residues. 5 month control on German Cockroaches after 30 minutes continuous exposure to residues.

4-Month Claims

56. Kills bugs [indoors] for 4 months9

9 Applies to/for spiders (excluding black widow, brown recluse, hobo)

3-Month Claims

57. Kills bugs [indoors] for 3 months¹⁰

Master label formatted according to EPA Smart label style guide - items on the first page does not mean they will appear on front panel

10 Applies to [for] spiders (excluding black widow, brown recluse), harvester ants, / crickets, grasshoppers

- 58. Keeps [bugs/insects] away for up to 3 months 11
- 59. [Provides] up to 3 month control of insects 11
- 60. Provides up to 3 months protection 11
- 61. [One application] kills ants, roaches [and spiders] for up to 3 months 11
- 62. [One application] kills [bugs/insects] up to 3 months 11
- 63. Keeps ants, roaches [and spiders] away [out] for up to 3 months 11
- 64. [One application] kills roaches [and spiders] for up to 3 months 11
- 65. Keeps ants, roaches [and spiders] away [out] for up to 3 months 11

11 Up to 3 month control on: Ants (including Western Harvester), Carpet Beetles, German Cockroaches, Crickets, Firebrats, Moths, Silverfish and Spiders on treated non-porous surfaces after 5 minutes continuous exposure to residues. 3 month control on German Cockroaches after 30 minutes continuous exposure to residues.

Other Insect Egg Killing Claims

- 66. Kills Asian Lady Beetles and their eggs
- 67. [Plus] kills insects and their eggs¹³
- 68. Kills insect eggs¹³
- 69. Prevents insect eggs from hatching!13
- 70. Up to 12 month control* plus kills insect eggs¹³
 - 13 Applies to [for] Asian Lady Beetles

Efficacy/Disease Related Claims

- 71. Kills Fleas that may transmit Flea Allergy Dermatitis (FAD)/ Flea-Bite Anemia/ Tapeworms/ Haemobartonellosis [to cats/dogs]
- 72. Kills Fleas that may transmit Bartonellosis [to cats/dogs/people]
- 73. Kills Fleas that may transmit Mycoplasma to cats
- 74. Kills roaches/cockroaches that may carry disease causing bacteria
- 75. Kills roaches/cockroaches that may carry [Salmonella typhimurium], [Entamoeba histolytica], [E. coli/ Escherichia Coli], [Staphylcoccous spp.], [Pseudomonas aeruginosa], [Klebsiella pneumoniae], [the poliomyelitis virus].
- 76. Kills roaches/cockroaches that may produce allergens
- 77. Kills roaches/cockroaches that may carry disease causing bacteria
- 78. Kills roaches/cockroaches that contribute to asthma [in children]
- 79. Kills roaches/cockroaches that may produce asthma-causing allergens [in children]
- 80. Kills roaches/cockroaches that may produce allergens that cause asthma [in children]
- 81. Kills roaches/cockroaches that are a leading contributor/cause of asthma [in/among children]
- 82. Kills Ticks that may transmit [the] Powassan/POW virus
- 83. Kills Ticks that may transmit Haemobartonellosis/ Anaplasma phagocytophilum [to cats/dogs]
- 84. Kills Ticks that may transmit Cytauxzoonosis/ Tularemia to cats
- 85. Kills Ticks that may transmit Anaplasma/ Babesiosis/ Ehrlichiosis/ Lyme borreliosis/ Rocky Mountain spotted fever/ Hemoplasmosis/ Mycoplasma [to dogs]
- 86. Kills Ticks that may transmit Lyme Disease

Formula claims

- 87. No Stains
- 88. Non-staining
- 89. Will Not Stain/Non-Staining on [Water-Safe Fabrics and Surfaces]

Master label formatted according to EPA Smart label style guide – items on the first page does not

mean they will appear on front panel

- 90. Does not stain [fabrics, floors, wood, surfaces]
- 91. Water-based/Non-staining Formula
- 92. Water based [formula]
- 93. Unscented
- 94. [Convenient] Ready to Use
- 95. Synergized Formula
- 96. No Mixing Necessary
- 97. Easy to Use
- 98. No odor/Odor Free
- 99. Fragrance-Free
- 100. [Leaves] no odor
- 101. No lingering [chemical] odor
- 102. [Virtually] odor free
- 103. Odorless
- 104. Dries clean/clear
- 105. No oily residue
- 106. No [sticky] mess
- 107. Dries fast/in minutes [for fast/quick re-entry]
- 108. No greasy residue [mess]
- 109. No need to wipe up
- 110. Leaves no residue [behind]
- 111. Indoor [Formula]

Area/Use Site Claims

- 112. [Formulated] For use on Mattresses (seams/tufts/folds) [Luggage] [[Wood]Furniture] [Headboards] [Beds] [and] [as a spot treatment on Carpet]
- 113. Luggage Spray
- 114. Use [with confidence] in [bathrooms], [family rooms], [attics], [garages], [basements], [closets], [storage areas], [kitchens] and [bedrooms] [to keep/kill listed bugs [from entering your home]](except bed bugs)
- 115. Ideal/great for large[r]* /small[er] jobs/areas/spaces/rooms
- 116. Use inside your home!
- 117. Use* in [kitchens], [garages], [basements] [and] [attics] [to kill listed bugs/insects].
- 118. [Can be] Use[d] in [bathrooms], [kitchens], [family rooms], [pantries], [attics], [garages], [basements], [closets], [storage areas], and [bedrooms]
- 119. Use with confidence in [bathrooms], [kitchens], [family rooms], [pantries], [attics], [garages], [basements], [closets], [storage areas], and [bedrooms]
- 120. [Illustrations of kitchen, bathroom, home perimeter/foundation, garage, windows and doorways, basement, attic, porches and patios]
- 121. Designed to/for use in kitchens and pantries
- 122. Apply along [and behind/between] baseboards [and][appliances]
- 123. Apply beneath [and behind] sinks
- 124. Apply in other areas where listed insects [are often found/appear]

*Not for broadcast use

Dual Action/Mode of Action Claims

- 125. Dual/Two Modes of Action
- 126. Contains two different active ingredients

Master label formatted according to EPA Smart label style guide - items on the first page does not mean they will appear on front panel

- 127. Two active ingredients in one product
- 128. Works two ways to kill [even resistant¹⁴ / the toughest¹⁴] bed bugs
- 129. Two active ingredients to kill [even resistant / the toughest14] bed bugs
- 130. [Kills two/2 ways] / [Dual Action]: 1) Kills listed insects [by contact] and 2) Keeps¹⁵ killing even after spray has dried
- 131. Dual-action
- 132. Works/Kills [in] 2 ways
- 133. Kills even the tough bed bugs¹⁴ by treating them in 2 ways
- 134. Kills the toughest bugs* with 2 ways to kill
- 135. More control¹⁵ in one bottle
- 136. Dual-Actives for Ensured Kill¹⁵
- 137. Two actives for two modes of kill
- 138. Two-Way/Dual Kill
- 139. Targets bed bugs in 2 ways
- 140. Targets bed bugs with 2 key ingredients
- 141. Targeted dual-action ingredients
- 142. Engineered to kill even the toughest bed bugs¹⁴
- 143. Formulated with tough bugs* in minds
- 144. Two ways to actively kill
- 145. Double/Dual Defense
- 146. 1-2 Punch
- 147. Double Down Defense
- 148. Double/Dual Assurance
- 149. Two lines of defense for peace of mind
- 14 Pyrethroid-Resistant Bed Bugs
- 15 except bed bugs

Speed of Action Claims

- 150. Starts killing listed bugs¹⁶ in seconds
- 151. Starts killing bugs¹⁶ fast
- 152. Kills by contact [Guaranteed]

16 except bed bugs

General Applicator Claims

- 153. Consistent spray for maximum accuracy
- 154. Consistent/even coverage
- 155. You're /It's always ready to spray
- 156. The easy/easier way [to spray][to kill bugs][to kill insects] [Home Defense®]
- 157. Change the way you spray
- 158. Save[s] time and energy
- 159. Less/No Leaks or Mess
- 160. Precise control [for maximum accuracy]
- 161. Adjustable sprayer [nozzle] [for maximum control]
- 162. Cut your time spraying in half
- 163. Grab & Go
- 164. No more bending/kneeling
- 165. Easy to spray

*vs. previous design/Applicator Name

Master label formatted according to EPA Smart label style guide - items on the first page does not

mean they will appear on front panel

BOV Claims

- 166. Sprays at any angle
- 167. Spray/s at any angle [to cover hard-to-reach areas]
- 168. Won't lost pressure [as can empties]
- 169. Continuous Spray
- 170. Any-angle spray [helps cover hard-to-reach areas] for complete coverage
- 171. Spray/s at any angle to kill [& prevent] insects where they live/hide
- 172. Covers XXX sq. ft./linear feet

Sales Claims

- 173. Bonus Size
- 174. Exclusive to Club Stores!
- 175. Exclusive Club [Bonus] Size!
- 176. [Great] Value
- 177. Value Pack
- 178. Refill/Recharge/Renew/Fill-Up/Reload
- 179. Buy Wand & Refill, Get [X%] Free!
- 180. Same formula, better value!
- 181. Save [Money] with the Refill!
- 182. (Over) X% more than X gal size
- 183. Bonus Size
- 184. Combo/Wow Pack
- 185. Value/Bonus Size X-pack/ X-gallons!
- 186. Value/Bonus Size X-pack = X gallons!
- 187. Value Size
- 188. 33% more than 1 gallon size (applies to 1.33 gal. size)
- 189. 10% more bonus size (applies to 1.1 gal. size)
- 190. Look inside [label] for special offer information!
- 191. Go to [www.orthohomedefense.com] now for a special offer! Offer subject to change or expiration.
- 192. New Look, Same Great Results
- 193. New Look, Same [Fast Acting] [Long Lasting] Results¹⁷

17 except bed bugs

OTHER

- 194. [icon] People and pets may re-enter treated areas after spray has dried
- 195. XX% more than X gallon size
- 196. XX% less plastic*
- 197. [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.
- 198. New/Now (The following claim may appear on any label panel for 6 months following commercial introduction)
- 199. Proven performance
- 200. Read Entire label before use
- 201. [Recyclable symbol]
- 202. Before [illustration] / After [illustration]
- 203. [For] Indoor Residential use only
- 204. Intended for residential use

Master label formatted according to EPA Smart label style guide – items on the first page does not

mean they will appear on front panel

- 205. Peel Open for use directions and further information
- 206. OPEN
- 207. Resealable Label for Directions & Precautions
- 208. Peel Open for use directions and further information
- 209. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
- 210. PEEL HERE / PRESS TO RESEAL
- 211. PULL / PEEL HERE [TO REMOVE TAPE]
- 212. Product of -and/or- Made in U.S.A.
- 213. Assembled in the USA
- 214. ©20XX, licensed by [Company/Brand]. World rights reserved.
- 215. QUESTIONS OR COMMENTS [phone icon] 1-800-xxxxxxxx www.ortho.com [Visit our website] [computer icon]

Guarantees:

- 216. Guaranteed†††
- 217. [Company/Brand] Guarantee[d] †††
- 218. Guaranteed [results] †††
- 219. Guaranteed Kill [or your money back] †††
- 220. [Company/Brand] Satisfaction guaranteed[†††]
- 221. [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.

Sustainable

- 222. [Eco-Friendly] [Sustainable] Refill
- 223. Go Green/Be Sustainable Refill [Reuse]!
- 224. REFILL A more sustainable way to keep bugs out!

Bed Bug System Names/Headings:

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

- 1. [3-Step] [Location based/use area] System for Protection from bed bugs
- [3-Step] Bed Bug [Location based/use area] Treatment [Plan/Program/System]
- 3. [3-Step] Bed Bug [Location based/use area] Solution System/Set
- 4. [3-Step] Bed Bug [Location based/use area] System [for Protection]
- 5. [3-Step] Bed Bug [Location based/use area] Protection [Plan/Program/System]
- 6. 3-Step Bed Bug [Location based/use area] [Program/System]
- 7. Part of the [Ortho Home Defense/Brand name] [3-Step] System for Protection from bed bugs [in 3 steps]
- 8. Part of the [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] Treatment Plan/Program/System [in 3 steps]
- 9. Part of the [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] Solution System/Set [in 3 steps]
- 10. Part of the [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] System [for Protection] [in 3 steps]

1000409685_902_000_0300acf prddi5 MMCLAIN1 2021-02-16T08:00:29 1.000

^{*}vs. previous bottle/container/packaging

Master label formatted according to EPA Smart label style guide - items on the first page does not mean they will appear on front panel

- 11. Part of the [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based]/use area] Protection Plan/Program/System [in 3 steps]
- 12. Part of the [Ortho Home Defense/Brand name] 3-Step Bed Bug [Location based/use area] [Program/System] [in 3
- 13. [Ortho Home Defense/Brand name] [3-Step] [Location based/use area] System for [protection from] bed bugs [in 3 steps1
- 14. [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] Treatment Plan/Program/System [in
- 15. [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] [Solution] System/Set [in 3 steps]
- 16. [Ortho Home Defense/Brand name] [3-Step] Bed Bug [Location based/use area] Protection Plan/Program/System [in
- 17. [Ortho Home Defense/Brand name] 3-Step Bed Bug [Location based/use area] [Program/System]
- 18. [Location based/use area] [Home] Bed Bug [system] in 3 steps
- 19. Zones of protection from Bed Bugs [in 3 steps]
- 20. Treat these/this area[s]/location[s] [Large Areas*],[Small Areas],[and][Hard-to-Spray[areas]/Hard-to-Reach [areas] / Crack & Crevices for [protection from] Bed Bugs
- 21. Location based Bed Bug treatment/control/protection [program/system/plan] [in 3 steps]
- 22. For best results use a system to treat Bed Bugs
- 23. For best results treating bed bugs use the entire/full [treatment/solution/protection] system/plan/program
- 24. For best management of bed bugs use the entire/full [treatment/solution/protection] system/plan/program
- 25. For best results, more than one product may/might/could be needed for bed bug treatment
- 26. [Part of a] Bed Bug Treatment System/Program/plan [in 3 steps]
- 27. Use as a system for treatment of Bed Bugs
- 28. Step 2
- 29. Ortho Home Defense/Brand Name Home Protection
- 30. Targeted Bed Bug [Location based/use area] Treatment Program/Plan/System [in 3 steps]

Additional System Claims

- 1. Part of a system for Home Protection from bed bugs
- 2. [Part of] [Ortho] [Home Defense/Brand Name] Bed Bug system for Home Protection
- 3. [Ortho] Home Defense/Brand Name [provides][products for] zones/areas of bed bug protection[:] inside/indoors/inside your home by [detecting/identifying/detecting and trapping/attracting and trapping [bed bugs] and] treating large areas*[like your carpets/ closets /baseboards / tile/ flooring], small areas [like around bed frames/headboards/box springs/ mattresses/ beds/ walls/ baseboards/ drawers], and Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices [like electrical outlets/ mattresses creases/ seams/bed frames/baseboards/cracks/crevices].
- 4. Cover all areas with [Ortho] [Home Defense/Brand Name] [treatment/control] system/program/plan for Home Protection
- 5. [Let] [Ortho] Home Defense/Brand Name [system for Home Protection] [guard(s)/protect(s)] your home from insects/bed bugs
- 6. Part of a home defense system/program/plan for bed bugs
- 7. [System/Program/Plan for] Bed Bug Home Protection [in 3 steps]

Bed Bug System Language

Note to PM: This product will emphasize or indicate the product is for "Step 2 in both options" on the FPL.

Note to PM: Below are the system step call outs. On the FPL, it will either list all 3 steps emphasizing the applicable step (see examples)

1000409685_902_000_0300acf prddi5 MMCLAIN1 2021-02-16T08:00:29 1.000

^{*}Not for broadcast use

^{*}Not for broadcast use

Master label formatted according to EPA Smart label style guide – items on the first page does not mean they will appear on front panel



OR just the step applying to this product and the corresponding text.



On this label, the following bolded text is what can be used in association with product labels for this registration.

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

[Bed bugs are expert biters and expert hiders. They can hide in the tiniest of places [which makes them tough to kill]. Our bed bug system [detects them and] provides treatment options for all areas of your room/bedroom/home.]

OR

[Bed bugs can hide everywhere [, making them tough to kill]. [Detect and] treat/kill them where they hide with our bed bug-specific system/program/treatments.]

OR

[Tackle your problem with our bed bug system of products to [detect them and] provide treatment for all areas of your room/bedroom/home.]

OPTION 1

[Identify/Detect][Kill/Treat][Prevent]

[Step][1][:][Identify] [Attract & Trap][Detect] [Detect & Trap] [Identify & Detect] [Bed Bugs] [icon][*]

[Step][2][:] Room Treatment / Large Areas^A/ Spray Treatment / Spot, Crack & Crevice Spray [icon][**]

[Step][3][:] Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat] [icon][***]

[**][Step] [2] [Treat] [:]Room Treatment / Large Areas^A/ Spray Treatment / Spot, Crack & Crevice Spray [Icons] [:] Spray bed bugs in their hiding spots [like your carpet edges/ closets /baseboards / tile/ flooring].

OR

Kills on carpets/furniture/flooring/baseboards/tile/surfaces.

OR

Spot-treat(s)/kills on bed frames/headboards/box springs/ mattresses/ beds/ walls/ baseboards/ drawers/ carpets/closets/tile/flooring/surfaces

ANot for Broadcast Use

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

[*][Step] [1] [:] [Identify [& Detect] / Attract & Trap /Detect [& Trap] [Bed Bugs] [icon] [:]

Confirm you have bed bugs by luring them out of hiding and into our secure trap.]

OR

Lure bed bugs out of hiding places

[Use/Look for Ortho [Home Defense/Brand Name] products marked for Identify [& Detect] / Attract & Trap /Detect [& Trap]]

[***] [Step] [3] [Treat] [:] [Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat] [icon] [:]

[Don't forget to] treat places that are difficult to spray [like electrical outlets/ mattresses creases/ seams/bed frames/baseboards/cracks/crevices].

OR

Kills in ducts/wall voids/electrical outlets/creases/seams/bed frames/baseboards/mattresses.

Page 40 of 45

Master label formatted according to EPA Smart label style guide - items on the first page does not

mean they will appear on front panel

[Use/Look for Ortho [Home Defense/Brand Name] products marked for Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat]

OPTION 2

Note to PM: This following option removes the identify/detect portion and focuses on the treatment.

[Kill/ Treat][Prevent]

[Step][1][:]Large Areas^A [icon] [*]

[Step][2][:] Small Areas [icon] [**]

[Step][3][:] Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Hard To Treat [icon][***]

[**][Step] [2] [Treat] [:] Small Areas/ Spot Treatment [Icons] [:]

Treat bed bug[s] [in their] hiding spots like around bed frames/headboards/box springs/ mattresses/ beds/ walls/ baseboards/ drawers.

OR

Spot-treat(s)/kills on bed frames/headboards/box

springs/mattresses/beds/walls/baseboards/drawers/furniture/luggage/curtains

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

[*][Step] [1] [Treat] [:] [Large Areas^A [icon] [:]

Spray bed bugs in their hiding spots [like your carpet edges/ closets /baseboards / tile/ flooring].

OR

Kills on carpets/furniture/flooring/baseboards/tile/surfaces.

OR

Spot-treat(s)/kills on bed frames/headboards/box springs/ mattresses/ beds/ walls/ baseboards/ drawers/ carpets/closets/tile/flooring/surfaces

[Use/Look for Ortho [Home Defense/Brand Name] products marked for Large Areas^A]]

ANot for broadcast use

[***] [Step] [3] [Treat] [:] Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat [icon] [:]

[Don't forget to] treat places that are difficult to spray [like electrical outlets/ mattresses creases/ seams/bed frames/baseboards/cracks/crevices].

OR

Kills in ducts/wall voids/electrical outlets/creases/seams/bed frames/baseboards/mattresses.

Use/Look for Ortho [Home Defense/Brand Name] products marked for Hard-to-Spray [Areas] / Hard-to-Reach [Areas] / Crack & Crevice / Cracks/ Crevices/ Difficult Areas/ Difficult To Treat/ Precise Areas/ Hard To Treat]

Note to PM: Below are representative icons and images for use with this system.

1000409685_902_000_0300acf prddi5 MMCLAIN1 2021-02-16T08:00:29 1.000





ORTHO Bed Bug Defense Plan/Program Text Based

Note to Reviewer: The following describes/explains the Ortho Bed Bug Defense Plan/Program

[Bed Bug Home Protection Plan] [Bed Bug Home Protection Cycle] [Bed Bug 3-Step Process] [Bed Bug Home Defense Plan] [Ortho Home Defense Bed Bug Plan] [Home Defense Bed Bug Plan]

[GRAPHICAL ICON identifying the steps: Detection, Treatment, Prevention]

FOR BEST RESULTS USE THIS PRODUCT AS PART OF A COMPREHENSIVE BED BUG TREATMENT PLAN. Visit our website, www.ortho.com, for more information.

Treating bed bugs systematically is crucial for adequate control. The information below will help you determine where in the system to begin. **DETECTION**

If you have not seen any bed bugs are in prevention mode, and/or want to ensure you are still bed bug free, you can detect bed bugs (if present) using the Ortho® Home Defense® Bed Bug Trap/Product Name.

TREATMENT

If you have detected bed bugs by using the products above, are being bitten, or, observe bed bugs, bed bug eggs or excrement in mattress tufts and bedding, you may want to choose from one or more of the Ortho [Home Defense/Brand Name] Bed Bug Products.

PREVENTION

To help prevent the spread of bed bugs, you should use an appropriate mattress and box spring encasement.

Note to Reviewer: The following text is an alternative (or in addition to) the above for a more comprehensive education of the consumer on the steps necessary to approach a bed bug problem. This text may appear on product labels, labeling, point of purchase educational material.

[Bed Bug Home Protection Plan] [Bed Bug Home Protection Cycle] [Bed Bug 3-Step Process] [Bed Bug Home Defense System] [Bed Bug Home Defense Solution] [Bed Bug Home Defense Bed Bug Home Defense Bed Bug Plan] [Home Defense Bed Bug System]

Detection

While bites can be an indicator that you have a bed bug problem, bites alone are not proof you are being bitten by bed bugs since bites from ticks, fleas and mosquitoes can resemble bed bug bites. Additionally, some people do not exhibit a reaction to bed bug bites. The only way to know for sure is to find and identify the bugs. You may do so through inspection or with the Ortho Home Defense Bed Bug Trap that will lure and detect bed bugs in under an hour.

Look for:

239-2746.20210218.Amendment Page 42 of 45

- Small, reddish-brown bugs approximately the size of an apple seed
- Small blood stains or dark fecal spots
- Dead bed bugs, shed skins, or small whitish eggs
- A sweet or musty odor in the room

A thorough inspection is mandatory. Bed bugs are cryptic, so be sure to look in places such as:

- mattresses & box springs around seams, creases, tufts, buttons, folds, vent holes & indentations
- bed frames disassemble bed frame to inspect cracks and crevices
- bedding & linens
- headboards & footboards
- nightstand & dresser drawers
- storage boxes, including those under beds
- furniture & upholstered furniture cushions
- pull out couches & sofa beds
- curtains & curtain rods
- rugs & tapestries
- cribs & changing tables
- chairs
- luggage & folding luggage racks
- wooden hangers
- clothing
- shoes & shoe boxes
- picture frames & wall hangings
- loose wallpaper or paneling
- wall voids & outlets behind switch plates
- electrical boxes
- baseboards & floorboards
- carpeting & carpet tack strip
- crown molding
- door & window casings
- files, papers, books & magazines
- smoke detectors, thermostats, alarm clocks, telephones, radios and other electronics
- stuffed animals and plush toys
- pet carriers

Be thorough! Any crack or crevice can serve as harborage for bed bugs. Often the places they hide are smaller than you may think possible.

Bed bugs prefer to stay close to their food source (you!) and are typically found within 1-6 feet of sleeping areas and furniture that is frequently occupied. However, inspection of entire rooms should be conducted, as bed bugs may be found in areas outside this range.

Detection devices [such as interceptors] [coasters][traps][detectors][glue traps] that are placed anywhere in the room, including under the legs of beds, couches or other furniture can be used to monitor for bed bug activity. You may not notice any bed bug activity unless monitoring/detecting is done. These types of traps can provide a barrier between the floor and bed and can be a very useful as part of an integrated pest management program.

Treatment

Bed bugs are challenging to eliminate because they can hide in many different places. Once detected, several steps must be taken to treat properly. Inspections must be thorough, and elimination, especially of eggs, is not always a certainty. Treating for bed bugs is not the same as treating for other insects such as roaches and ants. Baits typically used to treat for roaches or ants are ineffective because bed bugs must bite and feed on blood. As a result, multiple treatments and treatment steps over several weeks as part of an integrated pest management program are necessary. Non-chemical and chemical options include:

- Declutter: Eliminate all clutter where bed bugs can hide. It is clutter, not uncleanliness that puts you at risk for a bed bug infestation.
- Vacuum: Vacuum the entire area thoroughly, including the underside of the mattress, box spring and furniture, as well as the carpets and floor. Disassemble the bed and vacuum all bed components. Bed bugs and their eggs can be difficult to dislodge, so use the vacuum's suction wand or crevice tool to scrape the infested area. Immediately discard the vacuum contents into a tightly sealed trash bag. Double bag. Discard the double-sealed trash bag in an outdoor receptacle. Vacuuming every 2-3 days for 14 days is recommended. If you are using a dust product it should be reapplied after vacuuming to maintain its effectiveness.

239-2746.20210218.Amendment Page 43 of 45

- Heat Treat: Dry-dry-wash-dry. First place clothing, bedding, etc. in the dryer for two full cycles at high temperature (120-140° F). Then, wash and dry all clothing, bedding, etc. at high temperatures (120-140° F). Be careful while stripping the bed so as to not dislodge bed bugs or eggs. Seal in a plastic bag before laundering to avoid spreading bed bugs and again after laundering in a new, clean plastic bag while you finish the treatment process so as to prevent re-infestation. Place toys, shoes, backpacks, etc. in a clothes dryer set on high heat for two full cycles. Wrap items that cannot be put in a washer or dryer in a large plastic bag and place them outdoors in a hot, sunny location. The fewer items packed in each bag, the better. Monitor with a thermometer for a target temperature of at least 120°F.
- Apply Insecticides: One step in eliminating bed bugs is to carefully apply insecticides registered to treat bed bugs [and bed bug eggs] to all areas where bed bugs are detected. Controlling bed bugs using non-chemical means alone is often very difficult, potentially less effective, and usually more time consuming.
 - o Carefully read and follow label directions.
 - o Allow product to dry completely.
 - Do not sleep directly on treated mattress.
 - We recommend carefully inspecting the area and reapplying insecticides every week to kill bed bugs that later hatch from eggs, along with those that were missed during earlier treatment.
 - Detect with a trap after the second treatment to make sure there are no remaining bed bugs.
- o Cracks & Crevices: Use a liquid to treat the cracks and crevices of the bed frame, mattress & box springs, luggage and other hard to reach places, contacting as many of the insects as possible. A dust is best in electrical outlets, wall voids, carpet tack strips and bed frames.
- o Spot Treatment: Use an aerosol insecticide for spot treatment of the mattress, box spring & bed frame, baseboards, carpet & tack strips and luggage, contacting as many insects as possible.
- o Area Treatment: Use a liquid insecticide with residual activity to treat baseboards and carpet that will continue to kill bed bugs as they come in contact with the area.
- o Barrier Treatment: Use a dust to create a barrier around your baseboards, wall voids, electrical outlets and other entrance points.
- o Mattress & Household Items: To treat the mattress, box spring, furniture and other large household items that cannot be washed, use a mattress encasement to keep bed bugs where they are and from biting you.
- □ **Dispose Infested Items:** For items that cannot be treated by vacuuming, heat, laundering or insecticides, tightly wrap and seal in a large plastic bag prior to disposing. Destroy or mark "Infested with Bed Bugs" to prevent someone else from picking them up.

If after one month you are still experiencing a severe bed bug infestation, please contact your local professional pest management company.

Prevention

Proper steps must be taken to prevent an initial introduction or secondary re-infestation. These include:

- Isolating the Bed: Move your bed and other furniture away from the wall slightly. Remember, bed bugs do not fly or jump! Making sure the bed skirt and blanket do not touch the floor will make it harder for bed bugs to crawl onto the bed.
- Sealing Cracks & Crevices: Seal openings in window sills, baseboards, floorboards, furniture, bed frames and where pipes or wires or
 other utilities enter the home. Fix or take down any peeling wall paper. Tighten loose switch covers. Installing door sweeps will help
 discourage movement into hallways.

Manage the Environment: Eliminate clutter. Launder bedding and clean furniture routinely. Vacuum often and thoroughly.

Thoroughly inspect purchased furniture before bringing it home, especially if it was purchased used. However, purchasing used furniture should be avoided when possible. Monitor previously infested or likely to be infested sites daily. Remove evidence of previous infestations. Restart treatment process if necessary.

Bed bugs are typically transported from place to place as people travel, so it is important to take proper precautionary steps when traveling. Also make sure any visiting guests are not transporting bed bugs in their luggage.

o Prior to Travel:

o DO Spray luggage and allow to dry completely with a[n aerosol] product with residual activity registered to treat bed bugs [and bed bug eggs] and for use on luggage.

o DO Pack clothing and other items in sealable plastic bags. Bring extra re-sealable plastic bags for soiled clothing.

At Hotel/Destination:

o DO check for signs of bed bugs by examining the cracks and crevices of the mattress, box spring, sheets, bedding, headboard, nightstand & dresser drawers, desks, chairs, and other furniture; behind wallpaper and pictures; in clocks and other electronics; in cracks in wood floors; and under the edge of the carpet. [Carrying a small flashlight such as the [insert product name here] will help you quickly and thoroughly inspect for signs.] Signs of bed bug activity may include the presence of eggs, fecal spots, and shed skins.

- DO change rooms immediately, or change hotels entirely, if you identify bed bugs in your hotel room.
- DO check clothes hangers thoroughly before unpacking. Bed bugs hide in the cracks and crevices of hangers so a thorough inspection is necessary before hanging up clothes, especially if the hangers are wooden.
- DO re-pack luggage contents into sealable plastic bags so you can throw them directly in the dryer when you return home to kill any bed bugs or eggs that may be nestled in the clothing.
- DO use a bed bug trap such as the Ortho Home Defense Bed Bug Trap to lure and detect bed bugs
- DO Spray your luggage and allow it to dry completely with a[n aerosol] product [such as the Ortho Home Defense Dual-Action Bed Bug Killer] registered to treat bed bugs [and bed bug eggs] and for use on luggage.

239-2746.20210218.Amendment Page 44 of 45

EPA Reg. No. 239-2746

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

Master label formatted according to EPA Smart label style guide – items on the first page does not mean they will appear on front panel

- DO NOT put your suitcase on the bed. Elevate all luggage off the floor using a luggage rack (inspect first), tabletop or other hard surface. The best place is in the bathtub.
- DO NOT unpack your suitcase contents into dressers.

Returning Home:

- DO remove the items you placed in plastic bags at the hotel, and throw them immediately into the dryer, set on the highest heat setting the fabric can withstand to kill any bed bugs or their offspring that may be nestled in the items.
- DO inspect luggage and clothing for signs of bed bug activity. If signs are found, treat luggage by vacuuming, laundering (scrubbing with hot, soapy water) and/or insecticides.
- DO store luggage in sealed bags and keep them in the garage. If you are exposed to a bed bug infestation, there is no reason to throw
 out your luggage and clothing unless your infestation is severe. The key is to contain all items suspected of carrying bed bugs in plastic
 bags until you can treat them.
- DO NOT unpack luggage inside. Unpack luggage outside, or in a garage, laundry room or utility room.

These steps are very important, and must be done carefully, consistently and cyclically. Bed bugs are resilient insects that will not go away without intervention.

A comprehensive, continuous cycle of Detection -> Treatment/System-> Prevention/Detection/Monitoring is the key to gaining control. [Continuing the integrated system creates a better chance of managing bed bugs]

END OF SUB LABEL B - BOV PACKAGING