



**OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION**

WASHINGTON, D.C. 20460

June 26, 2025

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

Subject: Label Amendment - Registration Review Mitigation for Bifenthrin and Zeta-Cypermethrin  
Product Name: Outdoor Insect RTU  
EPA Registration Number: 239-2747  
Application Dates: March 9, 2021 & June 17, 2025  
Decision Numbers: 571982 & 597087  
Case Numbers: 482804

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 and Zeta-Cypermethrin Decisions, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

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

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. You must

submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact Meaghan Robertson by phone at 202-566-0169, or via email at [robertson.meaghan@epa.gov](mailto:robertson.meaghan@epa.gov).

Sincerely,

A handwritten signature in blue ink, reading "Cathryn Britton".

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

ENCLOSURE: Stamped label

***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.

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EPA File Symbol 239-2747

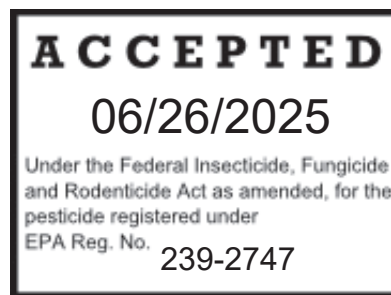
## **OUTDOOR INSECT RTU**

For Outdoor Use Only

<b>Active Ingredient:</b>	<b>By Wt.</b>
Bifenthrin <sup>1</sup> .....	0.0500%
Zeta-Cypermethrin <sup>2</sup> .....	0.0125%
Other Ingredients: .....	99.9375%
Total .....	100.0000%

<sup>1</sup> Cis isomers 97% min, trans isomers 3% max

<sup>2</sup> Cis/trans ratio: Max. 75% (±) cis and min. 25% (±) trans



## **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. 239-2747

EPA Est. No. XXXXXXXXX

[Superscript is first letter of lot number]

### **Alternate Brand Names:**

Ortho BugClear Misting Insect Killer  
Ortho Home Defense Insect Killer  
Ortho Home Defense Outdoor Insect Killer  
Ortho Home Defense Insect Killer for Outdoor Power Mister  
Ortho Home Defense Insect Killer for Power Mister  
Ortho Home Defense Outdoor Power Mister Insect Killer  
Ortho Home Defense Power Mister Insect Killer  
Ortho Home Defense Mosquito & Bug Killer  
Ortho Home Defense Insect Killer Ready-to-Use  
Ortho Home Defense Outdoor Insect Killer Ready-to-Use  
Ortho Home Defense Insect Killer for Outdoor Power Mister Ready-to-Use  
Ortho Home Defense Insect Killer for Power Mister Ready-to-Use  
Ortho Home Defense Outdoor Power Mister Insect Killer Ready-to-Use  
Ortho Home Defense Power Mister Insect Killer Ready-to-Use  
Ortho Home Defense Mosquito & Bug Killer Ready-to-Use  
Ortho Home Defense Ready-to-Use Insect Killer  
Ortho Home Defense Ready-to-Use Outdoor Insect Killer  
Ortho Home Defense Ready-to-Use Outdoor Insect Killer for Power Mister  
Ortho Home Defense Ready-to-Use Insect Killer for Power Mister  
Ortho Home Defense Insect Killer for Power Sprayer  
Ortho Home Defense Outdoor Insect Killer for Power Sprayer  
Ortho Home Defense Ready-to-Use Insect Killer for Power Sprayer  
Ortho Home Defense Power Sprayer Insect Killer  
Ortho Home Defense Power Sprayer Outdoor Insect Killer  
Ortho Home Defense Power Sprayer Insect Killer Ready-to-Use

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

<b>FIRST AID</b>	
<b>If swallowed</b>	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.
<b>If in eyes</b>	Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
<b>HOTLINE NUMBER</b>	
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.	
<b>NOTE TO PHYSICIAN</b>	
Emergency Information call 1-877-465-5161.	

## **PRECAUTIONARY STATEMENTS**

<b>Hazards to Humans &amp; Domestic Animals</b>
<b>CAUTION.</b> Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear: Long-sleeved shirt and long pants, socks, shoes, and waterproof gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

**ENVIRONMENTAL HAZARDS:** This pesticide is extremely toxic to fish, aquatic invertebrates, oysters and shrimp. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Drift and run-off from treated areas may be hazardous to aquatic organisms in neighboring areas. Care should be used when spraying to avoid fish and reptiles in/around ornamental ponds. This product is highly toxic to bees exposed to direct treatment or residues on blooming plants. Do not apply this product or allow it to drift to blooming plants if bees are visiting the treatment area.

**PHYSICAL OR CHEMICAL HAZARDS:** Do not apply this product in or on electrical equipment due to the possibility of shock hazard.

## **DIRECTIONS FOR USE**

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

## **USE RESTRICTIONS**

- Do not use this product with thermal fogger devices which heat the product.
- Do not apply this product in a way that will contact any person or pet either directly or through drift.
- Do not allow people or pets to enter the treated area until after spray has dried.
- Not for use with any heated electric or propane foggers

To avoid unintentional exposure to Bees and other beneficial pollinators:

- Apply in early morning (dawn) or evening (dusk) when pollinators are not actively foraging.
- **DO NOT** apply when bees are visiting the treated area.
- Apply when air is calm to avoid drift.

All outdoor spray applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

1. Application to pervious surfaces such as soil and other vegetation;
2. Perimeter band treatments of 7 feet wide or less from the base of a man-made structure to pervious surfaces (e.g., soil, or mulch);
3. Applications to underside of eaves, soffits, doors, or windows permanently protected from rainfall by a covering, overhang, awning, or other structure;
4. Applications around potential exterior pest entry points into man-made structures such as doorways and windows, when limited to a band not to exceed one inch;
5. Applications to vertical surfaces (such as the side of a man-made structure) directly above impervious surfaces (e.g., driveways, sidewalks, etc.), up to 2 feet above ground level;
6. Applications to vertical surfaces directly above pervious surfaces, such as soil, mulch or other vegetation) only if the pervious surface does not drain into ditches, storm drains, gutters, or surface waters.

- Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios except as a spot or crack-and-crevice treatment.
- For soil or foliar applications, do not apply by ground within 25 feet of lakes, reservoirs, rivers, permanent streams, marshes or natural ponds, estuaries and commercial fish farm ponds.
- Treat surfaces to ensure thorough coverage but avoid runoff.
- To treat insects harbored in voids and cracks-and-crevices, applications must be made in such a manner to limit dripping and avoid runoff onto untreated structural surfaces and plants.
- Spot treatments must not exceed two square feet in size (for example, 2 ft. by 1 ft. or 4 ft. by 0.5 ft.).
- Do not make applications during rain. Avoid making applications when rainfall is expected before the product has sufficient time to dry (minimum 4 hours).
- Rainfall within 24 hours after application may cause unintended runoff of pesticide application.
- Do not apply or irrigate to the point of runoff.
- Do not apply when the wind speed is greater than 15 mph.
- Do not spray the product into fish pools, ponds, streams, or lakes. Do not apply directly to sewers or storm drains, or to any area like a drain or gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur.
- Do not allow the product to enter any drain during or after application.



Do not 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:** 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:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

## **PRODUCT APPLICATION INSTRUCTIONS**

**NOTE TO PM:** For all Options below Graphics illustrating a step or group of steps may appear on final printed label

**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")

### **Mister**

[Applicator (Device) (Applicator Name) Directions/Instructions]

#### **[HOW TO USE:]**

##### **[Fill]**

1. Unscrew/remove/twist cap off of the reservoir/tank
2. Pour [product name]/the product into the reservoir/tank.
3. Screw/attach/twist/secure cap onto the reservoir/tank

##### **[Spray]**

1. Push/turn/flip [the] on/off button/on/off button
2. Aim and Spray/treat/apply according to the How To Apply section

##### **[Finish]**

1. Push/turn/flip [the] on/off button
2. Pour any remaining liquid back into original bottle/container

##### **[Clean]**

1. [To clean: Refer to the Applicator Name/Mister cleaning instructions.

Refer to the Applicator Name/Mister booklet for additional information.

**Important:** To Prevent sprayer from clogging, always clean after use, as directed.]

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## **METHODS OF USE AND GENERAL APPLICATION INSTRUCTIONS**

### **[PRODUCT FACTS]**

#### **Kills (any or all of the following insects)**

<b>Adelgids</b>	Eastern Sprucegall		
<b>Ants</b>	Argentine Carpenter Foraging Fire Ants	Pavement Pharaoh/Sugar Pyramid	Red/Western Harvester
<b>Aphids</b>	Apple Black Cherry Buckhorn	Greenbug Pea Pecan	Rose Rosy Apple Walnut
<b>Bees</b>			
<b>Beetles</b>	Billbugs Black Turfgrass Ataenius Carpet Colorado Potato Corn Rootworm (Adults) Curculio (Cow Pea ,Plum) Elm Leaf	Flea Japanese (Adults) Lady Beetles (including Asian Lady Beetle Eggs) Mexican Bean Pine Chafer (grub) Pine Shoot	Sap Spotted Cucumber / Southern Corn Rootworm (Adults) Striped Cucumber Weevils (Annual Bluegrass & Black Vine)
<b>Borers</b>	American Plum European Corn Lesser Peachtree	Peachtree Peach Twig Southwestern Corn	Squash Vine Stalk
<b>Boxelder Bugs</b>			
<b>Bristletails</b>			
<b>Caterpillars</b>	Alfalfa Armyworms (Beet, Fall, Southern, True, Yellow Striped, Beet Armyworm Eggs) Bagworms Blueberry Spanworm Budworms Corn Earworm Cutworms	Cranberry Fruitworm Filbertworm Green Cloverworm Green Fruitworm Hickory Shuckworm Hornworms (Tobacco & Tomato) Imported Cabbageworm Loopers (Alfalfa, Cabbage, Celery)	Navel Orangeworm Painted Lady Pecan Nut Casebearer Pickleworm Rindworm Saltmarsh Sod Webworms Tent Velvetbean
<b>Centipedes</b>			
<b>Chinch Bug</b>	Hairy	Southern	
<b>Cockroaches</b>	American/Palmetto Bug/Waterbug	Asian Oriental	German
<b>Crickets</b>			
<b>Earwigs</b>			
<b>Firebrats</b>			
<b>Fleas</b>	Cat	Dog	
<b>Flies</b>	Apple Maggot Biting Flies	Cherry Fruit Corn silk	European Crane (Adult) House
<b>Fungus Gnats</b>			
<b>Grasshoppers</b>			
<b>Hornets</b>			
<b>Lace Bugs</b>			
<b>Leaffooted Bugs</b>	Squash Bug		
<b>Leafhoppers</b>			
<b>Leafminers</b>	Alder	Tentiform	Vegetable
<b>Leafrollers</b>	Oblique Banded	Red-Banded	Variegated
<b>Mealybug</b>			
<b>Midges</b>			
<b>Millipedes</b>			
<b>Mites</b>	Broad Carmine Chigger	Spruce Clover Two Spotted Spider (Adult)	Two Spotted Spider (Eggs) European Red Pecan Scorch
<b>Mole Crickets</b>			
<b>Mosquitoes</b>			

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<b>Moths</b>	Artichoke Plume Codling	Diamondback	Gypsy
<b>Periodical Cicada</b>			
<b>Phylloxera</b>	Pecan Leaf	Pecan Stem	
<b>Pillbugs &amp; Rollie Pollies</b>			
<b>Plant Bugs</b>	Tarnished	Lygus Bug	
<b>Psyllids</b>	Pear		
<b>Sawflies</b>	European Pine	Redheaded Pine	
<b>Scales</b>	San Jose Euonymus	Brown Soft	California Red
<b>Scorpions</b>			
<b>Silverfish</b>			
<b>Sowbugs</b>			
<b>Spiders</b>	Black Widow Brown Recluse	Hobo	Wolf
<b>Spittlebugs</b>	Pecan		
<b>Springtails</b>			
<b>Stink Bugs</b>	Brown Marmorated	Kudzu	
<b>Stored Product Pests</b>			
<b>Thrips</b>			
<b>Ticks</b>			
<b>Termites</b>			
<b>Wasps</b>			
<b>Whiteflies</b>			
<b>Yellowjackets</b>			

#### ***For Listed General Insect Use***

	<b>Outdoor Surfaces &amp; Nuisance Pests</b>
<b>When to Apply</b>	<ul style="list-style-type: none"> <li>Use anytime as a preventative treatment or after you see evidence of insect activity</li> </ul>
<b>Before You Apply</b>	<ul style="list-style-type: none"> <li>Do not allow this product to contact water supplies</li> <li>Shake Well</li> </ul>
<b>How to Apply</b>	<ul style="list-style-type: none"> <li>Apply directly to the listed pests [from about 12 inches]. Also spray surfaces of building, porches, patios, garages, and [&amp;] other areas where these bugs [insects] [pests] have been seen or are found. [Hold Sprayer/Mister/Device/Wand about 12 inches from the surface.] Do not spray in or near fishponds or other bodies of water. Spray until slightly wet without soaking.</li> <li><i>Image of typical Outdoor Application</i> [Perimeter Foundations] [Patios &amp; Decks]</li> </ul>
<b>After You Apply</b>	<p><i>[reentry icon]</i> Do not allow people or pets to enter the area until after spray has dried.</p> <ul style="list-style-type: none"> <li>Repeat as needed. Re-treatment is recommended at least once per season (3 months)</li> <li>For long-lasting residual control/action leave spray undisturbed. The product will keep on killing for up to X months* <b><i>Note to PM: See 3 &amp; 6 month claim section for qualifying statement which will appear here</i></b></li> </ul>

#### **[Garden & Vegetables Uses][Landscape Uses]**

[Garden/ Yard Pests [Bugs] [Insects] [Controlled] [Killed]: Aphids, beetles, caterpillars, whiteflies and [&] other listed garden/outdoor/yard pests [more]]

<b>On Ornamental Plants including: ROSES, FLOWERS, SHRUBS, &amp; SMALL [Shade][Non-Fruit Bearing] TREES</b>
<b>Kills Insects</b> Aphid, armyworm, bagworms, billbug, crickets, cutworms, Eastern spruce gall adelgade, elm leafbeetles, European pine sawfly, fall webworm, flea beetle, grasshoppers, greenbug aphids, gypsy moth, hornets, Japanese beetle (adults), lacebug, lady beetles [asian lady beetles] [lady bugs], leafhopper, loopers, lygus bug, mealybugs, mimosa webworms, mosquitoes, northern pine weevil, oak webworm, orchard weevil, periodical cicada, pine chaffer, pine shoot weevil, plantbug, redheaded pine sawfly, saltmarsh caterpillar, sap beetle, sawfly, silverfish, spittlebug, springtails, spruce mites, stink bug, tarnished plant bug, tent caterpillar, thrips, two-spotted spider mite, wasp, whitefly, and Zimmerman pine moth.



On [listed] [Home] Vegetable[s] [Gardens], Melons, Fruit and Nut Trees	
<b>Kills Insects</b>	
Aphids, alfalfa caterpillar, alfalfa looper, American plum borer, apple aphid, apple maggot, armyworms, artichoke plume moth, beet armyworm, black cherry aphid, black vine weevil, blueberry spanworm, buckhorn aphid, cabbage loopers, carrot weevil, celery looper, cherry fruit fly, chinch bug, clover mites, codling moth, Colorado potato beetle, corn earworm, corn rootworm (adults), corn silkfly (adult), cow pea curculio, cranberry fruitworm, cranberry weevil, crickets, spotted and striped cucumber beetle (adults), cutworms, diamondback moth, European corn borer, fall webworm, filbert worm, flea beetle, grasshoppers, green cloverworm, green fruitworm, hickory shuckworm, imported cabbageworm, lacebug, leafhopper, leafrollers, lesser peach tree borer, loopers, lygus bug, Mexican bean beetle, naval orangeworm, oblique banded leafroller, oriental fruit moth, painted lady caterpillar, pea aphid, pea weevil, peach tree borer, peach twig borer, pecan nut casebearer, pecan spittlebug, pecan leaf phylloxera, pecan stem phylloxera, pear psylla, pecan aphid, pecan weevil, pepper weevil, pickleworm, plantbug, plum curculio, potato leafhopper, potato psyllid, potato tubeworm, red-banded leafroller, red striped fireworm, rindworm, rosy apple aphid, saltmarsh caterpillar, San Jose scale (fruit only), sap beetle, southwestern corn borer, squash bug, squash vine borer, stalk borer, stink bug, tarnished plant bug, tentiform leaf miner, tobacco hornworm, tomato fruitworm, tomato hornworm, tomato pinworm, tufted apple budmoth, vegetable leafminer, velvetbean caterpillar, variegated leafroller, walnut aphid, walnut husk fly, weevils, western bean cutworm, and whitefly.	

<b>Where to Apply/Use</b>	On Roses, flowers, shrubs, trees and other ornamentals, vegetables, [nuts] and [&] fruit trees.
<b>How to Apply/Use</b>	<ul style="list-style-type: none"> <li>• <b>Garden/Landscape Pests:</b> Hold Sprayer/Mister/Device/Wand about 12 inches from plant. Thoroughly cover all the plant surfaces until slightly wet, but not to the point of runoff. <b><i>Alternate text:</i></b> Hold Sprayer/Mister/Device/Wand about 12 inches from plant to wet the upper and lower leaf surfaces until wet, but not to the point of runoff.</li> </ul>
<b>When to Apply/ Use</b>	<ul style="list-style-type: none"> <li>• Apply when insects first appear.</li> <li>• Re-apply as necessary to maintain control waiting at least 7 days between each application.</li> </ul>

VEGETABLES AND FRUITS	DAYS TO WAIT TO HARVEST
Corn (Sweet corn)	3
Tomatoes	1
Blackberries, Raspberries	3
Lima Beans	3
Peas (Green pea, Snow pea, Sugar Snap pea), Beans (Snap bean, Wax bean), Blackeyed pea	3
Chayote, Cucumber, Edible gourds, Cantaloupe, Casaba, Honeydew melon, Pumpkin, Summer squash (Zucchini), Winter squash (Butternut squash, Acorn squash, Spaghetti squash), Watermelon	3
Mustard Greens *DO NOT USE IN CA	7
Broccoli, Chinese broccoli, Cabbage, Cauliflower, Eggplant	7
Head lettuce, Peppers (Bell and Non-bell), Artichoke	7
Pears	14
Pecans	21

# **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.

## **Optional Marketing 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:** When qualified claims are used on the market label, the qualifying statement will appear in close proximity to the claim when it does not impact any mandatory language.

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



[Brand]	Ortho BugClear Misting Insect Killer	
[Product name]		
[Marketing Call-out]	Works [exclusively] with Ortho Home Defense Outdoor Power Mister and other battery or pump powered sprayers. (include image)	
[Claims]		
1.	Kills 180+ bugs including Mosquitoes [that may transmit the Zika virus], [Fleas,] [Ticks,] [Spiders,] [Ants] [and Japanese Beetles]	
2.	Prevents insects/bugs for up to 3-6 months * Note to PM- if this claim is used, one of the qualifiers for either the 3 or 6 month claim will be included	
3.	Fast Acting Formula	
4.	Odor Free	
<b>[Product Facts:]</b> <b>Follow all use directions appearing elsewhere on this label.</b>	<b>What it Does:</b> Kills [home invading] insects including [ants], [cockroaches], [spiders], [fleas], [ticks], [scorpions], [beetles], [earwigs], [silverfish], [centipedes], [millipedes], [mosquitos]. (See inside for complete list)	
	<b>Where to Use:</b> Outdoors ([perimeter foundations],[patios & decks]) wherever insects are a re-occurring problem.	
	<b>When to Use:</b> Use anytime as a preventative treatment or after you see evidence of insect activity.	
	Do not allow people or pets to enter the treated area until after spray has dried Questions & Comments: (phone & computer icon) Call 1-800-225-2883 or visit our website at <a href="http://www.ortho.com">www.ortho.com</a>	

#### **General Residual Control claims**

1. Forms/Creates/Establishes a perimeter treatment
2. Forms/Creates/Establishes a [bug/insect] barrier
3. Create(s) a [bug] border/barrier/perimeter [treatment]
4. Create [a] bug barrier[s]
5. Apply [as] a barrier
6. Apply as a border around your home
7. Apply as a perimeter/border/residual treatment
8. Long lasting [bug] perimeter treatment/barrier/border
9. Guards against the bugs you can't/don't see
10. Keeps [on] killing with residual action, even after you spray/ spray has dried
11. Keeps on killing after spray has dried
12. Kills [insects] even after you spray
13. Kills [insects] even after spray has dried

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

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

***Note to PM: When qualified claims are used, the qualifying statement should appear following the claim when it does not impact any mandatory language.***

#### **6-Month Claims**

14. Up to 6 month control/protection [outdoors]\*\*
15. Kills/Controls/Protects [for] up to 6 months [outdoors]\*\*
16. Kills insects [outdoors] for 6 months\*\*

\*\* Applies to/for: spiders (excluding Black Widow, Brown Recluse, Hobo)

#### **3-Month Claims**

17. Up to 3 month control [protection] [outdoors]\*\*\*
18. Kills/Controls/Protects [for] up to 3 months [outdoors]\*\*\*
19. Kills bugs [outdoors] for 3 months\*\*\*

\*\*\* Applies to/for: Ants, Fleas, Cockroaches, Spiders (excluding Black Widow), House Flies, Scorpions, and American Dog Ticks

### **Egg Killing Claims**

20. Kills Beet Armyworm, Two Spotted Spider Mites, Asian Lady Beetle and their eggs
21. (Plus) kills insects and their eggs\*\*\*\*
22. Kills insect eggs\*\*\*\*
23. Prevents insect eggs from hatching!\*\*\*\*
24. Up to 12 month control\* plus kills insect eggs\*\*\*\*

\*\*\*\*Applies to/for: Beet Armyworms, Two Spotted Spider Mites and Asian Lady Beetles

### **Efficacy Claims**

25. Kills Fleas that may transmit Flea Allergy Dermatitis (FAD)/ Flea-Bite Anemia/ Tapeworms/ Haemobartonellosis [to cats/dogs]
26. Kills Fleas that may transmit Bartonellosis [to cats/dogs/people]
27. Kills Fleas that may transmit Mycoplasma to cats
28. Kills Ticks that may transmit Haemobartonellosis/ Anaplasma phagocytophilum [to cats/dogs]
29. Kills Ticks that may transmit Cytauxzoonosis/ Tularemia to cats
30. Kills Ticks that may transmit Anaplasma/ Babesiosis/ Ehrlichiosis/ Lyme borreliosis/ Rocky Mountain spotted fever/ Hemoplasmosis/ Mycoplasma [to dogs]
31. Kills ticks that may transmit [the] Powassan [POW] disease/virus
32. Kills mosquitoes that may transmit Heart worm [to cats/dogs]
33. Kills mosquitoes that may transmit Subcutaneous dirofilariasis [to cats/dogs/people]
34. Kills mosquitoes that may transmit West Nile Virus [to humans]
35. Kills mosquitoes that may transmit the Zika virus [to humans]
36. Kills mosquitoes that may transmit West Nile [and Zika] virus
37. Kills mosquitoes that may transmit West Nile and Zika virus
38. Kills mosquitoes, ticks and fleas that may transmit diseases\*

\*any disease combination of diseases in claims 32-37

### **Dual Ingredient Claims**

39. Two active ingredients in one product
40. Dual Action
41. [Dual Action] Fast Acting plus Long Residual
42. [Fast Acting], [Long Lasting] Insect Control

### **Water Based Marketing Claims**

43. Non-Staining
44. No Stains
45. Does not Stain
46. Dries clear
47. Virtually Odor Free
48. Odorless
49. Odor Free
50. Fragrance-Free
51. Unscented
52. No lingering odor
53. Dries fast
54. Water based [formula] [*water droplet icon*]
55. Non-flammable
56. Dries in minutes [for fast/quick re-entry]!
57. Leaves no residue [behind]

### **Location of Use Claims**

58. Outdoor [Formula]
59. [Formulated] [For] Outdoor Use
60. Ideal For/ Use Before/ Great Before Backyard/Outdoor parties, gardening and games\*

\*Keep out of reach of children and cover or remove exposed food and drinks before application.

**Perimeter Treatment Claims**

61. Apply [as] a barrier
62. Apply as a border around your home
63. Apply [as] a (perimeter/border/residual treatment)
64. Creates a [bug] barrier
65. Creates a [bug] border
66. Creates a perimeter treatment
67. Long lasting [bug] perimeter treatment/barrier/border

**Kill Claims**

68. Kills insects<sup>∞</sup>, Spiders and Ticks
69. Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish, Scorpions, Black Widow Spiders, and other insects<sup>∞</sup>
70. Kills Home invading Insects<sup>∞</sup>
71. Also Kills Ticks (including Ticks that may transmit Lyme Disease)
72. Visible activity against bugs within minutes ≈
73. Starts killing/acting within minutes≈
74. Kills [1...188/180+] Insects<sup>∞</sup>
75. Kills [the] bugs you see and/& [the] [ones] bugs you don't [see] ∞
76. Kills the toughest home invading bugs<sup>∞</sup>
77. Kills[both] crawling and/& flying insects<sup>∞</sup>
78. Kills [all] common household bugs<sup>∞</sup>
79. Kills by contact!
80. Kills Roaches, [any combination of listed insects]
81. Kills insects [including any combination of listed insects]

≈Applies to/for: Carpenter Ants, Harvester Ants, Oriental and German Cockroaches

<sup>∞</sup>Refer to booklet/back panel for complete list of insects/bugs/pests (NOTE to PM: If qualifier is not present, "listed" will be inserted before "insects/bugs/pests")

**General Applicator Claims**

82. No [more] tired hands
83. Reduces hand fatigue
84. No more squeeze, squeeze, squeeze
85. No [constant] pumping
86. Save[s] time and energy
87. [Quick and] Easy to Use
88. No Leaks or Mess
89. Precise control [for maximum accuracy]
90. Consistent spray [for maximum accuracy]
91. Adjustable sprayer [nozzle] [for maximum control]
92. Cut your time spraying in half
93. [New][Improved] Applicator/Applicator Name
94. Grab & Go
95. No [constant] pumping
96. No more bending/kneeling
97. Consistent/even coverage
98. You're/It's always ready to spray
99. The easy/easier way [to spray/to kill bugs/to kill insects/Home Defense®]
100. Change the way you spray
101. [The] Easy [way] to spray
102. No Hand Fatigue
103. Ideal/Great for large/small jobs/areas/spaces
104. No Aerosols
105. No Mixing, No Measuring
106. Convenient/Simple Design
107. Ready to Use

### **Mister Claims**

- 108. Powerful mist spray reaches insects where they hide
- 109. Treat your gardens/shrubs/ornamentals/bushes/roses/flowers
- 110. Do it yourself professional treatment application
- 111. Use with Power Mister/Applicator Name (sold separately)
- 112. Use/Works with Non-Heated Misters & Foggers
- 113. Image of Power Mister [Insert Image]

### **Value**

- 114. [Great] Value
- 115. Value/Combo/Wow Pack
- 116. X pack
- 117. Refill/Recharge/Renew/Fill-Up/Reload
- 118. Same formula, better value!
- 119. Save [Money] with the Refill!
- 120. X% more [Free]!
- 121. Home & Ranch [Value] Size
- 122. Over 10% more than 1.33 gal size
- 123. [Over] X% more than X gal size
- 124. Bonus/Value Size
- 125. Exclusive to Club Stores!
- 126. Exclusive Club [Bonus] Size!
- 127. Value/Bonus Size – 2-pack!
- 128. Value/Bonus Size – 2 gallons!
- 129. Value/Bonus Size – 2-pack = 2 gallons!
- 130. Value/Bonus Size – X-pack/ X-gallons!
- 131. Value/Bonus Size – X-pack = X gallons!
- 132. 33% more than 1 gallon size (***applies to 1.33 gal. size***)
- 133. 10% more bonus size (***applies to 1.1 gal. size***)
- 134. Look inside [label] for special offer information!
- 135. Go to [[www.orthohomedefense.com](http://www.orthohomedefense.com)] now for a special offer! Offer subject to change or expiration.
- 136. Buy [Outdoor power mister/product name] get [one bottle/product name] free

### **OTHER**

- 137. Easy to Use
- 138. XX% less plastic
- 139. [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.
- 140. New/Now (The following claim may appear on any label panel for 6 months following commercial introduction)
- 141. Proven performance
- 142. Read Entire label before use
- 143. [Recyclable symbol]
- 144. Before [illustration] / After [illustration]
- 145. [For] Outdoor Residential use only
- 146. Intended for residential use
- 147. Peel Open for use directions and further information
- 148. OPEN
- 149. Resealable Label for Directions & Precautions
- 150. Peel Open for use directions and further information
- 151. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
- 152. PEEL HERE / PRESS TO RESEAL
- 153. PULL / PEEL HERE [TO REMOVE TAPE]
- 154. Product of –and/or- Made in U.S.A.
- 155. Assembled in the USA
- 156. ©20XX, licensed by [Company/Brand]. World rights reserved.
- 157. QUESTIONS OR COMMENTS - [phone icon] 1-800-225-2883 [www.ortho.com](http://www.ortho.com) [Visit our website] [computer icon]
- 158. For additional mosquito control look for Ortho Home Defense Products [product images]

**Guarantees:**

- 159. Guaranteed†††
- 160. [Company/Brand] Guarantee[d] †††
- 161. Guaranteed [results] †††
- 162. Guaranteed Kill [or your money back] †††
- 163. [Company/Brand] Satisfaction guaranteed[†††]
- 164. [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.

**Mosquito System Names/Headings / Home Defense [product line] System:**

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

***This product is for Shrubs/Gardens/Landscape - Lawns relates to another product in the Home Defense program/system.***

- 1. [3-Step] [Location based/use area] System for [Protection from] Mosquitoes
- 2. [3-Step] Mosquito [Location based/use area] Treatment[Plan/Program/System]
- 3. [3-Step] Mosquito [Location based/use area] Solution System/Set
- 4. [3-Step] Mosquito [Location based/use area] System [for Protection]
- 5. [3-Step] Mosquito [Location based/use area] Protection [Plan/Program/System]
- 6. [3-Step] Mosquito [Location based/use area] Treatment I [Program/System]
- 7. Part of the [Ortho Home Defense/brand name] [3-Step] [Location based/use area] System for [protection from] Mosquitoes [in 3 steps]
- 8. Part of the [Ortho Home Defense/brand name] [3-Step] Mosquito [Location based/use area] Treatment Plan/Program/System [in 3 steps]
- 9. Part of the [Ortho Home Defense/brand name] [3-Step] Mosquito [Location based/use area] Solution System/Set [in 3 steps]
- 10. Part of the [Ortho Home Defense/brand name] [3-Step] Mosquito [Location based] [use area] System [for Protection] [in 3 steps]
- 11. Part of the [Ortho Home Defense/brand name] [3-Step] Mosquito [Location based/use area] Protection Plan/Program/System [in 3 steps]
- 12. Part of the [Ortho Home Defense/brand name] 3-Step Mosquito [Location based/use area] Treatment [Program/System] [in 3 steps]
- 13. [Ortho Home Defense/brand name] [3-Step] [Location based/use area] System for [protection from] Mosquitoes [in 2/3 steps]
- 14. [Ortho Home Defense/brand name] [3-Step] Mosquito [Location based/use area] Treatment Plan/Program/System [in 3 steps]
- 15. [Ortho Home Defense/brand name] Mosquito [Location based/use area] [Solution] System/Set [in 3 steps]
- 16. [Ortho Home Defense/brand name] [3-Step] Mosquito [Location based/[use area] Protection Plan/Program/System [in 3 steps]
- 17. [Ortho Home Defense/[brand name] 3-Step [3-Step] Mosquito [Location based/use area] Treatment [Program/System]
- 18. [Ortho Home Defense/brand name] protection from Mosquitoes System [in 3 steps]
- 19. [Ortho Home Defense/brand name] Outdoor protection from Mosquitoes [in 3 steps]
- 20. Home [Mosquito] Treatment [system] [in 3 steps]
- 21. [Outdoor] protection from Mosquitoes [in 3 steps]
- 22. [Outdoor] Mosquito Treatment I [in 3 steps]
- 23. Treat these/this area[s]/location[s] for [protection from] mosquitoes [Patio & Deck][Landscape/Shrubs][Lawns]
- 24. Location based [mosquito] treatment/protection [program/system/plan] [in 3 steps]
- 25. [Outdoor/backyard] Patio [& Deck], Shrubs/Garden/Landscape and Lawn [mosquito] [Program/system/treatment] [in 3 steps]
- 26. [Outdoor/backyard] Patio [& Deck], Landscape & Lawn [mosquito] [Program/system/treatment/control] [in 3 steps]
- 27. For best results use a system to treat mosquitoes
- 28. For best treatment [of mosquitoes] use the full [treatment/solution/protection] system/plan/program
- 29. For best results [of mosquitoes] use the full [treatment/solution/protection] system/plan/program [For best results, more than one product may be needed for mosquito /prevention]
- 30. [part of a] [Pest/Mosquito] Control System [in 3 steps]
- 31. Use as a system for treatment of mosquitoes

***Bold, italicized text is information for the reader and is not part of the label.***

EPA File Symbol 239-2747

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

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32. Mosquito Treatment in 3 Steps
33. Step 2
34. Ortho Home Defense Home Protection
35. Targeted [Mosquito] [Location based/use area]Treatment/ Program/Plan/System [in 3 steps]

#### **Additional System Claims**

1. Part of a system for Home Protection [from mosquitoes]
2. [Part of] [Ortho] [Home Defense] [mosquito] system for Home Protection
3. [Ortho] Home Defense [provides][products for] zones/areas of protection around your patio & deck/perimeter/outdoor living space(s), Shrubs/gardens/landscapes, and lawn [from mosquitoes]
4. Extend your [bug/insect] barrier further with [Ortho] [Home Defense] [treatment/control] system/program/plan for Home Protection
5. [Let] [Ortho] Home Defense [system for Home Protection] [guard(s)/protect(s)] your home [from mosquitoes]
6. Part of a home defense system/program/plan [from mosquitoes]
7. [system/program/plan for] [Mosquito] Home Protection [in 3 steps]
8. [Part of the] [Home] [brand name] protection

#### **ORTHO Mosquito System**

***Note to PM: This registration will emphasize or indicate the product is for “Step 2” on the FPL.***

***This Product is not for Step 3 – Lawns***

[Don't just spray yourself for Mosquitoes but treat your outdoor areas [as well] to repel them away from you and kill them where they live and breed in your lawn & landscape.]

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

[Step][1][:] Repel Mosquitoes [from Patio & Deck/Perimeter/Outdoor Living Space(s)] [icon]\*

[Step][2][:] Kill/Treat mosquitoes in Shrubs/Gardens/Landscape [icon] \*\*

[Step][3][:] Kill/Control/Treat mosquitoes in Lawns [icon] \*\*\*

**\*\* [Step] [2] [:] Kill/ Treat mosquitoes in Shrubs/Gardens/Landscape [icons]: Penetrate [foliage/brush/plants] and kill mosquitoes where they hide.**

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

\*[Step] [1] [:] Repel Mosquitoes [from Patio & Deck/Perimeter/Outdoor Living Space (s)] [icons]: Repel mosquitoes from your patio [and/&/or] deck [with candles/devices/diffusers/barrier sprays].

[Use/Look for Ortho [Home Defense] products marked to Repel Mosquitoes [from Patio & Deck].]

\*\*\* [Step] [3] [:] Kill/Treat mosquitoes in Lawns [icon]: Apply to areas/lawns to kill mosquitoes when they land.

[Use/Look for Ortho [Home Defense] products marked for Kill/Treat mosquitoes in Lawns.]

**OR**

[Kill][Repel]

[Step][1][:] Patio & Deck/Perimeter [Protection]/Outdoor Living Space(s) [icons]\*

[Step][2][:] Shrubs/Landscapes/Gardens [icons] \*\*

[Step][3][:] Lawn: [icons] \*\*\*

**\*\* [Step] [2] [:] Shrubs/Landscapes/Gardens [icons]: Penetrate [foliage/brush/plants] and kill mosquitoes where they hide. OR Kill Mosquitoes OR Kill/ Treat mosquitoes where they hide.**

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

\*[Step] [1] [:] Patio & Deck/Perimeter [Protection]/Outdoor Living Space(s) [icons]: Repel mosquitoes from your patio [and/&/or] deck [with candles/devices/diffusers/barrier sprays].

[Use/Look for Ortho [Home Defense] products marked for Patio & Deck.]

\*\*\* [Step] [3] [:] Lawns [icons]: Apply to areas/lawns to kill mosquitoes when they land.

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[Use/Look for Ortho [Home Defense] products marked Lawns.]

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

