



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

March 25, 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: BBG 2701
EPA Registration Number: 239-2763
Application Date: February 17, 2021
Decision Number: 571037
Case Number: 481949

Dear Chris Zemanek:

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

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

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

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

If you have any questions about this letter, please contact Meaghan Caruso by phone at 202-566-0169, or via email at caruso.meaghan@epa.gov.

Sincerely,

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

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

ENCLOSURE: Stamped label

BBG 2701

For Outdoor Use Only. Not for use in commercial nurseries or greenhouses, or on grass grown for seed, or on golf courses and sod farms.

ACTIVE INGREDIENTS:

Bifenthrin*0.55%
Chlorantraniliprole 0.27%
OTHER INGREDIENTS 99.18%
Total100.00%

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

[Product is covered by one or more of the following patents:

U.S. Patent No. 4,742,060, 5,783,203 and 4,238,505. Other patents pending]

[No Sale, Sale Into, Distribution and/or Use In Nassau, Suffolk, Kings and Queens Counties of New York State.]

Net Contents: 5.33 fl. oz.....5 gal (157.6 mL.....18.9 L)

KEEP OUT OF REACH OF CHILDREN CAUTION

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

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if swallowed. Causes moderate eye and skin irritation. Avoid contact with eyes, skin or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Wear long-sleeved shirt and long pants, socks and shoes.

ACCEPTED

03/25/2025

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 239-2763

FIRST AID

If Swallowed	<ul style="list-style-type: none">• Call a 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 a poison control center or doctor.• Do not give anything by mouth to an unconscious person.
If in Eyes	<ul style="list-style-type: none">• Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, and then continue rinsing.• Call a poison control center or doctor for treatment advice.
If on skin or clothing	<ul style="list-style-type: none">• Take off contaminated clothing.• Rinse skin immediately with plenty of water for 15-20 minutes.• Call a poison control center or doctor for treatment advice.
For Medical Emergencies Call 24 Hours a Day 1-877-465-5161	
Have the product container or label with you when calling poison control center or doctor or going for treatment.	

ENVIRONMENTAL HAZARDS

This product is toxic to wildlife and highly toxic to fish and aquatic invertebrates, including oysters and shrimp. Do not apply directly to water. 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. This product is toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

Surface Water Advisory

This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having a high potential for reaching surface water via run-off for several months or more after application. A level, well-maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential loading of chlorantraniliprole from runoff water and sediment. Runoff of this product will be reduced by avoiding applications when rainfall is forecasted to occur within 48 hours.

Groundwater Advisory

This chemical has properties and characteristics associated with chemicals detected in groundwater. This chemical may leach into ground water if used in areas where soils are permeable, particularly where the water table is shallow.

PHYSICAL OR CHEMICAL HAZARDS

Do not apply this product in or on electrical equipment due to the possibility of shock hazard.

Do not mix or allow coming in contact with oxidizing agent. Hazardous Chemical reaction may occur.

DIRECTIONS FOR USE

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

[Shake Well]

RESTRICTIONS

- 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.
- [In New York State, this product may NOT be applied to any grass or turf area [lawns] within 100 feet of a water body (lake, pond, river, stream, wetland, or drainage ditch).]
- 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 apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios.
- Do not allow the product to enter any drain during or after application.
- Do not apply or irrigate to the point of runoff.
- 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 when the wind speed is greater than 15 mph.
- Do not apply more than 0.20125 lb AI Bifenthrin, 0.105 lb AI Chlorantraniliprole per acre per application to residential use sites (i.e. around private homes, apartment buildings, condominiums, non-agricultural out buildings, non-commercial greenhouses, preschools or day care facilities.)
- Maximum application rate is 12.8 fl. oz. of product per 1000 sq. ft. per application or 32 fl. oz. of product per 2500 sq. ft. (0.2 lb. Bifenthrin per acre per application)
- Do not apply more than 0.5 lb chlorantraniliprole/Acre/year.
- Do not make more than 2 applications per year. [In New York State, do not apply more than once per year.]
- Do not apply more than once every 7 days.
- Do not apply BBG 2701 to areas which are waterlogged or saturated. Doing so will not allow penetration into the root zone of the plant.
- Do not use for commercial grass seed production.
- Do not use on sod farm turf, golf course turf, or grass grown for seed.
- Do not apply indoors or to people or animals
- Do not let people and pets enter the treated area until treatment has dried.



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 product.

[PRODUCT FACTS]	
INSECTS KILLED & CONTROLLED	<p>Use BBG 2701 to kill and provide [3-month] control of:</p> <p>Surface Insects: Ants (Including Lasius spp., Carpenter, Harvester, Pavement, Odorous, Pyramid, Argentine, Black Turf, White-footed Ant, Crazy Ant, Little Black Ant, Small Honey Ant, Black Turf Ant, Lawn Ant, Cornfield Ant, Ghost Ant, Thief Ant, Acrobat Ant, Citronella Ant, Big-headed Ant, Allegheny Mound Ant), , Cockroaches (Including American, Asian, Brown banded, smoky brown, Oriental), Fleas (Including Cat flea, Dog flea) Scorpions (Arizona Stripetail Scorpion, Southern Unstriped Scorpion, Lesser Stripetail Scorpion, Yellow Ground Scorpion, California Common Scorpion, Northern Scorpion, Dune Scorpion, Eastern Sand Scorpion), Spiders (including Daddy long legs, Hobo, Marbled Cellar Spider, Longbodied Cellar Spider, Shortbodied Cellar Spider, Thinlegged Wolf Spider, Burrowing Wolf Spider, Pirate Wolf Spider)</p> <p>Subsurface Insects: White Grubs (including larvae of): Japanese Beetles, Asiatic Garden Beetles, Black turfgrass ataenius, Aphodius spp., European chafers, Green June beetles, May/June beetles, Northern masked chafers, Oriental beetles, Southern masked chafers; Caterpillars (Armyworms, Cutworms and Sod Webworms), Billbugs, Crane fly larvae.</p>
INSECTS KILLED	<p>[Use BBG 2701 to also kill:]</p> <p>Armyworms (Including Lawn armyworm, Fall Armyworm), Billbugs (Including Bluegrass billbug, Hunting Billbug), Black Turfgrass Ataenius adults, Centipedes, Chinch Bugs (Including Hairy Chinchbug, Southern Chinchbug, False Chinchbug), Crickets (Including House Cricket, Common short-tailed Cricket, Indies short-tailed cricket, Arizona Cricket, Tropical Cricket, Variable Field Cricket, Fall Field Cricket, Southeastern Field Cricket, Texas Field Cricket, Spring Field Cricket, Northern Wood Cricket, Western Striped Cricket, Eastern Striped Cricket, Sand Field Cricket, Vocal Field Cricket, Southern Wood Cricket), Cutworms (Including Black cutworm, Bronzed Cutworm, Granulate Cutworm, Variegated Cutworm), Earwigs, European Crane Fly Larvae, Fiery Skipper, Firebrat, Frit Fly, Ground Beetle, Ladybeetles (Including Convergent ladybeetle, Seven-spotted Ladybeetle, Two- spotted Ladybeetle, Thirteen-spotted Ladybeetle, Twice-stabbed Ladybeetle, Asian Ladybeetle, Mealybug Ladybird), Leafhoppers, Moths, Mealybugs, Millipedes, Mole Crickets (Including Tawny Mole Cricket, Southern Mole Cricket, European Mole Cricket, Northern Mole Cricket, Prairie Mole Cricket, Short-Winged Mole Cricket), Pillbugs /Rollie Pollies, Seed Maggots, Sowbugs, Springtails, Striped Grassworm, Ticks (Including American Dog, Brown dog, Deer), Two-lined Spittle Bugs, Webworms (Including Sod Webworm, Grass Webworm, Tropical Sod Webworm), Weevils (Including Hyperodes, Bluegrass weevils), Beetles, Biting Flies, Fungus Gnats, Grasshoppers, Lacebugs, Treehoppers, Leaf-footed bugs, Stinkbugs (Including, Kudzu, Brown Marmorated), Periodical Cicadas, Sowbugs, Mosquitoes (Including Anopheles, Aedes, Culex), Whiteflies, Yellowjackets, Spiders (Including Black widow, Brown Recluse and Hobo)</p>
WHERE TO APPLY/USE	[All grass type] Lawns
WHEN TO APPLY/USE	<p>Apply early/proactively [in the Spring to late Summer] to prevent and resolve/stop infestation. [Works best when applied before grubs hatch.]</p> <p>DO NOT apply BBG 2701/this product when turf areas are waterlogged. The product may not work effectively under these conditions.</p>
PEOPLE & PETS [👤🐕]	Do not let people and pets enter the treated area until treatment has dried.

NOTE TO PM: FOR USE WITH CONSUMER-MIXED CONCENTRATE PRODUCTS ONLY

HOW TO USE:

Option 1 – Dial ‘N Spray/Dial ‘N Spray [with Direct Connect]



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

[HOW TO USE:]

Set:[Applicator name][

1. Turn dial to 5 1/3 fl oz.

Fill:

1. Pour [desired amount of] concentrate/product into sprayer jar.
2. Turn sprayer nozzle to preferred spray.
3. Do NOT add water.

Spray: [

1. Connect [garden] hose to sprayer.
2. Turn on water.
3. Press and hold trigger for continuous spray. Apply evenly [at 5 1/3 fl. oz. per 412 sq. ft.].
4. Spray only until surface [of the lawn] is wet.

Finish: [

1. Pour unused concentrate/product back into its original container.
2. To clean: refer to the Ortho® Dial N Spray® cleaning instructions.

AND/OR

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

[HOW TO USE:]

Set: [Applicator Name] [

2. Turn dial to 5 1/3 fl. oz.

Connect: [

1. Remove jar/container from/Ortho® Dial ‘N Spray®/applicator name [applicator/sprayer].
2. Remove cap from the concentrate bottle. [Keep cap for storage.]
3. Twist [screw] the [Ortho® Dial ‘N Spray®] [applicator name] [applicator/sprayer] onto concentrate bottle to attach.
4. Connect [garden] hose to the sprayer and turn on water.

Spray: [

1. Press and hold trigger for continuous spray. Apply evenly.
2. Spray only until surface of the lawn is wet.


Finish: [

1. Untwist [unscrew] the [product name] concentrate bottle from the /Ortho® Dial ‘N Spray®/applicator name/applicator/sprayer.
2. Replace cap on the [product name] concentrate bottle.
3. To clean: Refer to the Ortho® Dial ‘N Spray® cleaning instructions.

Refer to the Ortho® Dial ‘N Spray label and booklet for additional information.

Important:

To prevent sprayer from clogging, always clean after use, as directed.

	<p>Option 2 – Tank Sprayer</p> <p> []</p> <p>[Applicator (Device) (Applicator Name) Directions/Instructions]</p> <p>[HOW TO USE:]</p> <ol style="list-style-type: none"> 1. Add 6.4 fl. oz. per gallon of water to treat 500 ft². 2. Spray the lawn until thoroughly covered. <p>[1 Tablespoon (Tbs) = 3 teaspoons (tsp) 1 fl oz = 2 Tbs 4 fl oz = ½ cup]</p> <p>Food utensils such as spoons and measuring cups must not be used for food purposes after use with pesticides.</p>
How to Apply	<ul style="list-style-type: none"> • Spray when air is calm to avoid drift. Apply as necessary, waiting 7 to 14 days between each application. Hard to control insects may require 2 applications, except in NY. • If temperature is expected to exceed 85°F, spray in early morning or late afternoon when it is cooler. • Bottle (32 fl. oz.)/(5.33 fl. oz.....5 gal) will treat 2,500 sq. ft./(416.....50,000 sq. ft.) (0.2 lb. Bifenthrin per acre per application)

NOTE TO PM: FOR USE WITH READY-TO-SPRAY PRODUCTS ONLY

<p>How to Use</p>	<p>Connect</p> <ul style="list-style-type: none"> • Connect sprayer to [garden] hose. • Turn on water • [User tip: start at the farthest point in your yard and work back.] <p>Spray</p> <ul style="list-style-type: none"> • To BEGIN spraying, [Bend small plastic tab back and] move/turn/rotate/slide [color] switch/knob/lever/slider to ON position. • [Spray only until the surface of the [plants/leaves] are/is wet. Apply evenly] • [Spray as directed in the [How Much to Use][How To Apply]/[Section Header] [instructions] <p>Finish</p> <ul style="list-style-type: none"> • To STOP spraying, move/turn/rotate/slide [color] switch/knob/lever/slider to OFF position. • Turn off water • Relieve water pressure by moving/turning/rotating/sliding [color] switch/knob/lever/slider to ON/WATER position. • After water slows to a drip, move/turn/rotate/slide [color] switch/knob/lever/slider to OFF position. • Disconnect sprayer from [garden] hose. <p>OR</p> <p>HOW TO USE/APPLY:</p> <p>Connect:</p> <ul style="list-style-type: none"> ▪ Connect/Attach/Sprayer/bottle to end of hose ▪ Turn on water ▪ Extend hose to farthest area to be treated <p>Spray:</p> <ul style="list-style-type: none"> ▪ [Remove tamper evident band/strip/seal] ▪ To begin spraying, [disengage safety lock and] point nozzle in the direction you want to spray. ▪ Slide thumb activation switch forward to ON position. ▪ Spray evenly over measured area ▪ Allow to soak into ground, avoiding runoff to nearby desirable plants. <p>Finish:</p> <ul style="list-style-type: none"> ▪ To STOP spraying, slide thumb activation switch backward to OFF position. ▪ Turn off water. ▪ Relieve water pressure by sliding thumb switch to ON / WATER / WATER ONLY position until water slows to a drip. Then, slide switch back to OFF position [and engage safety lock].
<p>How To Apply/How Much to Use</p>	<ul style="list-style-type: none"> • Spray when air is calm to avoid drift. • Apply as necessary, waiting 7 to 14 days between each application. Hard to control insects may require 2 applications, except in NY. • If temperature is expected to exceed 85°F, spray in early morning or late afternoon when it is cooler. • Bottle (32 fl oz) will treat 2,500 sq. ft. (0.2 lb. Bifenthrin per acre per application)

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place to avoid excess heat.

PESTICIDE and CONTAINER DISPOSAL: 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.

ORTHOTHO AND YOUR ENVIRONMENT

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

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

†THE ORTHO GUARANTEE

If for any reason you the consumer are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.

[Subregistrant 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.

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Manufactured/Distributed/Sold for/by:
The Ortho Group
PO Box 190
Marysville, OH 43040

EPA Reg. No. 239-2763
EPA Est.No. XXXXXXXX
[Superscript is first letter of lot number]
Batch/Lot Code

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

[Made in USA]

QUESTIONS OR COMMENTS - [phone icon] [Call] [company/brand phone number] [or] [Visit our website][www.]
[company/brand website].com [computer icon]

Optional Marketing Claims

Any or all listed bugs may be represented graphically on Final Printed Labeling

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: numbers can be expressed numerically or spelled out on the FPL .

[3-Month] Grub Control

White grubs can cause extensive damage to turf by feeding on grass roots. Affected turf turns yellow, then brown, and is easily pulled up in pieces with your hands.

One Application Kills Grubs [for 3 Months]!

BBG 2701/This product works best when applied before grubs hatch. The active ingredients will remain in the root zone of the turf until the eggs of grubs hatch. Newly hatched grubs are highly susceptible to BBG 2701/this product and are killed before they become large enough to cause turf damage.

BBG 2701 prevents turf damage by killing grubs when they are newly hatched, before they can cause damage.

Protecting your lawn from damaging insects has never been easier!

Just one application of BBG 2701 will protect your lawn both above and below the soil surface. The formula kills invading surface insects like ants (except carpenter & pharaoh ants), fleas and ticks, plus damaging subsurface insects like grubs and European crane fly larvae.

Coverage:

1. [One] [32 fl oz][5.33 fl. oz.....5 gal] bottle] covers up to 2500/416....50,000 square feet [sq ft]
2. Covers [up to] 416...50,000 SQ. FT.
3. Treats [up to] 416....50,000 SQ. FT.

Speed Claims:

4. 1 Hour to Slow Grubs
5. 1 Hour to Slow Lawn Damage***
6. Fast acting* [formula]
7. Fast acting* against listed lawn insects
8. Fast-acting and long-lasting**
9. [Guaranteed⁺⁺⁺] Kills 1.....163 listed insects [with one application]
10. [Guaranteed⁺⁺⁺] Kills 1.....163 listed insects by contact
11. Kill[s] 1....163 Listed Insects
12. Kills by Contact [above and below the ground/surface]
13. Kills in 24 hours
14. Kills in hours
15. Kills overnight
16. Reduce grub damage in 1/one hour
17. Starts killing/to kill listed lawn insects immediately
18. Starts working/to work immediately
19. Slow [lawn] damage in 1/one hour***
20. Slow grub damage in 1/one hour
21. Slow grub[s] [from][feeding] in 1/one hour

*24 hours

**Kills in 24 hours and 3 month control

*** Reduction in grub feeding after ingestion

Residual Claims:

22. 3-Month* Control
23. 3-Month grub control
24. One application kills/controls listed [lawn damaging] insects for up to 3 months*

25. One application provides up to 3-month control*
26. One treatment/application prevents/controls 1....67 listed insects all season long/for up to 3 months*.
27. Apply Once to Kill and Prevent* [for up to 3 months]
28. Apply once to prevent/control 1....67 listed insects all season long*/for up to 3 months*.
29. Apply once and you're done [for 3 months*]
30. Controls/Kills grubs for up to 3 months* [90 days*]
31. Create[s] a/an [invisible] Bug Barrier
32. Creates a barrier to keep insects* from coming in through your neighbor's yard
33. Creates a barrier to keep /insects* out of your yard/lawn/home/property
34. Creates a 3 Month Bug* Barrier
35. Delivers performance: Kills grubs [all season long/for up to 3 months*]
36. Delivers performance: Prevents grub damage [all season long/for up to 3 months*]
37. Destroys/Kills (insert any listed insect(s) from 3 month list on label) [for up to 3 months*]
38. [Dual-Action:] Kills/Controls listed insects [above & below [the] ground/surface] [above ground & below] [for up to 3 months*] [guaranteed†]
39. Extended 3 month* control
40. [Got grubs?] One treatment/application prevents/controls grub problems all season long/for up to 3 months*.
41. [Got grubs?] Apply once to prevent/control grub problems all season long*/for up to 3 months*.
42. Keeps [on] killing for [up to] 3 months*
43. Kills listed insects by contact [keeps on killing] for [up to] 3 months*
44. Kill[s] [and prevents] 1....67 listed insects [for 3 months*]
45. Kill(s) 1....67 listed insects for 3 months*
46. Long Lasting! [up to] 3 month* control [guaranteed†]
47. Powerful protection against Bugs, even grubs [for up to 3 months*]
48. Provides 3-month* soil/lawn control/defense/protection
49. Season Long* [insect] [any insect from the list] Control
50. Season long* control of 1....67 listed insects
51. Season long* control of 1....67 listed insects including [insert any listed insect(s) from 3 month list on label]
52. The easy way to kill 1.....67 listed insects/kill grubs/prevent grub damage/problems [all season long*/for up to 3 months*]
53. [Up to] 3 months* of Control/Defense/Protection above & below ground
54. [Works two ways:] Kills/Controls listed insects [above & below [the] ground/surface] [above ground and below] [for up to 3 months*] [guaranteed†]
55. Works two ways: (1) Kills [by contact] [and] (2) Keeps killing for 3 months*
56. Works two ways: (1) Starts working immediately, (2) Keeps working for 3 months*

*Refer to booklet/back panel for 3 month insect list

Sub-Surface Claims:

57. 2-in-1/ Dual Action: Kill[s] surface insects and sub-surface insects
58. 2-in-1/ Dual Action [Kills Above & Below]
59. 2-in-1/ Dual Action: Kill[s] and Prevent[s] [Above & Below]
60. 2-in-1/ Dual Action [Surface and/plus Soil Insects]
61. 2-in-1 Formula [Insect [Control] and/plus Grub Control]
62. [2-in-1] [Formula] Lawn/Surface Insect Killer plus/and Grub Killer
63. [2 bottles in 1] Lawn/Surface Insect Killer plus/and Grub Killer
64. 3 [Benefits] in 1 [Bottle] Kills Lawn/Surface Insects plus/and Kills Grubs plus/and Prevents for 3 Months
65. Two Benefits in One [bottle]
66. All in One Bottle Kill & Prevent: Lawn/Surface Insect Killer plus/and [Mature] Grub Killer plus/and 3 Month Prevention [Above & Below]
67. Apply/Works anytime spring through late summer
68. Apply/Works between spring and late summer
69. [Apply/Works] Spring to [late] Summer
70. Bug plus/and Grub Killer
71. Controls/Kills above & below the [lawn('s)] surface
72. [Conveniently] Treat Two Insect problems at Once [Above and Below]
73. Cure[s] your grub problems

74. Defends against grubs [[plus] [to] help[s] turf recover]
75. Dual Action [formula]: Kills and Prevents/Controls
76. Dual Action formula: 1. Ortho MAX surface insect/bug control, 2. [Scotts] GrubEx Soil/Lawn Protection
77. [Guaranteed+] Above [ground] & Below [ground] Control/Defense/Protection\
78. [Helps] Prevent root damage/destructive grubs for a healthier/stronger lawn
79. Invest in your lawn. Protect it from [lawn damaging] insects/bugs [and] [grubs]
80. Kills listed [above surface/lawn/ground] insects/bugs
81. Kills listed [below surface/lawn/ground] insects/bugs
82. Kills listed insects in/and under the lawn
83. Kill[s] the Bugs you See and the Grubs you Don't
84. Kill[s] Insects Above and below the ground [even Grubs]
85. Kill[s] / Control[s] / Prevent[s] grubs before they become beetles
86. Kill[s] / Control[s] / Prevent[s] grubs so the lawn can repair itself
87. Kill[s]/ Control[s]/ Prevent[s] grubs and/to strengthen[s] your lawn
88. Kill[s] / Control[s] / Prevent[s] lawn damaging insects
89. Kills insects above and below ground [even grubs]
90. Kills 1....163 listed insects [on contact] [with one application]
91. Kills Lawn [Insects] and Soil Insects
92. Kills Lawn Insects and Grubs
93. Kills any size grubs
94. Kill[s] [white] Grubs
95. Kills late instar grubs
96. Kills lawn damaging grubs
97. Kill Grubs Before they Damage Your Lawn
98. Long lasting grub control guaranteed [all season long -] for up to 3 months
99. [Multi-purpose] lawn/surface insect and grub control
100. [Now] with the power of [Scotts] GrubEx
101. [One application] kills over 1.....163 listed insects [on contact]
102. Penetrates deep [in the soil] to kill lawn [damaging] grubs
103. Prevent Turf Damage [with Insert product name]
104. Prevents turf damage by killing grubs before they destroy your lawn
105. Protect/Guard your lawn [from grub damage]
106. Protect[s] your lawn from [lawn damaging] [bugs] [and] grubs
107. Protect[s]/revitalize[s]/regenerate [s]/renew[s]/rejuvenate[s]/refresh[es] your lawn by killing [lawn damaging] grubs
108. [Scotts] GrubEx soil/lawn protection
109. Kill Grubs [before they damage your lawn]
110. The active ingredient in [product name] will remain in the root zone of the turf until the grub eggs hatch. Young, newly hatched grubs are very susceptible to [product name] and are killed before they become large enough to cause turf damage.
111. With/Plus [the power of Scotts] GrubEx
112. With/Plus GrubEx [subsurface insect] control
113. You've worked hard for this lawn. Save/Protect it from [lawn damaging] insects/bugs [and] [grubs]

Specific Insect Claims:

114. Controls chinch bugs, sod webworms (lawn moth), fleas, ticks (including ticks that may transmit Lyme Disease), and other lawn pests listed on the back
115. Kills [1,2,3...163] listed insects [by contact]
116. Kills 1.....163 Listed Insects [even grubs]
117. Kills listed lawn-damaging insects
118. Kills listed lawn insects [for up to 3 months*]
119. Kills European Crane Fly Larvae
120. Kills [lawn damaging] Grubs
121. Kills listed [surface and subsurface] insects with a single application
122. Kills/controls/ prevents grubs now and prevents them for up to 3 months
123. Kills/Suppresses (***insert any listed insect***)
124. Kills surface insects by contact
125. Lawn protection [against / from] (***insert any listed insect***)

- 126. One application kills grubs before they damage your lawn
- 127. Tough on bugs, Easy to Use
- 128. Tough on (insert any insect from list), Easy to Use

*Refer to booklet/back panel for 3 month insect list

Usage Site Claims:

- 129. Use on [residential/home] lawns

Other Claims:

- 130. Apply anytime spring through late Summer
- 131. Apply both in spring and summer
- 132. Apply early April to late August
- 133. [Brand], The better way to fight bugs [in your lawn]
- 134. Bring Back the Life to Your Yard
- 135. Dead Insects Guaranteed†
- 136. Defend What's Yours™ [for up to 3 months*]
- 137. Draw the Line on bugs [with Brand]
- 138. Draw the Line on (any insect from the list) [with Brand]
- 139. Dual Action formula
- 140. Easy to apply
- 141. Easy to Use
- 142. Enjoy what's yours [Bug Free]
- 143. Fix/Prevent with [Insert Brand name]
- 144. Formulated for lawns
- 145. From the experts at Ortho
- 146. From the Experts at [Insert Brand name]
- 147. [Get][Insert Brand name], Part of the [Insert Brand name] Family of Products
- 148. Get Tough on Bugs with [Insert Brand name]
- 149. Got [tough] Bugs? Get [Insert Brand name]
- 150. [Have a] skunk/mole/armadillo/raccoon problem? It might be grubs/bugs. [Prevent turf damage with][Product Name]
- 151. Helps prevent root damage caused by insects/grubs for a healthier / stronger lawn
- 152. Kills/Destroys Bugs [any listed insect], Not the Lawn
- 153. Kill Bugs with the power of [Brand Name]
- 154. Kill (any insect from the list) with the power of [Brand Name]
- 155. Kill more by using with [Product Name]
- 156. Kill [Bugs] with Confidence
- 157. Kills [lawn] insects that are annoying to children/people/pets
- 158. Kill and Prevent [listed insects/insert any insect from list] [to Save you Time]
- 159. Look out bugs, [Brand] is coming after you too
- 160. Look out (any insect on the list), [Brand Name] is coming after you too
- 161. New (to be used for six months after commercial introduction)
- 162. No Bugs, No problem[s]
- 163. Non-Staining
- 164. Not harmful to lawn grasses
- 165. Odor-Free
- 166. Outsmart/Kill/Prevent Bugs the First Time* [with confidence]
- 167. Outsmart Bugs [with Product/Brand name]
- 168. Outsmart [Insert any insect from the list].
- 169. Part of the [sub registrant] Family of Products
- 170. Prevent Turf Damage [with Product Name]
- 171. Prevents lawn damage for a healthier / stronger lawn
- 172. Protect What's Yours with [Brand Name]
- 173. Protect your Lawn with [Product Name]
- 174. Protects [Defends] your lawn from top to bottom

- 175. Satisfaction Guaranteed†
- 176. Say Goodbye to Bugs [or any listed insect on the label]
- 177. Prevent Skunk/Mole/Armadillo/Raccoon problems caused by grubs in your lawn with [Product Name].
- 178. Take Control of Your Yard with [Brand]
- 179. The [Product Name] [Summer] Program/Plan
- 180. Trusted/Proven [insert Brand name] results
- 181. Won't Harm the Lawn
- 182. Won't harm lawns

*Refer to booklet/back panel for 3 month insect list

Promotional Offering Options

- 183. Great Value- 2 [products] in 1 [bottle]
- 184. Great/Best Value - 2 [products] in 1
- 185. Bonus [Size/Pack/Pak]
- 186. [Insert value]% Free [More][than X] qualify
- 187. [Insert value]% More value size [than X] qualify
- 188. Club [Pack/Pak]
- 189. Combo [Pack/Pak]
- 190. New! (Use only if new package or formulation) (to be used for six months after commercial introduction)
- 191. New and Improved! (Use only if new package or formulation) (to be used for six months after commercial introduction)
- 192. New! Larger Size [covers up to [insert value] sq ft] (if a new size is introduced) (to be used for six months after commercial introduction)
- 193. Value [size/sized]
- 194. [Insert Dollar Amount] Rebate
- 195. A [Insert dollar amount] value Free [insert description] with this purchase [insert brand name][insert container size]
- 196. Free [insert brand name][insert amount][value]
- 197. Free Sample
- 198. Great Value
- 199. Twin [pack/pak]
- 200. Bundle Pack
- 201. [Insert number] Bottles [Included]
- 202. Value [pack/pak]
- 203. A [Insert dollar amount] value
- 204. Free [insert description] with this purchase [insert brand name][insert container size]
- 205. Better Value [concentrate]
- 206. Super Saver [concentrate]
- 207. Super value [concentrate]
- 208. Economical [concentrate]

Ready-to-Spray Applicator Claims:


- 209. Ready to Spray Hose-end applicator
- 210. One-handed operation
- 211. Ergonomic [design]
- 212. Ready-Spray [II]® [Ready-to-Spray] [Applicator Name]
- 213. [Simply] attach to [garden] hose and spray [go]
- 214. No mixing required
- 215. Low pressure [applicator] [spray pattern]
- 216. Broadcast [applicator] [spray pattern]
- 217. Simple [and/ easy] [to use]
- 218. Convenient [Simple] [Design]
- 219. Economical – use to cover large areas
- 220. Easily cover large areas
- 221. Hand doesn't get wet [Hand stays dry]
- 222. Easy grip [control]
- 223. Includes water [only] setting [option]

- 224. [Easy] [Ergonomic] Comfort Grip [Design]
- 225. [Instant] [Easy] [One-handed] on/off [applicator] [switch] [action]
- 226. No mixing, no measuring- just spray!
- 227. Easy-to-use sprayer
- 228. Improved [Applicator/Application] [System! /Device!]
- 229. One-hand design
- 230. One step prep
- 231. Covers/Treats 2500 sq. ft. in 12 minutes (32 fl oz RTS)
- 232. Covers/Treats more [area/ground] faster (with broadcast control)
- 233. Easy/ Simple [to use]
- 234. Gentle shower applicator/spray pattern
- 235. No messy clean-up
- 236. No concentrate contact [with] [Ready-Spray®/Ready-to-Spray/Applicator Name]
- 237. One-handed operation [use] [spraying]
- 238. Ready-Spray®/Ready-to-Spray/Applicator Name
- 239. [To remove] Cut here [to remove] /[Insert graphic].
- 240. Remove [Before Use]
- 241. Tamper Evident [seal/strip/band]

Concentrate/DNS/Tank Sprayer Claims

- 242. Easy to apply with a tank sprayer
- 243. Exact measurement with Ortho® Dial 'N Spray®
- 244. No over/under application with Ortho® Dial 'N Spray®
- 245. With [the convenient] measuring cup, mixing [Insert brand name] has never been easier
- 246. No drip spout
- 247. Drain back no-mess cap
- 248. [Apply with/ Use in] a Ortho [insert brand name] [tank/ Multi Purpose] Sprayer [or a [handheld] trigger sprayer]
- 249. As easy as 1) Open 2) Pour [into measuring [cap/ cup] 3) Mix [with water] 4) Apply
- 250. Cap is a measuring cup
- 251. Cap works like a measuring cup [to help you use the right amount]
- 252. Close tightly while pushing down to turn [Insert Arrow Graphics]
- 253. [Drain-Back/ Drain back] [cup/ cap/ spout/ into bottle]
- 254. Drip free [pour] spout
- 255. [Easy-Measure/ Easy measure] [cup/ cap]
- 256. [Easy] Pour [cap/ spout]
- 257. Easy pour cap [allows for delivery of/ helps deliver the/ helps measure the] [correct/ desired/ right]
- 258. amount of product [every time]
- 259. Easy pour [cap/ spout] makes using concentrates [simple/ easy/ to use]
- 260. Easy to apply with a Ortho [insert brand name] [tank/ Multi Purpose] sprayer
- 261. Easy to [see/ read] measuring lines
- 262. For [Insert Brand Name] Use Only
- 263. Includes Measuring [Cup /Cap]
- 264. Less mess [with easy pour spout] [with drain back [cap/ cup]]
- 265. Never lose the measuring cup again
- 266. No drip [pour] [lip/ spout] [helps [prevent/ avoid] [spilling/ messes]]
- 267. No leak [cap/ cup]
- 268. No mess [bottle/ cap/ lid]
- 269. No need to rinse the [cap/ cup] [- product drains back into the bottle]
- 270. Measuring [Cup /Cap] Included
- 271. Measuring [cap/ cup] makes it easy to use the right amount
- 272. Measuring [cap/ cup] won't get lost
- 273. [Peel/ Pull/ Tear] [off tamper resistant band/ on bottom of cap]
- 274. Pour Spout
- 275. Recyclable bottle
- 276. Recycle symbol
- 277. Remove foil seal
- 278. Rinse After Use

279. Squeeze Tabs, Turn Cap to Open []

280. Squeeze, turn, press cap [and turn/ while turning] [to open] []

281. With [the convenient] measuring [cup/ cap], mixing [Insert Brand Name] [controlling insects around your home] has never been easier

282. With [the convenient] measuring [cup/ cap], controlling insects all around your home] has never been this fast and easy

ORTHO DIAL N SPRAY DIRECT CONNECT CLAIMS:

- 283. Direct connect to the Ortho Dial N Spray [applicator name]
- 284. Direct connect to Ortho Dial N Spray [applicator name] means no more measuring
- 285. No more measuring concentrates with Ortho Dial N Spray [applicator name]
- 286. No concentrate contact with Ortho Dial N Spray [applicator name]
- 287. No over/under application with Ortho Dial N Spray [applicator name]
- 288. Exact measurement with Ortho Dial N Spray [applicator name]
- 289. Simple, direct connect capability with Ortho Dial N Spray [applicator name]
- 290. No measure, direct connect capability with Ortho Dial N Spray [applicator name]
- 291. No over/under application, direct connect capability to Ortho Dial N Spray [applicator name]
- 292. Quick and easy to attach to Ortho Dial N Spray [applicator name]
- 293. Easily connects to the Ortho Dial N Spray [applicator name]
- 294. No measuring! Attaches directly to the Ortho Dial N Spray. [applicator name]
- 295. With a quick twist, attach directly to the Ortho Dial N Spray [applicator name]
- 296. Direct Connect [applicator name]
- 297. No measuring [with Direct Connect/applicator name]

Packaging Claims:

- 298. Easy-Measure [Cap] [Top] [Lid] [Cup]
- 299. Drain-Back [Cap] [Top] [Lid] [Cup]

Guarantees:

- 317. Guaranteed+++
- 318. [Company/Brand] Guarantee[d] +++
- 319. Guaranteed [results] +++
- 320. Guaranteed Kill [or your money back] +++
- 321. [Company/Brand] Satisfaction guaranteed[+++]
- 322. [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.