

U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7505P) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460

239-2774

EPA Reg. Number:

Date of Issuance:

9/8/20

NOTICE OF PESTICIDE:

X Registration
Reregistration
(under FIFRA, as amended)

Term of Issuance:

Conditional

Name of Pesticide Product:

Indoor and Outdoor Concentrate

Name and Address of Registrant (include ZIP Code):

Chris Zemanek Sr. Analyst, Registrations The Scotts Company d/b/a The Ortho Group P.O. Box 190 Marysville, OH 43040

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA section 3(c)(7)(A). You must comply with the following conditions:

1. Submit and/or cite all data required for registration/registration/registration review of your product under FIFRA when the Agency requires all registrants of similar products to submit such data.

Signature of Approving Official:	Date:
Jel Herrick	9/8/20
Jacquelyn Herrick, Product Manager 03	
Invertebrate-Vertebrate Branch 01	
Registration Division (7505P)	

EPA Form 8570-6

2. You are required to comply with the data requirements described in the DCI identified below:

Page 2 of 2 EPA Reg. No. 239-2774 Decision No. 562490

a. Bifenthrin GDCI-128825b. Zeta-cypermethrin GDCI-129064

You must comply with all of the data requirements within the established deadlines. If you have questions about the Generic DCI listed above, you may contact the Chemical Review Manager in the Pesticide Reevaluation Division: http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1

- 3. Make the following label changes before you release the product for shipment:
 - Revise the EPA Registration Number to read, "EPA Reg. No. 239-2774."
- 4. Submit one copy of the final printed label for the record before you release the product for shipment.

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.

If you fail to satisfy these data requirements, EPA will consider appropriate regulatory action including, among other things, cancellation under FIFRA section 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records. Please also note that the record for this product currently contains the following CSFs:

- Basic CSF dated 2/17/2020
- Alternate CSF 1 dated 8/21/2020
- Alternate CSF 2 dated 8/21/2020
- Alternate CSF 3 dated 8/21/2020
- Alternate CSF 4 dated 8/21/2020
- Alternate CSF 5 dated 8/21/2020
- Alternate CSF 6 dated 8/21/2020
- Alternate CSF 7 dated 8/21/2020
- Alternate CSF 8 dated 8/21/2020

If you have any questions, please contact Jasmin Jackson by phone at 703-347-0732, or via email at jackson.jasmin@epa.gov.

Enclosure

Indoor and Outdoor Concentrate

Alternate Brand Names:

Ortho Home Defense Insect Killer for Indoor & Perimeter Concentrate

Ortho Home Defense Indoor & Outdoor Insect Killer Concentrate

Ortho Bug B-Gon Insect Killer for Indoor + Perimeter Concentrate

Ortho Home Defense Max Indoor Insect Barrier Concentrate

Ortho Home Defense Max Indoor & Outdoor Insect Killer Concentrate

Ortho BugClear Insect Killer for Indoor & Perimeter Concentrate

Traditional Bottle Packaging

[For Residential [Indoor/ [and/&] [Outdoor] Use Only]

Active Ingredients:	By Wt.
Bifenthrin ¹	0.300%
Zeta-Cypermethrin ²	0.075%
Other Ingredients:	<u>99.625%</u>
[Total:]	100.000%

¹ Cis isomers 97% min. trans isomers 3% max

KEEP OUT OF REACH OF CHILDREN CAUTION

See back [panel/booklet] for additional precautionary statements

NET CONTENTS: 1.0 fl. oz......2 gal. (59.1 ml 7.6 L)

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION. Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear: Longsleeved shirt and long pants, socks, shoes, and 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. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems. 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 reptile pets in/around ornamental ponds. This product is highly toxic to bees exposed to direct treatment of residues on blooming crops or weeds. Do not apply this product or allow to drift to blooming crops if bees are visiting the treatment area.

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 NUM	MBER
Have the produ	uct 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.

ACCEPTED

09/08/2020

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

239-2774

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

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

DIRECTIONS FOR USE

EPA Reg. No. 239-NEW

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

- Do not water the treated area to the point of run-off
- Do not make applications during the rain.

Outdoor Applications Including Hard Surfaces

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

- (1) Treatment to soil or vegetation around structures;
- (2) Application to building foundations, up to a maximum height of 2 feet.

Other than applications to building foundations, all outdoor applications to hard surfaces such as-sidewalks, driveways, patios, porches and structural surfaces (e.g., windows, doors, and eaves) are limited to spot and crack-and-crevice applications only.

Application is prohibited directly into sewers or drains, or to any area like a 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.

Application to Horizontal Hard Surfaces

To help prevent product from running off into sewers, storm drains, and curbside gutters, do not treat hard flat surfaces (e.g., driveways, sidewalks) unless the surface is protected from rainfall and spray from sprinklers.

Application to Vertical Hard Surfaces

Pest control on outside surfaces and around buildings: Applications to hard vertical surfaces outdoors (e.g., foundations) are permitted to a maximum height of 2 feet above the ground. Sections of hard vertical surfaces that join to hard flat surfaces outdoors can only be treated if either 1) these sections are protected from rainfall and spray from sprinklers, or, 2) the hard flat surfaces they touch do not drain into a sewer, storm drain, or curbside gutter.

Perimeter treatment: For sections of foundation that join to hard flat surfaces, the treated areas must be protected from rainfall and spray from sprinklers unless those hard flat surfaces do not drain into a sewer, storm drain, or curbside gutter.

IPRODUCT FACTS1

Kills [Controls] (any or all of the following insects)

Adelgids	Eastern Sprucegall	-	
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	Flea	Sap
	Black Turfgrass Ataenius	Japanese (Adults)	Spotted Cucumber / Southern Corn
	Carpet	Lady Beetles (including	Rootworm (Adults)
	Colorado Potato	Asian Lady Beetle Eggs)	Striped Cucumber
	Corn Rootworm (Adults)	Mexican Bean	Weevils (Annual Bluegrass & Black
	Curculio (Cow Pea ,Plum)	Pine Chafer (grub)	Vine)
	Elm Leaf	Pine Shoot	,
Borers	American Plum	Peachtree	Squash Vine
	European Corn	Peach Twig	Stalk
	Lesser Peachtree	Southwestern Corn	
Boxelder Bugs			
Bristletails			
Caterpillars	Alfalfa	Cranberry Fruitworm	Navel Orangeworm

000239-00NEW.20200324 Page 2 of 22

Centipedes Chinch Bug Cockroaches Crickets Earwigs Firebrats Fleas Flies	Armyworms (Beet, Fall, Southern, True, Yellow Striped, Beet Armyworm Eggs) Bagworms Blueberry Spanworm Budworms Corn Earworm Cutworms Hairy American/Palmetto Bug/Waterbug	Filbertworm Green Cloverworm Green Fruitworm Hickory Shuckworm Hornworms (Tobacco & Tomato) Imported Cabbageworm Loopers (Alfalfa, Cabbage, Celery) Southern Asian Oriental	Painted Lady Pecan Nut Casebearer Pickleworm Rindworm Saltmarsh Sod Webworms Tent Velvetbean German
Chinch Bug Cockroaches Crickets Earwigs Firebrats Fleas	American/Palmetto Bug/Waterbug	Asian	German
Crickets Earwigs Firebrats Fleas	American/Palmetto Bug/Waterbug	Asian	German
Crickets Earwigs Firebrats Fleas	Bug/Waterbug		German
Earwigs Firebrats Fleas			
Firebrats Fleas			
	<u> </u>		
Flies	Cat	Dog	
11103	Apple Maggot Biting Flies	Cherry Fruit Cornsilk	European Crane (Adult) House
Fungus Gnats			
Grasshoppers			
Hornets			
Lace Bugs			
Leaffooted	Squash Bug		
Bugs	Oquasii Bug		
Leafhoppers			
Leafminers	Alder	Tentiform	Vegetable
Leafrollers	Oblique Banded	Red-Banded	Variegated
Mealybug	Oblique Darided	Neu-Danueu	vanegated
Midges			
Millipedes			
Mites	Drood	Charles	Two Cretted Crider (Face)
wiites	Broad Carmine	Spruce Clover	Two Spotted Spider (Eggs)
			European Red Pecan Scorch
Mala Cristata	Chigger	Two Spotted Spider (Adult)	Pecan Scorch
Mole Crickets			
Mosquitoes	A (; 1 1 D)	D: 11 1	
Moths	Artichoke Plume Codling	Diamondback	Gypsy
Periodical Cicada			
Phylloxera	Pecan Leaf	Pecan Stem	
Pillbugs & Rollie Pollies			
Plant Bugs	Tarnished	Lygus Bug	
Psyllids	Pear		
Sawflies	European Pine	Redheaded Pine	
Scales	San Jose Euonymus	Brown Soft	California Red
Scorpions			
Silverfish			
Sowbugs			
Spiders	Black Widow Brown Recluse	Hobo	Wolf

Spittlebugs	Pecan			
Springtails				
Stink Bugs	Brown Marmorated	Kudzu		
Stored				
Product Pests				
Thrips				
Ticks				
Termites				
Wasps				
Whiteflies				
Yellowjackets				

EPA Reg. No. 239-NEW

[For Listed General Insect Control Use] SHAKE WELL

	Indoor Surfaces		Outdoor Sur	faces	[In Pantries – Optional Section]
When to Apply	Use anytime as lasting col		eatment or after	you see evidend	e of insect activity for long-
Before You Apply	Cover or Remore Food (including Cover All Food surfaces and U	pet food) Processing		w this product Water supplies ay into air	 [Cover or Remove Exposed Food (including pet food) Remove all items from pantry and clean pantry thoroughly
How to	Amount of Water			Am	ount of Product
Mix/Dilute		16 fl. oz.			1 fl. oz.
		24 fl. oz.			1.5 fl. oz.
		32 fl. oz.			2 fl. oz.
		1 gal.			8 fl. oz.
		1.33 gal.			10.6 fl. oz.
	2 gal.		16 fl. oz.		
	[1 Tablespoon (Tb Do not use food un pesticides.				up] od purposes after use with
How to Apply	 surface being Apply a 4-ind along the sur treated OR Apply a 4-ind along the interest home in area 	h wide band faces being h wide band erior of your s where insects rring problem	from surf sprayed. • Apply a family band alo being tree OR Apply a family band alo of your hand where in	12-inch wide ng the surfaces ated 12-inch wide ng the exterior ome in areas sects are a re- g problem able [below] for	 Spray cracks and crevices along shelves in pantries. Spray until slightly wet without soaking. [Replace non-infested items once spray has dried.]
	Volume of Diluted Product	Coverage (Linear Feet)	Volume of Diluted Product	Coverage (Linear Feet)	
	16 fl. oz.	127	16 fl. oz.	42	

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.

Image of typical Indoor		Image of typic Application	al Outdoor
2 gal.	2,044	2 gal.	679
1.33 gal.	1,359	1.33 gal.	452
1 gal.	1,022	1 gal.	340
32 fl. oz.	255	32 fl. oz.	84
24 fl. oz.	191	24 fl. oz.	63

Application







After You **Apply**

reentry icon People and Pets may re-enter treated area after spray has dried.

- Thoroughly wash all food processing surfaces and utensils with soap and water before reuse
- Repeat as needed. Re-treatment is recommended at least once per season (3 months) outdoors.
- For long-lasting residual control/action leave spray undisturbed. The product will keep on killing for up to 12 months [*] Note to PM: See 12 month claim section for qualifying statement which will appear here-options 1,2,3, or 4

Fleas and **Ticks** (Including ticks that may transmit Lyme Disease)

Do not Spray Animals

Pets resting guarters may be treated with this product. **How to Apply**: Spot treat infested areas; pet's resting quarters and localized areas of floors/floor coverings (rugs, carpet, tile, vinyl & wood) where pests may be present. Remove old bedding of pets and replace 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.

STORAGE & DISPOSAL

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

PESTICIDE DISPOSAL AND CONTAINER HANDLING: If empty: Non-refillable container. Do not reuse or refill this container. 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 (including toilet) or outdoor (including sewer) drain.

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

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

End of Traditional Bottle Packaging

000239-00NEW.20200324 Page 5 of 22

Dose Cap Concentrate

Carton/Pamphlet/Kit Label

Note to PM: Due to the small nature of the container, the following information will be presented on the outer carton or a pamphlet.

[For Residential [Indoor/ [and/&] [Outdoor] Use Only]

Active Ingredients:	By Wt.
Bifenthrin ¹	0.300%
Zeta-Cypermethrin ²	0.075%
Other Ingredients:	99.625%
[Total:]	100.000%

¹ Cis isomers 97% min, trans isomers 3% max

KEEP OUT OF REACH OF CHILDREN CAUTION

See back [panel/booklet] for additional precautionary statements

NET CONTENTS: 1.0 fl. oz......2 gal. (59.1 ml 7.6 L)

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

CAUTION. Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wear: Long-sleeved shirt and long pants, socks, shoes, and 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. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems. 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 reptile pets in/around ornamental ponds. This product is highly toxic to bees exposed to direct treatment of residues on blooming crops or weeds. Do not apply this product or allow to drift to blooming crops if bees are visiting the treatment area.

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 NUM	MBER
	uct container or label with you when calling a poison control center or doctor, or going for treatment.

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

000239-00NEW.20200324 Page 6 of 22

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

EPA Reg. No. 239-NEW

DIRECTIONS FOR USE

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

- Do not water the treated area to the point of run-off
- Do not make applications during the rain.

Outdoor Applications Including Hard Surfaces

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

- (1) Treatment to soil or vegetation around structures;
- (2) Application to building foundations, up to a maximum height of 2 feet.

Other than applications to building foundations, all outdoor applications to hard surfaces such as-sidewalks, driveways, patios, porches and structural surfaces (e.g., windows, doors, and eaves) are limited to spot and crack-and-crevice applications only.

Application is prohibited directly into sewers or drains, or to any area like a 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.

Application to Horizontal Hard Surfaces

To help prevent product from running off into sewers, storm drains, and curbside gutters, do not treat hard flat surfaces (e.g., driveways, sidewalks) unless the surface is protected from rainfall and spray from sprinklers.

Application to Vertical Hard Surfaces

Pest control on outside surfaces and around buildings: Applications to hard vertical surfaces outdoors (e.g., foundations) are permitted to a maximum height of 2 feet above the ground. Sections of hard vertical surfaces that join to hard flat surfaces outdoors can only be treated if either 1) these sections are protected from rainfall and spray from sprinklers, or, 2) the hard flat surfaces they touch do not drain into a sewer, storm drain, or curbside gutter.

Perimeter treatment: For sections of foundation that join to hard flat surfaces, the treated areas must be protected from rainfall and spray from sprinklers unless those hard flat surfaces do not drain into a sewer, storm drain, or curbside gutter.

IPRODUCT FACTS1

Kills [Controls] (any or all of the following insects)

Adelgids	Eastern Sprucegall		
Ants	Argentine Carpenter Foraging Fire Ants	Pavement Pharaoh/Sugar Pyramid	Red/Western Harvester
Aphids	Apple Black Cherry Buckhorn	Greenbug Pea Pecan	Rose Rosy Apple Walnut
Bees			
Beetles	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)
Borers	American Plum European Corn Lesser Peachtree	Peachtree Peach Twig Southwestern Corn	Squash Vine Stalk
Boxelder Bugs			
Bristletails			
Caterpillars	Alfalfa Armyworms (Beet, Fall, Southern, True, Yellow Striped, Beet Armyworm Eggs)	Cranberry Fruitworm Filbertworm Green Cloverworm Green Fruitworm Hickory Shuckworm	Navel Orangeworm Painted Lady Pecan Nut Casebearer Pickleworm Rindworm
000000 00015/0/ 0000	*		Dog 7 of 22

000239-00NEW.20200324 Page 7 of 22

	Bagworms	Hornworms (Tobacco &	Saltmarsh
	Blueberry Spanworm Budworms	Tomato)	Sod Webworms Tent
	Corn Earworm	Imported Cabbageworm Loopers (Alfalfa, Cabbage,	Velvetbean
	Cutworms	Celery)	Velvelbeall
Centipedes		3,	
Chinch Bug	Hairy	Southern	
Cockroaches	American/Palmetto	Asian	German
	Bug/Waterbug	Oriental	
Crickets			
Earwigs Firebrats			
	0-4	Des	
Fleas	Cat	Dog	F
Flies	Apple Maggot	Cherry Fruit	European Crane (Adult)
Fungus Gnats	Biting Flies	Cornsilk	House
Grasshoppers			
Hornets			
Lace Bugs			
Leaffooted	Squash Bug		
Bugs			
Leafhoppers			
Leafminers	Alder	Tentiform	Vegetable
Leafrollers	Oblique Banded	Red-Banded	Variegated
Mealybug			
Midges			
Millipedes			
Mites	Broad	Spruce	Two Spotted Spider (Eggs)
	Carmine	Clover	European Red
Mala Orialista	Chigger	Two Spotted Spider (Adult)	Pecan Scorch
Mole Crickets			
Mosquitoes Moths	Artichoke Plume	Diamondback	Cyncy
	Codling	Diamondback	Gypsy
Periodical			
Cicada	Described	Danes Chara	
Phylloxera Pillbugs &	Pecan Leaf	Pecan Stem	
Rollie Pollies			
Plant Bugs	Tarnished	Lygus Bug	
Psyllids	Pear	De Illere de di Dire	
Sawflies	European Pine	Redheaded Pine	0.116
Scales	San Jose Euonymus	Brown Soft	California Red
Scorpions			
Silverfish			
Sowbugs			
Spiders	Black Widow	Hobo	Wolf
	Brown Recluse		
Spittlebugs	Brown Recluse		
Spittlebugs Springtails			
Spittlebugs Springtails Stink Bugs	Brown Recluse	Kudzu	

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

Product Pests	
Thrips	
Ticks	
Termites	
Wasps	
Whiteflies	
Yellowjackets	

EPA Reg. No. 239-NEW

[For Listed General Insect Control Use]

SHAKE WELL

	Indoor Surface	es	Outdoor Surfac	es	[In Pan	tries – <i>Optional</i> า]
When to Apply	Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting control.					
Before You Apply	Cover or Remove Exposed Food (including pet food) Cover All Food Processing surfaces and Utensils		Do not allow t to contact WaDo not spray	iter supplies	Food • Rem pant	rer or Remove Exposed (including pet food) nove all items from ry and clean pantry bughly
How Much To Use	Add 1/XX dose [cap]/Product Name per 24/XX fl oz/gallons/gallon to treat 72/XX (12" band) linear feet. Note to PM: the chart below shows the volume that will be contained also shows the linear feet and square feet which will be put in for X in This chart will not be listed on the final printed label.				in the dose cap. It n the above table.	
	Container Fill	Dose C	ap Fill		Application Area	
	Volume	Volume of Concentrate (mL)	Volume of Concentrate (fl. oz.)	Linear Feet (4'	" Band)	Linear Feet (12" Band)
	16 fl. oz.	33	1.1	143		48
	24 fl. oz.	50	1.7	215		72
	32 fl. oz.	66	2.2	287		96
	64 fl. oz.	133	4.5	575		192
	1 gal.	266	9.0	1,150		384
	1.1 gal.	293	10	1,265		421
	1.25 gal.	333	11	1,438		479
	1.33 gal.	354	12	1,530		510
	2 gal.	532	18	2,300		768
How to Apply	 Hold sprayer 12 inches from surface being sprayed. Apply a 4-inch wide band over XX linear feet along the surfaces being treated OR Apply a 4-inch wide band over XX linear feet along the interior of your home in areas where insects are a reoccurring problem Note To PM: XX will be from the		Note To PM: XX will be from the		 Spray cracks and crevices along shelves in pantries. Spray until slightly wet without soaking. [Replace noninfested items once spray has dried.] 	

000239-00NEW.20200324 Page **9** of **22**

Image of typical Indoor Image of typical Outdoor Application **Application** After You **Apply** reentry icon] People and Pets may re-enter treated area after spray has dried. Thoroughly wash all food processing surfaces and utensils with soap and water before reuse Repeat as needed. Re-treatment is recommended at least once per season (3 months) outdoors. For long-lasting residual control/action leave spray undisturbed. The product will keep on killing for up to 12 months [*] Note to PM: See 12 month claim section for qualifying statement which will appear here-options 1,2,3, or 4 Fleas and Do not Spray Animals Pets resting guarters may be treated with this product. How to Apply: Spot treat infested areas: pet's **Ticks** resting quarters and localized areas of floors/floor coverings (rugs, carpet, tile, vinyl & wood) where (Including ticks that pests may be present. Remove old bedding of pets and replace with clean, fresh bedding after may transmit treatment of pet area. To control the source of flea infestation, pets inhabiting the treated premises Lyme should themselves be treated with a product registered for application to animals. Disease)

HOW TO USE/APPLY:

- 1.Fill bottle/container [to the line] with [XXX fl oz/X gallon/XXX gallons of] water. [DO NOT OVER FILL.] **Note to PM: the fill amount will be based on the bottle/container size (16 fl. oz. to 2 gal.)**
- 2.Attach dose [cap]/Product Name/this/the product to the bottle/container and screw/turn/twist clockwise/counterclockwise [until it clicks/snaps][and][dispenses/releases the product].
- Shake lightly/well/vigorously [to dilute the product].
- 4.Remove the dose [cap]/Product Name/this/the product once it is empty[by unscrewing/turning clockwise/counterclockwise] [and discard by placing in the trash].

Note to PM: follow steps 1-4 before proceeding with number. The steps below are when the Dose Cap is purchased with an empty bottle/container.

[HOW TO [SET UP AND] USE [THE] APPLICATOR] [HOW TO USE BOTTLE]

Option 1

Trigger Sprayer

- 1.Install the spray head/trigger sprayer with dip tube onto the bottle/container.
- 2.Turn/Twist the spray head/trigger sprayer tip/nozzle to the intended spray pattern.
- 3. Aim tip/nozzle at the surface being treated and squeeze the trigger.
- 4. When the application is complete, turn tip/nozzle to OFF/X and store the mixture/contents/bottle/container in a cool, dry place.

Use the entire mixture/contents/bottle/container within XX days/weeks.

Option 2

Comfort Wand

- 1. Install the twist/flip cap with dip tube onto the bottle/container.
- 2. [Remove wand from shipping package/box.]
- 3. Unwrap/Uncoil hose and insert [color] hose connector into [color] twist/flip cap on the bottle/container [until it clicks.]

000239-00NEW.20200324 Page **10** of **22**

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.

- 4. Remove/Pull [color] strip on bottom of wand handle to activate batteries.
- 5. Unfold/Flip open wand until it clicks/locks into position.
- 6. Turn/Twist wand tip/nozzle to the intended spray pattern.
- 7. Slide/Move [color] switch on trigger to the "Unlock" position.
- 8. [Flip up [color] spout/knob until fully upright.] [Pull spout up.] [Turn twist cap [counterclockwise] to "ON".]
- 9. Aim the wand tip/nozzle at the surface being treated and squeeze the trigger.
- 10. When the application is complete, turn nozzle to OFF and store mixture/contents/bottle/container in a cool, dry place.

Use the entire mixture/contents/bottle/container within XX days/weeks.

OR

[Prep [Wand]

- 1. Remove sprayer [Applicator Name] [from box]
- 2. [Remove [color] pull strip to activate batteries].
- 3. Unfold [Flip Open] [Applicator Name] [wand] [until it clicks/locks] into position.]

Connect

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

Spray

- 1. Turn [sprayer] nozzle to desired spray [pattern].
- 2. [Slide [color] switch on trigger to "Unlock"].
- 3. Press trigger to spray.

Finish

- 1. [Turn [sprayer] nozzle to "OFF" [X]].
- 2. [Slide [color] switch on trigger to "Lock"].
- 3. [Push/turn/twist cap/knob/spout to "OFF" [X]/[Flip spout closed].
- 4. Fold [Applicator Name] wand closed and place sprayer [back in holster]/ [holder].] Use the entire mixture/contents/bottle/container within XX days/weeks.

[How to Clean the Reusable Bottle/Container

Prior to cleaning the bottle/container any unused product should be disposed of according to Storage & Disposal

- 1. Fill the bottle/container with [clean tap] water and replace the spray head/trigger sprayer/twist cap/flip cap with dip tube.
- 2. Shake the bottle/container to rinse.
- 3. Remove the spray head/trigger sprayer/twist cap/flip cap with dip tube and empty the contents onto gravel or bare soil.
- 4. Repeat steps 1-3 until the bottle/container and spray head/trigger sprayer/twist cap/flip cap with dip tube are clean. [Recommend 3 times.]
- 5. DO NOT THROW AWAY. Store empty bottle for reuse with additional Dose Caps/Product Name/Eco-refill/[Dose Cap Name].
- 6. Only use this bottle/container for dose [cap]/Product Name/Dose Cap Name/ecorefill/Eco-Refill/E-Refill/ dilutions]

STORAGE &	PESTICIDE STORAGE: Keep from freezing. To be stored in original container and placed in areas
DISPOSAL	inaccessible to children.
	PESTICIDE DISPOSAL AND CONTAINER HANDLING: If empty: Non-refillable container. Do not
	reuse or refill this container. 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
	(including toilet) or outdoor (including sewer) drain.

000239-00NEW.20200324 Page **11** of **22**

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.

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

Manufactured/Sold/Distributed For/By:

The Ortho Group

P.O. Box 190 Marysville, OH 43040

EPA Reg. No. 239-NEW

EPA Est. No. XXXXXX

[Superscript is first letter of lot number]

[Made in USA]

Note to PM for use on outer pack to explain/clarify dose cap.

[Product Facts]

Fill

Fill bottle/container with water [to line].

Twist/Snap

Twist/Snap [dose] cap/Dose Cap/Product Name/Eco-Refill/ecorefill/E-Refill/package name on to bottle/container.

Shake

Shake well and remove [dose] cap/Dose Cap/Product Name/Eco-Refill/ecorefill/E-Refill/package name. Add [trigger/applicator name] sprayer [and/&] [you're good to go] [you're ready to spray] [you're ready to kill bugs/insects].

Dose Cap Unit Label

Indoor and Outdoor Concentrate

Active Ingredients:	By Wt.
Bifenthrin ¹	0.300%
Zeta-Cypermethrin ²	0.075%
Other Ingredients:	99.625%
[Total:]	100.000%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See [outer] carton/insert for Directions for Use

NET CONTENTS 1.118 fl. oz (33 532 mL)

EPA Reg. No. 239-NEW EPA Est. No. XXXX-XXX

[Superscript used is first letter of lot number]

Note to PM: A bottle/container will be provided for use with the dose cap. The bottle label will appear when the container is sold with the Dose Cap. It is not included with the Dose only offering that is designed for refilling the previously provided bottle.

Secondary Container/Bottle Label

Indoor and Outdoor Concentrate

Note to PM: Ingredient Statement is for the diluted product in the secondary container.

 Active Ingredients:
 By Wt.

 Bifenthrin¹
 0.021%

 Zeta-Cypermethrin²
 0.005%

 Other Ingredients:
 99.974%

 [Total:]
 100.000%

000239-00NEW.20200324 Page **12** of **22**

KEEP OUT OF REACH OF CHILDREN CAUTION

See [back] [side] [other] [panel] [booklet] for additional precautionary statements

The product in this container is diluted as directed in the pesticide product label.

Follow Directions for Use on the enclosed pamphlet/label/leaflet.

[FOR USE ONLY WITH DOSE CAP[S]/ECOREFILL FOR Indoor and Outdoor Concentrate /PRODUCT NAME]

NET CONTENTS 16 fl. oz 2 gal (473 mL7.6 L) EPA Reg. No. 239-NEW The Ortho Group P.O. Box 190 Marysville, OH 43040

Questions or/&/and Comments? [Call] 1-800-225-2883 [or] [visit] [our website at] [www.]ortho.com

STORAGE & DISPOSAL

PESTICIDE STORAGE: Keep from freezing. To be stored in original container and placed in areas inaccessible to children. **PESTICIDE DISPOSAL AND/& CONTAINER HANDLING**: [Dose Cap bottle/container]. Refillable container. Refill this container with dose cap/product name only. Do not reuse this container for any other purpose. Follow instructions in the Dose Cap Concentrate/Product Name Directions section when reusing this bottle/container. **If empty:** If you do not want to refill this container, 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.

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

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

	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.
IF IN EYES	 Hold eye open and rinse slowly and gently with water for 15 to 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.

HOT LINE 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 medical treatment information.

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 reptile pets in/around ornamental ponds. This product is highly toxic to bees exposed to direct treatment or

000239-00NEW.20200324 Page 13 of 22

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.

[Text on side of the bottle:

This bottle is nearly empty

Time to get a ecorefill/Eco-Refill/E-Refill/[Dose Cap Name]/dose cap/pack and reuse it!]

End of Secondary Container/Bottle Label

End Dose Cap Concentrate Section

Optional Marketing Claims for Listed General Insect Control Use

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

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

Note to PM: Numbers in claims may be represented numerically or spelled out.

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 in the below boxes dependent upon sites listed on the market label and product size

[Brand]	Ortho
[Product name]	
[Marketing Call-out]	Kills Bugs Inside. Keeps Bugs Out.
[Claims]	
1.	Kills 188 [Listed] Insects
2.	Treats up to 4,088 linear. ft.
3.	Makes [up to] 4/X gallons
4.	Kills by Contact
[Product Facts:]	 What it Does: Kills home invading insects including [ants], [cockroaches], [spiders], [fleas], [ticks], [scorpions], [beetles], [earwigs], [silverfish], [centipedes], [millipedes]. (See inside for complete list) Where to Use: Use with confidence indoors ([kitchens] [bathrooms], [doors & windows], [basements]) and outdoors ([perimeter of foundations, patios and decks], [garages], [doors & windows]) 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. People and pets may enter treated areas after spray has dried Questions & Comments: (phone & computer icon) Call 1-800-225-2883 or visit [our website at] [www.]ortho.com
[Ortho Guarantee]	The ORTHO Guarantee: If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.

000239-00NEW.20200324 Page 14 of 22

[Standard Copy]	© 20XX The ORTHO Group. World rights reserved.
	Sold by The ORTHO Group
	PO Box 190, Marysville, OH 43040
[EPA Info]	EPA Reg. No. 239-NEW
	EPA Est. No. XXX, XXX, XXX, XXX, XXX
	[Superscript is first letter of lot number.]

The following Product Facts format is optional and the information may appear inside or outside of a box.

[PRODUCT FACTS]:

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

[Where to Use /Apply:] Use with confidence indoors ([kitchens], [bathrooms], [doors & windows], [basements]) and outdoors ([perimeter of foundations, patios & decks], [garages], [doors & windows]) wherever insects are a re-occurring problem.

[When to Use /Apply:] Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting control.

Note to PM: How To Use is for the Dose pack Only.

[How To Use]

- [1] Fill bottle/container with water [to line]
- [2] Twist/Snap [dose] cap/[Dose Cap/Product Name] on to bottle/container
- [3] Shake well and remove [dose] cap/Dose Cap Name. Add [trigger] sprayer [and] [you're good to go] [you're ready to spray] [you're ready to kill insects]

Questions &/or Comments: (icon phone) (icon computer)

Call 1-800-225-2883 or [Visit] [our Website at www.]ortho.com

12-Month Claims

- 1. Up to 12 month control/protection*
- 2. Kills/Controls [for] up to 12 months*
- 3. Kills bugs inside all year*
- 4. Kills home invading bugs all year*
- 5. Kills indoor bugs all year*
- 6. Creates a barrier that will kill bugs you have and control/prevent new bugs for up to 12 months*.
- 7. Creates a perimeter/border/residual treatment that will kill bugs you have and control/prevent new bugs for up to 12 months*.
- 8. Protects your home in/with just 1 application a year[!]

Qualifier Option 1: * [applies to] [for] Ants, Roaches, & Spiders indoors on non porous surfaces

Qualifier Option 2: * [applies to] [for] American Cockroach/Palmetto Bug/Waterbug, Carpenter Ant, Pharaoh Ant, Striped Tail Scorpion, Black Widow Spider, Brown Recluse Spider indoors on treated non porous surfaces within minutes of exposure.

Qualifier Option 3: * [applies to] [for] American Cockroach/Palmetto Bug/Waterbug, 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: * [applies to] [for] American Cockroach/Palmetto Bug/Waterbug, 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.

000239-00NEW.20200324 Page **15** of **22**

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.

6-Month Claims

- 9. Up to 6 month control/protection outdoors**
- 10. Kills/Controls/Protects [for] up to 6 months outdoors**
- 11. Kills insects outdoors for 6 months**
- 12. Kills insects [indoors] [and] [outdoors] for 6 months**
- ** Applies to/for: spiders (excluding Black Widow, Brown Recluse, Hobo)

3-Month Claims

- 13. Up to 3 month control [protection] outdoors***
- 14. Kills/Controls/Protects [for] up to 3 months outdoors***
- 15. Kills bugs outdoors for 3 months***
- 16. Kills bugs [indoors] [and] [outdoors] for 3 months***

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

Egg Killing Claims

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

Efficacy Claims

- 22. Kills Fleas that may transmit Flea Allergy Dermatitis (FAD)/ Flea-Bite Anemia/ Tapeworms/ Haemobartonellosis [to cats/dogs]
- 23. Kills Fleas that may transmit Bartonellosis [to cats/dogs/people]
- 24. Kills Fleas that may transmit Mycoplasma to cats
- 25. Kills Ticks that may transmit Haemobartonellosis/ Anaplasma phagocytophilum [to cats/dogs]
- 26. Kills Ticks that may transmit Cytauxzoonosis/ Tularemia to cats
- 27. Kills Ticks that may transmit Anaplasma/ Babesiosis/ Ehrlichiosis/ Lyme borreliosis/ Rocky Mountain spotted fever/ Hemoplasmosis/ Mycoplasma [to dogs]
- 28. Kills mosquitoes that may transmit Heart worm [to cats/dogs]
- 29. Kills mosquitoes that may transmit Subcutaneous dirofilariasis [to cats/dogs/people]
- 30. Kills cockroaches/roaches that may carry [Salmonella typhimurium], [Entamoeba histolytica], [E. coli], [Staphylococcus spp.], [Pseudomonas aeruginosa], [Klebsiella pneumoniae], [the poliomyelitis virus].
- 31. Kills roaches/cockroaches that may produce allergens
- 32. Kills ticks that may transmit [the] Powassan [POW] disease/virus.
- 33. Kills mosquitoes that may transmit West Nile virus
- 34. Kills mosquitoes that may transmit the chikungunya virus
- 35. Kills mosquitoes that may transmit yellow fever
- 36. Kills mosquitoes that may transmit dengue fever
- 37. Kills mosquitoes that may transmit encephalitis
- 38. Kills Ticks that may transmit Lyme Disease
- 39. Kills mosquitoes, fleas and ticks that may transmit diseases.
- 40. Kills mosquitoes that may transmit [Zika, West Nile and the Chikungunya virus] [yellow fever and dengue fever]

Dual Ingredient Claims

- 41. Two active ingredients in one product
- 42. Dual Action
- 43. [Dual Action:] Fast Acting plus Long Residual*
- 44. [Fast Acting**],[Long Lasting***] Insect Control

000239-00NEW.20200324 Page 16 of 22

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

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.

- *Starts killing in seconds and 12 month control for Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non-porous surfaces
- ** Starts killing in seconds
- ***12 month control for Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non-porous surfaces

Water Based Marketing Claims

- 45. Non-Staining
- 46. No Stains
- 47. Does not Stain [fabrics, floors, wood, surfaces]
- 48. Dries clear
- 49. Odorless
- 50. Odor Free
- 51. Fragrance-Free
- 52. Unscented
- 53. No lingering [chemical] odor
- 54. Dries fast
- 55. Water based [formula] [water droplet icon]
- 56. Dries in minutes [for fast/quick re-entry]!
- 57. Leaves no residue [behind]
- 58. No oily residue
- 59. No [sticky] mess
- 60. [Leaves] no odor
- 61. No greasy residue [mess]
- 62. No need to wipe up

Location of Use Claims

- 63. Apply along [and behind] baseboards [and][foundations]
- 64. Apply along [behind] [and] [between] appliances
- 65. Apply beneath [and behind] sinks
- 66. Apply in other areas where listed insects [are often found] [often appear]
- 67. Can be used in [bathrooms], [kitchens], [family rooms], [pantry], [attics], [garages], [basements], [closets], [storage areas], [and] [bedrooms]
- 68. Designed to/for use in kitchens and pantries
- 69. [Formulated][For] Indoor and Outdoor Use
- 70. [Formulated] [For] Outdoor Use
- 71. [Formulated] [For] Indoor Use
- 72. [For] Indoor & Outdoor Residential use only
- 73. Intended for residential use
- 74. Ideal/Great for large/larger jobs/areas/spaces/rooms
- 75. Ideal/Great for small/smaller jobs/areas/spaces/rooms
- 76. Indoor/Outdoor [Formula]
- 77. Indoor Surfaces / Outdoor Surfaces
- 78. Use in garage[s] and/or basement[s] and/or attic[s] to keep listed bugs from coming into [entering] the [your] home.
- 79. Use in [kitchens], [garages], [basements], [attics] to keep/to kill listed bugs [from entering your home]
- 80. Use in [bathrooms], [kitchens], [family rooms], [pantry], [attics], [garages], [basements], [closets], [storage areas], [and] [bedrooms]
- 81. Use in [kitchens], [garages], [basements] [and] [attics] to kill listed bugs.
- 82. Use inside and outside your home!
- 83. Use with confidence in [bathrooms], [kitchens], [family rooms], [pantries], [attics], [garages], [basements], [closets], [storage areas], [and] [bedrooms].

Perimeter Treatment Claims

- 84. Apply [as] a barrier
- 85. Apply as a border around your home
- 86. Apply [as] a perimeter/border/residual treatment
- 87. Creates a [bug] barrier

000239-00NEW.20200324 Page **17** of **22**

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.

- 88. Creates a [bug] border
- 89. Creates a perimeter treatment
- 90. Long lasting [bug] perimeter treatment/barrier/border
- 91. Kills bugs inside. Keeps bugs out.
- 92. Forms/Creates/Establishes a perimeter treatment
- 93. Forms/Creates/Establishes a [bug/insect] barrier
- 94. Creates a barrier that will kill/kills the bugs you have and prevent[s] new bugs from coming in/ inside your home
- 95. Guards against bugs so you don't have to
- 96. Guards against the bugs you can't/don't see
- 97. Kills and prevents insects∞ [inside your home] [outside your home]
- 98. Provides residual control against listed home invading insects
- 99. Keeps [on] killing with residual action, even after you spray
- 100. Keeps [on] killing with residual action, even after spray has dried
- 101. Keeps on killing after spray has dried
- 102. [Kills two/2 ways] / [Dual Action]: 1) Kills insects∞ [by contact] and 2) Keeps killing 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.

Kill Claims

- 103. Kills insects∞, Spiders and Ticks
- 104. Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish, Scorpions, Black Widow Spiders, and other listed insects
- 105. Kills Home invading Insects∞
- 106. [Also] Kills Ticks (including Ticks that may transmit Lyme Disease)
- 107. Kills mosquitoes that may transmit West Nile virus
- 108. Kills bugs inside. Keeps bugs out(side) ∞
- 109. Visible activity against bugs within minutes ≈
- 110. Starts killing/acting within minutes≈
- 111. Kills [1...188] Insects∞
- 112. Kills [the] bugs you see and/& [the] [ones] bugs you don't [see] ∞
- 113. Kills the toughest home invading bugs∞
- 114. Kills/Controls [both] crawling and/& flying insects∞
- 115. Kills/Controls [all] common household bugs∞
- 116. Kills by contact!
- ≈Applies to/for: Carpenter Ants, Harvester Ants, Oriental and German Cockroaches
- ∞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")

Claims for the Dose Cap Section of the Label

GENERAL - Total System Claims (Bottle + Dose Cap):

- 117. Stock up [for insect season] [and save] with [Dose Cap Name] [packs/caps/concentrates]
- 118. Prepare yourself [for insect season] with [Dose Cap Name] [refill(s)] [packs/caps/concentrates]
- 119. Order online and/& save [\$XX] with [Dose Cap Name] [packs/caps/concentrates]
- 120. [Dose Cap /Product Name] [is] tough on insects [and saves [XX%] plastic [per refill [dose] cap***]]
- 121. Power of [Dose Cap/Product Name] [right to/at] your door
- 122. Control and conserve*** [XX% more plastic [per refill [dose] cap]***] [with [Dose Cap/Product Name]]
- 123. Same [great] insect fighting/killing power****
- 124. [Dose Cap/Product Name is great/ideal for spot [treatment/application]
- 125. [Dose Cap Product Name] covers/treats up to 48.....768 square feet/sq. ft.
- 126. [Dose Cap/Product Name] starts working immediately****
- 127. Rapid Refill [Technology]

000239-00NEW.20200324 Page **18** of **22**

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.

- 128. [Dose Cap/Product Name] [is] the easy/sustainable*** way to kill/control [insects]
- 129. Insects gone in a snap/twist/click
- 130. Insects gone with [just] one click/snap/twist
- 131. [Dose Cap/Product Name] Your/The [Essential] [Sustainable***] Refill Solution/System
- 132. Proven results, reusable bottle/container
- 133. Ships clean [- no leaking!]*
- 134. Reuse your spray bottle/container
- 135. [Includes] [Refill]able [bottle/container]
- 136. [Refill] over and over
- 137. No mess
- 138. No leaking*
- 139. [Just] refill, reload, reuse
- 140. [Dose Cap/Product Name] [with/including] Reusable [bottle/container] [Just] refill, reload, reuse]
- 141. [Dose Cap/Product Name] makes what you need [when you need it]
- 142. Includes/Uses/Using [Dose Cap/Product Name] cap/dose cap/concentrate
- 143. Includes/Uses/Using [Dose Cap/Product Name] technology
- 144. Guess-free/Mess-free dose [cap]/cap/concentrate [with included applicator/bottle/container]
- 145. [Dose Cap/Product Name] saves time [and energy][±] [±]buying online vs. going to store
- 146. [Includes] Reusable bottle/container!
- 147. Reusable refill bottle/container!
- 148. [1] Refill, [2] Reload, [3] Reuse
- 149. Easy as 1, 2, 3
- 150. [The] [Quick] [No-Mess] Way to Kill [Your] Insects
- 151. [Dose Cap Name] Straight/Direct to Your Door!
- 152. [Dose Cap/Product Name] [Refill] [Technology] Straight/Direct to Your Door!
- 153. [Convenient] [Sustainable***] Insect Control in a Box
- 154. [Convenient] [Sustainable***] Insect Control Straight/Direct to Your Door
- 155. [Dose Cap/Product Name] [Exclusive] Clean/Simple/Easy/Single/One Snap/Click [Technology]
- 156. [Dose Cap/Product Name] One-Snap/One-Click [Technology]
- 157. [Dose Cap/Product Name] Snap/Click [Technology]
- 158. [Just] [1]fill, [2] twist/click/snap [Dose Cap/Product Name] [and] [3] spray/kill/shake [icons]
- 159. [1]Fill the bottle/container, [2] snap/twist/click [the] concentrate/[dose] cap/[Dose Cap Name] [and [3] [start] [to kill/killing] insects
- 160. [1] Fill the bottle/container, [2] add concentrate/[Dose Cap Name] [and] [3] spray
- 161. [1]Fill with water, [2] add concentrate/[Dose Cap Name] [and] [3] spray
- 162. [1]Fill with water, [2] add concentrate/[Dose Cap Name] [and] [3] [start] [to kill/killing] insects
- 163. Snap/Twist/Click and [You're Ready to] Go!
- 164. Just add water to start killing insects!
- 165. E-commerce/Ecommerce/E-comm/Ecomm -friendly
- 166. [Just] shake to mix/create/make insect killer
- 167. If the trigger spray(er) breaks on the bottle/container, [insert company/brand name here] will deliver a replacement free of charge
- 168. [Simple] Refill [Technology]
- 169. Easy/Simple to attach/connect [Dose Cap Name] to bottle/container
- 170. [Dose Cap/Product Name[concentrate] starter kit/[total] system [with bottle/container included]
- 171. [Dose Cap/Product Name [[concentrate] starter kit/[total] system just add water to start killing insects!
- 172. [Simply] attach/connect [Dose Cap/Product Name] to bottle/container and spray/go!
- 173. Just add water [and shake]!
- 174. [Dose Cap/Product Name] Make it [only] when you need it
- 175. [Brand name] Lightweight package/design [for easy shipping]
- 176. Lightweight[,/-] [shipping friendly/easy to ship]
- 177. [Brand name/Product name] light design
- 178. [Product name] light
- 179. [1] Fill [ICON] bottle/container with water [to line]
 - [2] Twist/Snap [ICON] [dose] cap/[Dose Cap Name]/concentrate on to bottle/container

000239-00NEW.20200324 Page **19** of **22**

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.

[3] Shake well [ICON] and remove [dose] cap/Dose Cap Name. Add [trigger] sprayer [and] [you're good to go] [you're ready to spray] [you're ready to kill insects]

*when used as directed

- **see inside [booklet] for insect list
- ***Each dose cap uses XX% less plastic than a standard XX oz product bottle
- ****Starts killing/acting within minutes against Carpenter Ants, Harvester Ants, Oriental and German Cockroaches

Dose Cap-Specific Claims:

- 188. [Power packed] [dose] caps/refills/[Dose Cap/Product Name]
- 189. One [dose] cap/pack/refill [of [Dose Cap/Product Name] treats [up to] 48....768 square feet/sq. ft.
- 190. [One [dose]cap] makes [more than] 16 fl. oz.2 gallons
- 191. Takes the guesswork out [of insect control]!
- 192. No guessing, no measuring!
- 193. [Dose Cap/Product Name] requires no measuring
- 194. No mess [refill]
- 195. No leaking [refill]*
- 196. Pre-measured dose [cap]/cap/concentrate [with included applicator/bottle/container]
- 197. Quick snap/click/twist [cap]
- 198. Pre-measured [and ready to go/mix/use]
- 199. Pre-measured [Dose Cap/Product Name] [refill] cap/dose cap
- 200. [Dose Cap/Product Name] [is] a concentrated refill that allows you to reuse/refill your existing bottle/container [numerous times]
- 201. [Convenient] [Pre-measured] Dose(s)/Dose cap(s)
- 202. No drip/spill cap/dose cap/concentrate/[Dose Cap/Product Name]
- 203. No mess/drip/spill [Dose Cap/Product Name] technology
- 204. [Dose Cap/Product Name] Quickly [and easily] attaches/connects to bottle/container
- 205. No more measuring [concentrates] [with [Dose Cap/Product Name]]
- 206. [You can] Make a difference [, use/buy a reusable bottle]
- 207. Store more [product] in a smaller space∞ ∞Dose cap/Product name vs. regular bottle/container
- 208. Easy to use[mix][refill]
- 209. Just add water
- 210. Premeasured [refill] [bottle/container]
- 211. One step prep
- 212. [Dose Cap name]
- 213. The value of XX [size RTU] in 1/one concentrate/refill/dose [cap]
- 214. Convenient [simple] design
- 215. Easy [and simple] to use
- 216. Quick & Easy [to use]
- 217. Save[s] time [and energy]
- 218. No measure cap [top] [lid] [cup]
- 219. Mess free cap [top] [lid] [cup]
- 220. Measure with ease
- 221. Quick, convenient, and mess free

*when used as directed

- **see inside [booklet] for insect list
- ***Each dose cap uses XX% less plastic than a standard XX oz product bottle

Dose Cap Refill Pack Claims:

Note To PM: For use for sale of dose caps only to refill already provided bottle.

- 222. [The power of] X/4/3/2 [Refill Packs/[Dose] Caps/Concentrates/Dose Cap Name] in 1/one [convenient] [size/pack/package]
- 223. Use/Pair/Buy refill packs/[dose] caps/concentrates with [Dose Cap Name/ecorefill/Eco-Refill/E-Refill] [to kill insects]
- 224. [Dose Cap/Product Name] [Refill] [Technology]
- 225. Save \$XX with each refill/[Dose Cap/Product Name/cap/pack

000239-00NEW.20200324 Page 20 of 22

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.

226. [1/2/3/4 [dose(s)]cap(s)] make(s) [more than] 16 fl. oz.2 gallons

Value

Note to PM: X in the following claims is based on number of products sold together or based on a comparison to other packaging configurations offered.

- 227. Great Value
- 228. Value Pack
- 229. Refill/Recharge/Renew/Fill-Up/Reload
- 230. Same formula, better value!
- 231. Save [Money] with the Refill!
- 232. Over 10% more than 1.33 gal size
- 233. (Over) X% more than X gal size
- 234. Bonus Size
- 235. Combo Pack
- 236. Wow (Pack)
- 237. Exclusive to Club Stores!
- 238. Exclusive Club (Bonus) Size!
- 239. Value/Bonus Size 2-pack!
- 240. Value/Bonus Size 2 gallons!
- 241. Value/Bonus Size 2-pack = 2 gallons!
- 242. Look inside [label] for special offer information!
- 243. Go to [www.orthohomedefense.com] now for a special offer! Offer subject to change or expiration.
- 244. Value [pack/size/buy/dose/cap/concentrate]
- 245. Bonus [value/size/offer/package/pack/buy/dose/cap/concentrate]
- 246. Exclusive item [size]
- 247. Special [buy/offer/size/item/dose [cap]/cap]
- 248. Limited time offer
- 249. X% more than X size
- 250. XX% more than X gallon size
- 251. [X%] More [doses] [packs]!
- 252. Save [money]
- 253. [Easy] Refill/Dose system
- 254. Free sample [dose(s)]
- 255. X% more [free] [than competitive product]
- 256. Refill [dose] [Combo] pack
- 257. Great value
- 258. 1.....100 dose(s)/dose packs/caps/dose caps/concentrates/refills [per pack/box]
- 259. Bottle/container in [a] box
- 260. Makes [up to] 4/X gallons/gals

OTHER

- 261. [icon] People and pets may re-enter treated areas after spray has dried
- 262. XX% less plastic*
- 263. [Company] & Your Environment Your home and yard are places 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.
- 264. Proven performance
- 265. Read Entire label before use
- 266. [Recyclable symbol]
- 267. Before / After
- 268. OPEN
- 269. Resealable Label for Directions & Precautions
- 270. Peel Open for use directions and further information
- 271. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
- 272. PEEL HERE / PRESS TO RESEAL
- 273. PULL / PEEL HERE [TO REMOVE TAPE]

000239-00NEW.20200324 Page 21 of 22

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.

- 274. Product of -and/or- Made in U.S.A.
- 275. Assembled in the USA
- 276. ©20XX, licensed by [Company/Brand]. World rights reserved.
- 277. QUESTIONS OR COMMENTS [phone icon] [Call]1-800-xxxxxxx or [Visit] [our website at] [www.][company/brand].com [computer icon]
- 278. New Look, Same Great Results
- 279. New Look, Same [Fast Acting] [Long Lasting] Results
- 280. New form/bottle/container [same results]
- 281. New [Product name/dose cap name/ecorefill/E-Refill/E-Refill]

Guarantees

- 282. Guaranteed † † †
- 283. [Company/Brand] Guarantee[d] †††
- 284. Guaranteed [results] †††
- 285. Guaranteed Kill [or your money back] †††
- 286. [Company/Brand] Satisfaction guaranteed[†††]
- 287. [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.

QR Code:

Scan here to/and learn more [about [Dose Cap Name]]
Scan here/me [to/and learn more] [about] [product name/dose cap]
Discover [Dose Cap Name]

000239-00NEW.20200324 Page 22 of 22