

#### U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7505T) 1200 Pennsylvania Ave., N.W.

vania Ave., N.W.

Washington, D.C. 20460

#### NOTICE OF PESTICIDE:

X Registration
Reregistration
(under FIFRA, as amended)

EPA Reg. Number:	Date of Issuance:
239-2783	1/10/24

Term of Issuance:	
Conditional	

Name of Pesticide Product:

HD Mini Flexi

Name and Address of Registrant (include ZIP Code):

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 (FIFRA).

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:

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

Continues page 2

Signature of Approving Official:	Date:
Manjula Unnikrishnan, Acting Product Manager 3 IVB1, Registration Division (7505T)	1/10/24
, ,	

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#### EPA Form 8570-6

- 2. You are required to comply with the data requirements described in the generic data call-in (GDCI) order identified below:
  - a. Bifenthrin GDCI-128825-902
  - Bifenthrin GDCI- 128825-1100
  - c. Bifenthrin GDCI- 128825-1159
  - d. Zeta-Cypermethrin GDCI-129064-1097
  - e. Zeta-Cypermethrin GDCI-129064-1209

You must comply with all of the data requirements within the established deadlines. If you have questions about the GDCI listed above, you may contact the Chemical Review Manager in the Pesticide Re-Evaluation Division: <a href="http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1">http://iaspub.epa.gov/apex/pesticides/f?p=chemicalsearch:1</a>

- 3. As this product is packaged in a novel container type, you are reminded that pursuant to FIFRA Section 6(a)(2) and 40 CFR Part 159, information regarding unreasonable adverse effects on the environment, including incidents affecting humans or other non-target organisms, must be submitted to the Agency within 15 days after learning of any allegations involving human fatality (H-A type incidents) and within 30 days after the end of each 30-day report accumulation period for H-B and H-C type incidents, as defined in 40 CFR § 159.184(c)(5).
- 4. Make the following label changes before you release the product for shipment:
  - Revise the EPA Registration Number to read, "EPA Reg. No. 239-2783."
- 5. 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 FIFRA 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) lists 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.

The record for this product currently contains the following CSF(s):

Basic CSF dated 07/07/2021

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- Alternate CSF A dated 07/07/2021
- Alternate CSF B dated 07/07/2021
- Alternate CSF C dated 07/07/2021
- Alternate CSF D dated 07/07/2021

If you have any questions, please contact Manjula Unnikrishnan at (202-566-2949) or at unnikrishnan.manjula@epa.gov.

Enclosure

# **HD Mini Flexi**

# Dose Pack and Dose Pack + Applicator (Kit)

Note to PM: the text below will appear in a pullout accordion label or an insert label.

#### **Alternate Brand Names:**

Ortho Home Defense Insect Killer Concentrate for Indoor & Perimeter

Ortho Home Defense Insect Killer Concentrated Refill for Indoor & Perimeter

# ACCEPTED

01/10/2024

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

<sup>3. NO.</sup> 239-2783

FOR INDOOR USE ONLY/FOR OUTDOOR USE ONLY/FOR BOTH INDOOR and/& OUTDOOR USE Note to PM: These options will only be used for ABNs that are intended for and only have DFU for indoors or outdoors only

 Active Ingredients:
 By Wt.

 Bifenthrin¹
 0.300%

 Zeta-Cypermethrin²
 0.075%

 Other Ingredients:
 99.625%

 [Total:]
 100.000%

This product contains 0.025 lb/gal of Bifenthrin and 0.006 lb/gal of Zeta-Cypermethrin.



# KEEP OUT OF REACH OF CHILDREN CAUTION

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

EPA Reg. No. 239-ETIG

EPA Est. No. XXX-XXX (insert EPA Registered Establishment Number(s))

[Superscript is first letter of lot number]

NET CONTENTS 10 fl. oz. (295 ml)

Note to PM: 10 fl. oz. size is meant to dilute into a ½ gallon container.

Note to PM: Size may be expressed in GALS, QT, PT, fl oz and their metric equivalents, as applicable.

When sold as a multi-dose pack unit: 2 x 10 fl oz pouch/container [applicator name] 0 fl oz (591 mL)/ [XX x] 10 fl oz pouch/container [applicator name] X fl oz/GAL/QT/PT) XX [L/mL]

When sold as a kit: 10 fl oz (295 mL) &/+ 1 Refillable Bottle

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

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

#### PRECAUTIONARY STATEMENTS

#### **Hazards to Humans & Domestic Animals**

**CAUTION.** Harmful if swallowed. Causes moderate eve irritation. Avoid contact with eves or clothing. Wear: Long-sleeved shirt and long pants, socks, shoes, and waterproof gloves. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

	FIRST AID		
If	•	Call poison control center or doctor immediately for treatment advice.	
swallowed • Have person sip a glass of water if able to swallow.		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 15-20 minutes.	
-	•	Remove contact lenses, if present, after the first 5 minutes, then continue rinsing	
	eye.		
	•	Call a poison control center or doctor for treatment advice.	
HOTLINE NUMBER			

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-877-465-5161 for Emergency Assistance.

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 insects. Do not apply this product or allow to drift to blooming crops if bees are visiting the treatment area.

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

#### DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. All outdoor spray applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

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

or surface waters.

- Do not apply directly to impervious horizontal surfaces such as sidewalks, driveways, and patios
  except as a spot or crack-and-crevice treatment.
- Treat surfaces to ensure thorough coverage but avoid runoff.
- To treat insects harbored in voids and cracks-and-crevices, applications must be made in such a manner to limit dripping and avoid runoff onto untreated structural surfaces and plants.
- Do not make applications during rain. Avoid making applications when rainfall is expected before the product has sufficient time to dry (minimum 4 hours).
- Rainfall within 24 hours after application may cause unintended runoff of pesticide application.
- Do not apply or irrigate to the point of runoff.
- Do not spray the product into fish pools, ponds, streams, or lakes. Do not apply directly to sewers
  or storm drains, or to any area like a drain or gutter where drainage to sewers, storm drains,
  water bodies, or aquatic habitat can occur.
- Do not allow the product to enter any drain during or after application.
- Spot treatments must not exceed two square feet in size (for example, 2 ft. by 1 ft. or 4 ft. by 0.5 ft.)
- Each pouch is for one-time use only. Do not store any opened pouches. Empty the entire contents of the pouch into the container. Once empty, discard the empty pouch immediately into a secure trash receptacle that cannot be accessed by children.
- Store pouch[es] in closed product box and away from children and food

**b** Do not allow to enter indoor or outdoor drains. No permita la entrada a desagües internos o externos.

Follow proper disposal procedures on this label. Siga las indicaciones del etiquetado para el desecho apropiado del producto.

### [PRODUCT FACTS]

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 /
	Carpet	Lady Beetles (including	Southern Corn Rootworm
	Colorado Potato	Asian Lady Beetle Eggs)	(Adults)
	Corn Rootworm (Adults)	Mexican Bean	Striped Cucumber
	Curculio (Cow Pea ,Plum)	Pine Chafer (grub)	Weevils (Annual Bluegrass
	Elm Leaf	Pine Shoot	& Black Vine)
Borers	American Plum	Peachtree	Squash Vine
	European Corn	Peach Twig	Stalk
	Lesser Peachtree	Southwestern Corn	
Boxelder Bugs			
Bristletails			
Caterpillars	Alfalfa	Cranberry Fruitworm	Navel Orangeworm
-	Armyworms (Beet, Fall,	Filbertworm	Painted Lady
	Southern, True, Yellow	Green Cloverworm	Pecan Nut Casebearer
	Striped, Beet Armyworm	Green Fruitworm	Pickleworm
	Eggs)	Hickory Shuckworm	Rindworm

	I D	/T. L 0	0.16
	Bagworms	Hornworms (Tobacco &	Saltmarsh
	Blueberry Spanworm	Tomato)	Sod Webworms
	Budworms	Imported Cabbageworm	Tent
	Corn Earworm	Loopers (Alfalfa, Cabbage,	Velvetbean
	Cutworms	Celery)	
Centipedes			
Chinch Bug	Hairy	Southern	
Cockroaches	American/Palmetto	Asian	German
	Bug/Waterbug	Oriental	
Crickets			
Earwigs			
Firebrats			
Fleas	Cat	Dog	
Flies	Apple Maggot	Cherry Fruit	European Crane (Adult)
	Biting Flies	Cornsilk	House
Fungus Gnats			
Grasshoppers			
Hornets			
Lace Bugs			
Leaffooted	Squash Bug		
Bugs			
Leafhoppers			
Leafminers	Alder	Tentiform	Vegetable
Leafrollers	Oblique Banded	Red-Banded	Variegated
Mealybug			3
Midges			
Millipedes			
Mites	Broad	Spruce	Two Spotted Spider (Eggs)
Wites	Carmine	Clover	European Red
		Two Spotted Spider (Adult)	Pecan Scorch
l	Chiqaer		1 COUNT COOLON
Mole Crickets	Chigger	The species spises (Fisally	
Mole Crickets	Cnigger	The openion opinion (Financy	
Mosquitoes			Gynsy
	Artichoke Plume	Diamondback	Gypsy
Mosquitoes Moths			Gypsy
Mosquitoes Moths Periodical	Artichoke Plume		Gypsy
Mosquitoes Moths Periodical Cicada	Artichoke Plume Codling	Diamondback	Gypsy
Mosquitoes Moths  Periodical Cicada Phylloxera	Artichoke Plume		Gypsy
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs &	Artichoke Plume Codling	Diamondback	Gypsy
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs & Rollie Pollies	Artichoke Plume Codling Pecan Leaf	Diamondback Pecan Stem	Gypsy
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs & Rollie Pollies Plant Bugs	Artichoke Plume Codling  Pecan Leaf  Tarnished	Diamondback	Gypsy
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs & Rollie Pollies Plant Bugs Psyllids	Artichoke Plume Codling  Pecan Leaf  Tarnished Pear	Diamondback  Pecan Stem  Lygus Bug	Gypsy
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs & Rollie Pollies Plant Bugs Psyllids Sawflies	Artichoke Plume Codling  Pecan Leaf  Tarnished Pear European Pine	Diamondback  Pecan Stem  Lygus Bug  Redheaded Pine	
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs & Rollie Pollies Plant Bugs Psyllids	Artichoke Plume Codling  Pecan Leaf  Tarnished Pear European Pine San Jose	Diamondback  Pecan Stem  Lygus Bug	Gypsy  California Red
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs & Rollie Pollies Plant Bugs Psyllids Sawflies Scales	Artichoke Plume Codling  Pecan Leaf  Tarnished Pear European Pine	Diamondback  Pecan Stem  Lygus Bug  Redheaded Pine	
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs & Rollie Pollies Plant Bugs Psyllids Sawflies Scales  Scorpions	Artichoke Plume Codling  Pecan Leaf  Tarnished Pear European Pine San Jose	Diamondback  Pecan Stem  Lygus Bug  Redheaded Pine	
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs & Rollie Pollies Plant Bugs Psyllids Sawflies Scales Scorpions Silverfish	Artichoke Plume Codling  Pecan Leaf  Tarnished Pear European Pine San Jose	Diamondback  Pecan Stem  Lygus Bug  Redheaded Pine	
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs & Rollie Pollies Plant Bugs Psyllids Sawflies Scales  Scorpions Silverfish Sowbugs	Artichoke Plume Codling  Pecan Leaf  Tarnished Pear European Pine San Jose Euonymus	Diamondback  Pecan Stem  Lygus Bug  Redheaded Pine Brown Soft	California Red
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs & Rollie Pollies Plant Bugs Psyllids Sawflies Scales Scorpions Silverfish	Artichoke Plume Codling  Pecan Leaf  Tarnished Pear European Pine San Jose Euonymus  Black Widow	Diamondback  Pecan Stem  Lygus Bug  Redheaded Pine	
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs & Rollie Pollies Plant Bugs Psyllids Sawflies Scales  Scorpions Silverfish Sowbugs	Artichoke Plume Codling  Pecan Leaf  Tarnished Pear European Pine San Jose Euonymus	Diamondback  Pecan Stem  Lygus Bug  Redheaded Pine Brown Soft	California Red
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs & Rollie Pollies Plant Bugs Psyllids Sawflies Scales  Scorpions Silverfish Sowbugs Spiders	Artichoke Plume Codling  Pecan Leaf  Tarnished Pear European Pine San Jose Euonymus  Black Widow Brown Recluse	Diamondback  Pecan Stem  Lygus Bug  Redheaded Pine Brown Soft	California Red
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs & Rollie Pollies Plant Bugs Psyllids Sawflies Scales  Scorpions Silverfish Sowbugs Spiders	Artichoke Plume Codling  Pecan Leaf  Tarnished Pear European Pine San Jose Euonymus  Black Widow	Diamondback  Pecan Stem  Lygus Bug  Redheaded Pine Brown Soft	California Red
Mosquitoes Moths  Periodical Cicada Phylloxera Pillbugs & Rollie Pollies Plant Bugs Psyllids Sawflies Scales  Scorpions Silverfish Sowbugs Spiders	Artichoke Plume Codling  Pecan Leaf  Tarnished Pear European Pine San Jose Euonymus  Black Widow Brown Recluse	Diamondback  Pecan Stem  Lygus Bug  Redheaded Pine Brown Soft	California Red

Stored	
Product Pests	
Thrips	
Ticks	
Termites	
Wasps	
Whiteflies	
Yellowjackets	

# [For Listed General Insect Control Use] SHAKE WELL

	Indoor Surfaces	Outdoor Surfaces	[In Pantries – Optional Section]
When to Apply	Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting* control.  *Note to PM: See 12 month claim section for qualifying statement which will appear here-options 1,2,3, or 4		
Where to Apply [Use Sites]		ns/bathrooms/doors & windows/basen ations/patios and decks/garages/doors	
Before You Apply	<ul> <li>Cover or Remove Exposed Food (including pet food)</li> <li>Cover All Food Processing surfaces and Utensils</li> </ul>	<ul> <li>Do not allow this product to contact water supplies</li> <li>Do not spray into air</li> </ul>	<ul> <li>Cover or Remove Exposed Food (including pet food)</li> <li>Remove all items from pantry and clean pantry thoroughly</li> </ul>
How to Mix/Dilute	Mixing Instructions for Si [Single-Dose Pouch] – $\frac{1}{2}$		
	concentrate package bottle/container [ap 2. Fill bottle/container oz)] of water. 3. Securely screw cap 4. Shake gently to mix 5. Spray as directed u One half[1/2] gallon covers linear feet indoors]. Maximut ft. per application or 32 fl. oper application, 0.05 lb. Zet [Follow all directions on the	<ol> <li>Unscrew cap from concentrate package/bottle/container/pouch and empty entire concentrate package/bottle/container/pouch into a [reusable] [Ortho®] bottle/container [applicator name] [or tank sprayer]</li> <li>Fill bottle/container [brand name] [or tank sprayer] with [one half/½ gallon] [(64 floz)] of water.</li> <li>Securely screw cap or top onto bottle/container [brand name] [or tank or sprayer].</li> <li>Shake gently to mix.</li> <li>Spray as directed using [chosen applicator/bottle/container [brand name]]. he half[1/2] gallon covers [up to 1367 linear feet][455 linear feet outdoors and 1367 lear feet indoors]. Maximum application rate is 22.9 fl. oz. of diluted product per 1000 sq. per application or 32 fl. oz. of diluted product per 1395 sq. ft. (0.2 lb. Bifenthrin per acre er application, 0.05 lb. Zeta Cypermethrin per acre per application)</li> <li>ollow all directions on the applicator label used to apply this product.]</li> <li>se within [30 days OR 4weeks OR 1 month.]</li> </ol>	
	[Two, Single-Dose Pouch]	] – 1 gallon dilution	
	empty both concent	two concentrate packages/bottles/cont trate packages/bottles/containers/pouc tainer [applicator name] [or tank spraye	ches into a [reusable]

- 2. Fill bottle/container [brand name] [or tank sprayer] with [one/1 gallon] [(128 fl oz)] of water.
- 3. Securely screw cap or top onto bottle/container [brand name] [or tank or sprayer].
- 4. Shake gently to mix.
- 5. Spray as directed [using chosen applicator/bottle/container[brand name]].

One/1 gallon covers XXX sq ft. [2555 linear feet][850 linear feet outdoors and 25 linear feet indoors]. Maximum application rate is 22.9 fl. oz. of diluted product per 1000 sq. ft. per application or 32 fl. oz. of diluted product per 1395 sq. ft. (0.2 lb. Bifenthrin per acre per application, 0.05 lb. Zeta Cypermethrin per acre per application)

[Follow all directions on the applicator label used to apply this product.]

[Use within [30 days OR 4weeks OR 1 month.]

# **How to Apply**

- Hold sprayer 12 inches from surface being sprayed.
- Apply a 4-inch wide band along the surfaces being treated.

#### OR

- Apply a 4-inch wide band in the interior of your home along baseboards and around doors and/& windows in areas where insects are a recurring problem.
- Spray until slightly wet without soaking.

- Hold sprayer 12 inches from surface being sprayed.
- Apply a 12-inch wide band along the surfaces being treated.

#### OR

- Apply a 12-inch wide band on the exterior of your home, along the perimeter of foundations, doors and/& windows in areas where insects are a recurring problem.
- Spray until slightly wet without soaking.

- [Spray cracks and crevices along shelves in pantries.]
- [Spray until slightly wet without soaking.]
- [Replace non-infested items once spray has dried.]

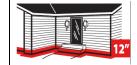
Apply at a rate of 0.2 lb. Bifenthrin per acre.

Volume of	Coverage	Volume of Diluted	Coverage
Diluted	(Linear	Product	(Linear
Product	Feet)		Feet)
64 fl. oz.[1/2	1367	64 fl. oz.[1/2 gal.]	455
gal.]			
1 gal.	2734	1 gal.	910

# Image of typical Indoor Application



Image of typical Outdoor 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-treat 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
Ticks	Pets resting quarters may be treated with this product. <b>How to Apply</b> : Spot treat infested
(Including	areas: pet's resting quarters and localized areas of floors/floor coverings (rugs, carpet,
ticks that	tile, vinyl & wood) where pests may be present. Remove old bedding of pets and replace
may transmit	with clean, fresh bedding after treatment of pet area. To control the source of flea
Lyme	infestation, treat pets inhabiting the treated premises with a product registered for
Disease)	application to animals.

# STORAGE & DISPOSAL

**PESTICIDE STORAGE:** Keep from freezing. Store in original container and placed in areas inaccessible to children.

Note to PM: for Non-Refillable containers:

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

Note to PM: optional text for the reusable bottle (when the bottle and dose pack are sold as a kit):

# [How to Clean the Reusable Bottle/Container]

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

- 1. [Fill the bottle/container [brand name] with [clean tap] water and replace the spray head/trigger sprayer/twist cap/flip cap with dip tube.[
- 2. Shake the bottle/container [brand name] to rinse.[



 Remove the spray head/trigger sprayer/twist cap/flip cap with dip tube and empty the contents onto gravel or bare soil or spray onto the treated area.



- Repeat steps 1-3 until the bottle/container and spray head/trigger sprayer/twist cap/flip cap with dip tube are clean.
- 5. DO NOT THROW AWAY Reusable Bottle/Container. Store empty bottle/container [brand name] for reuse with additional HD Mini Flexi/Product Name.] [ ]

### OR

[Refer to applicator label/manual for additional clean out information.]

OR

[To clean sprayer, rinse sprayer and all parts with water three times.]

# [WARRANTY INFORMATION]

**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.

End of pamphlet / insert directions.

End of Container/Bottle Label

**Bold, italicized text is information for the reader and is not part of the label.** [Bracketed information is optional text]. Text separated by / denotes and/or options.

Note to PM: optional text when a dedicated bottle is provided for initial point of sale. Bottle is not included with Dose Pack only offering for refilling the provided bottle.

# Secondary Container/Bottle Label (Sold empty)

[Use Solution/Dilution of]

# **HD Mini Flexi/Brand Name [Bottle]**

#### FOR INDOOR USE ONLY/FOR OUTDOOR USE ONLY/FOR BOTH INDOOR and/& OUTDOOR USE

When diluted according to HD Mini Flexi/Product Name Directions for Use the resultant formula contains:

 Active Ingredients:
 By Wt.

 Bifenthrin¹
 0.0500%

 Zeta-Cypermethrin²
 0.0125%

 Other Ingredients:
 99.9375%

 [Total:]
 100.0000%

This product contains 0.025 lb/gal of Bifenthrin and 0.006 lb/gal of Zeta-Cypermethrin.

# KEEP OUT OF REACH OF CHILDREN CAUTION

See accompanying label for Directions for Use.

Note to PM: approved optional marketing claims may be added to the bottle (e.g. reusable bottle).

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

FOR USE ONLY WITH [Dose Pack FOR] HD Mini Flexi/PRODUCT NAME

[Use within [30 days OR 4weeks OR 1 month.]

[This bottle/container holds up to 1[1/2] Gal (3.78[1.89]L)] [NOT FOR RESALE]

Sold by: 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]

**Text on side of the bottle:** This bottle is nearly empty. Time to get a Dose Pack/HD Mini Flexi/Product Name and reuse it!]

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

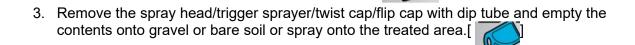
<sup>&</sup>lt;sup>2</sup> Cis/trans ratio: Max. 75% (±) cis and min. 25% (±) trans

# Note to PM: optional text for the reusable bottle:

# [How to Clean the Reusable Bottle/Container]

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

- 1. [Fill the bottle/container [brand name] with [clean tap] water and replace the spray head/trigger sprayer/twist cap/flip cap with dip tube.[
- 2. Shake the bottle/container [brand name] to rinse.[



- 4. Repeat steps 1-3 until the bottle/container and spray head/trigger sprayer/twist cap/flip cap with dip tube are clean.
- 5. DO NOT THROW AWAY Reusable Bottle/Container. Store empty bottle/container [brand name] for reuse with additional HD Mini Flexi/Product Name.] [

### OR

[Refer to applicator label/manual for additional clean out information.]

#### OR

[To clean sprayer, rinse sprayer and all parts with water three times.]

End of Secondary Container/Bottle Label End Dose Pack and Dose Pack + Kit label

# Individual unit label

# **HD Mini Flexi**

#### FOR INDOOR USE ONLY/FOR OUTDOOR USE ONLY/FOR BOTH INDOOR and/& OUTDOOR USE

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

This product contains 0.025 lb/gal of Bifenthrin and 0.006 lb/gal of Zeta-Cypermethrin.



# KEEP OUT OF REACH OF CHILDREN CAUTION

See accompanying label for Directions for Use.

Note to PM: approved optional marketing claims may be added to this label.

EPA Reg. No. 239-NEW Sold by:

EPA Est. No. XXXXXX The Ortho Group [Superscript is first letter of lot number.] P.O. Box 190

Marysville, OH 43040

NET CONTENTS: 10 fl. oz. (295 ml)

Note to PM: 10 fl. oz. size is meant to dilute into a  $\frac{1}{2}$  gallon container.

Each pouch is for one-time use only. Do not store any opened pouches. Empty the entire contents of the pouch into the container. Once empty, discard the empty pouch immediately into a secure trash receptacle that cannot be accessed by children.

Store pouch[es] in closed product box and away from children and food

# End of individual unit label.

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

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

# Optional Marketing Claims for Listed General Insect Control Use

Note to PM: the term 'cockroach' can be interchanged with 'roach' 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 'bugs'-and/or 'pests' and vice versa.

Note to PM: When qualified claims are used, the qualifying statement will appear following the claim.

The following claims may or may not appear on any label panel or in advertising. Appropriate formula and company specific information will be inserted on Final Printed Label to replace "X".

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]	[HD Mini Flexi]
[Froduct name]	
[Marketing Call-	Kills Bugs Inside. Keeps Bugs Out.
out]	
[Claims]	
1.	Kills 188 listed Insects
2.	[One pouch makes half/1/2 gallon][Two pouches make one/1 gallon]
3.	Kills by Contact
[Product Facts:]	What it Does: Kills listed home invading insects: [ants], [cockroaches], [spiders], [fleas], [ticks], [scorpions], [beetles], [earwigs], [silverfish], [centipedes], [millipedes]. (See inside for complete list)
	Where to Use: Use indoors (kitchens/bathrooms/doors & windows/basements) and outdoors (perimeter of foundations/patios and decks/garages/doors & windows).
	When to use: Use anytime as a preventative treatment or after you see evidence of insect activity for long-lasting* control.  *Note to PM: See 12 month claim section for qualifying statement which will appear here-options 1,2,3, or 4
	[ reentry icon] 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

**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.

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



[Where to Use /Apply:] Use indoors (kitchens/bathrooms/doors & windows/basements) and outdoors (perimeter of foundations/patios and decks/garages/doors & windows).



[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: See 12 month claim section for qualifying statement which will appear here-options 1.2.3. or 4



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\*
- Kills/Controls [for] up to 12 months\*
- 3. Kills bugs inside all year\*
- 4. Kills home invading bugs all year\*
- 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.



#### 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\*\*

# 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\*\*\*

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

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

# 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.

### **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

# 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

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

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

<sup>\*\*</sup> Starts killing in seconds

<sup>\*\*\*12</sup> month control for Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non-porous surfaces

# 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.

- 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. Use [Can be used] in [bathrooms], [kitchens], [family rooms], [pantry], [attics], [garages],

[basements], [closets], [storage areas], [and] [bedrooms]

- 67. Designed to/for use in kitchens &/and pantries
- 68. [Formulated][For] Indoor [Use] [/][and] Outdoor Use
- 69. [Formulated] [For] Outdoor Use
- 70. [Formulated] [For] Indoor Use
- 71. Indoor/Outdoor [Formula]
- 72. For large/larger jobs/areas/spaces/rooms
- 73. For small/smaller jobs/areas/spaces/rooms
- 74. Indoor Surfaces / Outdoor Surfaces
- 75. Use/Can be used in garage[s] and/or basement[s] and/or attic[s]
- 76. Use in garage[s] and/or basement[s] and/or attic[s] to keep listed bugs from coming into [entering] the/your home.
- 77. Use in [bathrooms], [kitchens], [family rooms], [pantry], [attics], [garages], [basements], [closets], [storage areas], [and] [bedrooms]
- 78. Use in [kitchens], [garages], [basements],[and] [attics] to keep bugs from entering your home.
- 79. Use in [kitchens], [garages], [basements] [and] [attics] to kill listed bugs.
- 80. Use inside and outside your home!
- 81. Use in [bathrooms], [kitchens], [family rooms], [pantries], [attics], [garages], [basements], [closets], [storage areas], [and] [bedrooms].
- 82. Use in garage[s] and/or basements[s] and/or attic[s]
- 83. [Illustrations of kitchen, bathroom, home perimeter/foundation, garage, windows and doorways, basement, attic, porches and patios]







# **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
- 88. Creates a [bug] border
- 89. Creates a perimeter treatment
- 90. Long lasting\*\*\* [bug] perimeter treatment/barrier/border

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.

- 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 listed bugs you have and prevent[s] new listed 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 listed 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
- \*\*\*12 month control for Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non-porous surfaces

#### Note to PM: When qualified claims are used, the qualifying statement will appear following the claim



# 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. Starts killing/acting within minutes≈
- 110. Kills [1...188] Insects∞
- 111. Kills [the] bugs you see and/& [the] [ones] bugs you don't [see] ∞
- 112. Kills/Controls [both] crawling and/& flying insects∞
- 113. Kills/Controls common household bugs∞
- 114. Kills by contact!
- 115. Say goodbye to insects

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

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

### Claims for Dose Pack Kit/System (Dose Pack and Dose Pack + Applicator (Kit)):

Note to PM: in references to saves X% of plastic claims, each 10fl oz pouch is expected to save up to 88% plastic, The use of an "X" allows for future changes in packaging designs for the 1 gal refill bottle. When X% is used, it will be < 88%.

- 116. Easy to Store[!]
- 117. Less Hassle[!]
- 118. The Easy Way to Spray[!]
- 119. Easy to mix, easy to spray.
- 120. Stock up [for insect season] [and save] with [HD Mini Flexi/Product Name] [packs/pouches/concentrates]
- 121. Prepare yourself [for insect season] with [HD Mini Flexi/Product Name] [refill(s)] [packs/pouches/concentrates]
- 122. Order online and/& save [\$XX] with [HD Mini Flexi/Product Name]] [packs/concentrates]
- 123. [HD Mini Flexi/Product Name] [is] tough on listed insects [and saves [[up to][88%/X] plastic [per refill [dose] pack\*\*\*]][4]
- 124. Power of [Brand Name/HD Mini Flexi/Product Name] [right to/at] your door
- 125. Control and conserve\*\*\* [88%/X more plastic [per refill/product name]]\*\*\*] [with [HD Mini Flexi/Product Name]]  $\left[ \frac{1}{4} \right]$
- 126. Same listed insect fighting/killing power\*\*\*\*
- 127. [HD Mini Flexi/Product Name] can be used for spot [treatment/application]
- 128. [HD Mini Flexi/Product Name] starts working immediately\*\*\*\*
- 129. [HD Mini Flexi/Product Name] [is] the easy [with less plastic]way to kill/control [listed insects]
- 130. [HD Mini Flexi/Product Name] Your/The Refill Solution/System
- 131. Proven results, reusable bottle/container
- 132. Reuse your spray bottle/container
- 133. [Includes] [Refill]able [bottle/container]
- 134. [Refill] over and over
- 135. No mess
- 136. [HD Mini Flexi/Product Name] [with/including] [Reusable] [bottle/container] [Just refill and reuse]
- 137. [HD Mini Flexi/Product Name] make[s] what you need [when you need it]
- 138. [HD Mini Flexi/Product Name] saves time [and energy]<sup>±</sup> <sup>±</sup>buying online vs. going to store
- 139. [Includes] Reusable [refill] bottle/container!
- 140. [The] [Quick] [No-Mess] Way to Kill [Your] Insects
- 141. [Brand Name/HD Mini Flexi/Product Name] Straight/Direct to Your Door!
- 142. [Convenient] Insect Control in a Box
- 143. [Convenient] Insect Control Straight/Direct to Your Door
- 144. [1] Add concentrate/[HD Mini Flexi/Product Name] [2] Fill the bottle/container, [and] [3] spray
- 145. [1] Add concentrate/[HD Mini Flexi/Product Name] [2] Fill with water, [and] [3] spray/ [[start] [to kill/killing]] [listed insects]
- 146. Easy as 1, 2, 3!
- 147. Just add water to start killing listed insects!
- 148. E-commerce/Ecommerce/E-comm/Ecomm/eComm/eCommerce -friendly
- 149. If the trigger spray(er) breaks on the bottle/container, [insert company/brand name here] will deliver a replacement free of charge.
- 150. [Simple] Refill [Technology]
- 151. [HD Mini Flexi/Product Name][concentrate] starter kit/[total] system [with bottle/container included]
- 152. [HD Mini Flexi/Product Name][concentrate] starter kit/[total] system just add water to start killing listed insects!
- 153. [HD Mini Flexi/Product Name] Make it [only] when you need it
- 154. [The] new [, easy] way to kill listed insects[!] (Note to PM: This claim may appear on any label panel for 6 months following commercial introduction)
- 155. [X] Refill pouch[es]/HD Mini Flexi/Product Name] included inside[!]
- 156. [X] Refill[s] included inside[!]

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.

- 157. [Pouch icon/ ♠] Empty Pouch.
- 158. [Tap water icon/ ♣] Add water.
- 159. [Control Icon/ ] [Control Insects\*\*]
- 160. Combo pack
- 161. [ ] Reduce[s] plastic [waste] by [up to] 88/X%[!]+
- 162. [[]] Uses [up to] 88/X% less plastic[!]+
- 163. Easy to store, easy to mix, easy to use.
- 164. Easy to pour, easy to mix, easy to use.
- 165. Mix &/and Go
- 166. Small pouch. Simple mix. Super easy.
- 167. Small. Simple. Easy.
- 168. Keep it simple.
- 169. Easy to mix. Easy to use.
- 170. Just add water.
- 171. A simple mix without the mess.
- 172. The hassle-free mix.
- 173. No mess, just mix and go.
- 174. The seriously easy mix.
- 175. Save space. Less waste.
- 176. Less mess. Less waste.
- 177. Reduce. Refill. Reuse.
- 178. Refill with [image/ ] [pouch / container / Pouch Name / Product Name / HD Mini Flexi].
- 179. [引 [Uses] [up to] 88/XX% less plastic+
- 180. [And] now [using] [up to] 88/XX% less plastic+ [th]
- 181. Save[s] plastic. Reduce[s] waste. [🖟]
- 182. Reduce plastic. Reduce waste. [♣]
- 183. Save[s] plastic [waste] with every refill. [4]
- 184. Reduce[s] plastic [waste] with every refill. [ ]
- 185. Learn more [about our efforts to reduce plastic waste] at ortho.com[/XXX]
- 186. Learn [more about] how we're reducing plastic waste at ortho.com[/XXX].
- 187. Learn about our/Ortho's sustainability efforts at ortho.com[/XXX].
- 188. Every refill saves plastic [waste]. [4]
- +vs. 1gal refill bottle
- \*when used as directed
- \*\*see inside [booklet] for insect list
- \*\*\*Each dose pack uses 88/X% less plastic than a standard 1 gallon product bottle
- \*\*\*\*Starts killing/acting within minutes against Carpenter Ants, Harvester Ants, Oriental and German Cockroaches

### Claims for Dose Pack Packaging – intended to apply to the flexible container/refill pouch

- 189. [More] Convenient [Size]
- 190. Takes up less space
- 191. Fits on your shelf
- 192. Fits under your sink
- 193. Light[er]/Easy/Easier to Carry
- 194. Lightweight
- 195. Fits [in] your life/shelf/space/home/apartment/house
- 196. Small bugs. Small package.
- 197. Easy/EZ [Mix] [Concentrate]

#### 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.

- 198. [Concentrated/Concentrate] Refill
- 199. [Super] Easy to pour
- 200. [For] use with refillable container
- 201. [For/Easy] use with tank sprayer
- 202. Easy to pour and mix[!]
- 203. Small package, Ortho Home Defense results
- 204. Good things come in small packages.
- 205. Mini-pouch/mini pouch/[Pouch Name/Product Name/HD Mini Flexi
- 206. Concentrated effective formula
- 207. It may be small[,] but it works.
- 208. Small pouch. Ortho Home Defense results.
- 209. Small pouch. Simple mix. Super easy.
- 210. Small. Simple. Easy.
- 211. Mini [pack/pouch]. Maximum easy.
- 212. Keep it simple.
- 213. Easy to mix. Easy to use.
- 214. No guesswork. No messwork.
- 215. Add to jug, fill with water. Easy.
- 216. Pour contents into container. Fill with water. Done.
- 217. Mix contents with a [one] half [ $\frac{1}{2}$ ] gallon of water. Shake and go.
- 218. Mix contents with a/one/1/half/ ½ gallon of water. Shake and go.
- 219. Makes 2L/one half gallon/ ½ gallon of solution/product
- 220. Use 1/2 packs/pouches to make ½ /1/a half/one gallon.
- 221. Pour. Shake. Go.
- 222. Pour. Add Water. Shake. Go.
- 223. Pour. Mix. Kill listed Insects.
- 224. Just add water.
- 225. The seriously easy mix.
- 226. Save space. Less waste.
- 227. Less mess. Less waste.
- 228. Contact[-]free concentrate
- 229. [The] EZ[-]Flex Pouch
- 230. [The] Easy Flex Pack
- 231. [The] Quick[-]Mix Pouch
- 232. [The] Mix & Go Pouch
- 233. [The] [Pouch Name/Product Name/HD Mini Flexi]
- 234. Refill

<sup>\*\*</sup>see inside [booklet] for insect list

# [CONTROLLING INSECTS HAS NEVER BEEN EASIER:] /

[How it works:] / [Getting started:] / [How to use:] / [How to mix:]

Note to PM: the images (below) may be used in association with each step, but are optional.

1. Unscrew cap from pouch/[Pouch Name/Product Name/HD Mini Flexi]and empty entire pouch into a reusable bottle [or tank sprayer.][ \_\_\_\_ ]

2. Fill bottle/container [brand name] [or tank sprayer] with [one half] [1/2] gallon [(64 fl oz)] of water.



3. Securely screw cap or top onto bottle [or sprayer]. [



4. Shake gently to mix. [ ]

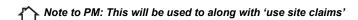


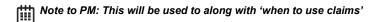
5. Spray as directed. [



# Images for use on applicable product claims:

Note to PM: This will be used to along with 'kill/control claims'





Note to PM: This will be used to along with 'residual claims'

**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.

#### 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.

- 235. Great Value
- 236. Value Pack
- 237. Refill/Recharge/Renew/Fill-Up/Reload
- 238. Same formula, better value!
- 239. Save [Money] with the Refill!
- 240. [Over] X% more than X gal size
- 241. Bonus Size
- 242. Combo Pack
- 243. Exclusive to Club Stores!
- 244. Exclusive Club [Bonus] Size!
- 245. Value/Bonus Size 2-pack!
- 246. Value/Bonus Size 2 gallons!
- 247. Value/Bonus Size 2-pack =1 gallons!
- 248. Look inside [label] for special offer information!
- 249. Go to [] now for a special offer! Offer subject to change or expiration.
- 250. Value [pack/size/buy/dose/pack/pouch/concentrate]
- 251. Bonus [value/size/offer/package/pack/buy/dose/pack/pouch/concentrate]
- 252. Exclusive item [size]
- 253. Special [buy/offer/size/item/dose [pack]/pouch]
- 254. Save [money]
- 255. [Easy] Refill/Dose system
- 256. Free sample [dose(s)]
- 257. Refill [dose] [Combo] pack
- 258. Great value
- 259. Bottle/container in [a] box
- 260. How2Recycle Logo Note to PM: Below are examples of images from the How2Recycle program. Image on FPL will be based upon the program's assessment of the packaging material. To be used on outer packaging only, not intended for individual pouches.











261. 88% less plastic\*

\*vs. 1gal refill bottle

#### **OTHER**

- 262. [\*\*reentry icon] People and pets may re-enter treated areas after spray has dried
- 263. Proven performance
- 264. Read Entire label before use
- 265. Recyclable symbol/ 5 Note to PM: To be used on outer packaging only, not intended for

# individual pouches.

- 266. Before / After
- 267. OPEN
- 268. Resealable Label for Directions & Precautions
- 269. Peel Open for use directions and further information

**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.

- 270. PRESS TO RESEAL [Placed on booklet cover or base of label depending upon space.]
- 271. PEEL HERE / PRESS TO RESEAL
- 272. PULL / PEEL HERE [TO REMOVE TAPE]
- 273. New [Product name/HD Mini Flexi] (Note to PM: This claim may appear on any label panel for 6 months following commercial introduction)
- 274. New/Now (Note to PM: This claim may appear on any label panel for 6 months following commercial introduction)
- \*\*\*12 month control for Ants, Roaches / palmetto bug / water bug, & Spiders indoors on non-porous surfaces

#### Guarantees

The [insert company name] Guarantee: [When purchased from an authorized seller,] 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: [When purchased from an authorized seller,] 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.

The *[insert 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.

Money Back Guarantee. See back panel for details±

Consumer Guarantee: [When purchased from an authorized seller,] 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.

[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.

#### QR Code:

Scan here to/and learn more [about [Ortho]]
Scan here/me [to/and learn more] [about] [Ortho]
Discover [Ortho]



Questions or Comments?

[Call] [800 number] [icon phone/



] [or visit [our website at]] [[www.]ortho.com][icon computer/



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

EPA File Symbol 239-ETIG

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P.O. Box 190 Marysville, OH 43040 EPA Reg. No. 239-ETIG EPA Est. No. XXXXXX [Superscript is first letter of lot number]

Insert trademark statement [Assembled in/Made in/Product of] [USA/Insert Country]