



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

June 27, 2023

Ms. Heather Klamer
Registration Specialist
S.C. Johnson & Son, Inc.
1525 Howe St.
Racine, Wisc. 53403-2236

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 – Adding optional graphics, updating company information and registration number
Product Name: TER-RTU2
EPA Registration Number: 4822-633
EPA Receipt Date: 05/25/2023
Action Case Number: 00452461

Dear Ms. Klamer:

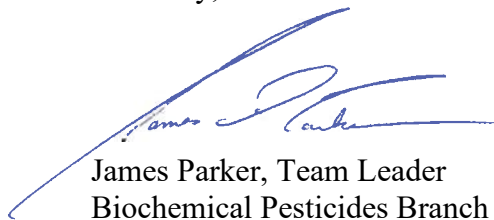
The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10.

The labeling submitted with this application has been stamped “Notification” and will be placed in our records. You must submit one (1) copy of the final printed labeling with the modifications.

Should you wish to add/retain a reference to your company’s website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the 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 EPA find or if it is brought to our attention that a website contains statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA’s Office of Enforcement and Compliance Assurance.

If you have any questions, please contact Nina Naimy via email at naimy.nina@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "James Parker", with a long, sweeping underline that extends to the left.

James Parker, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511M)
Office of Pesticide Programs

Enclosure

NOTIFICATION

4822-633

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

06/27/2023

[Bracketed information is optional text.]

TER-RTU2 (EPA Reg. No. 4822-633)

MASTER LABEL

Sublabel A is for Commercial Use

Kills bed bugs and their eggs, fleas, dust mites, moisture ants, pavement ants, field ants, cockroaches and their eggs, spiders (Except black widow spiders), house crickets, firebrats[†], silverfish, millipedes, centipedes, sow bugs, aphids[†] and bottle flies in indoor areas, and for moisture ants, pavement ants, field ants, crickets, aphids, millipedes, centipedes, sow bugs, and bottle flies in outdoor areas.

Sublabel B is for Residential Use on Bed Bugs

Kills bed bugs and their eggs

Sublabel C is for Residential Use on Bed Bugs, Fleas and Dust Mites

Kills bed bugs (and their eggs), fleas and dust mites

Sublabel D is for Residential Use

Kills cockroaches (and their eggs), moisture ants, pavement ants, field ants, bed bugs (and their eggs), fleas, dust mites, spiders (Except black widow spiders), crickets, firebrats, silverfish, millipedes, centipedes, sow bugs, aphids and bottle flies in indoor areas, and to kill moisture ants, pavement ants, field ants, crickets, firebrats, silverfish, millipedes, centipedes, sow bugs, aphids and bottle flies in outdoor areas.

TER-RTU2

For Use as an Insecticide for all Listed Pests

For Use as an Ovicide on Bed Bugs and Cockroaches

Active Ingredient:

Cold Pressed Neem Oil.....	5.5%
Other Ingredients.....	94.5%
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

READ ALL DIRECTIONS BEFORE USING THIS PRODUCT

If you do not understand the label, find someone to explain it to you in detail.

(Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.)

EPA Reg. No. 4822-633

EPA Est. No. XXXXX

NET CONTENTS: 3, 3.4, 12, 16, 22, 24, 32 or 64 fl. oz., 1 or 5 Gallons

Sold By © [year] S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U. S. A.

Questions? Comments? Call 800-558-5252

[website may be listed]

TER-RTU2 (EPA Reg. No. 4822-633)

Sublabel A: Commercial Use

Kills bed bugs and their eggs, fleas, dust mites, moisture ants[†], pavement ants, field ants, cockroaches and their eggs, spiders (Except black widow spiders), house crickets, firebrats, silverfish, millipedes, centipedes, sow bugs, aphids and bottle flies in indoor areas, and for moisture ants, pavement ants, field ants, crickets, aphids, millipedes, centipedes, sow bugs, and bottle flies in outdoor areas.

TER-RTU2

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EPA Reg. No. 4822-633

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Sold By © [year] S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U. S. A.

Questions? Comments? Call 800-558-5252

[website may be listed]

PRECAUTIONARY STATEMENTS

PHYSICAL AND CHEMICAL HAZARDS

Do not apply this product around electrical equipment due to the possibility of shock hazard.

ENVIRONMENTAL HAZARDS

For terrestrial uses: Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

[USER SAFETY RECOMMENDATIONS

User should wash hands thoroughly after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.]

[Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: www.npic.orst.edu.) [For emergencies, call the poison control center 1-800-222-1222.]

DIRECTIONS FOR USE

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

Read entire label. Use strictly in accordance with precautionary statements and directions, and with applicable state and Federal regulations.

GENERAL INFORMATION

TER-RTU2 is a [water-based] [plant-based] Ready-to-Use spray for indoor and outdoor use, containing 5.5% pure cold-pressed neem oil. Apply **TER-RTU2** as a general surface, spot, or crack and crevice treatment in food or non-food areas. Use **TER-RTU2** for the treatment of *bed bugs and their eggs, fleas, dust mites, moisture ants, pavement ants, field ants, cockroaches and their eggs, spiders (Except black widow spiders), house crickets, firebrats, silverfish, millipedes, centipedes, sow bugs, aphids and bottle flies in indoor areas, and for moisture ants, pavement ants, field ants, crickets, aphids, millipedes, centipedes, sow bugs, and bottle flies in outdoor areas.*

GENERAL PRECAUTIONS:

- [TER-RTU2 may cause damage or discolor certain surfaces and materials [, including paper, freshly painted surfaces, soft plastics, plastic varnishes, some flooring and finishes, frames, photographs, artwork, wallpaper and consumer electronics].] Make small inconspicuous spot treatments to test all surfaces and fabrics for colorfastness, discoloration or damage before use.
- Do not use on surface prone to water damage.
- Do not allow excessive dripping or run-off on surfaces to avoid potential material damage.

- Treatment of smooth floor surfaces may leave slippery residue. Exercise caution.
 - Allow treated surface to dry completely before use.
 - Overspray or excess drift to household plants may injure or kill. Avoid contacting residential plants.
 - Do not make outdoor applications during rain [or if rain is expected within 4 hours].
 - Food handling or processing establishments: Application is permitted in food and non-food areas of food handling and food processing establishments. However, do not apply when the facility is in operation or food is present. When using in livestock facilities, such as barns and poultry farms, do not spray where livestock feed is present.
- Shake well prior to use.

INDOOR PESTS:

Use **TER-RTU2** to [control][kill] *bed bugs and their eggs, fleas, dust mites, moisture ants[†], pavement ants, field ants, cockroaches and their eggs, spiders (except black widow spiders), house crickets, firebrats, silverfish, millipedes, centipedes, sow bugs, aphids and bottle flies.*

Use **TER-RTU2** in indoor areas including residential homes, multi-dwelling units, apartments, dormitories, schools, hospitals, nursing homes, prisons, temporary shelters, aircraft, buses, marine vessels, airports, offices, theaters, hotels, motels, restaurants, lounges, arenas, retail stores, conference centers and other indoor spaces.

WHERE TO APPLY:
 Treat areas where pests are found, or may hide, feed or breed. Use on all surfaces, fabrics or materials [such as floors, ceilings, walls, windows, doors, baseboards, moldings, painted and unpainted wood, mattresses, linens, furniture, upholstery, curtains, rugs, suitcases,] and anywhere listed pests may harbor. Spot test fabrics or surface prior to treatment.

- HOW TO APPLY:**
1. Spray pests directly, and spray surfaces until moist. Use approximately one ounce of **TER-RTU2** per 1.5 to 6 sq. ft. of surface area depending on the pest or material treated. Porous surfaces such as carpets may require more volume (e.g. one ounce per 1.5~3 sq.ft.) than non-porous hard surfaces such as vinyl floors (e.g. one ounce per 3~6 sq.ft.). Allow treated surface to dry completely before contacting the surface.
 2. For optimal performance, close doors and windows and turn off air circulation (e.g. heaters and air conditioners), leave treated area, and keep site of application undisturbed for at least 4 hours after treatment if possible. After 4 hours, ventilate the treated area well and allow reentry.
 3. Re-apply as needed when listed pests reappear or as instructed below.

For Bed Bug Control:	<p>TER-RTU2 provides effective knockdown (i.e. immobilize), residual and preventative control of bed bugs, including pyrethroid-resistant bed bugs, and their eggs. [TER-RTU2 kills bed bugs and eggs and helps manage the spread of pesticide resistance.] Spray bed bugs, nymphs or eggs directly or apply to surfaces where bed bugs are found, may harbor or lay eggs for residual control of bed bugs for up to 2 weeks and eggs for up to 3 weeks.</p> <p>Apply to a variety of indoor surfaces, fabrics and materials, [such as painted and unpainted wood, under beds, box springs, bed frames, headboards, mattresses, linens,</p>
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	<p>under and behind night stands, closets, dressers, drawers, curtains, blinds, under and behind wall hangings, carpets, rugs, upholstery, wall and window treatments, suitcases, seams, points where carpets and wall meet, moldings,] and anywhere bed bugs may harbor or their eggs may be found. Ensure to inspect and spray tufts, folds, seams, edges, cracks and crevices to minimize further infestation.</p> <p>[When treating suitcases, remove loose clothing and other articles and treat both inside and outer surface of the suitcase, especially seams, tufts and pockets.]</p> <p>For bed bugs adults, nymphs and eggs, re-apply every 1 to 2 weeks or as needed. For ongoing control of bed bug eggs only, re-apply every 2 to 3 weeks or as needed.</p>
Moisture, pavement, and field ants	Spray directly over and around ants at one ounce per 1.5 ~3 sq.ft. to ensure sufficient exposure to treatment. Treat floors, walls, baseboards, under furniture, and other areas where ants are seen or may aggregate for food or water. Apply to ant trails and nest sites. Treat entry points (e.g. doors, windows, and around pipes) and areas around them. Spray around the perimeter of ant aggregations first before applying directly to live ants in order to prevent them from escaping. On non-porous surfaces, apply one ounce per 3~6 sq.ft. On porous surfaces, apply one ounce per 1.5~3 sq.ft.
Fleas	[TER-RTU2 controls fleas as a direct spray and surface treatment.] Spray areas where fleas may be present, especially fibrous surfaces such as carpets, rugs or linens and areas where pets rest or travel. Apply one ounce per 3~6 sq.ft. on non-porous surfaces such as vinyl floor, and apply one ounce per 1.5~3 sq.ft. on porous surfaces such as carpet or linen.
Cockroaches and Eggs	Apply directly over and around cockroaches at the rate of one ounce per 1.5 sq.ft. for continuous exposure to kill them. Treat areas where cockroaches may feed, hide or lay eggs such as under kitchen appliances, in and around cabinets, sinks, around water pipes or other water sources, baseboards, cracks and crevices. If cockroaches are flushed out of hiding, spray them directly. Treat entry points and areas around them. Apply one ounce per 1.5 sq.ft. for adults, and one ounce per 3~6 sq.ft. for eggs.
Dust Mites	Spray surfaces where the presence of dust mites is suspected. Porous surfaces such as carpets, linens, mattress and bedding are ideal breeding sites for dust mites. Also treat areas around bed such as walls, floors, headboards and baseboards to kill and prevent spread of dust mites. Apply one ounce per 1.5~3 sq.ft.
Spiders (Except black widow spiders)	Spray directly over and around spiders for continuous exposure at the rate of one ounce per 1.5 sq.ft. A direct spray immobilizes spiders within 5 minutes and kills brown recluse and other spiders (except black widow spiders) within 4 hours. Black widow spiders may recover from immobility after approximately 8 hours.
OUTDOOR/PERIMETER PESTS:	
Use TER-RTU2 to [control] [kill] moisture ants, pavement ants, field ants, crickets, aphids, millipedes, centipedes, sow bugs, and bottle flies in outdoor areas.	

<p>WHERE TO APPLY: Use TER-RTU2 on listed pests in outdoor areas including around structures, exterior building surfaces, exterior structural elements, patios, sidewalks, garbage cans, dumpsters, parks, recreational areas, and other outdoor areas.</p> <p>Apply to outdoor surfaces and entry points such as the exterior building surfaces, building foundations, around doors, windows, cracks, crevices, and exterior holes. Apply to outdoor ground surfaces, including sidewalks, driveways, foundation perimeters and soil.</p> <p>HOW TO APPLY:</p> <ol style="list-style-type: none"> 1. Spray listed pests directly where possible, and spray surfaces until moist. Use approximate one ounce of product per 1.5~6 sq.ft. of surface area depending on surface treated. 2. Apply outdoor perimeter treatment. If pests are flushed out from hiding sites, spray directly. 3. Overspray or excess drift to household plants may injure or kill. Avoid contacting residential plants. 	
<p>Ants (moisture, pavement, field ants)</p>	<p>Spray directly over and around the listed ants at the rate of one ounce per 1.5~6 sq.ft. to ensure continuous exposure to treatment. Spray around the perimeter of ant aggregations first before applying directly to live ants. Treat entry points (e.g. doors, windows, and around pipes) and areas around them.</p>
<p>crickets[†], aphids[†], millipedes[†], centipedes[†], sow bugs[†], and bottle flies[†]</p>	<p>Spray directly where possible at the rate of one ounce per 3~6 sq.ft. Treat surfaces where the list pests are found or may hide at the rate of one ounce per 1.5~3 sq.ft.</p>

STORAGE AND DISPOSAL

DO NOT contaminate water, food, or feed by storage or disposal. Open dumping is prohibited. Do not reuse container.

PESTICIDE STORAGE: Do not store this product above 104°F or below 20°F for extended periods of time. Store in original containers and keep it tightly closed when not in use. Protect containers from sunlight or moisture.

PESTICIDAL DISPOSAL: Wastes resulting from the use of this product must be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. Offer for recycling if available or place in trash or in a sanitary landfill.

**IMPORTANT: READ BEFORE USE
WARRANTY STATEMENT**

Read the entire Directions for Use, Conditions of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

The **Directions For Use** of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks inherently associated with the use, handling and transport of this product. Damage to products, materials, treated surfaces or fabrics, ineffectiveness or other unintended consequences may result because of factors such as environmental conditions, the presence of other materials, the manner of use or application, the use of the product in a manner inconsistent with its labeling, or other unknown reasons, all of which are beyond the control of **the seller**. All such risks shall be assumed by the user or buyer.

To the extent consistent with applicable law, **the seller** makes no other warranties, guarantees or representations of any kind, either express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of **the seller** is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, **the seller** disclaims any liability for special, consequential, incidental, or indirect damages resulting from the use, transport, or handling of this product.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the user or buyer and the exclusive liability of **the seller** for any and all losses, injuries or damages resulting from the use, handling, or transport of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid for the product, or at **the seller's** election, the replacement of product.

<i>{Optional marketing claims – Specific to Sublabel A}</i>	
- Controls bed bug[s] [infestations] for up to 2 weeks when used as directed]	- [Just] spray and [leave to dry] [walk away]
- Manages bed bug[s] [infestations] [for up to 2 weeks][when used as directed]	- Smells strong [and] [but] it works
- Prevents bed bug[s] [infestations] [for up to 2 weeks][when used as directed]	- Use on [mattresses] [beds] [upholstery] [wood] [carpets] [rugs] [suitcases] [fabrics]
- Kills Bed Bug Adults, Nymphs and Their Eggs [including [pyrethroid] [chemical] [pesticide] resistant bed bugs]	- [For] use everywhere in [the] [house] [home] [kitchen] [bathroom]
- Effective bed bug control [for up to two weeks] [when used as directed]	- [For] use [at the office] [at work] [while traveling][on the road]
- Effective treatment for fleas and dust mites [when used as directed]	- Provides Around the clock protection from Bed bugs [and their eggs] for up to 2 weeks [when used as directed]
- 100% effective bed bug [flea] [dust mite] protection* (*tested under laboratory conditions)	- [Use] The Power of Neem
- Stops bed bug infestations for up to 2 weeks [when used as directed]	- Derived From Neem
- Patent[ed][-pending] [formula]	- Kills Bed bugs [fleas and dust mites] where they [live] [hide] [when used as directed]
- Keeps on killing bed bug adults and nymphs for up to 2 weeks and bed bug eggs for up to 3 weeks	- Protect [yourself] [your home] [your family] from [bed bugs][fleas][dust mites][spiders]
- Prevents bed bug egg hatch for up to 3	- plant-based [biopesticide][spray]
	- botanical insecticide
	- Non-toxic [mode of] [killing] action
	- Kills bed bugs [fleas][dust mites][ants**] [cockroaches] [on contact] [when sprayed directly] ** moisture, pavement and field ants
	- [knocks down] [disables] [immobilizes]

<ul style="list-style-type: none"> weeks [when used as directed] - Prevents the [growth] [spread] of bed bug infestations [when used as directed] - Effective against [pyrethroid] [chemical] [pesticide] resistant bed bugs [when used as directed] - All-in-one protection from bed bugs [fleas][dust mites][cockroaches][ants (moisture, pavement and field)][spiders (except black widow spiders)] - Be Bed bug Free - Provides Protection from bed bugs - [The] smart way to [Control] [Manage] [Protect] [Yourself] [Your Family] [From] Bed bugs - [The] smart solution - Ready-to-Use [spray] [formula] - Made in [the] [USA][America] [of US and imported components] - Easy to use - Makes bed bugs dead bugs - Makes fleas and dust mites dead bugs - Stops bed bug eggs from hatching for up to 3 weeks - Use in and around bedroom 	<ul style="list-style-type: none"> spiders within 5 minutes by direct spray - Spray spiders directly to immobilize them within 5 minutes [and kill them in 4 hours, except black widow spiders] - Keeps on killing bed bugs [as a residual treatment] [on treated surfaces] for up to 2 weeks [when applied as directed] - Kills moisture ants, pavement ants and field ants [on contact][when sprayed directly] - Kills Spiders (Except black widow spiders) - Kills ants** and cockroaches **Moisture, pavement, field ants - [For] Use as part of an Integrated Pest Management [program][strategy] - -
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TER-RTU2 (EPA Reg. No. 4822-633)
Sublabel B: Residential Use on Bed Bugs – Indoor Use Only
Kills bed bugs and their eggs

TER-RTU2
Insecticide and Ovicide for Bed Bugs

[ABN: PROOF AQ]

Active Ingredient:	
Cold Pressed Neem Oil.....	5.5%
Other Ingredients.....	94.5%
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

STOP - Read the Label Before Use

EPA Reg. No. 4822-633
EPA Est. No. XXXXX

NET CONTENTS: 3, 3.4, 12, 16, 22, 24, 32 or, 64 fl. oz.,
1 or 5 Gallons

Sold By © [year] S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U. S. A.
Questions? Comments? Call 800-558-5252
[website may be listed]

PRECAUTIONARY STATEMENTS

PHYSICAL AND CHEMICAL HAZARDS

Do not apply this product around electrical equipment due to the possibility of shock hazard.

[USER SAFETY RECOMMENDATIONS

User should wash hands thoroughly after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.]

[Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: www.npic.orst.edu.) [For emergencies, call the poison control center 1-800-222-1222.]

DIRECTIONS FOR USE

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

Read entire label. Use strictly in accordance with precautionary statements and directions, and with applicable state and Federal regulations.

General Information

TER-RTU2 is a [water-based] [plant-based] Ready-to-Use spray for use around the home and other indoor spaces to kill bed bugs and their eggs. **TER-RTU2** kills bed bugs and their eggs on contact, and keeps on killing bed bugs for up to 2 weeks and their eggs for up to 3 weeks after initial treatment. **TER-RTU2** can be used as a preventative solution against bed bug infestations when applied every 2 weeks. Shake well prior to use.

How To Apply

Spray bed bugs and eggs directly when they are visible. Apply as a surface spray to indoor surfaces, fabrics and materials on which bed bugs may harbor, hide or lay eggs [(e.g. suitcases, travel bags, wood, under beds, box springs, mattresses, linens, under and behind night stands, curtains, blinds, under and behind wall hangings, carpets, rugs, upholstery, wall and window treatments, bed frames, headboards, closets, dressers, seams, points where carpets and wall meet, moldings)]. Pay particular attention to tufts, folds, edges, cracks and crevices. [When treating suitcases, remove loose clothing and other articles and treat both inside and outer surface of the suitcase, especially seams, tufts and pockets.] Spray surfaces until it is moist. Use approximately one ounce per 1.5-3 sq.ft. on porous surfaces and one ounce per 3-6 sq.ft. on non-porous surfaces.

For optimal performance, minimize air circulation where possible and leave treated areas undisturbed for at least 4 hours after treatment. After 4 hours, ventilate the treated area well and allow re-entry.

For ongoing control of bed bugs and eggs, re-apply every 1 to 2 weeks or as needed.
For ongoing control of bed bug eggs only, re-apply every 2 to 3 weeks or as needed.

General Precaution

- [TER-RTU2 may cause damage or discolor certain surfaces and materials[, including papers and soft plastics such as plexiglass, plastic varnishes, some flooring and finishes, frames, photographs, artwork,

wallpaper and consumer electronics]]. Make small inconspicuous spot treatments to test all surfaces and fabrics for colorfastness, discoloration or damage before use.

- Do not apply directly to electrical outlets or to other potential electrocution hazards.
- Do not spray to the point of excessive dripping or run-off to avoid potential material damage.
- Allow treated areas to dry completely before use.

STORAGE AND DISPOSAL

Store in a cool dry place out of reach of children and pets and away from direct sunlight, windows, flames and other sources of heat or ignitions. Keep containers tightly closed and in original containers when not in use. Do not store exposed to ultraviolet light (sunlight) or moisture. Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

NOTICE: Research and testing have determined the “Directions for Use” are appropriate for the proper use of this product under expected conditions. To the extent consistent with applicable law, user assumes responsibility for the lack of performance or safety if not used as directed.

<i>{Optional marketing claims – Specific to Sublabel B}:</i>	
- Controls bed bug[s] [infestations] for up to 2 weeks when used as directed]	- [For] Use as part of an Integrated Pest Management [program][strategy]
- Manages bed bug[s] [infestations] [for up to two weeks][when used as directed]	- [Just] spray and [leave to dry] [walk away]
- Prevents bed bug[s] [infestations] [for up to two weeks][when used as directed]	- Smells strong [and] [but] it works
- Kills Bed Bug Adults, Nymphs and Their Eggs [including [pyrethroid] [chemical] [pesticide] resistant bed bugs]	- Use on [mattresses] [beds] [upholstery] [wood] [carpets] [rugs] [suitcases] [fabrics]
- Effective bed bug control [for up to two weeks] [when used as directed]	- [For] use everywhere in [the] [house] [home] [kitchen] [bathroom]
- Effective treatment for fleas and dust mites [when used as directed]	- [For] use [at the office] [at work] [while traveling][on the road]
- 100% effective [bed bug protection]* (*tested under laboratory conditions)	- [Convenient] [Travel][personal][home] size
- Stops bed bug infestations for up to 2 weeks [when used as directed]	- Provides Around the clock protection from Bed bugs [and their eggs] for up to 2 weeks [when used as directed]
- Patent[ed][pending] [formula]	- [Use] The Power of Neem
- Keeps on killing bed bug adults and nymphs for up to 2 weeks and bed bug eggs for up to 3 weeks	- Derived From Neem
	- Kills Bed bugs where they [live] [hide] [when used as directed]
	- Protect [yourself] [your home] [your family] from bed bugs
	- plant-based [biopesticide][spray]
	- botanical insecticide
	- Non-toxic [mode of] [killing] action
	- Keeps on killing bed bugs as a residual treatment on treated surfaces for up to 2

<ul style="list-style-type: none"> - Prevents bed bug egg hatch for up to 3 weeks [when used as directed] - Prevents the [growth] [spread] of bed bug infestations [when used as directed] - Effective against [pyrethroid] [chemical] [pesticide] resistant bed bugs [when used as directed] - Kills [pyrethroid] [chemical] [pesticide] resistant bed bugs - All-in-one protection from bed bugs - Provides Protection from bed bugs - [The] smart solution to [Control] [Manage] [Protect] [Yourself] [Your Family] [From] Bed bugs - [The] smart solution - Ready-to-Use [spray] [formula] - Made in [the] [USA][America] [of U.S. and imported components] - Easy to use - Makes bed bugs dead bugs - Stops bed bug eggs from hatching for up to 3 weeks - Use in and around bedroom 	<ul style="list-style-type: none"> weeks [when applied as directed] - Spray your suitcases and belongings, [in and around beds] [and] [living areas] [,and] [use it on the go] - TER-RTU2's] patent-pending technology unleashes the [botanical] power of [cold-pressed] neem [oil] to create a zone of protection [at home] [and] [while travelling]. - Kills, Protects, Prevents - This plant-based spray is even effective against pesticide-resistant bed bugs and eggs. - Preventative solution against bed bugs [when applied every 2 weeks] - Bed Bug Killer - [TER-RTU2 is a] water-based [product] - Keeps killing [bed bugs][adults] for up to two weeks and eggs for up to three weeks.* - *when used as directed
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TER-RTU2 (EPA Reg. No. 4822-633)
Sublabel C: Residential Use
on Bed Bugs, Fleas and Dust Mites – Indoor Use Only
Kills bed bugs (and their eggs), fleas and dust mites

TER-RTU2
[ABN: PROOF Bed Bug & Dust Mite Killer]

For Use as an Insecticide for All Listed Pests
For Use as an Ovicide on Bed Bugs

Active Ingredient:	
Cold Pressed Neem Oil.....	5.5%
Other Ingredients.....	<u>94.5%</u>
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

STOP - Read the Label Before Use

EPA Reg. No. 4822-633
EPA Est. No. XXXXX

NET CONTENTS: 3, 3.4, 12, 16, 22, 24, 32 or, 64 fl. oz.,
1 or 5 Gallons

Sold By © [year] S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U. S. A.
Questions? Comments? Call 800-558-5252
[website may be listed]

PRECAUTIONARY STATEMENTS

PHYSICAL AND CHEMICAL HAZARDS

Do not apply this product around electrical equipment due to the possibility of shock hazard.

[USER SAFETY RECOMMENDATIONS

User should wash hands thoroughly after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.]

[Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: www.npic.orst.edu.) [For emergencies, call the poison control center 1-800-222-1222.]

DIRECTIONS FOR USE

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

Read entire label. Use strictly in accordance with precautionary statements and directions, and with applicable state and Federal regulations.

General Information

TER-RTU2 is a [water-based] [plant-based] Ready-to-Use spray for use around the home and other indoor spaces to kill bed bugs (and their eggs), fleas and dust mites.

Shake well prior to use.

General Precaution

- [TER-RTU2 may cause damage or discolor certain surfaces and materials [, including papers and soft plastics such as plexiglass, plastic varnishes, some flooring and finishes, frames, photographs, artwork, wallpaper and consumer electronics]]. Make small inconspicuous spot treatments to test all surfaces and fabrics for colorfastness, discoloration or damage before use.
- Do not apply directly to electrical outlets or to other potential electrocution hazards.
- Do not spray to the point of excessive dripping or run-off to avoid potential material damage.
- Allow treated areas to dry completely before use.

How To Apply

Spray pests directly, or treat surfaces and fabrics until moist. Spray approximately one ounce per 1.5 to 6 sq. ft. of surface area depending on material treated. For optimal performance, close doors and windows and turn off air circulation (*e.g.* heaters and air conditioners). Leave treated areas undisturbed for at least 4 hours after treatment. After 4 hours, ventilate the treated area well and allow reentry.

To Kill and Prevent Bed Bugs: Spray bed bugs or eggs directly, and/or apply as a surface spray to indoor surfaces, fabrics and materials on which bed bugs may harbor, hide or lay eggs [(*e.g.* suitcases, travel bags, wood, under beds, box springs, mattresses, linens, under and behind night stands, curtains, blinds, under and behind wall hangings, carpets, rugs, upholstery, wall and window treatments, bed frames, headboards, closets, dressers, seams, points where carpets and wall meet, moldings)]. Pay particular attention to tufts, folds, edges, cracks and crevices.

For ongoing control of bed bugs and eggs, re-apply every 1 to 2 weeks or as needed.

For ongoing control of bed bug eggs only, re-apply every 2 to 3 weeks or as needed.

To Kill and Prevent Fleas and Dust Mites (DO NOT APPLY TO HUMANS OR ANIMALS): Spray fleas directly when found. Spray the areas where fleas and dust mites may be present, especially fibrous surfaces [such as carpets, rugs, linens, mattress, beddings, and couches], and areas around those surfaces [such as floors, headboards, baseboards, cracks and crevices]. For fleas, spray areas where pets rest or travel. Use approximately one ounce of product per 1.5 to 3 sq.ft. on fibrous surfaces, and one ounce per 3~6 sq.ft. on non-porous surfaces. Reapply if pests reappear.

STORAGE AND DISPOSAL

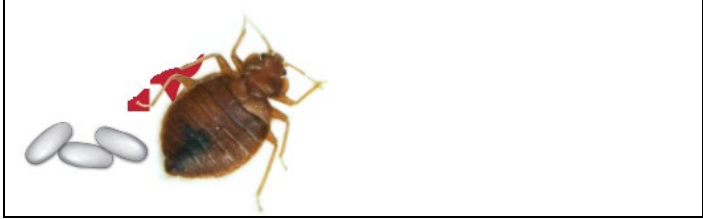
Store in a cool dry place out of reach of children and pets and away from direct sunlight, windows, flames and other sources of heat or ignitions. Keep containers tightly closed and in original containers when not in use. Do not store exposed to ultraviolet light (sunlight) or moisture. Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

NOTICE: Research and testing have determined the “Directions for Use” are appropriate for the proper use of this product under expected conditions. To the extent consistent with applicable law, user assumes responsibility for the lack of performance or safety if not used as directed.

<i>{Optional marketing claims – Specific to Sublabel C}:</i>	
- Controls bed bug[s] [infestations] for up to 2 weeks when used as directed]	- [For] Use as part of an Integrated Pest Management [program][strategy]
- Manages bed bug[s] [infestations] [for up to two weeks][when used as directed]	- [Just] spray and [leave to dry] [walk away]
- Prevents bed bug[s] [infestations] [for up to two weeks][when used as directed]	- Smells strong [and] [but] it works
- Kills Bed Bug Adults, Nymphs and Their Eggs [including [pyrethroid] [chemical] [pesticide] resistant bed bugs]	- Use on [mattresses] [beds] [upholstery] [wood] [carpets] [rugs] [suitcases] [fabrics]
- Kills bed bugs and [their] eggs [including chemical resistant bed bugs]	- [For] use everywhere in [the] [house] [home] [kitchen] [bathroom]
- Effective bed bug control [for up to two weeks] [when used as directed]	- [For] use [at the office] [at work] [while traveling][on the road]
- Effective treatment for fleas and dust mites [when used as directed]	- [Convenient] [Travel][personal][home] size
- 100% effective* [bed bug] [flea] [dust mite] [killer] [protection] (*tested under laboratory conditions)	- Provides Around the clock protection from Bed bugs [and their eggs] for up to 2 weeks [when used as directed]
	- [Use] The Power of Neem
	- Derived From Neem
	- Kills Bed bugs [fleas and dust mites] where they [live] [hide] [when used as directed]
	- Protect [yourself] [your home] [your family] from [bed bugs][fleas][dust mites]
	- plant-based [biopesticide][spray]
	- botanical insecticide

- | | |
|--|---|
| <ul style="list-style-type: none"> - Stops bed bug infestations for up to 2 weeks [when used as directed] - Patent[ed][]-pending] [formula] - Keeps on killing bed bug adults and nymphs for up to 2 weeks and bed bug eggs for up to 3 weeks - Prevents bed bug egg hatch for up to 3 weeks [when used as directed] - Prevents the [growth] [spread] of bed bug infestations [when used as directed] - Effective against [pyrethroid] [chemical] [pesticide] resistant bed bugs [when used as directed] - Kills [pyrethroid] [chemical] [pesticide] resistant bed bugs - All-in-one protection from bed bugs [fleas] [dust mites] - Provides Protection from bed bugs - [The] smart way to [Control] [Manage] [Protect] [Yourself] [Your Family] [From] Bed bugs, fleas and dust mites - [The] smart solution to control bed bugs, fleas and dust mites - Ready-to-Use [spray] [formula] - Made in [the] [USA][America] [of US and imported components] - Easy to use | <ul style="list-style-type: none"> - Non-toxic [mode of] [killing] action - Kills bed bugs [fleas][and dust mites] - Kills dust mites - TER-RTU2 [also] kills 100% of dust mites when sprayed directly. - Keeps on killing bed bugs [as a residual treatment] [on treated surfaces] for up to 2 weeks [when applied as directed] - Kills bed bugs in all life cycles and keeps killing adults for up to 2 weeks and eggs for up to 3 weeks when used as directed. - Makes bed bugs dead bugs - Makes fleas and dust mites dead bugs - Stops bed bug eggs from hatching for up to 3 weeks - Use in and around bedroom - Spray your suitcases and belongs, [in and around beds] [and] [living areas] [, and use it on the go] - TER-RTU2’s patent-pending technology unleashes the [botanical] power of [cold-pressed] neem [oil] to create a zone of protection [at home] [and while traveling]. - Kills, Protects, Prevents - This plant-based spray is even effective against pesticide-resistant bed bugs and eggs - Bed Bug & Dust Mite Killer - [TER-RTU2 is a] water-based [product] |
|--|---|

{Optional marketing graphics – Specific to Sublabel C}:



TER-RTU2 (EPA Reg. No. 4822-633)

Sublabel D: Residential Use

Kills cockroaches (and their eggs), moisture ants, pavement ants, field ants, bed bugs (and their eggs), fleas, dust mites, spiders (Except black widow spiders), crickets, firebrats, silverfish, millipedes, centipedes, sow bugs, aphids and bottle flies in indoor areas, and to kill moisture ants, pavement ants, field ants, crickets, firebrats, silverfish, millipedes, centipedes, sow bugs, aphids and bottle flies in outdoor areas.

TER-RTU2

[ABN: BugProof Multipest Killer]

***For Use as an Insecticide for all Listed Pests
For Use as an Ovicide on Bed Bugs and Cockroaches***

Active Ingredient:

Cold Pressed Neem Oil.....	5.5%
Other Ingredients.....	94.5%
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

STOP - Read the Label Before Use

[See inside for further directions for use, precautionary statements, storage and disposal.]

EPA Reg. No. 4822-633

EPA Est. No. XXXXX

NET CONTENTS: 3, 3.4, 12, 16, 22, 24, 32 or, 64 fl. oz.,
1 or 5 Gallons

Sold By © [year] S. C. Johnson & Son, Inc. Racine, WI 53403-2236 U. S. A.

Questions? Comments? Call 800-558-5252

[website may be listed]

PRECAUTIONARY STATEMENTS

PHYSICAL AND CHEMICAL HAZARDS

Do not apply this product around electrical equipment due to the possibility of shock hazard.

ENVIRONMENTAL HAZARDS

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.

[USER SAFETY RECOMMENDATIONS

User should wash hands thoroughly after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.]

[Have the product container or label with you when calling a poison control center, doctor, or going for treatment. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: www.npic.orst.edu).] [For emergencies, call the poison control center 1-800-222-1222.]

DIRECTIONS FOR USE

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

Read entire label. Use strictly in accordance with precautionary statements and directions, and with applicable state and Federal regulations.

Use **TER-RTU2** to kill *cockroaches (and their eggs), moisture ants, pavement ants, field ants, bed bugs (and their eggs), fleas, dust mites, spiders (Except black widow spiders), crickets, firebrats, silverfish, millipedes, centipedes, sow bugs, aphids and bottle flies in indoor areas, and to kill moisture ants, pavement ants, field ants, crickets, firebrats, silverfish, millipedes, centipedes, sow bugs, aphids and bottle flies in outdoor areas.*

Shake well before use.

General Precaution

- [TER-RTU2 may cause damage or discolor certain surfaces and materials[, including papers and soft plastics such as plexiglass, plastic varnishes, some flooring and finishes, frames, photographs, artwork, wallpaper and consumer electronics]]. Make small inconspicuous spot treatments to test all surfaces and fabrics for colorfastness, discoloration or damage before use.
- Do not apply directly to electrical outlets or to other potential electrocution hazards.
- Do not spray to the point of excessive dripping or run-off to avoid potential material damage.
- Allow treated areas to dry completely before use.
- Do not make outdoor applications during rain or if rain is expected within 4 hours.

Spray listed pests directly, and treat surfaces until moist. Use one ounce of product per 1.5 to 6 sq.ft. of surface area depending on the pest or material treated. Re-apply as needed when listed pests reappear.

To Kill Moisture, Pavement and Field Ants: Spray directly over and around the listed ants at the rate of one ounce per 1.5~3 sq.ft. to ensure continuous exposure to treatment. Spray around the perimeter of listed ant

aggregations first before applying directly to live ants. Treat floors, walls, baseboards, under furniture, and other areas where listed ants are seen or may aggregate.

To Kill Cockroaches: Spray directly over and around cockroaches at the rate of one ounce per 1.5 sq.ft. to ensure continuous exposure to treatment. For control of eggs, spray one ounce per 3~6 sq.ft.

To Kill Bed Bugs, Fleas and Dust Mites: Spray bed bugs (and their eggs) and fleas directly when found. Spray indoor surfaces, fabrics and materials where bed bugs, fleas, and dust mites may be present. Ensure to spray tufts, folds, edges, cracks and crevices. For fleas and dust mites, treat fibrous surfaces such as carpets, rugs, linens, mattress, beddings, and couches, and areas surrounding those surfaces such as floors, headboards, baseboards, cracks and crevices. For fleas, spray areas where pets rest or travel. Apply one ounce per 1.5~3 sq.ft. on porous surfaces, and one ounce per 3~6 sq.ft. on non-porous surfaces.

To Kill Spiders (Except black widow spiders): Spray directly over and around spiders for continuous exposure at the rate of one ounce per 1.5 sq.ft. to immobilize them. A direct spray immobilizes spiders within 5 minutes and kills them (except black widow spiders) within 4 hours. Black widow spiders may recover from immobility after approximately 8 hours.

To Kill crickets, firebrats, silverfish, millipedes, centipedes, sow bugs, aphids, bottle flies: Spray pests directly if they are visible at the rate of one ounce per 3~6 sq.ft. Treat surfaces where the pests are seen or known to hide or breed until the surface is moist.

STORAGE AND DISPOSAL

Store in a cool dry place out of reach of children and pets and away from direct sunlight, windows, flames and other sources of heat or ignitions. Keep containers tightly closed and in original containers when not in use. Do not store exposed to sunlight or moisture. Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

NOTICE: Research and testing have determined the “Directions for Use” are appropriate for the proper use of this product under expected conditions. To the extent consistent with applicable law, user assumes responsibility for the lack of performance or safety if not used as directed.

<i>{Optional marketing claims – Specific to Sublabel D:</i>	
- Controls bed bug[s] [infestations] for up to 2 weeks when used as directed]	- [Just] spray and [leave to dry] [walk away]
- Manages bed bug[s] [infestations] [for up to 2 weeks][when used as directed]	- Smells strong [and] [but] it works
- Prevents bed bug[s] [infestations] [for up to 2 weeks][when used as directed]	- Use on [mattresses] [beds] [upholstery] [wood] [carpets] [rugs] [suitcases] [fabrics]
- Kills Bed Bug Adults, Nymphs and Their Eggs	- [For] use everywhere in the house [including] [kitchen][and] [bathrooms]
- Effective bed bug control [for up to two weeks] [when used as directed]	- [For] use [at the office] [at work] [while traveling][on the road]
	- Provides Around the clock protection from Bed bugs [and their eggs] for up to 2 weeks

- Effective treatment for fleas and dust mites [when used as directed]
 - 100% effective bed bug [fleas] [dust mites] [cockroach] protection* (*tested under laboratory conditions)
 - Stops bed bug infestations for up to 2 weeks [when used as directed]
 - Patent[ed][-pending] [formula]
 - Keeps on killing bed bug adults and nymphs for up to 2 weeks and bed bug eggs for up to 3 weeks
 - Prevents bed bug egg hatch for up to 3 weeks [when used as directed]
 - Prevents the [growth] [spread] of bed bug infestations [when used as directed]
 - Effective against [pyrethroid] [chemical] [pesticide] resistant bed bugs [when used as directed]
 - All-in-one protection from bed bugs [fleas][dust mites][cockroaches][ants (moisture, pavement and field)][spiders (except black widow spiders)]
 - Be Bed bug Free
 - Provides Protection from bed bugs
 - [The] smart way to [Control] [Manage] [Protect] [Yourself] [Your Family] [From] Bed bugs
 - [The] smart solution to control ants & crawling insects‡
 - ‡Moisture, pavement, field ants and other listed crawling insects
 - Ready-to-Use [spray] [formula]
 - Made in [the] [USA][America] [of US and imported components]
 - Easy to use
 - Makes bed bugs dead bugs
 - Makes fleas and dust mites dead bugs
 - Stops bed bug eggs from hatching for up to 3 weeks
 - Use in and around bedroom
 - Guaranteed Effective[^]
 - [^]Guarantee: If you are not satisfied with this product's performance, we will gladly refund your original purchase price.
- [when used as directed]
 - [Use] The Power of Neem
 - Derived From Neem
 - Kills Bed bugs [fleas and dust mites] where they [live] [hide] [when used as directed]
 - [Confidently] Protect [yourself] [your home][and] [your family] from [bed bugs][fleas][dust mites][spiders][listed ants, crawling insects and spiders.]
 - plant-based [biopesticide][spray]
 - botanical insecticide
 - Non-toxic [mode of] [killing] action
 - Kills bed bugs [fleas][dust mites] [cockroaches] [on contact] [when sprayed directly]
 - [knocks down] [disables] [immobilizes] spiders within 5 minutes by direct spray
 - Spray spiders directly to immobilize them within 5 minutes [and kill them in 4 hours, except black widow spiders]
 - Keeps on killing bed bugs [as a residual treatment] [on treated surfaces] for up to 2 weeks [when applied as directed]
 - Kills moisture ants, pavement ants and field ants [on contact][when sprayed directly]
 - Kills Spiders (except black widow spiders)
 - Kills ants and crawling insects[‡] on contact when used as directed
 - ‡ Moisture, pavement, field ants and other listed crawling insects
 - Ants** and Cockroach Killer
 - ** Moisture, pavement, field ants
 - [For] Use as part of an Integrated Pest Management [program][strategy]
 - [Convenient] [Travel][personal][home] size
 - Use outdoors on hard surfaces such as driveways, patios and along your home's foundation.
 - Made using cold-pressed neem oil, [TER-RTU2] patent-pending technology unleashes the [botanical] power of [cold-pressed] neem [oil] to create a zone of protection.