

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 3, 2020

Norma C. Pangilinan, Ph.D, Head of Regulatory Affairs North America SBM Life Science Corp. 1001 Winstead Drive, Suite 500 Cary, NC 27513

Subject: Notification per PRN 98-10 – Storage and Stability Update/Minor Label Changes

Product Name: 16INS005 Insecticide RTU EPA Registration Number: 92564-74

Application Date: 11/18/2019 Decision Number: 558497

Dear Dr. Pangilinan:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

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

If you have any questions, please contact Jamey Shuler at (703) 347-8036 or by email at Shuler.Jamey@epa.gov.

Sincerely,

Jacquelyn Herrick, Product Manager 03 Invertebrate & Vertebrate Branch 1 Registration Division (7505P) Office of Pesticide Programs

#### NOTIFICATION

92564-74

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:

02/03/2020

(Front Panel)

## 16INS005 Insecticide RTU

[ABN: Natria Multi-Insect Killer Ready-To-Use; Natria Multi-Purpose Insect Killer Ready-To-Use; Natria Ant & Roach Killer Plus Ready-To-Use; Natria Ant, Roach + Spider Killer; Natria Bed Bug Killer Ready-To-Use; Natria Home Pest Control Ready-To-Use; Natria Home Protect Insect Killer Ready-To-Use; Natria HomeGuard Insect Killer Ready-To-Use; Natria HomeShield Insect Killer Ready-To-Use]

FOR RESIDENTIAL USE ONLY [For Residential][Indoor][and][Outdoor][Use Only]

Editorial Note - [Bracketed text] is optional language

Active	Ingredient:
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*Pyrethrins	0.06%
Other Ingredients	99.94%
Total	100.00%

<sup>\*</sup>Contains 0.0003 lb Pyrethrins per gallon

### **CAUTION**

#### KEEP OUT OF REACH OF CHILDREN

FIRST AID	
IF ON SKIN OR CLOTHING:	Take off contaminated clothing.
	<ul> <li>Rinse skin immediately with plenty of water for 15-20 minutes.</li> </ul>
	Call a poison control center or doctor for treatment advice.
<b>NOTE:</b> Have the product container or label with you when calling a poison control center or doctor or going for treatment.	
Vou may contact 877-229-3763	for emergency medical treatment information

EPA Reg No. 92564-74

EPA Est. No. \_-AA-\_

See Back Panel for Precautionary Statements

NET CONTENTS: [4 fl oz (118 mL), 8 fl oz (236 mL), 10 fl oz (295 mL), 16 fl oz (473 mL), 24 fl oz (709 mL), 32 fl oz (946 mL), 64 fl oz (1892 mL),128 fl oz [1 gal] (3785 mL), 141 fl oz [1.1 gal] 4164 mL), 170 fl oz [1.33 gal] (5027 mL)]

#### (BACK PANEL)

This product kills listed[\*] insects for up to 1 month indoors with a single application and can be applied around the home both indoors and outdoors. Convenient and easy to use, controlling listed[\*] insect pests in and around your home has never been easier.

#### **QUICK FACTS**

- Contains pyrethrins, a botanical insecticide derived from the Chrysanthemum flower
- Kills by contact and through residual action (indoors only)
- Kills [ants] [bed bugs] [carpenter bees] [cockroaches] [fleas] [flies] [hornets] [pantry pests] [spiders] [ticks] [wasps]
- Can be used indoors against general listed[\*] household pests and outdoors for lawn and perimeter pests
- Provides effective knockdown and residual control (indoors only)
- Contains 0.0003 pounds of pyrethrins per gallon

[Note to PM: May choose any claim from above and from marketing claims list.]	
	An emulsifiable concentrate formulation containing 0.0003 pounds of pyrethrins per gallon.
16INS005 IINSECTICIDE	A highly versatile product designed for use both indoors and outdoors. This product provides effective knockdown and residual control (indoors only) of the pests listed on this label.
	For residential control of major nuisance and public health pests listed on the label.
	[For residential control of major nuisance and listed[*] public health pests in residential areas.]
	Indoor, General Household
CONTROLS	Listed[*] Pests
	Outdoor, Perimeter Listed[*] Pests
	For a list of specific pests, see inside
WHERE TO APPLY	Apply where listed[*] pests have been seen or found or can find shelter. In and around buildings and structures. Apply as general surface, spot treatments or as crack & crevice sprays.
HOW TO APPLY	General surface applications, spot treatments, crack & crevice sprays, or void injections (sprays or mists).  Shake well. Hold sprayer 12 inches from surface being sprayed.
RE-APPLY	Treatments may be applied at 7-day intervals.
RE-ENTRY	Do not allow children or pets to re-enter until sprays have dried.
	Questions, comments, or medical information call 1-877-229-3724 or visit our website at <a href="https://www.natria.com">www.natria.com</a> .

#### PRECAUTIONARY STATEMENTS

## HAZARDS TO HUMANS AND DOMESTIC ANIMALS CAUTION

Avoid contact with skin or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Wash all contaminated clothing with soap and hot water before reuse

#### **ENVIRONMENTAL HAZARDS**

This product is toxic to aquatic organisms, including fish and invertebrates. 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

This product is highly toxic to bees exposed to direct treatment on blooming plants. Do not apply or allow to drift to blooming crops or weeds while bees are actively visiting the treatment area.

#### PHYSICAL- CHEMICAL HAZARDS

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

**NOTICE**: Research and testing have determined that the "Directions for Use" are appropriate for the proper use of this product under expected conditions. To the extent consistent with applicable law, the Buyer assumes responsibility for lack of performance or safety if not used according to the directions.

#### **DIRECTIONS FOR USE**

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

#### **BEFORE USE**

## Read and follow all label directions.



#### **RESTRICTIONS:**

Do not contaminate food or feedstuffs.

Do not make applications during rain.

Do not allow excessive dripping to occur when treating vertical or overhead surfaces.

Do not allow children or pets to re-enter until sprays have dried.

All food preparation surfaces and utensils should be covered during treatment or thoroughly washed before use.

Remove pets, birds, and cover fish aquariums before spraying.

Outdoor applications are limited to spot or crack-and-crevice treatments only, except for the following permitted uses,

- to soil or vegetation around structures
- to lawn, turf, and other vegetation
- to building foundation, up to a maximum height of 3 feet;

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

Application of this product is prohibited directly into sewers or drains, or to any area like a gutter where drainage can to storm sewers, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.

#### **INDOOR**

Indoor applications to residential buildings and structures; apply this product as a general surface, spot, crack and crevice or void treatment. The following indoor insects are controlled:

Ants (non-porous surfaces only)	Dermestids	Leather beetles	
Blow flies	Earwigs	Midges	
Bed bugs	Elm Leaf beetles	Millipedes	
Blue/Green bottle flies	Face flies	Multi-colored Asian lady beetles	
Boxelder bugs	Fleas	Pantry pests, beetles & moths	
Brown marmorated stink bugs	Firebrats	Phorid flies	
Carpet beetles	Flies	Sciarid flies (fungus gnats)	
Clothes moths	Fruit flies	Silverfish	
Cluster flies	Gnats	Spiders (non-porous surfaces only)	
Cockroaches (non-porous surfaces only)	Hide beetles	Ticks	
Crickets	Hornets	Wasps	
Darkling beetles	House flies	Yellowjackets	
G	Kudzu bugs		
	-		
WHERE TO APPLY	Areas where listed[*] pests have been seen or can find shelter.		
	Areas where listed[*] pests normally feed or hide, such as baseboards,		
	corners, around water pipes, behind and under refrigerators, cabinets, sinks		
	and stoves.		
	<ul> <li>Can be applied to walls, floors, ceilings, in and around cabinets, between, behind and beneath appliances, window and door frames, around plumbing, sinks, crack</li> </ul>		
	and crevices and other possible pest harborage sites.		
	·	s, floor coverings, carpets or rugs for flea and	
	tick control.	.,g.,p. ste et tage tet mea and	
WHEN TO APPLY	Begin applications when pests are noticed. Tre	eatments may be applied at 7 day intervals.	

## HOW TO APPLY (APPLICATION FOR INDOOR PESTS)

## For Cockroaches, Ants, Crickets, Silverfish, Firebrats, Millipedes, Clothes Moths, Earwigs, and Spiders:

Apply as a general surface application, spot treatment or crack and crevice spray. Pay attention to dark corners of rooms and closets, cracks and crevices in walls, along and behind baseboards, beneath and behind sinks, stoves, refrigerators, and cabinets, around plumbing and utility installations, doors, windows and in attics.

#### For Carpenter ants, Pharaoh ants, and other nuisance ants:

Apply to trails, around doors and windows and areas where ants inhabit or enter premises. Follow trails of foraging worker ants and inspect for likely nest sites. Spray into cracks & crevices, or spray into voids where ants or their nests are present. Use enough spray to cover the area.

#### For Flying Insect Pests - Flies, Gnats, Midges, or Mosquitoes:

Apply directly to walls, ceilings, window screens and other resting areas as a residual surface treatment. May be used inside residential buildings, as well as in and around carports, garages, storage sheds, unoccupied barns, stables, or pet kennels.

For Pantry Pests - (adult and accessible immature stages of insects such as lesser grain borers, grain weevils, flour beetles, saw-toothed grain beetles, cigarette beetles, merchant grain beetles, Angoumois grain moths, Mediterranean flour moths and Indian meal moths):

Apply to cupboards, shelving and storage areas. Remove all foodstuffs, all utensils, shelf paper, and objects before spraying and allow the surface to dry before replacing.

#### For Carpet beetles (black, furniture, and varied), hide beetles, or leather beetles:

Apply to infested areas at a rate of 1 gallon per 1,000 square feet. Apply under the edge of carpets, floor coverings and furniture as well as along baseboards, in closets and to infested areas of shelving or storage areas.

#### For Clothes moths:

Remove infested articles, brush them thoroughly and air-dry them in sunlight for several hours, or have them professionally dry cleaned. Do not return infested articles until they have been cleaned or disinfected. Apply as a crack and crevice treatment to empty chests, bureaus, closets and other storage sites.

#### For Bed Bugs:

Remove and sanitize infested bedding (pillows and linens), clothing, or items. Apply on mattresses as a spot treatment to mattress seams, edges, and tufts of bed only. Allow mattress to dry thoroughly before replacing pillows and/or bed linens.

#### Do not:

- use directly on pillows, bed linens or clothes.
- saturate the mattress
- treat entire surface area of mattress.

With upholstered furniture apply spot treatments to tufts, seams, folds, and edges only. Do not saturate the upholstered surfaces; and do not treat entire surface of upholstery.

Bed bugs may also harbor in areas away from the bed. Apply as a crack & crevice or spot application where evidence of bed bugs occurs. This includes bed frames, box springs, inside empty drawers and clothes closets, night stands and other furniture in the room, carpet edges, high and low wall moldings (such as floor molding or window casings), wall voids, behind wall hangings and mirrors, wallpaper edges and popcorn ceilings.

Remove all clothes and other articles from dressers or closets before application. Take bed apart. Treat joints and channels if hollow, such as square or round tubing, and see that interior framework is treated. Apply as a surface application to carpeting, drapes, and flooring. Allow all treated areas to dry thoroughly before use.

## For Fleas and Ticks (including ticks that may transmit Lyme Disease and Rocky Mountain Spotted Fever):

Vacuum infested areas prior to treatment and discard the vacuum cleaner bag in an outdoor trash container upon completion. Infested pet bedding should be cleaned or replaced.

Apply thoroughly to infested areas - pet bedding and resting quarters, nearby cracks & crevices, carpets, rugs and similar floor coverings (including under their edges), between

and under the cushions of upholstered furniture and other areas where the pests may be present. If treating the entire surface of carpets or rug, thoroughly treat the surface with a volume of 1 gallon of spray dilution per 1,000 square feet. Do not allow adults, children, or pets to enter the treated area until treated surfaces are dry.

#### For Kennels, stables, and barns:

To kill listed [\*] crawling and flying insects in and around these structures, apply as a general surface and/or crack and crevice spray. Apply only to areas of facility where animals are not present. Allow spray to dry before allowing re-entry of animals into treated areas.

OUTDOOR/PERIMETER		
	ation as a general surface spray, perimeter trea	atment, spot treatment or crack and crevice
treatment. The following outdoor insects ar		ament, spectroatment of stack and crovide
Ants	Face flies	Millipedes
Blow flies	Fleas	Mosquitoes
Blue/Green bottle flies	Firebrats	Multi-colored Asian lady beetles
Boxelder bugs	Flesh flies	Pill bugs
Brown marmorated stink bugs	Flies	Silverfish
Carpenter ants	Gnats	Sow bugs
Carpet bees	Ground beetles	Spiders
Clover mites	Hornets	Springtails
Cluster flies	House flies	Stable flies
Cockroaches	Kudzu bugs	Ticks
Crickets	Midges	Wasps
Elm leaf beetles	Midges	Yellowjackets
Limited beeties		1 ellowjackets
WHERE TO APPLY	Apply this product as a general surface spray or as a perimeter treatment around residential and non-residential settings.  • Apply as a general surface spray, perimeter treatment, spot treatment or crack-and-crevice treatment, to surfaces on building exteriors, porches, patios, and other structures, around doors and windows, eaves and attic vents, utility entry points, soffit areas and other exterior openings (including foundation cracks or drilled holes) where pests enter the structure, where they have been seen or can find shelter.  • Treat the outside of the structure including walls, around door and window frames, and beneath eaves and soffits where pests are active or may enter or hide.	
WHEN TO APPLY	Treat the soil, turf, or other ground covering adjacent to the structure (in a band up to 10 feet wide) where pests are seen, have been found, or can find shelter.  Begin applications when listed[*] pests are noticed. Treatments may be applied at 7-day intervals. Apply as a general surface spray and/or perimeter treatment around the infested structure as described above. For more difficult to kill pests, such as large cockroaches, direct contact spray may be required for effective control. Thoroughly treat mulched areas.	
HOW TO APPLY	For Carpenter ants and other nuisance ar	<u>nts:</u>
(APPLICATION FOR LISTED[*] OUTDOOR PESTS)	Locate and treat ant nests if possible. Follow trails of foraging worker ants and inspect for likely nest sites. If ants are nesting in soil, drench the nest and surrounding soil.	
	Apply around doors and windows and other places where ants may enter. Treat cracks & crevices, or voids where ants or their nests are present. Use enough spray to cover the area. Remove or prune away any shrubbery, bushes or tree branches touching the structure which may allow ants the ability to avoid contact with the treatment.	
	For Spiders: Spray directly to spiders and their webbing, webs (interior surfaces in garages, sheds, or exterior surfaces of buildings, porches or particles.)	attics, basements, crawlspaces and to
	Listed[*] Occasional/fall invading pests, including boxelder bugs, elm leaf beetles, multi- colored Asian lady beetles, brown marmorated stink bugs,	
Page 7 of 14	kudzu bugs: Apply directly to listed[*] insects that have consimilar areas where they may enter the structure treatments as described above.	

#### For Flies:

#### • House flies, stable flies, cluster flies, and other flying pests:

Apply to outside surfaces of barns, buildings, fences, garages, porches, patios, sheds, stables, and areas where flies rest.

Cluster Flies: Treat in late summer or fall, just before cluster flies begin looking
for winter shelter. Spray siding, eaves, around windows and doors, and window
screens. To help reduce infestations, treat cracks & crevices, attics and other
indoor winter hiding places.

## For Fleas and Ticks (including ticks that may transmit Lyme Disease and Rocky Mountain Spotted Fever):

Apply to areas where fleas and ticks are likely to be found, such as dog houses, runways, along paths or trails, under plants, shrubs, bushes, trees, or other shaded, moist areas.

#### For Mosquitoes:

Treat under decks, around building foundations and other places where mosquitoes may rest.

#### For Hornets, wasps, and yellowjackets;

Apply directly to the entire surface of the exposed nest. To reduce sting threat, make applications in the evening when the listed[\*] insects are inside the nest. Remove and destroy treated nests to prevent emergence of newly emerged adults. If removal is not possible, retreat nests as needed.

#### For Carpenter bees:

Apply directly into gallery entrance holes. Leave entrance open to be sure that returning adult carpenter bees are killed. When there is no longer any activity, the entrance hole may be sealed with a suitable sealant. Apply to exterior wood surfaces where carpenter bees have been active or to temporarily prevent nest cavity excavation by adult carpenter bees. Apply early in the spring to prevent carpenter bees from invading wood.

#### [1.3 Gallon ERGO-GRIP™ Sprayer Directions:]

Remove ERGO-GRIP™ spray wand from pocket.
Remove protective battery strip from sprayer handle.









#### **CONNECT HOSE TO CAP**

- Remove wrap from coiled hose.
- In down position, insert plug at end of hose into flip-spout opening on cap until it snaps into place.
- Flip up spout until fully upright. Spout must remain upright while spraying.

#### **OPEN SPRAY WAND**

- Unfold spray wand until it snaps into place
- Point spray nozzle away from body.
- Adjust spray nozzle to desired setting.

### TURN POWER ON

Slide OFF-ON switch to ON position.

#### **SQUEEZE**

- Squeeze trigger to dispense product.
   Sprayer may require several seconds to prime before product is released.
- Release trigger to stop spraying.

#### **Storage**

Slide OFF-ON switch to OFF position

Return flip spout on cap to the down position. Do not unplug hose.

Turn spray nozzle to the off position

Fold spray wand down against sprayer handle

Return ERGO-GRIP™ spray wand to pocket for storage.

#### **4 AA Batteries Included**

#### For important battery information – see booklet.

#### To Replace Batteries

Open battery compartment [with a small screwdriver]
Remove used batteries and replace with new batteries in correct
position as indicated inside battery compartment
Securely close battery compartment door [and screw closed]

#### **Proper use of Batteries**

Never mix old batteries with new batteries.

Do Not mix Alkaline with Standard (carbon zinc) or Rechargeable (nickel cadmium) batteries.

When storing sprayer for long periods, remove batteries to prevent leakage.

Dispose of used batteries according to manufacturer's instructions or in household trash.

[Nested Sprayer Directions for Use:]



[REVISED Directions for 1 Gallon Nested Sprayer]

### Attach Sprayer

- 1. Remove sprayer from bottle
- 2. Remove twist tie
- 3. Pull down and extend hose
- 4. Open flip-cap on bottle
- 5. Insert hose and plug into flip-cap opening until it snaps into place
- 6. Move tab to open position

### Spray

- 1. Adjust nozzle to stream or spray position
- 2. Point sprayer downward and squeeze trigger repeatedly until liquid is released

### **After Use**

- 1. Turn sprayer nozzle to X (off) position
- 2. Do not unplug hose
- 3. Return sprayer to bottle. Sprayer will snap into place

STORAGE AND DISPOSAL  Do not contaminate water, food, or feed by storage or disposal	
Pesticide Storage	The storage area must be dry, well-lit, and well-ventilated. Keep pesticide storage areas clean. Clean up any spills promptly.
Pesticide Disposal and Container Handling	If empty: Non-refillable container. Do not refill or reuse container. Place in trash or offer for recycling, if available.  If partly filled: Call your local solid waste agency or toll free 1-877-229-3724 [1-800 CLEAN-UP] for disposal instructions. Never place unused product down any indoor or outdoor drain.

Money Back Guarantee: If you are not satisfied with this product, we will gladly refund your original purchase price.

Natria<sup>®</sup> is a trademark of SBM Life Science Corp. Ergo-Grip™ is a trademark of SBM Life Science Corp.

# PRODUCED FOR: [DISTRIBUTED BY:]

SBM Life Science Corp. 1001 Winstead Drive Suite 500 Cary, NC 27513

16INS005 Insecticide 8/26/201911/18/2019

### **Marketing Claims**

#### **Residual Claims**

- 1. Up to [1 Month] [4 Weeks] [28 Days] control/protection\*
  - [applies to] [for] Ants, Roaches, & Spiders indoors on non-porous surfaces
- Kills/Controls [for] up to [1 month] [4 weeks] [28 days]\*
  - [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.
- 3. Control that lasts for [1 month] [4 weeks] [28 days] or longer (indoors only)
- Controls fleas for [14 days] [2 weeks] (indoors only)
- 5. Kills by contact and through residual action (indoors only)
- 6. Kills (Bed Bugs) (Ants) (Roaches) (Spiders) (on non-porous surfaces only) for up to (1 Month) (4 Weeks) (28 Days)
- 7. Controls [Argentine ants (on non-porous surfaces only)] [blow flies] [stable flies] [carpet beetles] for up to [7 days][1 week].
- 8. Controls [Argentine ants (on non-porous surfaces only)] [stable flies] for up to [14 days][2 weeks].
- Controls [Argentine ants (on non-porous surfaces only)] for up to [28 days][1 month][4 weeks].

#### **General Claims**

- 1. Guaranteed
- 2. Guaranteed Kill [or your money back]
- 3. Money Back Guarantee
- 4. Ready to Use
- 5. No Mixing Necessary
- 6. Easy to Use
- 7. Kills by Contact!
- 8. 10% more bonus size (applies to 1.1 gal size)
- 9. 33% more than 1 gallon size (applies to 1.33 gal size)

#### **Water Based Claims**

- 1. Non-Staining
- 2. No Stains
- 3. Dries Clear
- 4. Odorless
- 5. Odor-Free
- 6. Fragrance-Free
- 7. Unscented
- 8. Dries Fast
- 9. Water based [formula] [water droplet icon]
- 10. Non-flammable
- 11. Dries in minutes
- 12. Leaves no residue [behind]

#### **Location of Use Claims**

- 1. Apply along [baseboards] [foundations]
- Use with confidence in [bathrooms], [kitchens], [family rooms], [pantries], [attics], [garages], [basements], [closets], [storage areas], and [bedrooms].
- Designed to/for use in kitchens &/ pantries
- 4. Use in garages[s] and/or basement[s] and/or attic[s]
- Use/Can be used in garage[s] and/or basement[s] and/or attic[s]
- Use with confidence in garage[s] and/or basement[s] and/or attic[s]
- 7. [Formulated] [For] Indoor Use
- 8. Indoor/Outdoor [Formula]
- 9. [Formulated] [For] Indoor/Outdoor Use
- 10. Apply along [baseboards] [foundations]
- 11. For use in Kitchens, Pantries & Food-Preparation Areas
- 12. For use on (bed frames), (box springs), (mattress), & (luggage)
- 13. Spot Treat Mattress, Tufts, Folds, Vent Holes & Seams

#### Perimeter Treatment Claims

- 1. Apply [as] a barrier
- 2. Apply as a border around your home
- 3. Creates a listed[\*] [bug] barrier
- 4. Creates a listed[\*] [bug] border
- 5. Creates a perimeter treatment

- 6. Keeps listed[\*] insects out of your home
- 7. Kills listed[\*] insects around and inside your home

#### Kill Claims

- 1. Kills listed[\*] insects, Spiders, and Ticks\*
- Kills Roaches, Ants, Fleas, Ticks, Spiders, Earwigs, Silverfish, Scorpions, Black Widow Spiders, and other listed[\*] insects
- 3. Kills Listed[\*] Home invading insects[\*]
- 4. Kills [cockroaches], [ants], [flies], [and] [spiders]
- 5. Kills [bed bugs], [fleas] [and] [ticks]
- 6. Kills [black widow] [and] [brown recluse spiders]
- 7. Kills most common household listed[\*] insect pests
- 8. Kills the listed[\*] insects you see, kills the ones you don't see
- 9. Kills [ants] [and] [cockroaches] in seconds
- 10. Kills by contact
- 11. Kills listed[\*] insects in seconds
- 12. Kills fast
- Also Kills Ticks (including Ticks that may transmit Lyme Disease)
- 14. Kills mosquitoes that may transmit West Nile Virus
- 15. Kills listed[\*] bugs inside. Keeps listed[\*] bugs out(side)\*
- 16. Visible activity against listed[\*] bugs within minutes§
- 17. Starts killing/activity within minutes§
- 18. Kills [1...72] Listed[\*] Insects\*
- Kills [the] listed[\*] bugs you see and/& [the] listed[\*] [ones] bugs you don't [see]
- 20. Kills the toughest listed[\*] home invading bugs
- 21. Kills/Controls [both] listed[\*] crawling and/& flying insects
- 22. Kills/Controls [all] listed[\*] common household bugs
- 23. (Bed Bug), (Flea) & Tick Killer
- 24. Kills (Bed Bugs) (Fleas) (Ticks) for up to (28 Days) (4 Weeks) (1 Month)
- 25. Kill Bed Bugs Where They Hide

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

#### **Other Claims**

- 1. Contains Botanical Insecticides
- 2. Derived from Chrysanthemum Flowers
- 3. Plant Based Active Ingredient
- 4. Contains pyrethrins, a botanical insecticide derived from Chrysanthemum Flower
- 5. Plant-Based Spray

<sup>§</sup>Applies to/for: Carpenter Ants, Harvester Ants, Oriental and German Cockroaches

<sup>\*</sup>Refer to booklet/back panel for complete list of insects/bugs/pests

### **ART**

