

74843-5

07/14/2011

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Insect Shield, LLC
c/o Ms. Juli Mann
Steptoe & Johnson, LLP
1330 Connecticut Avenue, NW
Washington, DC 20036-1795

JUL 14 2011

Dear Ms. Mann:

Subject: Amendment: Add Optional Marketing Statements
Insect Shield Repellent Gear
EPA Reg. No. 74843-5
Your submission dated April 19, 2011

The amendment referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) section 3(c)(7)(a), is acceptable provided the following revisions are made prior to release for shipment under the amended labeling:

- 1) Delete the proposed claims "The active ingredient [in Insect Shield] is a man-made version of a/n [natural][insect repellent][repellency] found in certain types of chrysanthemum[s] [plants]." and "The active ingredient [in Insect Shield] is a [[synthetic][man-made]] [[replica][version]] of pyrethrum which [is an insect repellent found in][which is a/an [repellent] extract from] certain types of chrysanthemum[s][plants]". The US EPA has regulatory authority over this pesticide product and does not allow comparisons between pesticides with different profiles, as is the case with permethrin and pyrethrum. Citations to comment/descriptions by other government agencies or departments do not constitute EPA regulatory decisions.
- 2) Delete the overly promising "Insect Shield has the potential to be an important tool in the battle against insect-borne disease [and improve the health of people worldwide.]".

A stamped copy of the label is enclosed for your records. Please submit two copies of the revised amended labeling prior to release for shipment.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on nonrefillable containers. The code may appear either on the label (and can be added by non-notification/PR Notice 98-10) or durably marked on the container itself.

If you have any questions regarding this letter, please contact Dana Pilitt, PhD of my staff at (703) 305-7071 or via e-mail at pilitt.dana@epa.gov.

Sincerely,

Dana R Pilitt

for Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505P)

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

Amendment to add optional
marketing statements
4/19/2011

INSECT SHIELD REPELLENT GEAR [optional wording identifying gear brand or style]

- THIS ITEM HAS BEEN TREATED WITH PERMETHRIN INSECT REPELLENT
- REPELS MOSQUITOES, FLIES, TICKS AND FLEAS
- DO NOT RE-TREAT GEAR WITH OTHER PERMETHRIN INSECT REPELLENT PRODUCTS
- REPELLENCY TO MOSQUITOES REMAINS EFFECTIVE FOR 6 MONTHS OF EXPOSURE TO WEATHERING FOR NON WASHABLE ITEMS: TENTS, TARPS, AWNINGS, PATIO UMBRELLA COVERS, KENNEL COVERS, STALL COVERS
- REPELLENCY REMAINS EFFECTIVE FOR 25 WASHINGS FOR WASHABLE ITEMS: SLEEPING BAG COVERS, BACKPACKS, OUTDOOR FURNITURE COVERS, OUTDOOR FURNITURE CUSHION COVERS, NETTING, GROUND CLOTHS, HORSE BLANKETS, PET BEDDING
- WASH SEPARATELY FROM OTHER ITEMS
- DO NOT USE FOR PURPOSES OTHER THAN ORIGINALLY INTENDED
- DRYCLEANING REMOVES ACTIVE INGREDIENT - DO NOT DRYCLEAN

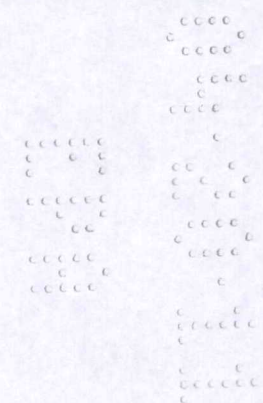
EPA Reg No. 74843-5
EPA Establishment No. 74843-NC-001

Active Ingredient	
Permethrin	0.52%
Other Ingredients (Gear)	<u>99.48%</u>
	100.00%

Manufactured by/for Insect Shield, LLC.
P.O. Box 10129
Greensboro, NC 27404

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

Storage and Disposal
Do not contaminate water, food or feed by storage or disposal.
Disposal: Discard in trash when gear is worn out.



**ACCEPTED
with COMMENTS
In EPA Letter Dated:
JUL 14 2011**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
74843-5**

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Amendment to add optional
marketing statements
4/19/2011

Optional Marketing Statements:

- o Repels mosquitoes
- o Repels ticks
- o Repels flies
- o Repels fleas
- o Bug repellent
- o Whether in the backwoods or the backyard, Insect Shield Repellent Gear helps keep you protected
- o Insect Shield Repellent Gear is a patent-pending technology for treating gear that repels mosquitoes, flies, ticks and fleas
- o By taking advantage of the latest fibers and technology, we've created innovative gear that also repels insects
- o Enjoy the Outdoors
- o Repels flies, fleas and ticks from animal bedding
- o No bugs, no bite
- o Repels mosquitoes [including those which may carry West Nile virus][including those which may transmit malaria]
- o Repels ticks [including those which may carry Lyme disease]
- o Repels insects including those that can carry [Lyme disease], [West Nile virus], [malaria] and [other insect borne diseases]
- o [Insect Shield] protects against insects including those that can carry [Lyme disease], [West Nile virus], [malaria] and [other insect borne diseases]
- o Repels mosquitoes, ticks, flies and fleas
- o All buzz, No bite
- o [Insect Shield] has you covered
- o You can't tell it's there but the bugs can
- o Built-In Insect Protection
- o Invisible
- o Invisible protection
- o Durable
- o Convenient
- o Comfortable
- o Effective
- o Easy Care
- o *used as a heading:* [Insect Shield] Advantages
- o Tested/proven
- o Proven protection
- o Dependable protection
- o Long-lasting protection
- o Built-in [Insect Shield]
- o Odorless
- o Built-in invisible, odorless insect protection
- o Unscented
- o Unscented protection
- o No unpleasant scent



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Amendment to add optional
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- o Repel without the smell
- o The active ingredient [in Insect Shield] is a man-made version of a/an [natural] [insect repellent] [repellency] found in certain types of chrysanthemum[s] [plants]
- o The active ingredient [in Insect Shield] is a [[synthetic] [man made]] [[replica] [version]] of pyrethrum which [is an insect repellent found in] [which is a/an [repellent] extract from] certain types of chrysanthemum[s] [plants]]
- o Technology is the result of years of research and field study
- o No special care or storage required
- o [Insect Shield] technology converts gear into long-lasting effective and convenient insect protection
- o [Insect Shield] offers protection for the entire family
- o Helps you protect your entire family from insects
- o Family protection
- o Insect protection for your entire family
- o Protecting you and your family
- o No restrictions for use
- o Bug barrier
- o What makes it work?
- o Powerful weapon in the war with insects
- o Winning the battle against bugs
- o Don't be bugged
- o Changing the way you think about insect protection
- o Ditch the itch
- o If you love being outdoors, you'll love [Insect Shield]
- o It's time to annoy them for a change
- o It's time to annoy the bugs for a change
- o Wouldn't it be great to annoy them for a change?
- o A better way to keep bugs at bay
- o [Insect Shield] keeps bugs at bay
- o [Insect Shield] keeps bugs at bay so you can enjoy the greater outdoors in peace
- o Insect Shield is a revolutionary defense in the battle against bugs
- o Insect Shield has the potential to be an important tool in the battle against insect-borne disease [and improve the health of people worldwide]

