

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

April 28, 2017

Juli Mann
Senior Regulatory Analyst
Authorized Agent for Insect Shield, LLC
Steptoe and Johnson LLP
1330 Connecticut Avenue NW
Washington, DC 20036-1795

Subject: PRIA Label Amendment – Add dog apparel and harnesses to label

Product Name: INSECT SHIELD REPELLENT GEAR

EPA Registration Number: 74843-5

Application Date: 01/19/2017 Decision Number: 525793

Dear Ms. Mann:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance

Page 2 of 2 EPA Reg. No. 74843-5 Decision No. 525793

with FIFRA section 6. If you have any questions, you may contact Elizabeth Fertich at 703-347-8560 or via email at fertich.elizabeth@epa.gov.

Sincerely,

Gene Benbow, Acting Product Manager 4

Invertebrate & Vertebrate Branch 1 Registration Division (7505P)

Su to

Office of Pesticide Programs

MASTER LABEL

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

Not to Scale



ACCEPTED

04/28/2017

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

This item has been treated with permethrin insect repellent. Repels mosquitoes, ticks, fleas, and flies.

Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, hammocks, awnings, patio umbrella covers, kennel covers, stall covers. Repellency remains effective for 25 washings for washable items: sleeping bag covers, backpacks, camping sheets, furniture covers, outdoor furniture cushion covers, floor mats, netting, blankets, travel sheets, ground cloths, beach towels, table cloths, place mats, curtains, horse blankets and coverings, pet bedding, dog apparel and harnesses. Dog apparel and harnesses are not to be worn by puppies less than 7 weeks

ACTIVE INGREDIENT:

Permethrin	0.52%
OTHER INGREDIENTS: (Gear)	99.48%
TOTAL:	

Directions for Use

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

Do not dry clean. Do not re-treat gear with other permethrin insect-repellent products. Wash separately from other items. Do not use or recycle this product for purposes other than originally intended.

For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin.

Storage and Disposal: Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash when gear is worn out.

EPA Reg. No. 74843-5 EPA Est. No.: Manufactured for: Insect Shield, LLC 814 West Market Street, Greensboro, NC 27401

> [ESL date] [REVdate]

Gear Hangtag Actual size is 2 3/8" wide x 4 5/8" high

Not to Scale

insect ♥ shield®

repellent gear

Repels mosquitoes, ticks, fleas, and flies.
Repellency remains effective for 25 washings for washable items. Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items.

Do not dry clean. Refer to the hangtag for more information.

ACTIVE INGREDIENT: Permethrin 0.52% w/w

EPA Reg. No 74843-5 EPA Est. No.:

Wash separately from other items.
Disposal: Discard in trash when gear is worn out.

[REVdate]

Sewn-in Gear Label
Actual size is 1 1/4" wide x 4 1/8" high

Note to Reviewer: [REV date] identifies the last label revision

Text separated by "/" denotes and/or options

Optional Marketing Statements:

- 1. Repels mosquitoes
- 2. Repels ticks
- 3. Repels flies
- 4. Repels fleas
- 5. Bug repellent
- 6. Whether in the backwoods or the backyard, Insect Shield Repellent Gear helps keep you protected
- 7. Insect Shield Repellent Gear is a patent-pending technology for treating gear that repels mosquitoes, flies, ticks and fleas
- 8. By taking advantage of the latest fibers and technology, we've created innovative gear that also repels insects
- 9. Enjoy the Outdoors
- 10. Repels flies, fleas and ticks from animal bedding
- 11. No bugs, no bite
- 12. Repels mosquitoes [including those which may carry West Nile virus][including those which may transmit malaria][including those which may transmit Zika virus]
- 13. Repels ticks [including those which may carry Lyme disease]
- 14. Repels insects including those that carry [Lyme disease], [West Nile virus], [malaria], [Zika virus] and [other insect borne diseases]
- 15. [Insect Shield] protects against insects including those that carry [Lyme disease], [West Nile virus], [Zika virus] and [malaria]
- 16. Repels mosquitoes, ticks, flies and fleas
- 17. All buzz, No bite
- 18. You can't tell it's there but the bugs can
- 19. Build-In Insect Protection
- 20. Invisible
- 21. Invisible protection
- 22. Durable
- 23. Convenient
- 24. Comfortable
- 25. Effective
- 26. Easy Care
- 27. Used as a heading: [Insect Shield] Advantages
- 28. Tested
- 29. Proven protection
- 30. Long-lasting protection
- 31. Built-in [Insect Shield]
- 32. Odorless
- 33. Built-in invisible, odorless insect protection
- 34. Unscented
- 35. Unscented protection

Note to Reviewer: Number Sequence of Optional Marketing Statements for tracking purposes

- 36. No unpleasant scent
- 37. Repel without the smell
- 38. Technology is the result of years of research and field study
- 39. [Insect Shield] technology converts gear into long-lasting effective and convenient insect protection
- 40. [Insect Shield] offers protection for the entire family
- 41. Helps you protect your entire family from insects
- 42. Family protection
- 43. Insect protection for your entire family
- 44. Protecting you and your family
- 45. Bug barrier
- 46. What makes it work?
- 47. Winning the battle against bugs
- 48. Don't be bugged
- 49. Changing the way you think about insect protection
- 50. Ditch the itch
- 51. If you love being outdoors, you'll love [Insect Shield]
- 52. It's time to annoy them for a change
- 53. It's time to annoy the bugs for change
- 54. Wouldn't it be great to annoy them for a change?
- 55. Insect Shield is a revolutionary defense in the battle against bugs
- 56. picture of grass
- 57. picture of crawling bugs/mosquitoes
- 58. Neither Insect Shield nor any other insect protection product can guarantee complete protection from insects or insect bites.
- 59. Insect Shield protection is built right in and lasts 25 washings, the expected lifetime of the product.
- 60. Who can use it? (everyone)(your whole/entire family)
- 61. Good news! Bugs won't love you anymore.
- 62. Insect repellent (Product type¹)
- 63. Bug repellent (Product type¹)
- 64. (Product Type¹) with Insect Protection
- 65. Insect Shield treated (product type¹)
- 66. Insect Shield (product type¹)

Note to Reviewer: Number Sequence of Optional Marketing Statements for tracking purposes

¹ Where product type refers to the product variety (i.e, tents, tarps, hammocks, awnings, patio umbrella covers, kennel covers, stall covers, sleeping bag covers, backpacks, camping sheets, furniture covers, outdoor furniture cushion covers, floor mats, netting, blankets, travel sheets, ground cloths, beach towels, table cloths, place mats, curtains, horse blankets and coverings, pet bedding, dog apparel and harnesses).