


80203-1

3/18/2005

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 <p style="text-align: center;">U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Pesticide Programs Registration Division (H7505C) 401 "M" St., S.W. Washington, D.C. 20460</p> <p style="text-align: center;">NOTICE OF PESTICIDE: <input checked="" type="checkbox"/> Registration <input type="checkbox"/> Reregistration</p> <p>(under FIFRA, as amended) —</p>	EPA Reg. Number: 80203-1	Date of Issuance: MAR 18 2005
	Term of Issuance: Conditional	
	Name of Pesticide Product: Elimibug	
Name and Address of Registrant (include ZIP Code): Starensier Inc. 10 Mulliken Way P.O. Box 408 Newburyport, MA 01950		
<p>Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.</p> <p>On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.</p> <p>Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.</p> <p>This product is <u>conditionally</u> registered in accordance with FIFRA sec. 3(c)(7)(A), provided that you:</p> <ol style="list-style-type: none"> 1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4. 2. Make the following labeling changes: <ol style="list-style-type: none"> a) Revise the EPA Registration Number to read "EPA Reg. No. 80203-1" b) Delete "(product)(item)" throughout the labeling. The data cited supports treatment of outerwear apparel and fabric.. c) Delete "spiders" from the labeling. The data submitted and product cited does not support this claim. d) Replace 50 launderings with 25 launderings. The data submitted and product cited support residual claims up to 25 washings. 		
Signature of Approving Official: George T. LaRocca, Product Manager (13), IB/RD (7505C)	Date:	

- e) Delete the claim beginning "Mosquitoes and ticks may carry diseases such as xxx etc." Neither the efficacy data submitted nor cited product support this claim.
- f) Either delete the last statement on the back of the Hang-Tag label or revise as follows:

 "Starensier cannot guarantee complete protection from insects, insect bites or related reactions."
- g) Your proposed product name "Elimibug" is misleading in that it implies elimination of pests, in this case bugs which are not listed on the label. Terms which imply total eradication or elimination of pests are considered false and misleading statements. Therefore we request that you modify your product name.

We note submission of the storage stability and corrosion characteristics on treated fabrics at the nine month mark. Please submit the final report at the 12 month mark. The data must be packaged in accordance with PR Notice 86-5.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

If you have any questions regarding this action, please feel free to contact me at (703) 305-6100.

Master Label

Hang-Tag (removed by consumer after purchase)

[Optional Marketing Language]

[NAME OF PRODUCT BRAND]

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAR 18 2005**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
80203-1**

**ELIMIBUG™
INSECT REPELLENT [FABRICS] [APPAREL][PRODUCT][ITEM]**

[by (from) Name of Product Brand]

[Logo Area]

- [The following is optional marketing language. Note: Parenthesis indicates optional text.]
- This (garment) (product) (item) has been treated with Elimibug™ containing the insect repellent permethrin.
 - Repels Mosquitoes, Ticks, Ants, (Spiders)(Flies)(Chiggers)(and)(Midges)
 - Repellency remains effective through 50 launderings
 - DO NOT DRY CLEAN. Dry cleaning removes the active ingredient.]

Active Ingredient:	
Permethrin	0.52%
Other Ingredients (Garment)(Product)(Item)	99.48%
Total	100.00%

EPA Reg. No. 80203-XXX
EPA Establishment No. XXX-XX-XXX

Registered by:
Starensier, Inc.
Newburyport, MA 01950

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

Do not re-treat [garment][product][item] with other permethrin insect repellent products. For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin.

Care Instructions: Wash treated [garment][product][item] separately from other laundry. DO NOT DRY CLEAN. Dry cleaning removes the active ingredient.

Storage and Disposal
Do not contaminate water, food or feed by storage or disposal. Disposal: Discard in trash when [garment][product][item] is worn out. Do not reuse product for other purposes.

RETAIN THIS TAG FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS [GARMENT] [PRODUCT][ITEM]. THIS TAG IS NOT TO BE REMOVED EXCEPT BY CONSUMER.

Master Label

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Hang-Tag (back)

[NAME OF PRODUCT BRAND]

**ELIMIBUG™
INSECT REPELLENT [FABRICS] [APPAREL][PRODUCT][ITEM]**

[by (from) Name of Product Brand]

[Logo Area]

Elimibug™ fabrics use a durable carrier to bind the permethrin insect repellent onto the fabric. The fabrics original hand and drape is not changed by the application of Elimibug™.

Elimibug™ fabrics have been shown to be highly effective in repelling mosquitoes, ticks, and other insects. Mosquitoes and ticks may carry diseases such as West Nile Virus and Lyme's disease.

Neither Starensier nor any other insect protection product can guarantee complete protection from insects, insect bites, or related reactions or diseases.

Master Label

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Label sewn inside apparel

[NAME OF PRODUCT BRAND]

**ELIMIBUG™
INSECT REPELLENT [FABRICS] [APPAREL][PRODUCT][ITEM]**

[by (from) Name of Product Brand]

Do Not Dry Clean

Repels mosquitoes, ticks, ants, spiders, flies, chiggers, and midges.
Repellency remains effective through 50 launderings.

Active Ingredient:
Permethrin 0.52% w/w

EPA Reg. No. 80203-XXX
EPA Establishment No. XXX-XX-XXX

Wash separately from other laundry.
Dispose of *[garment][product][item]* in trash.

Consult hang tag for additional information.