

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

June 3, 2015

Micah T. Reynolds Senior Regulatory Consultant Technology Sciences Group Inc. Agent for International Textile Group, Inc. 1150 18<sup>th</sup> Street, NW, Suite 1000 Washington, DC 20036

Subject: Label Amendment – addition of sub-label for military use and other changes

Product Name: No Fly Zone

EPA Registration Number: 83588-1 Application Date: December 18, 2014

Decision Number: 498546

#### Dear Mr. Reynolds:

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

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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,

My M Mm

Jennifer Urbanski, PhD, Product Manager 4

Invertebrate and Vertebrate Branch 1 (IVB1) Registration Division (7505P)

Office of Pesticide Programs

## No Fly Zone™

## (MASTER LABEL)

**Sublabel A:** Permethrin-Treated Fabric uses for Garments and Gear

Sublabel B: Permethrin-Treated Fabric uses for Dog & Horse

Products/Gear

Sublabel C: Affixed Tag/Label - ALL Garments, Gear, or Dog/Horse

**Products** 

Sublabel D: Labels for Military Use Only – Hang-tag and Sewn-in

**Optional Label Claims** 

**EPA Reg. No.:** 83588-1

EPA Establishment No.: TBD

Manufactured [by] [for]:

International Textile Group, Inc. 804 Green Valley Road, Suite 300 Greensboro, NC 27408 USA

### ACCEPTED

06/03/2015

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

83588-1

## (SUBLABEL A: MASTER LABEL – GARMENTS and GEAR)

(Note to Reviewer: the following **garments** may be made from No Fly Zone<sup>TM</sup> fabric: *men's and women's shirts, pants, shorts, cargo shorts, hats, bonnies, bonnie hats, bush hats, jackets, pullovers, scarves, bandanas, socks, shoe coverings, and vests.* Their names may be used in place of the word "garment" in the text of the marketplace label. The following **gear articles** may be made from No Fly Zone<sup>TM</sup> fabric: *tents, tent mesh, tent netting, tent liner, umbrella, bivouac sack, bivy sack, bivvy bag, bivi bag, bivi, sleeping bag covers, backpacks, tarps, drapes/curtains, table cloths, picnic blankets, tent ground cloths, outdoor furniture covers, outdoor furniture cushion covers, camping chairs, patio umbrella covers, hats, bonnies, bonnie hat, bush hats.* Their names may be used in place of the word "gear" in the text of the marketplace label.)



(<u>Alternate Brand Names</u>: Mity-Tex, Mity Tex, NFZ, NFZ NOFLYZONE, NFZ NO-FLYZONE, Insect Defense, Insect Defense System)

[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

Manufactured [by] [for]: International Textile Group, Inc. 804 Green Valley Road, Suite 300 Greensboro, NC 27408 USA [XXX-XXX-XXXX]

Active Ingredient:	% by weight
Permethrin	0.52%
Other Ingredient (Garment/Gear fabric)	<u>99.48%</u>
TOTAL	100.00%

EPA Reg. No. 83588-1 EPA Est. No.

- The fabric in this [garment/gear] has been treated with the active ingredient Permethrin.
- Permethrin repels mosquitoes, ants, ticks, chiggers, flies, and midges.
- Permethrin in this [garment/gear] is bound to the fabric and remains effective for [70] [50] [25] washings [for washable garments/gear]
- For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin.

#### **Directions for Use**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Hangtag must not be removed, except by consumer after purchase. Keep this hangtag for future reference on how to properly handle this [garment/gear]. DO NOT DRY CLEAN [GARMENT/GEAR] (dry cleaning removes the Permethrin active ingredient). DO NOT RETREAT [GARMENT/GEAR] with other permethrin insect repellent products.

• International Textile Group, Inc. cannot guarantee complete protection from insects, insect bites, related diseases or reactions.

#### **STORAGE & DISPOSAL**

- Do not contaminate water, food, or feed by storage or disposal.
- Disposal: discard in trash when [garment/gear] is worn out.
- Do not use or reuse [garment/gear] for purposes other than originally intended.

# (SUBLABEL B: MASTER LABEL – DOG & HORSE PRODUCTS/GEAR)

(Note to Reviewer: the following dog/horse products/gear may be made from No Fly Zone<sup>TM</sup> fabric: *dog bedding, dog blanket, dog rug, kennel covers, horse blankets, flysheets and fly rugs (light horsewear), stall covers, dog shirts, dog hats, dog bandanas, dog collars, garment(s).* Their names may be used in place of the word "dog/horse product/gear" in the text of the marketplace label.)



(<u>Alternate Brand Names</u>: **Mity-Tex**, **Mity Tex**, **NFZ**, **NFZ NOFLYZONE**, **NFZ NO-FLYZONE**, **Insect Defense**, **Insect Defense System**) [Insect Repellent Technology] [Insect Defense System] [Insect Defense]

Manufactured [by] [for]: International Textile Group, Inc. 804 Green Valley Road, Suite 300 Greensboro, NC 27408 USA [XXX-XXX-XXXX]

Active Ingredient:	% by weight
Permethrin	0.52%
Other Ingredient [(Dog/Horse Product/Gea	ar)]. <u>99.48%</u>
TOTAL	100.00%

EPA Reg. No. 83588-1 EPA Est. No.

- The fabric in this [dog/horse product/gear] has been treated with the active ingredient Permethrin.
- Permethrin repels mosquitoes, ants, ticks, chiggers, flies, and midges.
- Permethrin in this [dog/horse product/gear] is bound to the fabric and remains effective for [70] [50 [25] washings [for washable dog/horse products/gear].

#### **Directions for Use**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Hangtag must not be removed, except by consumer after purchase. Keep this hangtag for future reference on how to properly handle this [dog/horse product/gear]. DO NOT DRY CLEAN [dog product/apparel] (dry cleaning removes the Permethrin active ingredient). DO NOT RETREAT THIS [dog/horse product/gear] with other permethrin insect repellent products.

• International Textile Group, Inc. cannot guarantee complete protection from insects, insect bites, related diseases or reactions.

#### STORAGE & DISPOSAL

- Do not contaminate water, food, or feed by storage or disposal.
- Disposal: discard in trash when [dog/horse product/gear] is worn out.
- Do not use or reuse [dog/horse product/gear] for purposes other than originally intended.

# (SUBLABEL C: MASTER LABEL – AFFIXED GARMENT, GEAR, or DOG/HORSE PRODUCT/GEAR TAG)

No Fly Zone™

(<u>Alternate Brand Names</u>: Mity-Tex, Mity Tex, NFZ, NFZ NOFLYZONE, NFZ NO-FLYZONE, Insect Defense, Insect Defense System)
[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

ACTIVE INGREDIENT	%W/W
Permethrin	0.52%
OTHER INGREDIENTS: (Garment/Gear)	99.48%
TOTAL	.100.00%

[Contains Permethrin that] repels mosquitoes, ants, ticks, chiggers, flies and midges.

Active ingredient remains effective for [70] [50] [25] washings [for washable gear] [for washable garments] [for washable dog/horse products/gear].

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

Do Not Dry Clean. Dry cleaning removes active ingredient. Do not retreat with other permethrin products.

Dispose of worn out [gear] [garment] [dog/horse product/gear] in trash.

EPA Reg. No. 83588-1 EPA Est. No.

Refer to hangtag for detailed information.

THIS TAG MUST NOT BE REMOVED.

## (SUBLABEL D: LABELS FOR MILITARY USE ONLY)

(Note to Reviewer: the following sublabel text is for military use garments and gear only that may be made from No Fly Zone<sup>TM</sup> fabric.)

(HANG-TAG LABEL)



(<u>Alternate Brand Names</u>: Mity-Tex, Mity Tex, NFZ, NFZ NOFLYZONE, NFZ NO-FLYZONE, Insect Defense, Insect Defense System)

[Insect Repellent Technology] [Insect Defense System] [Insect Defense]

[COAT, ARMY COMBAT UNIFORM] [TROUSERS, ARMY COMBAT UNIFORM]

Manufactured [by][for]: International Textile Group, Inc. 804 Green Valley Road, Suite 300 Greensboro, NC 27408 USA

Active Ingredient:	% by weight
Permethrin	0.52%
Other Ingredient (Garment/Gear)	<u>99.48%</u>
TOTAL	100.00%

EPA Reg. No. 83588-1

EPA Est. No.

- The fabric in this garment has been treated with the active ingredient, Permethrin.
- Permethrin repels mosquitoes, ants, ticks, chiggers, flies, and midges.
- Permethrin in this garment is bound to the fabric and remains effective for [70 [50] [25] washings.
- For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to the skin.

#### **Directions for Use**

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Hangtag must not be removed except by consumer, after purchase. Do Not Dry Clean – Dry cleaning removes the Permethrin active ingredient. Do not retreat this [garment/gear] with other permethrin insect repellent products. Wash treated [garment/gear] separately from other [garments/gear]. Only launder permethrin treated and untreated [garments/gear] together under field or combat conditions. Keep this hangtag for future reference on how to properly handle this [garment/gear].

#### Storage and Disposal

- Do not contaminate water, food, or feed by storage or disposal.
- Disposal: discard in trash when [garment/gear] is worn out. [Remove [Identify Friend or Foe] [IFF] tape first.] (Note to reviewer: IFF tape removal statement only relevant for coat.)
- Do not use or reuse [garment/gear] for purposes other than originally intended. International Textile Group, Inc. cannot guarantee complete protection from insects, insect bites, related diseases or reactions.

# (SUBLABEL D: LABELS FOR MILITARY USE ONLY, Continued)

### (SEWN-IN LABEL)

## NO FLY ZONE INSECT REPELLENT APPAREL

Refer to hangtag for more information
[Coat: Army Combat Uniform] [Trouser: Army Combat Uniform]
Contractor Name: International Textile Group, Inc.
Contract Number: [W911QY-14-F-0148]
EPA REG. NO.: 83588-1
EPA EST. NO.:

- Do Not Dry Clean
- Dry Cleaning removes active ingredient
- Wash separate from other clothing
- In military field operations, garment may be washed with other garments.
- Do Not Re-treat with other permethrin products
- Dispose of garment in trash in accordance with Army regulations

Repels mosquitoes, ticks, ants, flies, chiggers and midges Repellency remains effective for [70] [50] [25] washings

ACTIVE INGREDIENT	%W/W
Permethrin	0.52%
OTHER INGREDIENTS: (Garment/Gear)	99.48%
TOTAL	.100.00%

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

#### DO NOT REMOVE THIS LABEL

Optional Label Claims and Marketing Statements for Garment/Gear or Dog/Horse Product/Gear Hang Tags AND/OR Tag affixed to Garment/Gear Article, or Dog/Horse Product:

- [Apparel that repels insects]
- [Garments that repel insects]
- [Garment that repels insects]
- [Gear that repels insects]
- [Insect repellent clothing]
- [Insect repellent apparel]
- [Insect repellent gear]
- [Clothing that repels insects]
- [Insect repellent protection [in a] [clothing] [garment] [jacket] [shirt] [pair of pants] [pair of shorts] [hat]]
- [Repels mosquitoes]
- [Repels ticks]
- [Built-in insect repellent technology [that lasts through [70] [50] [25] washes]]
- [Insect Defense System]
- [Insect Defense]
- [[Tents] [Tent mesh] [Tent liner] [Umbrella] [Bivouac sack] [Bivy Sack] [Bivvy Bag] [Bivi Bag] [Bivy] [Sleeping bag cover] [Backpack] [Outdoor furniture] that repels insects]
- [No Fly Zone™ Technology converts [gear] [garments] into long-lasting, effective and convenient insect protection.]
- [Proven to repel mosquitoes, ants, ticks, chiggers, flies and midges.]
- [Treated with the active ingredient Permethrin for [long-lasting] [effective] fly, mosquito, ant, tick, chigger, and midge [protection] [repellency].]
- [No Fly Zone™ remains effective for [70] [50] [25] washings.]
- [Fly protection for a calm and happy horse]
- [Odorless [and] Invisible [Protection]]

- [Effective [mosquito] [ant] [tick] [chigger] [fly] [midge] protection]
- [Effective, [Odorless], [Invisible] Protection]
- [Flysheet [treated] with No Fly Zone™.]
- [Fly rug [treated] with No Fly Zone™.]
  (Note to reviewer: a flysheet/fly rug is a lighter horsewear garment.)
- [Bug buster repellency]
- [Fly buster repellency]
- [Bug buster]
- [Fly buster]
- [Vamoose fly protection]
- [Vamoose]
- [SmartPak]
- [Rambo Fly Buster]
- [Amigo Bug Buster]
- [Insect Defense for your family]
- [Insect Repellent Technology]
- [Insect protection [for] [from] pesky insects]
- [Treated with Burlington® Labs No Fly Zone™ Insect Repellent Technology]
- [Insect Defense System creates an odorless, invisible, and long lasting, effective protection against mosquitoes, ticks, chiggers, flies, ants, and midges. This achieves what you need – a defense that protects you while enjoying your outdoor adventures.]
- [© 20XX International Textile Group, Inc. No Fly Zone™, and Burlington® are registered trademarks owned or held under license by International Textile Group, Inc.]

### **Optional Logos and Pictograms for Hang Tag:**

- Pictogram(s) of target insects (mosquito, ant, tick, chigger, fly, and/or midge)
- Burlington Labs logo





