



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

August 22, 2017

Olav Messerschmidt
OMC Ag Consulting
c/o Terramera, Inc.
828 Tanglewood Lane
East Lansing, MI 48823

Subject: Pesticide Registration Improvement Act (PRIA) Labeling and Formulation Amendment and Notification to: Add alternate brand names 1) Cirkil VaproPad Mattress Treatment, 2) Cirkil VaproPad Electronics & Clutter Treatment, 3) Stuff Saver and 4) Mattress Saver; Combine Sublabel B and C; Add dust mites; Extend the efficacy period; Add additional marketing claims; and Replace several fragrances in the basic formulation under the pilot fragrance notification program.
Product Name: TER-RTU3 Bed Bug Pad
EPA Registration Number: 88760-7
Application Dates: February 28, 2017 and April 24, 2017
OPP Decision Numbers: 526982 and 528868

Dear Mr. Messerschmidt:

The amended labeling and Confidential Statement of Formula (CSF) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are acceptable.

The alternate brand names Cirkil VaproPad Mattress Treatment, Cirkil VaproPad Electronics & Clutter Treatment, Stuff Saver, and Mattress Saver have been added to the registration, and our records have been updated accordingly. This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

Please note that the record for this product currently contains the following acceptable CSFs:

- Basic CSF dated 04/24/2017
- Alternate CSF dated 04/24/2017

Any CSFs other than those listed above are superseded/no longer valid.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this 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 your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the 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 EPA 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 Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Menyon Adams by phone at (703) 347-8496 or via email at adams.menyon@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew C. Bryceland".

Andrew C. Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division
(7511P)
Office of Pesticide Programs

Enclosure

TER-RTU3 Bed Bug Pad (EPA Reg. No. 88760-7)

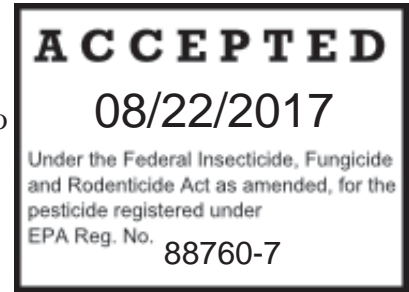
MASTER LABEL

Sublabel A is for Pest Management Professionals

Sublabel B is for Residential Use on Bed Bugs, Dust Mites and Eggs

TER-RTU3 Bed Bug Pad

Bed bug, dust mite insecticide/ovicide to
treat household/personal items and
mattresses



Active Ingredient:

Cold Pressed Neem Oil	5.5%
Other Ingredients.....	<u>94.5%</u>
Total	100.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION

READ ALL DIRECTIONS BEFORE USING THIS PRODUCT

If you do not understand the label, find someone to explain it to you in detail.
(Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.)

EPA Reg. No. 88760-7
EPA Est. No. 75830-WI-001

{ Pad Label Net Content } NET CONTENTS: 2 FL OZ per pad
{ Outer Box Label Content } [Contains 2, 4, 5, 6, 8, 10, 12, 14, 15, 16, 18, 20, 24, 25, 30, 40,
48 or 50 Treatment Pads]
Batch No.

Manufactured by:
Terramera, Inc.
6920 Salashan Pkwy D-109
Ferndale, WA 98248
1-800-597-9509

**TER-RTU3 Bed Bug Pad (EPA Reg. No. 88760-7)
Sublabel A is for Pest Management Professionals**

TER-RTU3 Bed Bug Pad

[ABNs: CIRKIL VaproPad Mattress Treatment
CIRKIL VaproPad Electronics & Clutter Treatment]

Bed bug insecticide/ovicide for treating bed bug and dust mite infested items
that can be sealed within airtight bags or containers

Active Ingredient:	
Cold Pressed Neem Oil	5.5%
Other Ingredients.....	94.5%
Total	100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

READ ALL DIRECTIONS BEFORE USING THIS PRODUCT

If you do not understand the label, find someone to explain it to you in detail.
(Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.)

[See Outer Packaging for Additional Precautionary Statements and Directions for Use.]
[See side and back panels for additional precautionary statements and directions for use.]

{**Note to Reviewer:** Any reference to “treatment pad” throughout Sublabel A may be
interchangeably expressed as “CIRKIL VaproPad” on the final printed label.}

EPA Reg. No. 88760-7
EPA Est. No. 75830-WI-001

{Pad Label Net Content} NET CONTENTS: 2 FL OZ per pad
{Outer Box Label Content} [Contains 2, 4, 5, 6, 8, 10, 12, 14, 15, 16, 18, 20, 24, 25, 30,
40, 48 or 50 Treatment Pads] [and] [1~10, 12, 15, 25 Treatment Bags] [1~5, 10 King-
Sized Mattress Treatment Bags] {if treatment bags are not included} [Treatment bags are
not included.]]

Batch No.

Manufactured for:
Terramera, Inc.
6920 Salashan Pkwy D-109
Ferndale, WA 98248
1-800-597-9509

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution: Liquid contained in the treatment pad can cause moderate eye irritation. Avoid contact with eyes or clothing. Do not get liquid in mouth. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid
If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.
If ingested: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.
In the event of a medical emergency call your poison control center at 1-800-222-1222 (24 hours). Have the product container or label with you when calling a poison control center, doctor, or going for treatment.

PHYSICAL AND CHEMICAL HAZARDS

Flammable. During all stages of treatment, keep the treatment pad and treated bags away from heat, sparks, open flames or hot surfaces (e.g. baseboard, floor heaters, stoves, cigarettes, [e-cigarettes,] etc.). Unplug all electrical equipment prior to opening treated bags.

DIRECTIONS FOR USE

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

Read entire label. Use strictly in accordance with precautionary statements and directions, and with applicable state and Federal regulations.

PRECAUTIONS:

- At all times during a treatment, keep bags[/containers] being treated away from sparks, open flame or hot surfaces.
- Always open treated bags[/containers] in a well-ventilated area, away from any source of sparks, open flame or hot surfaces.
- Treatment bag may pose suffocation hazard. Keep away from children. Do not enter or put head into treatment bag.
- **TER-RTU3 Bed Bug Pad** is intended to treat items sealed within treatment bags

[or airtight containers]. This product will not kill bed bugs [or dust mites] that are not enclosed in treatment bags/containers.

TO KILL BED BUGS [, DUST MITES] AND THEIR EGGS IN HOUSEHOLD [PERSONAL] ITEMS:

Use **TER-RTU3 Bed Bug Pad** to kill bed bugs [, dust mites] and their eggs in household [/personal] [clutter] items including, but not limited to, [books], [footwear], [handbags], [clothes], [linens], [electronics], [computers], [luggage], [backpacks], [pet bedding] and other items which can be placed in a treatment bag [or an airtight container].

[WHAT YOU NEED:

- Treatment bags [included] [{if bag is not included} Not Included] [or container that can be sealed airtight - **NOT INCLUDED**]
- 2 treatment pads for each bag[/container]
- A well-ventilated space, free of any source of spark or open-flame]

HOW TO TREAT:

1. Place items in treatment bag [or other airtight container] to treat. **Important: Leave air space at top of bag and pack items loosely.** [Figure 1]
2. Completely remove peel-off seal from treatment pads to expose the vents. [Figure 2] Place two (2) treatment pads on top of items in bag[/container], ensuring vents face *upward*. [Figure 3]
3. Close and seal bag[/container]. Seal treatment bag, ensuring vents of treatment pads are not blocked. Check for airtight seal by squeezing gently. Inspect for tears or punctures - if found, repair with packing tape. [Figure 4] [If using a container that is not airtight, tape may be used to achieve further airtightness.]
4. Leave bag[/container] sealed for at least [24 hours] [48 hours] and [{for 24-hr treatment time} only treat at 73°F or higher] [{for 48-hr treatment time} only treat at 70°F or higher]. [Figure 5]
5. Open bag in well ventilated area or outdoors. Do not open bag near sources of spark or open flame. Unplug any electrical devices nearby. Air out treatment bag [for 30 minutes] before removing items.
6. Items can be used immediately.

[Launder items after treatment when appropriate. Vacuum items if laundering is not possible.]

[For best results in managing bed bug or dust mite infestations, use CIRKIL RTU and CIRKIL CX to treat other areas that may harbor bed bugs or dust mites.]

]

TO KILL BED BUGS [, DUST MITES] AND THEIR EGGS ON MATTRESSES, BOX-SPRINGS [,BED FRAMES] [AND FURNITURE]:

Use **TER-RTU3 Bed Bug Pad** to kill bed bugs [, dust mites] and their eggs living on the surface and inside cracks and crevices of mattresses/box-springs [, bed frames] [and other furniture].

[WHAT YOU NEED:

- Mattress treatment bag [(included)] [for your mattress size (not included)]
- {for 48-hour treatment time} 4 treatment pads [per mattress bag]]
- {for 24-hour treatment time} 5 treatment pads [per mattress bag]]
- A well-ventilated space, big enough to maneuver a mattress and free of source of spark or open-flame]

[{Option 1: Text Instructions}

HOW TO TREAT:

1. For mattress/box-spring: Lean mattress (box-spring) upright against a wall away from spark, flame or heat sources. Pull bag over mattress starting at the top. Tip mattress onto a side edge and carefully pull bag until mattress is all the way in. For furniture: Place furniture inside bag carefully to avoid damaging the bag. Do not attempt to place heavy or large items in bag by yourself.
2. Completely remove peel-off seal from each treatment pad to expose vents. [Remove sticker liners from back and] affix [five (5)] [four (4)] treatment pads to inside of bag near the top. Ensure that vents are **not blocked** once bag is closed.
3. Close and seal bag. Visually check that bag is perfectly sealed and there are no holes or tears. Leave bag sealed for at least [{if 4 pads are used} 48 hours and only treat at 70 °F or higher] [{if 5 pads are used} 24 hours and only treat at 73 °F or higher. **Important: Once bag is sealed, inspect bag for holes or damage and repair any using tape (e.g. packing tape) to contain product within bag.**

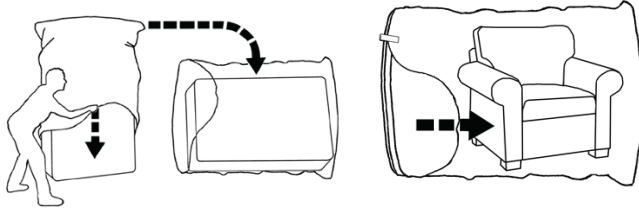
AFTER [48 HOURS] [24 HOURS]: Open bag completely in well ventilated area or outdoors. Do not open bag near sources of heat, spark or open flame. Unplug any electrical devices nearby. [Treated items can be used immediately.]

[Vacuuming surfaces after treatment is highly recommended.]

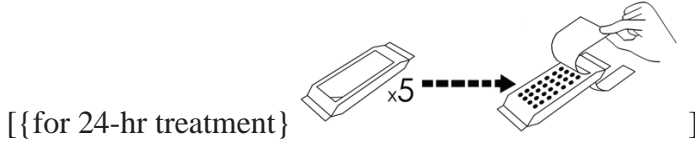
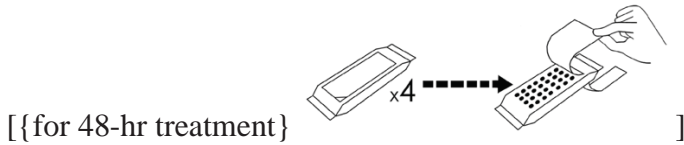
[For best results in managing bed bug or dust mite infestations, use CIRKIL RTU and CIRKIL CX to treat other areas that may harbor bed bugs or dust mites.]

]

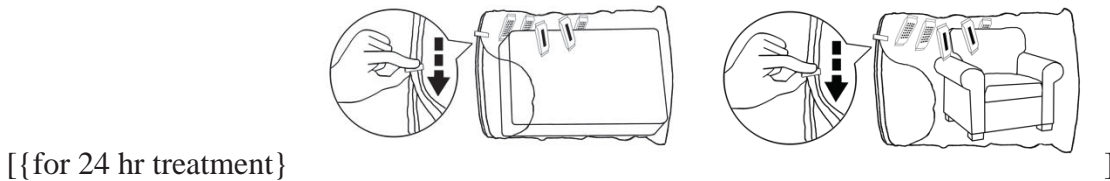
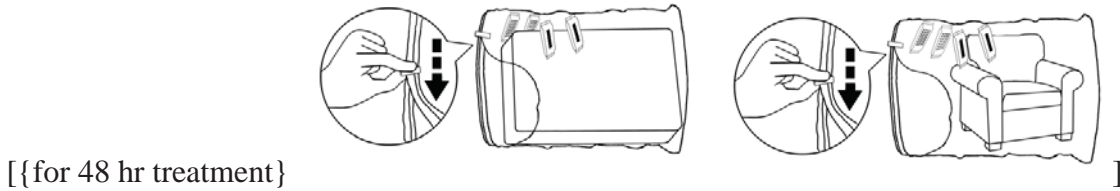
[{Option 2: Diagram-Text Directions}]



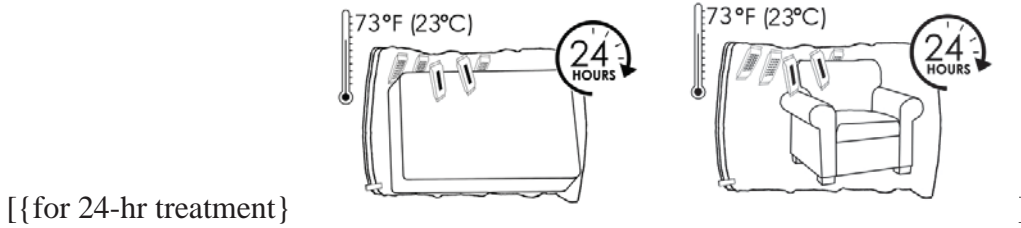
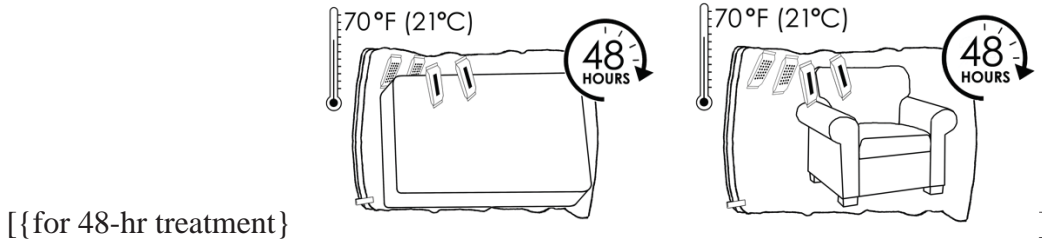
Step 1: For Mattress/Box-spring: Lean mattress (box-spring) upright against a wall away from spark, flame or heat sources. Place bag around mattress [from top]. Turn bag and mattress onto side. Pull bag until mattress is all the way in. For Furniture: Place furniture inside bag carefully to avoid damaging the bag. Do not attempt to place heavy or large items in bag by yourself.



Step 2: Remove seals to expose vent holes. [Remove sticker liner from back.]



Step 3: Affix [five] [four] treatment pads to inside of bag [near top] [where indicated] with vent holes facing in. Ensure vent holes are not blocked. Seal bag completely. Inspect bag for airtightness. Repair any holes or damage airtight using tape (e.g. packing tape).



[For best results] leave bag sealed for at least [{if 5 pads are used} 24 hours at 73 °F or higher]
[{if 4 pads are used} 48 hours at 70 °F or higher].

AFTER [24] [48] HOURS: Open bag in well ventilated area or outdoors, away from sources of heat, spark or flame. Unplug any electrical devices nearby. Air out [for 30 minutes] before removing the mattress. [Treated items can be used immediately.]

[Vacuuming surfaces after treatment is highly recommended.]

[For best results in managing bed bug or dust mite infestations, use CIRKIL RTU and CIRKIL CX to treat other areas of home that may harbor bed bugs or dust mites.]

]

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Protect the product from extreme heat or cold, away from light, hot surface, sparks, open flame or pilot lights. Do not remove from outer packaging until ready to use. Do not remove treatment pads from inner packaging.

DISPOSAL/CONTAINER HANDLING: The product is for one-time application only, and the inner and outer packaging are nonrefillable. Offer used product, packaging, and treatment bag for recycling if available or dispose of in trash.

IMPORTANT: READ BEFORE USE

Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the unopened product container at once. By using this product, user or buyer accepts the following Conditions, Disclaimer of Warranties and Limitations of Liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks inherently associated with the use, handling and transport of this product. Damage to products, materials, treated surfaces or fabrics, ineffectiveness or other unintended consequences may result because of factors such as environmental conditions, the presence of other materials, the manner of use or application, the use of the product in a manner inconsistent with its labeling, or other unknown reasons, all of which are beyond the control of Terramera. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: To the extent consistent with applicable law, Terramera or the Seller make no other warranties, guarantees or representations of any kind, either express or implied, of merchantability or of fitness for a particular purpose or otherwise, that extend beyond the statements made on this label. No agent of Terramera or the Seller is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Terramera and the Seller disclaim any liability for special, consequential, incidental, or indirect damages resulting from the use, transport, or handling of this product.

LIMITATIONS OF LIABILITY: To the extent consistent with applicable law, the exclusive remedy of the user or buyer and the exclusive liability of Terramera for any and all losses, injuries or damages resulting from the use, handling, or transport of this product, whether in contract, warranty, tort, negligence, strict liability or otherwise, shall not exceed the purchase price paid for the product, or at Terramera's election, the replacement of product.

{Optional Marketing Claims}

- Kills bed bugs [and their eggs] [that may cause itchy bites or allergic reactions] [in one treatment]
- Kills bed bugs [and their eggs] [in as little as] [24 hours] [1 day] [48 hours] [2 days] [in a weekend]
- Kills dust mites [and their eggs] [that may cause allergies or asthma] [in one treatment]
- Kills dust mites [and their eggs] [in as little as] [24 hours] [1 day] [48 hours] [2 days] [in a weekend]
- Kills bed bug eggs [to prevent reinfestation]

- Kills dust mite eggs [to prevent reinfestation]
- Kills 100% bed bugs, dust mites [and their eggs] [when used as directed]
- [Proven] 100% effective [in killing bed bugs, dust mites and eggs] [for bed bugs and eggs] [guaranteed**] [when used as directed]
- 100% effective bed bug and dust mite killer* *when used as directed
- Prevents bed bug and dust mite eggs from hatching
- Treat(s) [hard-to-treat] household items
- Treat(s) non-washable items
- Works on difficult to treat items [such as] [books] [, shoes] [, purses] [, electronics] [, curtains] [, pet bedding] [, etc.]
- [Can be used to] treat(s) luggage [for peace of mind]
- [Can be used to] treat(s) [up to] a king size mattress or box-spring
- [Can be used to] treat(s) twin, full, queen and king size mattresses [or box-springs]
- Contains X [CIRKIL VaproPads] [treatment pads] [and X King mattress treatment bag(s)]
- Contains X [CIRKIL VaproPads] [treatment pads] [X household/personal item treatment bags(s)]
- Contains X [CIRKIL VaproPads] [treatment pads] [X electronics & clutter treatment bags(s)]
- [Neem oil based] botanical [biopesticide] [treatment]
- Easy and clean [plant-based] treatment
- Guard against bed bug infestation
- Finally, a night of sleep
- Sleep bed bug free
- Makes bed bugs dead bugs
- Disinfest [your] belongings
- Disinfest [your] mattress
- Treat(s) [hard-to-treat] personal items
- Treat(s) [hard-to-treat] clutter
- Treat(s) [hard-to-treat] electronics
- Can treat up to X bags of items
- Can treat up to X mattresses
- Can treat up to X boxsprings
- Inspirium [Technology]
- The Power of Neem [, Made with You in Mind]
- Dependable bed bug and dust mite [treatment] [protection]
- Guaranteed results**
- ** Guarantee: If you are not satisfied with this product's performance, we will gladly refund your original purchase price
- Guaranteed to kill bed bugs, dust mites [and eggs] [when used as directed]
- For best results in managing bed bug or dust mite infestations, spray other areas that may harbor bed bugs or dust mites with CIRKIL CX or CIRKIL RTU.
- CIRKIL VaproPads
- Treatment Pad
- Value Pack [(Treatment Pads Only)]
- Terramera [PRO]
- [Includes X] [reusable] treatment bag(s) {Note to reviewer: Treatment bags are plastic bag that can be reused.}

- Custom-designed treatment bag(s)
- {for mattress treatment} What You Need:
 - Mattress Treatment Bag [included] [not included]
 - 4 CIRKIL VaproPads for each Mattress Treatment Bag
 - A well-ventilated space, big enough to maneuver a mattress and free of source of spark, open-flame or heat
- {for clutter treatment} What You Need:
 - Treatment Bag(s) [included] [not included]
 - 2 CIRKIL VaproPads for each Treatment Bag
 - A well-ventilated space, free of any source of spark, open-flame or heat

{Optional Graphics}



Figure 1

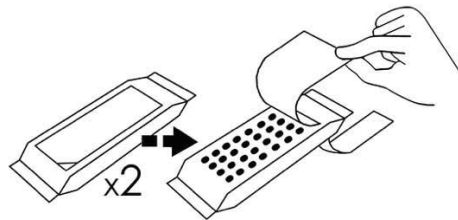


Figure 2



Figure 3

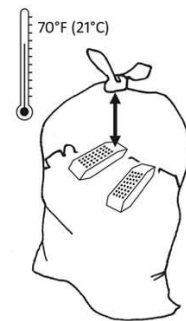


Figure 4

TER-RTU3 Bed Bug Pad (EPA Reg. No. 88760-7)
Sublabel B is for Residential Use on Bed Bugs, Dust Mites and Their Eggs

[ABN 1: Stuff Saver,
ABN 2: Mattress Saver]

TER-RTU3 Bed Bug Pad

Bed Bug Insecticide/Ovicide for residential use to treat bed bug/dust mite infested items that can be sealed within airtight treatment bags or containers

Active Ingredient:
Cold Pressed Neem Oil 5.5%
Other Ingredients..... 94.5%
Total 100.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

STOP - Read Entire Label Before Use

[See Outer Packaging for Additional Precautionary Statements and Directions for Use.]
[See side and back panels for additional precautionary statements and directions for use.]

{**Note to Reviewer:** Throughout Sublabel B, any reference to “treatment pad” may be interchangeably expressed as “PROOF Pad” on the final printed label. }

EPA Reg. No. 88760-7
EPA Est. No. 75830-WI-001

{Pad Label Net Content} NET CONTENTS: 2 FL OZ per pad
[{Outer Box Label Content} Contains 2, 4, 5, 6, 8, 10, 12, 14, 15, 16, 18, 20, 25, 48 or 50 Treatment Pads] [and] [1~10 Treatment Bags] [{if bag is not included} Treatment bag is not included.]
[1~5 King-Sized Mattress Treatment Bags]

Batch No.

Manufactured for:
Terramera, Inc.
6920 Salashan Pkwy
D-109 Ferndale, WA
98248
1-800-597-9509

PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution: Liquid contained in the treatment pad can cause moderate eye irritation. Do not get liquid in mouth. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid
If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.
If ingested: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.
In the event of a medical emergency call your poison control center at 1-800-222-1222 (24 hours). Have the product container or label with you when calling a poison control center, doctor, or going for treatment.

PHYSICAL AND CHEMICAL HAZARDS

Flammable. During all stages of treatment, keep the treatment pads and treated bags away from heat, sparks, open flames or hot surfaces (e.g. baseboard, floor heaters, stoves, cigarettes, [e-cigarettes] etc.). Unplug all electrical equipment prior to opening treated bags.

DIRECTIONS FOR USE

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

Read entire label. Use strictly in accordance with precautionary statements and directions, and with applicable state and Federal regulations.

PRECAUTIONS:

- At all times during a treatment, keep bags[/containers] being treated away from sparks, open flame or hot surfaces.
- Always open treated bags[/containers] in a well-ventilated area, away from any source of sparks, open flame or hot surfaces.
- Treatment bag may pose suffocation hazard. Keep away from children. Do not enter or put head into treatment bag.
- **TER-RTU3 Bed Bug Pad** is intended to treat items sealed within treatment

bags [or airtight containers]. It cannot control [bed bugs or] dust mites on surfaces outside of the treatment bag[/containers].

TO KILL [BED BUGS/] DUST MITES AND THEIR EGGS IN HOUSEHOLD ITEMS:

Use **TER-RTU3 Bed Bug Pad** to kill [bed bugs,] dust mites and their eggs in household items including, but not limited to, [books], [footwear], [handbags], [clothes], [linens], [electronics], [computers], [luggage], [backpacks,] [pet bedding] and other items which can be placed in a treatment bag [or an airtight container].

[**TER-RTU3 Bed Bug Pad** can also be used to clear travel items and suitcases of bed bugs after a travel.]

[WHAT YOU NEED:

- Treatment bags [included] [{if bag is not included} Not Included] [or container that can be sealed airtight]
- 2 treatment pads for each bag[/container]
- A well-ventilated space, free of any source of spark or open-flame]

HOW TO TREAT:

1. Place items in treatment bag [or other airtight container] to treat. **Important: Leave air space at top of bag and pack items loosely.** [Figure 1]
2. Completely remove peel-off seal from treatment pads to expose the vents. [Figure 2] Place two (2) treatment pads on top of items in bag, ensuring vents face *upward*. **Prevent items from contacting vents.** [Figure 3]
3. Close and seal bag[/container], ensuring vents of treatment pads are not blocked. Check for airtight seal by squeezing gently. Inspect for tears or punctures - if found, repair with packing tape. [Figure 4] [If using a container that is not airtight, tape may be used to achieve further airtightness.]
4. Leave bag[/container] sealed for at least [24 hours] [48 hours] and [{for 24-hr treatment time} only treat at 70° F or higher] [{for 48-hr treatment time} only treat at 70° F or higher]. [Figure 4]
5. Open bag in well ventilated area or outdoors. Do not open near sources of spark or open flame. Unplug any electrical devices nearby. Air out treatment bag [for 30 minutes] before removing items.
6. Items can be used immediately.

[Launder items after treatment when appropriate. Vacuum items if laundering is not possible.]

[For best results in managing bed bug or dust mite infestations, use **PROOF Bed Bug & Dust Mite Killer** [(EPA Reg. No. 88760-6)] to treat other areas of home that may harbor bed bugs or dust mites.]

TO KILL [BED BUGS,] DUST MITES AND THEIR EGGS ON MATTRESSES, BOX-SPRINGS [, BED FRAMES] [AND FURNITURE]:

Use **TER-RTU3 Bed Bug Pad** to kill bed bugs, dust mites and their eggs living on the surface and inside cracks and crevices of mattresses/box-springs [, bed frames] [and furniture].

[WHAT YOU NEED:

- Mattress treatment bag [(included)] [{if not included} (NOT INCLUDED)]
- {for 48-hour treatment time} 4 treatment pads [per mattress bag]
- {for 24-hour treatment time} 5 treatment pads [per mattress bag]
- A well-ventilated space, big enough to maneuver a mattress and free of source of spark or open-flame]

[{Option 1: Text Instructions }]

HOW TO TREAT:

1. For Mattress/Box-spring: Lean mattress (box-spring) upright against a wall away from spark, flame or heat source. Pull bag over mattress starting at the top. Tip mattress onto a side edge and carefully pull bag until mattress is all the way in. For Furniture: Place furniture inside bag carefully to avoid damaging the bag. Do not attempt to place heavy or large items in bag by yourself.
2. Completely remove peel-off seal from each treatment pad to expose vents. [Remove sticker liner from back and] affix [five (5)] [four (4)] treatment pads to inside of bag near the top. **Ensure vent holes are not blocked once bag is closed.**
3. Close and seal bag. Visually check that bag is perfectly sealed and there are no holes or tears. Leave bag sealed for at least [{if 4 pouches are used} 48 hours and only treat at 70° F or higher] [{if 5 pouches are used} 24 hours and only treat at 73° F or higher]. **Important: Once bag is sealed, inspect bag for holes or damage. Repair using tape (e.g. packing tape).**

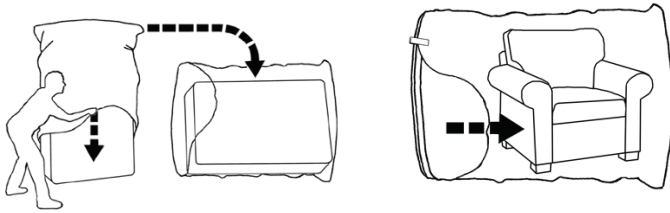
AFTER [48 HOURS] [24 HOURS]: Open bag completely in well ventilated area or outdoors. Do not open bag near sources of spark or open flame. Unplug any electrical devices nearby. Air out the treatment bag [for 30 minutes] before removing the mattress. [Treated items can be used immediately.]

[Vacuuming surfaces after treatment is highly recommended.]

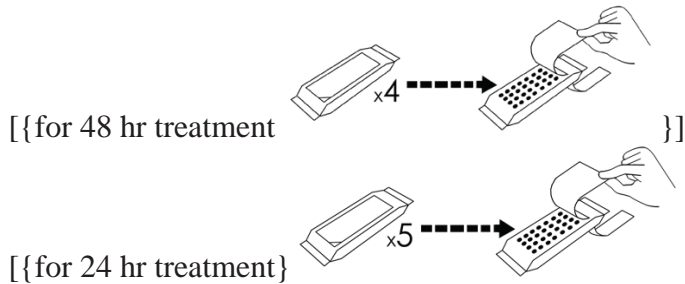
[For best results in managing bed bug or dust mite infestations, use PROOF Bed Bug & Dust Mite Killer [(EPA Reg. No. 88760-6)] to treat other areas of home that may harbor bed bugs or dust mites.]

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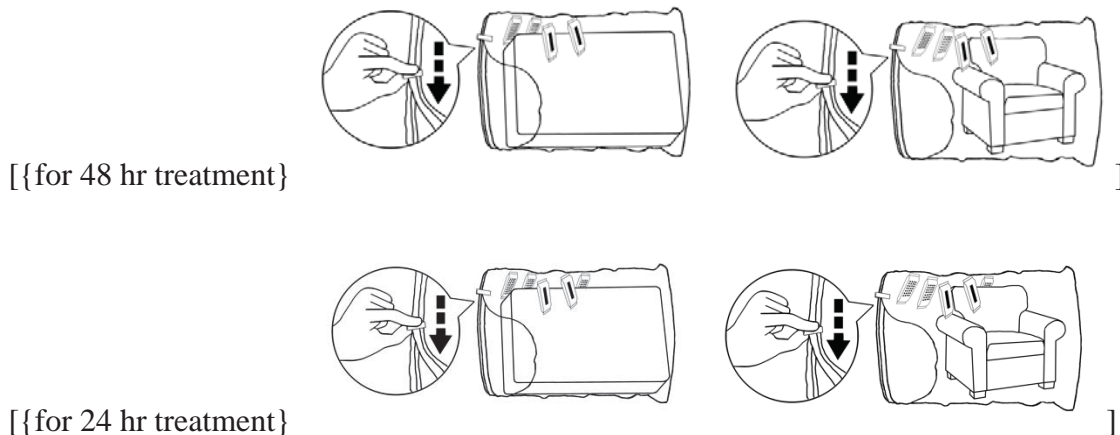
[{Option 2: Diagram-Text Directions}



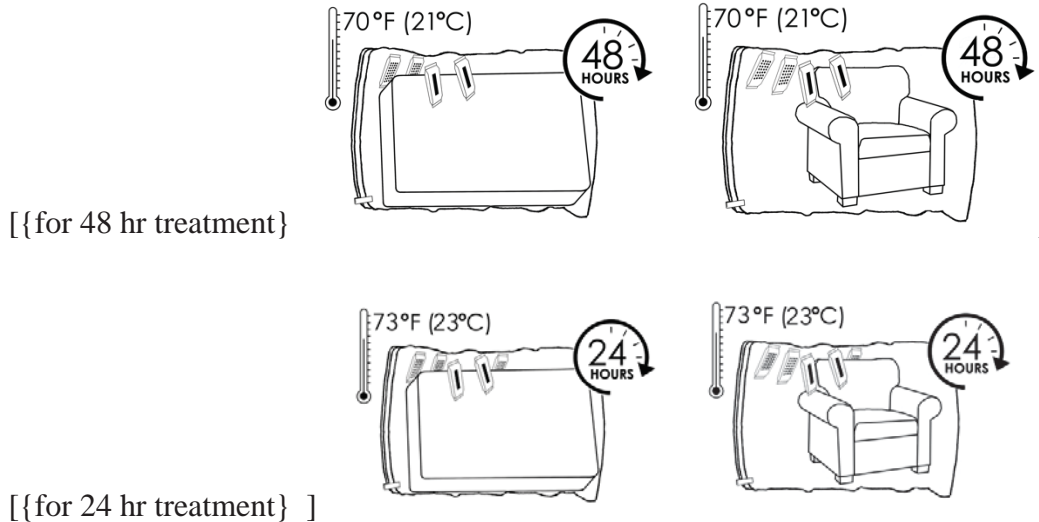
Step 1: For Mattress/box-spring: Lean mattress (box-spring) upright against a wall away from spark, flame or heat source. Place bag around mattress [from top]. Turn bag and mattress onto side. Pull bag until mattress is all the way in. For Furniture: Place furniture inside bag carefully to avoid damaging the bag. Do not attempt to place heavy or large items in bag by yourself.



Step 2: Remove seals to expose vent holes. [Remove sticker liner from back.]



Step 3: Affix [five] [four] treatment pads to inside of bag [near top] [where indicated] with vent holes facing in. Ensure vent holes are not blocked. Seal bag completely. Inspect bag for airtightness. Repair any holes airtight using tape (e.g. packing tape).



[For best results] leave bag sealed for at least [{if 4 pouches are used} 48 hours at 70 °F or higher] [{if 5 pouches are used} 24 hours at 73 °F or higher].

AFTER [48] [24] HOURS: Open bag in well ventilated area or outdoors, away from heat, spark or open flame. Unplug any electrical devices nearby. Air out [for 30 minutes] before removing the mattress. [Treated items can be used immediately.]

[Vacuuming surfaces after treatment is highly recommended.]
[For best results in managing bed bug or dust mite infestations, use with PROOF Bed Bug & Dust Mite Killer [(EPA Reg. No. 88760-6)] to treat other areas of home that may harbor bed bugs or dust mites.]

]

STORAGE AND DISPOSAL

Storage: Protect the product from extreme heat or cold, away from hot surface, sparks, open flame or pilot lights. Do not remove from outer packaging until ready to use. Do not remove treatment pads from inner packaging. **Disposal:** Do not place unused product in trash. The product is for one-time application only, and inner and outer packaging are nonrefillable. Offer used product, packaging, and treatment bag for recycling if available or dispose of in trash.

Warranty Statement

NOTICE: To the extent consistent with applicable law, research and testing have determined the “Directions for Use” are appropriate for the proper use of this product under expected conditions. To the extent consistent with applicable law, user assumes responsibility for the lack of performance or safety if not used as directed.

{Optional Marketing Claims}

- Kills bed bugs [and their eggs] [in one treatment] [that may cause itchy bites or allergic reactions]
- Kills bed bugs that may disrupt your sleep
- Kills bed bugs [and their eggs] [in as little as] [24 hours] [1 day] [48 hours] [2 days] [in a weekend]
- Kills dust mites [and their eggs] [that may cause allergies or asthma] [, a common cause of asthmas] [, a common cause of allergies] [in one treatment]
- Kills dust mites [and their eggs] [in as little as] [24 hours] [1 day] [48 hours] [2 days] [in a weekend]
- Kills bed bug eggs [to prevent reinfestation]
- Kills dust mite eggs [to prevent reinfestation]
- Include in your [regular] [Spring] cleaning [routine]
- Add to your [regular] [Spring] cleaning [routine]
- Kills 100% bed bugs, dust mites [and their eggs] [when used as directed]
- [Proven] 100% effective [in killing bed bugs, dust mites and eggs] [bed bug and dust mite killer] [guaranteed**] [when used as directed]
- Prevents bed bug and dust mite eggs from hatching
- [Facts:] Dust mites are microscopic pests commonly found on mattresses, pillows, carpets, curtains, upholstered furniture, pet bedding, soft toys and other soft household items. They are a common cause of asthma, eczema and allergic symptoms.
- [Facts:] Bed bugs are parasitic pests that feed on human blood. They usually remain hidden in and around beds and are mainly active at night. They cause itchy bites, psychological effects, and sometimes allergic symptoms.
- Can be used to treat pet bedding Treat(s) [hard-to-treat] household items
- Treat(s) [hard-to-treat] personal items
- Treat(s) [hard-to-treat] clutter
- Treat(s) [hard-to-treat] electronics
- Treat(s) non-washable items
- Works on difficult to treat items [such as books, purses, electronics, curtains, pet bedding, etc.]
- [Can be used to] treat(s) luggage [for peace of mind]
- Can treat up to X bags of items
- Can treat up to X mattresses [/box-springs] {Note to Reviewer: Number of mattress that can be treated depends on number of pads included in product (5 pads for each mattress).}
- [Can be used to] treat(s) [up to] a king size mattress [and box-spring]
- [Can be used to] treat(s) twin, full, queen and king size mattresses [and box-springs]
- Contains X [PROOF Pads] [treatment pads] [and contains X mattress treatment bags]
- Contains X [treatment] pads [and X household/personal item treatment bag(s)]
- Contains X [treatment] pads [and X electronic [and clutter] treatment bag(s)]
- [Neem oil based] botanical [biopesticide] [treatment]
- Easy and clean [plant-based] treatment
- Guard against bed bug infestation
- Use to clear travel items [and suitcases] of bed bugs [after travels]

- Finally, a night of sleep
- Rest and sleep safe
- Sleep safe [and] [, secure] [and bed bug free]
- Sleep bed bug and dust mite free
- Save your mattress
- Safe for all mattress types
- Makes bed bugs dead bugs
- Disinfest [your] belongings
- Save your [valuable] belongings
- For your valuables & other household items
- Don't throw away your belongings
- Cleanses mattresses, box springs, furniture and other large items of bed bugs
- Disinfest [your] [household/] personal items
- 100% effective* in disinfecting your belongings [from bed bugs and their eggs]
*when used as directed
- 100% effective* in disinfecting mattresses [from bed bugs and their eggs] [*when used as directed]
- PROOF Pad(s)
- Treatment Pad(s)
- The Power of Neem, Made with You in Mind
- Dependable bed bug, dust mite [protection][treatment]
- Guaranteed results**
- ** Guarantee: If you are not satisfied with this product's performance, we will gladly refund your original purchase price.
- Guaranteed to kill bed bugs, dust mites [and eggs] [when used as directed]
- For best results in managing bed bug or dust mites infestations, spray other areas of the room that may harbor bed bugs or dust mites with PROOF [Bed Bug & Dust Mite Killer [(EPA Reg. No. 88760-6)]].
- Value Pack [(Treatment Pads Only)]
- Reusable [/ recyclable] [mattress] treatment bag
- [Includes X] [reusable] treatment bag(s)
- [Includes X] [reusable] [/recyclable] mattress treatment bag(s) {Note to reviewer: Mattress treatment bags are custom-designed, plastic bag with reseal-able opening that can be reused.}
- Custom-designed treatment bag(s)
- [Facts:] Bed bugs are parasitic pests that feed on human blood. They usually remain hidden in and around beds and are mainly active at night. They cause itchy bites, psychological effects, and sometimes allergic symptoms.
- Can be used to treat pet bedding
- What You Need:
 - Treatment Bag(s) [included] [not included]
 - 2 Treatment Pads for each Treatment Bag
 - A well-ventilated space, free of any source of spark, open-flame or heat
- What You Need:
 - Mattress Treatment Bag [included] [not included]
 - 4 [PROOF Pads] [Treatment Pads] for each Mattress Treatment Bag
 - A well-ventilated space, big enough to maneuver a mattress and free of source of spark, open-flame or heat

Bed Bug Treatment Tips

1) Sort

- All loose items in the room are ideal places for bed bugs to hide. Sort all loose items into launderable and non-launderable items and seal them separately in plastic garbage bags (free of tears/holes).
- Remove everything from bedroom closet(s), dresser drawers, nightstands and dressing tables. Sort them into launderable and non-launderable items (e.g. electronics, books, etc.) and seal them separately in garbage bags.
- Strip bed(s) and seal all linens, pillowcases, mattress pads, blankets and drapes into garbage bags.
- Once the room is free of all debris and loose items, pull all furniture (e.g. beds, nightstands, chairs, etc.) away from the walls. Separate drawers from furniture, and separate mattresses and box-springs from bed frames.

2) Treat

- If your vacuum has a HEPA filter or can filter particles as small as 0.09 inches (2.5mm – the size of bed bug eggs), vacuum the room thoroughly to remove all visible bed bugs and debris from floors, cracks and crevices, under furniture, under bed legs, and around the room's perimeter where the wall meets the floor. After you have finished vacuuming, carefully remove the vacuum bag and seal into a plastic bag for disposal. Do not use a bag-less vacuum. Inspect the vacuum, attachments and hoses before storage.
- [Open Surfaces:] Spray all floor surfaces (including floor underneath furniture), the room's perimeter and all other cracks and crevices with an insecticide labeled for use against bed bugs and eggs (PROOF Bed Bug and Dust Mite Killer).
- [Large Furniture:] Also treat all surfaces of large, heavy furniture with a spray insecticide like PROOF Bed Bug and Dust Mite Killer. Always follow the spray insecticide's use directions carefully.
- [Small Furniture] Use TER-RTU3 Bed Bug Pad to treat all small furniture that can fit into the provided treatment bag.
- [Launderable Items:] Carefully transfer all launderable items from garbage bags to a laundry dryer. Tumble dry on high heat for 30 minutes or longer to kill bed bugs and eggs. Then washing them. [Always heat-dry first, then wash.]
- [Non-launderable Items:] Open garbage bags containing all non-launderable items and treat them with TER-RTU3 Bed Bug Pad.
- [Mattress and Box-spring:] Treat all mattresses and box-springs with TER-RTU3 Bed Bug Pad. Follow the product's user directions carefully.
- It is a good practice to apply a light dusting of diatomaceous earth in all cracks and crevices in the room, including under furniture, under bed legs and around the room's perimeter where the wall meets the floor.
- Before reusing beds after treatment, place bed bug interceptors under each bed leg.

Reduce Your Risk of Bed Bug Infestations:

Precautionary Measures

In your bedroom:

- Bed bugs can't fly or jump so eliminate bed bug travel routes like sheets/bedding touching the ground.
- Move your bed/headboard and nightstand away from walls, drapes or other items that bed bugs might use to travel onto your bed.
- Bed bug interceptors may be placed under each bed leg to stop bugs from climbing up your bed from the floor. Note: Bed bug interceptors will not work if bed bugs are already living on the bed's mattress, box-spring or bed frame (in this case these items need to be treated directly).
- It is recommended to apply a light dusting of diatomaceous earth along the room perimeter where the wall meets the floor, and inside cracks of bed frames, furniture, and all other tight areas where bed bugs typically hide. - Diatomaceous earth is a naturally occurring, chalk-dust like powder that slowly kills bed bugs that walk over it.
- Reduce the number of bed bug hiding spots in the room - regularly clean up loose items from floors, launder clothing and bedding and vacuum floors.

When bringing items into your home:

- Bed bugs and their eggs can travel on used furniture, clothing, books, luggage, and most other items that move from an infested room to a new location. Beware of items when the origin is unknown.
- If you are moving used furniture or other items to a new location, it is advisable to treat these items before introduction to the new location.
- Small furniture and other items can be easily treated by sealing them into treatment bags along with **TER-RTU3 Bed Bug Pad** to kill any bed bugs or eggs that may be present in those items.

When travelling:

- At your destination, inspect mattress seams, headboards, bed frames, electrical sockets and night stands around bed for bed bugs or bed bug droppings (tiny, raised black/brown spots stuck to surfaces around cracks and crevices).
- In your room, luggage and clothing should always be placed away from the bed and off of the floor, [inside a PROOF Bed Bug-Proof Dryer Bag or] inside a sealed plastic bag to prevent bugs from entering the luggage and clothing inside. Placing luggage and clothing inside a bathtub will also reduce the chance of infestation because bed bugs can't climb up the slippery surface.

Upon returning home:

- Clothing should be sealed inside [a PROOF Bed Bug-Proof Dryer Bag,] a heat-safe and escape-proof bag and placed in a clothes dryer on high heat for 30 minutes to kill any bugs and egg.
- Luggage and non-launderable items should be sealed inside a treatment bag along with **TER-RTU3 Bed Bug Pad** to kill any bed bugs or eggs that may be present in

those items.

{Optional Graphics}



Package &
Treatment Bag



Figure 1

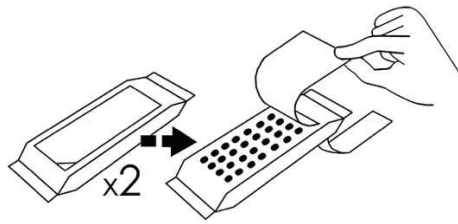


Figure 2



Figure 3

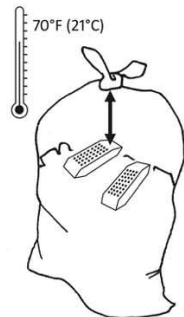


Figure 4