

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

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

September 24, 2020

Olav Messerschmidt Registration Agent for Terramera, Inc. c/o OMC Ag Consulting, Inc. 3334 S. Indiana Ave Milwaukee, WI 53207

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 – Addition of

optional marketing claims

Product Name: TER-RTU3 Bed Bug Pad EPA Registration Number: 88760-7

Application Date: 08/10/20 OPP Decision Number: 565503

Dear Mr. Messerschmidt:

The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The labeling submitted with this application has been stamped "Notification" and will be placed in our records. You must submit one (1) copy of the final printed labeling with the modifications.

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 the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the 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.

Page 2 of 2 EPA Reg. No. 88760-7 OPP Decision No. 565503

If you have any questions, please contact Susannah Powell of my team via email at powell.susannah@epa.gov.

Sincerely,

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

## NOTIFICATION

#### 88760-7

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

TER-RTU3 Bed Bug Pad v3.<u>1</u> 2 Nov 2018 Aug 10, 2020

09/24/2020

Text in [ ] is optional language.

Text in { } is note to reviewer.

## 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
 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.)

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

NET CONTENTS: 2 FL OZ per pad

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 for: 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	<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.)

[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] [ $1\sim10$ , 12, 15, 25 Treatment Bags] [ $1\sim5$ , 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

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## PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS AND DOMESTICANIMALS

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 [SMALL] HOUSEHOLD [/PERSONAL] ITEMS:

Use this product to kill bed bugs [, dust mites] and their eggs in [small] household [/personal] [clutter] items including [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 [or container that can be sealed airtight] [Included] [e.g. garbage bag - Not Included]
- 2 treatment pads for each bag[/container]
- A well-ventilated space, free of any source of spark or open-flame-]

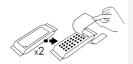
## **HOW TO TREAT:**

<u>Step 1</u> – Place household items in treatment bag [or other airtight container] to treat. **Important: Leave air space at top of bag and pack items loosely**.



#### Step 2

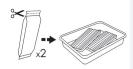
{Option 1 – Peel-Open Pouch} -Remove peel-off seal from two (2) treatment pads to expose the vents.



{Option 2 – Peel-Open Pouch with Burstable Inner Bag} Twist treatment pad pouch to burst inner fluid bag within each pouch. Shake to distribute fluid inside treatment pad pouch, then remove peel-off seal to expose the vent holes.



{Option 3 – Tear-Open Pouch} [Cut] [or] [tear] Open two (2) treatment pad pouches and empty treatment pads into a tray [(provided)] without touching treatment pads.



### Step 3

{Option 1 – Peel-Open Pouch OR Option 2 – Peel-Open Pouch with Burstable Inner Bag} Place two (2) opened treatment pads on top of household items in treatment bag[/container], ensuring vent holes face *upward*. Seal treatment bag[/container] airtight, ensuring vents of treatment pads are not blocked.



{Option 3 – Tear-Open Pouch} Place the tray with treatment pads on top of household items in treatment bag. Seal treatment bag [/container] airtight, leaving airspace at top of bag.



Inspect for tears or punctures - if found, repair with packing tape.

Leave bag [/container] sealed for at least 24 hours at 73°F or higher.

{Option 1 – Peel-Open Pouch & Option 2 – Peel-Open Pouch with Burstable Inner Bag}



{Option 3 - Tear-Open Pouch}



#### **After 24 Hours:**

Open bag in well ventilated area or outdoors. Unplug any electrical devices nearby before opening bag. Do not open bag near sources of spark or open flame. Air out treatment bag before removing items.

[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] [LARGE ELECTRONICS] [AND] [FURNITURE]:

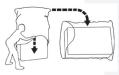
Use this product to kill bed bugs [, dust mites] and their eggs living on the surface and inside cracks and crevices of mattresses[/box-springs] [, bed frames] [large electronics] [and] [furniture].

#### **WHAT YOU NEED:**

- [Mattress] treatment bag [(included)] [(not included)]
- 5 treatment pads [per treatment bag]
- A well-ventilated space, big enough to maneuver items being treated and free of source of spark or open-flame

#### **HOW TO TREAT:**

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.



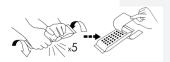


## Step 2:

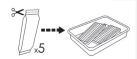
{Option 1 – Peel-Open Pouch} Remove peel-off seals to expose vent holes. [Remove sticker liner from back.]



{Option 2 – Peel-Open Pouch with Burstable Inner Bag} Twist unopen treatment pad pouch to burst inner fluid bag within each pouch. Shake to distribute fluid inside each pouch, then remove peel-off seals to expose vent holes. [Remove sticker liner from back.]



{Option 3 – Tear-Open Pouch} [Cut] [or] [tear] Open five (5) treatment pad pouches and drop treatment pads into a tray [provided] [not included].





#### Step 3:

{Option 1 – Peel-Open Pouch & Option 2 – Peel-Open Pouch with Burstable Inner Bag} Affix five (5) treatment pads to inside of bag [near top] [where indicated] with vent holes facing in. Ensure vent holes are not blocked. Seal bag completely [{if zipper is used} using the closing mechanism] [{if bag opening contains 2-sided tape} by pressing the ends of the

bag together along the entire length of the exposed tape] [{if zip tie is provided} by twisting the open end and securing with [included] tie] [{if tape is provided} by folding or rolling the open end of bag several times and securing with [included] tape]. Inspect bag for airtightness. Repair any holes or damage airtight using tape (e.g. packing tape).

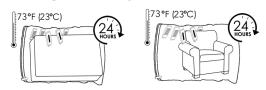


{Option 3 – Tear-Open Pouch} Place the tray containing five (5) treatment pads on top of items being treated inside the treatment bag. Leave space at top of bag. Seal bag completely [{if zipper is used} using the closing mechanism] [{if bag opening contains 2-sided tape} by pressing the ends of the bag together along the entire length of the exposed tape] [{if zip tie is provided} by twisting the open end and securing with [included] tie] [{if tape is provided} by folding or rolling the open end of bag several times and securing with [included] tape]. Inspect bag for airtightness. Repair any holes or damage airtight using tape (e.g. packing tape).

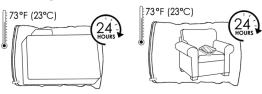


[For best results] leave bag sealed for at least 24 hours at 73 °F or higher.

{Option 1 – Peel-Open Pouch & Option 2 – Peel-Open Pouch with Burstable Inner Bag}



{Option 3 – Tear-Open Pouch}



AFTER 24 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 treated items. [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.

**DISPOSAL/CONTAINER HANDLING**: The product is for one-time application only, and the inner and outer packaging are nonrefillable. Offer used product, packaging, [tray] 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 One Treatment: [X treatment pads] [X King mattress treatment bag(s)]
   [and] [X treatment tray] [X tray]
- Contents: [X treatment pads] [X King mattress treatment bag(s)] [and] [X treatment tray] [X tray]
- 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
- [Cut] [or] [Tear] [Open]

{Optional Graphics}











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

[Alternate Brand Names: Stuff Saver; Mattress Saver; Proof Bed Bug Nest Killer 1; Proof Bed Bug Nest Killer 2; Proof Bed Bug Nest Killer 3; Proof Bed Bug Nest Killer 4; Proof Bed Bug Nest Killer 5; Proof Bed Bug Nest Killer 6; Proof Bed Bug Nest Killer Mattress & Furniture; Proof Bed Bug Nest Killer Luggage & Household Items; Proof Bed Bug Nest Killer Furniture; Proof Bed Bug Nest Killer Furniture; Proof Bed Bug Nest Killer Household Items]

## 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	$1\overline{00.0}\%$

#### 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.]

 $\{ \mbox{\bf Note to Reviewer} : \mbox{ Throughout Sublabel B, any reference to "treatment pad" may be interchangeably expressed as "PROOF Pad" on the final printed label. \}$ 

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

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] [ $1\sim10$  Treatment Bags] [ {if bag is not included} Treatment bag is not included. ]

[1~5 King-Sized Mattress Treatment Bags]

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

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## 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 TREAT [BOOKS] [, LAPTOP/PHONES] [LUGGAGE] [PET BEDDING] [CLOTHES] [AND] [SMALL] HOUSEHOLD ITEMS:

Use this product to kill bed bugs [, dust mites] and their eggs in household items like [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].

[This product can also be used to clear travel items and suitcases of bed bugs after a travel.]

#### **WHAT YOU NEED:**

- Treatment bags [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:**

<u>Step 1</u> – Place items in treatment bag [or other airtight container]. Important: Leave air space at top of bag and pack items loosely.



## Step 2

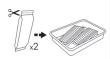
{Option 1 – Peel-Open Pouch} Remove peel-off seal from two (2) treatment pads to expose the vents. [Remove sticker liner from back.]



{Option 2 – Peel-Open Pouch with Burstable Inner Bag} Twist treatment pad pouch to burst inner fluid bag within each pouch. Shake to distribute fluid inside treatment pad pouch, then remove peel-off seal to expose vent holes. [Remove sticker liner from back.]



{Option 3 – Tear-Open Pouch} [Cut] [or] [tear] Open two (2) treatment pad pouches and drop treatment pads into a tray [(provided)] without touching the pads.



#### Step 3

{Option 1 – Peel-Open Pouch & Option 2- Peel-Open Pouch with Burstable Inner Bag} Place two (2) treatment pads on top of items in treatment bag, ensuring vent holes face upward. Prevent items from contacting vents. Seal treatment bag airtight[/container], ensuring vents of treatment pads are not blocked.



 $\{Option\ 3-Tear-Open\ Pouch\}$  Place the tray containing treatment pads on top of items in treatment bag. Seal treatment bag airtight, leaving space at top of treatment bag.



Inspect for tears or punctures - if found, repair with packing tape.

Leave bag[/container] sealed for at least [24 hours] [48 hours] at [{for 24-hr treatment time} 73°F or higher] [{for 48-hr treatment time} 70°F or higher].

 $\{Option\ 1-Peel-Open\ Pouch\ \&\ Option\ 2-Peel-Open\ Pouch\ with\ Burstable\ Inner\ Bag\}$ 

[{for 48 hr treatment time}

{Alternatively, for 24 hr treatment time}





{Option 3 – Tear-Open Pouch}

[{for 48 hr treatment time}

{Alternatively, for 24 hr treatment time}





#### After [24] [48] Hours:

]

]

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 before removing treated items. [Do not reuse treatment bag.]

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

## TO TREAT [MATTRESSES] [, BOX-SPRINGS] [, BED FRAMES] [AND] [FURNITURE] [CURTAINS] [LARGE ELECTRONICS/TELEVISIONS]:

{Option 1} Use this product to kill bed bugs [, dust mites] and their eggs living on the surface and inside cracks and crevices of mattresses [, box-springs] [and] [, bed frames].

*{Option 2}* Use this product to kill bed bugs [, dust mites] and their eggs in furniture such as a couch [, chair] [, table] [curtains/drapes] [or] [large electronics such as televisions] and other items which can be placed in a treatment bag.

*{Option 3}* Use this product to kill bed bugs [, dust mites] and their eggs living on the surface and inside cracks and crevices of mattresses, box-springs, furniture, large electronics and other items which can be place in a treatment bag.

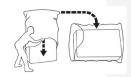
#### **WHAT YOU NEED:**

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

### **HOW TO TREAT:**

### Step 1:

{Option 1 - Mattress/box-spring Treatment} 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.



{Option 2 – Furniture Treatment} Place items inside treatment bag carefully to avoid damaging the bag. Do not attempt to place heavy or large items in bag by yourself.



{Option 3 – Mattress & Furniture Treatment} For Mattress: 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 Other Furniture: Place items inside treatment bag carefully to avoid damaging the bag. Do not attempt to place heavy or large items in bag by yourself.



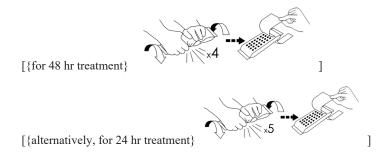


#### Step 2:

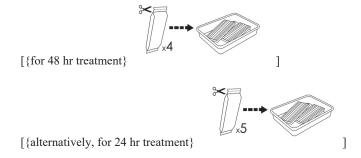
 $\{Option\ 1-Peel-Open\ Pouch\}$  Remove peel-off seals to expose vent holes. [Remove sticker liner from back.]



{Option 2 – Peel-Open Pouch with Burstable Inner Bag} Twist unopen treatment pad pouch to burst inner fluid bag within each pouch. Shake to distribute fluid inside each pouch, then remove peel-off seals to expose vent holes. [Remove sticker liner from back.]



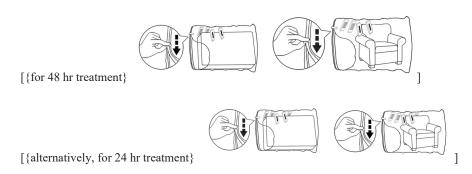
{Option 3 – Tear-Open Pouch} [Cut] [or] [tear] Open [{48 hr treament} four (4)] [{24 hr treatment} five (5)] treatment pad pouches and empty treatment pads into a tray [(provided)] [(not included)].



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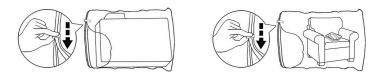
#### Step 3:

{Option 1 – Peel-Open Pouch & Option 2 – Peel-Open Pouch with Burstable Inner Bag} Affix [five (5)] [four (4)] treatment pads to inside of bag [near top] [where indicated] with vent holes facing in. Ensure vent holes are not blocked. Seal bag completely [{if zipper is used} using the closing mechanism] [{if bag opening contains 2-sided tape} by pressing the ends of the bag together along the entire length of the exposed tape] [{if zip tie is provided} by twisting the open end and securing with [included] tie] [{if tape is provided} by folding or rolling the open end of bag several times and securing with [included] tape]. Inspect bag for airtightness. Repair any holes airtight using tape (e.g. packing tape).



#### {Option 3 – Tear-Open Pouch}

Place the tray containing [five (5)] [four (4)] treatment pads on top of items being treated inside the treatment bag. Leave space at top of treatment bag. Seal bag completely [{if zipper is used} using the closing mechanism] [{if bag opening contains 2-sided tape} by pressing the ends of the bag together along the entire length of the exposed tape] [{if zip tie is provided} by twisting the open end and securing with [included] tie] [{if tape is provided} by folding or rolling the open end of bag several times and securing with [included] tape]. Inspect bag for airtightness. Repair any holes airtight using tape (e.g. packing tape).

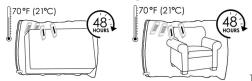


[For best results] leave bag sealed for at least [{if 4 treatment pads are used} 48 hours at 70 °F or higher] [{if 5 treatment pads are used} 24 hours at 73 °F or higher].

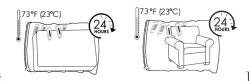
**AFTER [48] [24] HOURS:** Open bag in well ventilated area or outdoors, away from heat, spark or open flame. Unplug any electrical devices nearby. Air out [for 30 minutes] before

removing treated items. [Treated items can be used immediately.]

{Option 1 – Peel-Open Pouch & Option 2 – Peel-Open Pouch with Burstable Inner Bag}

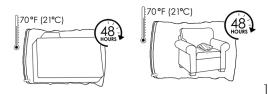


[{for 48 hr treatment}

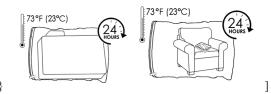


[{alternatively, for 24 hr treatment}

{Option 3 – Tear-Open Pouch}



[{for 48 hr treatment}



[{alternatively, for 24 hr treatment}

[Vacuuming surfaces after treatment is highly recommended.]

#### 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. **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, [tray] 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 bug[s] [nests] [where they nest] [and their eggs] [in one treatment] [that may cause itchy bites or allergic reactions]
- Kill the [bed bug] nest to stop the bites
- Kills bed bugs that may disrupt your sleep
- Kills bed bug[s] [nests] [where they nest] [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] [in and around bed bug nests]
- Kills dust mite eggs [to prevent reinfestation]
- Include in your [regular] [Spring] cleaning [routine]
- Add to your [regular] [Spring] cleaning [routine]
- Kills 100% bed bug[s] [nests] [, dust mites] [and their eggs] [in just one treatment] [in a single treatment] [when used as directed]
- [Scientifically] [Proven]100% effective\* [in killing bed bugs, dust mites and eggs]
   [bed bug and dust mite killer] [bed bug nest killer] [in killing bed bug nests] [in killing nesting bed bugs] [for bed bug nests] [guaranteed\*\*] [\*when used as directed]
- Also kills dust mites
- Penetrates deep to kill 100% of bed bugs [, their nests] [& eggs]
- Kills bugs sprays can't reach
- [Proof] Bed Bug Nest Killer
- Protect your family [and stuff] [from bed bugs]
- [Custom-] designed to kill bed bugs [where they hide] [where they nest]
- 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 nests in and around beds and leave those nests at night to feed. They cause itchy bites, psychological effects, and sometimes allergic symptoms.
- [Facts:] Bed bugs roam the whole room. [As they multiply, they will gather in 'nests' that sprays can't reach to hide and lay eggs.]
- There are two types of bed bugs, the bed bugs you see & the hiding bed bugs and eggs you don't see. Most sprays target the bed bugs you can see. To truly stop bed bug bites for good you need to kill the bed bugs where they are hiding the nests. TER-RTU3 Bed Bug Pad penetrates deep to kill bed bugs and eggs in places sprays cannot reach. Bed bugs can nest almost anywhere. Finally, there is a way to kill them!
- [Myth:] Bed bugs only live in your bed.
- Can be used to treat pet bedding Treat(s) [hard-to-treat] household items
- [To solve bed bug problems] Treat the whole room, not just the bed.
- Treat(s) [hard-to-treat] personal items
- Treat(s) [hard-to-treat] [small] household items
- Treat(s) [hard-to-treat] clutter
- Treat(s) [hard-to-treat] electronics
- Treat(s) [hard-to-treat] [fabrics and] clothing
- Treat(s) [hard-to-treat] [backpacks and] luggage
- Treat(s) [hard-to-treat] furniture
- Treat(s) [hard-to-treat] [whole] mattress [to kill bed bugs] [and stop the bites]
- Treat(s) non-washable items
- Mattress & Furniture
- Treat(s) large sized items
- Luggage & Household Items
- Treat(s) small/medium sized items
- Bag your items for complete bed bug kill
- Works on difficult to treat items [such as books, shoes, clothing, purses, electronics, curtains, backpacks, luggage, furniture, 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]
- Contains X [mattress treatment bags] [up to king size mattress] [large treatment bags]
- Contains X [treatment bag(s)]
- [Neem oil based] botanical [biopesticide] [treatment]
- Easy and clean [plant-based treatment]
- Fast and Easy
- Non-staining
- Does not stain
- No [sticky] [oily] [annoying] residue

- Plant-based [vapor] treatment
- Guard against bed bug infestation
- Use to clear travel items [, suitcases] [backpacks] [and] [luggage] 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 disinfesting your belongings [from bed bugs and their eggs]
   \*when used as directed
- 100% effective\* in disinfesting 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)]].
- Use Proof Bed Bug & Dust Mite Killer spray on cracks and crevices.
- 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)
- 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]
- [{48 hr treatment}4][{24 hr treatment} 5]Treatment Pads for each Treatment Bag

- A well-ventilated space, big enough to maneuver a mattress and free of source of spark, open-flame or heat
- Bugproof your life.
- S Size Contains: 2x Treatment Pads, 1x Treatment Bag
- M Size Contains: 2x Treatment Pads, 1x Treatment Bag
- L Size Contains: [4x] [5x] Treatment Pads, 1x [Large] Treatment Bag
- XL Size Contains: [4x] [5x] Treatment Pads, 1x Mattress Treatment Bag [(up to King Size Mattress)]

Size	Use TER-RTU3 Bed Bug Pad on household items such as:
XL	{Graphical representation of bed, mattress, bed frames, or other larger pieces
	of furniture like sofa, cupboard, dining table}
L	{Graphical representation of smaller furniture like couch, chair, drawer, TV
	stand, or other large electronics like television}
M	{Graphical representation of luggage, backpack, curtain, vacuum machine,
	brief case, table lamp}
S	{Graphical representation of books, cell phone, shoes, laptop, or other clutter}

	Use TER-RTU3 Bed Bug Pad on household items such as:
Mattress &	{Graphical representation of bed, mattress, or other larger pieces of
Furniture	furniture like sofa, chair, drawer, dining table, or TV stand}
Luggage &	{Graphical representation of luggage, backpack, curtain, vacuum
Household	machine, brief case, table lamp, books, cell phone, shoes, laptop, or
Items	other clutter}

#### [Bed Bug Treatment] Tips

- Identify
  - Usually, the first sign of bed bugs is itchiness from bites. It is difficult to identify bed bugs from just the bites but being bitten several nights in a row may be an indication that you may have bed bugs.
  - Inspect areas around bed for physical evidence of bed bugs. Look for adult bugs (size and shape of an apple seed), nymphs or eggs (white, translucent, ~1.5mm in length). Also look for cast-skins or dark brown/black "pepper-sized" bed bug fecal spots.

#### Sort

- All loose items in the room are ideal places for bed bugs to [nest and] 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.

#### 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. [A vacuum that can filter particles as small as 0.09 inches (2.5mm the size of bed bug eggs) is recommended to avoid spreading bed bug eggs or small nymphs.] 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).
- [Furniture] Use TER-RTU3 Bed Bug Pad to treat furniture that can fit into the provided treatment bag. Alternatively, you can treat all surfaces of large, heavy furniture with a spray insecticide like Proof Bed Bug & Dust Mite Killer. Always follow the spray insecticide's label carefully.
- [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 wash them. [Always heat-dry first, then wash.] Alternatively, these may also be treated with TER-RTU3 Bed Bug Pad inside a [treatment] [garbage] bag.
- [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] [nesting] 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).
- 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,] an escapeproof bag and transferred to a clothes dryer on high heat for 30 minutes to kill any
  bugs and egg. Alternatively, clothing may 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.
- 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}









TER-RTU3 Bed Bug Pad v3.1 2 Nov 2018Aug 10, 2020 Text in [ ] is optional language. Text in { } is note to reviewer.

