



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 23, 2022

Jeremy Malone
Consultant for HHL Group Limited
c/o
Spring Trading Company
203 Dogwood Trail
Magnolia, TX 77354

Subject: Label Amendment and Registration Review Label Mitigation for Permethrin—
Addition of language from the Permethrin Interim Decision.
Product Name: Vital Protection 0.5%
EPA Registration Number: 93511-2
Application Date: November 12, 2020
Decision Number: 569801 and 582176

Dear Mr. Malone:

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

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the Registration Review of the above referenced product in connection with the Permethrin Interim Decision, and has concluded that your submission is acceptable.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process.

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Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Jennifer Gaines by phone at (202) 566-2685, or via email at gaines.jennifer@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Fertich". The signature is written in a cursive style with a large initial "E".

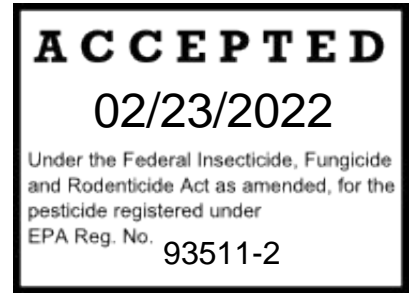
Elizabeth Fertich
Product Manager 4
Invertebrate-Vertebrate Branch 1
Registration Division
Office of Pesticide Programs

Enclosure

VITAL PROTECTION 0.5%

Vital Protection is a textile spray treatment to protect the wearer from mosquitoes, ticks and chiggers and also as a surface spray to protect against bed bugs, fleas and lice. Clothes treated with Vital Protection protect the user by repelling and killing mosquitos including those that may carry/transmit Zika virus and West Nile virus and ticks which may cause Lyme disease.

ACTIVE INGREDIENT: Permethrin*:0.5%
OTHER INGREDIENTS:99.5%
TOTAL:.....100.00%



*Cis/Trans Ratio: min. 42% (±) cis and max. 58% (±) trans.

[] Denotes Alternate Text.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID STATEMENTS	
If on Skin or Clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If In Eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses after the first 5 minutes, then continue rinsing. • Call a poison control center or doctor for treatment advice.
HOT LINE NUMBER	
Have the container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact the National Pesticide Information Center (NPIC) at 1-800-858-7378 for emergency medical treatment information.	

See [front][back][side][bottom][panel][leaflet][insert][inside][box][panel][precautions][precautionary statements].

- NET CONTENTS:**
- 100 ML (3.38 FL OZ)
 - 170 ML (6 FL OZ)
 - 220 ML (9 FL OZ)
 - 350 ML (24 FL OZ)
 - 500 ML (6 FL OZ)
 - 1 Liter (34 FL OZ)

MANUFACTURED BY:
HHL Group Limited
Winter Hill House, Station Approach
Marlow, Buckinghamshire, UK
England

EPA Reg. No. 93511-2
EPA Est. No. 93511-XXX-X

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Caution. Harmful if absorbed through skin. Causes moderate eye irritation. Avoid contact with skin, eyes, or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Wear long-sleeved shirt and long pants, socks, shoes and waterproof gloves. Remove and wash contaminated clothing before reuse. Wear goggles or face shield when handling.

ENVIRONMENTAL HAZARDS

This pesticide is extremely toxic to aquatic organisms, including fish and invertebrates. To protect the environment, do not allow pesticide to enter or runoff into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area.

This pesticide is highly toxic to bees and other pollinating insects exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees or other pollinating insects are foraging in the treatment area.

PHYSICAL OR CHEMICAL HAZARDS

Do not use or store near open heat or open flame. Do not mix or allow contact with oxidizing agents. Hazardous chemical reaction may occur.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labelling.
READ ENTIRE LABEL BEFORE EACH USE.

USE RESTRICTIONS:

FOR BOTH INDOOR AND OUTDOOR USE

Entry Restrictions:

Except when applying as a fabric treatment, do not allow adults, children, or pets to enter until sprays have dried.

Application Restrictions:

Do not apply the product directly to human skin or to domestic animals.

Do not breathe dust, vapors, or spray mist.

Do not apply when food is present.

In the home, cover all food processing surfaces and utensils during treatment or thoroughly wash before use. Cover or remove exposed food.

Not for broadcast use on indoor residential surfaces.

Do not use in aircraft cabins.

Not for use in outdoor residential misting systems.

Affix trigger, pump or other type sprayer to container for application. Do not transfer to another container.

SHAKE WELL BEFORE USING.

Do not contaminate food and feedstuff. Remove pets and birds and cover fish aquariums before surface applications. Do not use on humans. Do not allow children or pets to contact treated areas until surfaces are dry.

Do not use in commercial food/feed handling establishments, restaurants or other commercial facilities where food is commercially prepared, processed, or served. Do not use in institutions, schools, office buildings or similar commercial buildings.

TO CONTROL CARPET BEETLES: Spray edges of carpeting and under carpeting and rugs. Make localized application to floor and baseboards. Spray directly into cracks, crevices and infested areas of shelving.

TO CONTROL BED BUGS: Spray mattresses lightly, particularly around tufts and seams. Take beds apart and spray in all joints. Allow to dry thoroughly before remaking bed. Treat baseboards, mouldings and floors.

TO CONTROL FLEAS (ADULTS AND LARVAE) AND TICKS, INCLUDING TICKS WHICH MAY CARRY LYME DISEASE (ADULTS AND LARVAE):

Thoroughly spray infested areas, pet beds, resting quarters, nearby cracks and crevices, along and behind baseboards, mouldings, window and door frames. Apply as a spot treatment to floors and floor coverings. Fresh bedding should be placed in animal quarters following treatment. Repeat treatment every 35 days as needed. Allow to dry thoroughly before allowing pets to contact treated areas. To control the source of flea infestations, treat your pet with a product registered for animal application. Also, treat your yard with a product registered for yard application.

TO CONTROL CLOTHES MOTHS: Remove any infested articles from storage, brush thoroughly and air for several hours in sunlight if possible. Apply spray liberally to empty chests, closets, bureaus and other storages directing the spray into cracks, joints and crevices. After airing, infested articles may be treated lightly keeping nozzle at least three feet from fabric to avoid staining.

TO KILL LICE AND LOUSE EGGS: Spray in an inconspicuous area to test for possible staining or discoloration. Inspect again after drying then proceed to spray entire area to be treated. Spray from a distance of 8 to 10 inches. Treat only those garments and parts of bedding including mattresses and furniture that cannot be either laundered or dry-cleaned. Allow all treated articles to dry thoroughly before use.

USE INSTRUCTIONS FOR CLOTHING TREATMENT:

For protection against Ticks (including those which may carry Lyme disease), chiggers and mosquitoes, apply product as directed below. For further protection, use in conjunction with an insect repellent registered for direct application to the skin and utilize the following primary preventive measures. Avoid areas where the pests are found, wear appropriate protective clothing (light-colored, long-sleeved shirt and long pants tucked into socks) and inspect body daily for ticks. Pant cuffs should be worn inside the socks or footwear to ensure full protection against ticks and chiggers.

INITIAL TREATMENT INSTRUCTIONS:

1. Select a well-ventilated outdoor area protected from wind and lay out the clothing to be treated (as complete outfit; shirt, trousers and socks).
2. Spray about 6 to 8 inches from surface of the [article or] clothing and spray with a slow Sweeping motion to lightly moisten the surface of the fabric.
3. Continue spraying over entire [article or] outfit, until the outer surface of the fabric is moist enough to cause a slight color change or darkening. Pay special attention to socks, trouser cuffs and shirt cuffs.
4. Turn the [article or] clothing over and treat the other side as described in steps 2 & 3.
5. Hang the treated [article or] clothing and allow to dry for at least 2 hours (4 hours under humid conditions) before wearing.

RETREATMENT INSTRUCTIONS:

This product contains an active ingredient which actually binds to the fabric being treated, providing residual protection which lasts a minimum of six weeks, and holds up through several machine washings. **DO NOT RETREAT CLOTHING MORE THAN ONCE EVERY SIX WEEKS. LAUNDRER CLOTHING AT LEAST ONCE BEFORE RETREATING.** For retreatment, follow instructions for initial treatment.

INITIAL TREATMENT INSTRUCTIONS ON NETS, TENTS, SLEEPING BAGS AND BACKPACKS:

Do not treat inside of sleeping bag. Spray exterior surfaces of tent only.

Select a well-ventilated outdoor area protected from wind and lay out article to be treated. Spray about 6 to 8 inches from surface of the article and spray with a slow sweeping motion to lightly moisten the surface of the fabric. Continue spraying over entire article, until the outer surface of the article is moist enough to cause a light color change or darkening. Turn the article over and treat the other side as described in steps 2 and 3. Hang the treated article and allow to dry for at least 2 hours (4 hours under humid conditions) before using.

RETREATMENT INSTRUCTIONS:

This product contains an active ingredient that actually binds to the fabric being treated, providing residual protection that lasts a minimum of six weeks. **DO NOT RETREAT ARTICLES MORE THAN ONCE EVERY SIX WEEKS.** For retreatment, follow instructions for initial treatment.

STORAGE AND DISPOSAL

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

PESTICIDE STORAGE

Store in a cool, dry area. Always store pesticides in the original container. Store away from food and pet food.

PESTICIDE DISPOSAL

Wastes resulting from the use of this product may be disposed on site or at an approved waste disposal facility. Do not pour or dispose down-the-drain or sewer. Call your local solid waste Agency for local disposal options.

CONTAINER HANDLING

Non-refillable container. Do not reuse or refill this container.

If empty:

Place in trash or offer for recycling if available.

If partly filled:

Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[02/22/2022]