



KILTRONXTM
kiltronx enviro systems llc



Understanding Industry Designations on Pesticide Product Labels

LURE. TRAP. KILL. PREVENT.
anything else is a cover up.

www.KiltronX.com | 877.5VAMPIRE
877.582.6747

63 Flushing Ave.
Brooklyn Navy Yard
Brooklyn, NY 11205

©2010 KiltronX Enviro Systems LLC.
All rights reserved.

KILTREXTM
fabric bedbug shield

Made in the United States of America



Kiltronx Enviro Systems LLC Products

FDA GRAS | FIFRA Compliant | EPA Exempt

KiltronX Enviro Systems LLC manufactures KiltreX Fabric™, which kills bedbugs, fleas, ticks, mites, palmetto bugs, roaches, cockroaches, German cockroaches, silverfish and carpet beetles with a proprietary food-grade formulation. When installed according to directions, and left in place, KiltreX Fabric also prevents insects from generating re-infestations. KiltreX Fabric is FDA GRAS, FIFRA Compliant and EPA Exempt. Our patent pending proprietary formula is safe when used as directed in homes, commercial buildings, and transportation systems. KiltreX Fabric is made in the USA.

Products currently distributed for sale under the Kiltrex Fabric, Dream Ezzz Shield™, and PrimaDona Designs™ labels do not require EPA registration, and as such are EPA exempt. KiltronX also manufactures additional commercial-grade products and registers them with the EPA. The company has been issued EPA Registration numbers specifically for each product. However, these products have not been released for distribution. KiltronX maintains an EPA registration number and EPA Establishment number, pursuant to filing under Section 7 of (FIFRA), for pesticide-producing establishments. The EPA-issued company and establishment registration numbers issued to Kiltronx Enviro Systems are not applicable to products that KiltronX currently distributes.

Background on Federal Regulations and Designations

Products that kill insects are called pesticides. Some pesticides may be natural and organic. Others may be composed of synthetic or hazardous chemical formulations. Even natural and organic formulations can be hazardous in super concentrations. That's why every pesticide — even food-grade substances that are generally recognized as safe — must carry appropriate labeling that informs consumers of ingredients and protects consumers against false claims. And, labels must explain any guarantee that is referenced.

Highlights of Regulatory History

The first pesticide control law was enacted in 1910. This law was primarily aimed at protecting consumers from ineffective products and deceptive labeling. When the FIFRA was first passed in 1947, it established procedures for registering pesticides with the U.S. Department of Agriculture and established labeling provisions. The law was still, however, primarily concerned with the efficacy of pesticides and did not regulate pesticide use.

FIFRA was essentially rewritten in 1972 and amended by the Federal Environmental Pesticide Control Act (FEPCA). The law has been amended numerous times since 1972, including some significant amendments in the form of the Food Quality Protection Act (FQPA) of 1996.

Since the FEPCA amendments, EPA is specifically authorized to: (1) strengthen the registration process by shifting the burden of proof to the chemical manufacturer, (2) enforce compliance against banned and unregistered products, and (3) promulgate the regulatory framework missing from the original law.

— Source: Environmental Protection Agency

LURE. TRAP. KILL. PREVENT.
anything else is a cover up.

www.KiltronX.com | 877.5VAMPIRE
877.582.6747

63 Flushing Ave.
Brooklyn Navy Yard
Brooklyn, NY 11205

©2010 KiltronX Enviro Systems LLC.
All rights reserved.

What the term “FIFRA Compliant” Means for You

The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) was established to regulate pesticide distribution, sale and use. FIFRA empowers the Environmental Protection Agency (EPA) with the authority to oversee the sale and use of pesticides and make sure that labeling meets regulatory standards. All pesticides distributed or sold in the United States must be registered (licensed) by EPA. Before EPA may register a pesticide under FIFRA, the applicant must show, among other things, that using the pesticide according to specifications "will not generally cause unreasonable adverse effects on the environment."

According to the EPA, FIFRA defines “unreasonable adverse effects on the environment” to mean: '(1) any unreasonable risk to man or the environment, taking into account the economic, social, and environmental costs and benefits of the use of any pesticide, or (2) a human dietary risk from residues that result from a use of a pesticide in or on any food inconsistent with the standard under section 408 of the Federal Food, Drug, and Cosmetic Act."

Products that are FIFRA compliant demonstrate adherence to EPA guidelines that ensure all product claims regarding ingredient thresholds and efficacy claims and guarantees have been tested, officially reviewed, and found to comply with Federal standards. EPA enforcement safeguards consumers from risky pest-control substances or falling prey to fraudulent claims. Through EPA, FIFRA governs reporting and communication regarding the nature and effectiveness of pesticides.

FIFRA empowers the EPA to review and regulate pesticide labels and associated claims, and ingredients. Under FIFRA, the EPA's job is to make sure that labeling is forthright, that pest control manufacturers properly label ingredients, and provide appropriate disclaimers and or warranty statements.

The EPA guidelines specifically address words that may be used to qualify language about pesticide products. FIFRA Section 2(p)(2) — which refers to labels and all other written, printed, or graphic material accompanying a pesticide or device at any time — mandates that the EPA regulate the use and sale of pesticides to protect human health and preserve the environment.

The EPA must approve pesticide labels before a pesticide may be sold or distributed in the United States, unless the substances used in that pesticide have been predetermined by regulatory agencies to meet safety and regulatory standards by prior testing and evaluation. In those cases, the pesticide may be declared EPA Exempt.

Under FIFRA regulations, all pesticide products (insecticides, fungicides and rodenticides) must clearly label active and inert ingredients, and take caution when making representative statements about product effectiveness quality, and ingredients both on the label or in accompanying literature. All such printed material must comply with FIFRA regulations, or undergo evaluation by the EPA as appropriate.

Before non-FIFRA-compliant pesticide products may be released for market, they must comply with all EPA labeling criteria for pesticide ingredients and claims, and must include their EPA registration and location numbers on every product. An EPA number is specifically attributed to a particular product only. Each product must qualify independently of other products in a product line.

— Source: Environmental Protection Agency

How to Protect Yourself

Read labels carefully. Learn the criteria for product designations and make an informed purchase. Research the brands you choose and choose a brand you trust.

Material Safety Data Sheets (MSDS)

Pesticide manufacturers are required to submit Material Safety Data Sheets (MSDS) for product review and approval by the EPA. An MSDS is required for substances primarily intended for use in occupational settings. The MSDS provides details about a particular chemical or compound used in a product. It is required wherever chemicals are used, and lists information about

exposure risks, safety and environmental impact. The MSDS provides for the safety of workers and emergency personnel by specifying procedures for handling the product in a safe way. It may include information on ingredients, poison control, melting point, boiling point, flash point, toxicity, health effects, first aid, reactivity, storage, protective equipment, storage, spill handling and disposal.

— Source: Wikipedia

What We Mean by “FDA GRAS”

Kiltronx Enviro Systems Products are FDA GRAS. According to the U.S. Food and Drug Administration (FDA), the term GRAS is an acronym for the phrase Generally Recognized As Safe.

Under sections 201(s) and 409 of the Federal Food, Drug, and Cosmetic Act (the Act), any substance that is intentionally added to food is a food additive, which is subject to premarket review and approval by FDA, unless the substance is generally recognized, among qualified experts, as having been adequately shown to be safe under the conditions of its intended use, or unless the use of the substance is otherwise excluded from the definition of a food additive.

The use of a food substance may be GRAS either through scientific procedures or, for a substance used in food before 1958, through experience based on common use in food.

- Under 21 CFR 170.30(b), general recognition of safety through scientific procedures requires the same quantity and quality of scientific evidence as is required to obtain approval of the substance as a food additive and ordinarily is based upon published studies, which may be corroborated by unpublished studies and other data and information.
- Under 21 CFR 170.30(c) and 170.3(f), general recognition of safety through experience based on common use in foods requires a substantial history of consumption for food use by a significant number of consumers.

— Source: U.S. Food and Drug Administration



Kiltrex Organic Super Powder™

Mother Earth's Own Bedbug Remedy™

KiltreX Organic Super Powder, also known as Kiltrex Powder™ is a proprietary formulation that meets labeling criteria for a natural and organic, food-grade substance. Kiltrex Powder, and all elements of the comprehensive Kiltronx Product Suite, are pyrethrin free. Kiltrex Powder includes specially milled, food-grade diatomaceous earth, which serves as an inert carrier for natural ingredients, along with Fuller's Earth, sawdust, and amorphous silica. As such, Kiltrex Powder meets FDA test criteria to be labeled as a formulation that is Generally Recognized as Safe, according to the scientific procedures discussed above. This proprietary formulation of ingredients is safe for use as directed, FIFRA compliant and EPA exempt. KiltreX Powder is used in KiltreX Fabric to kill bedbugs and other insects. KiltreX Fabric has been university tested and proven 100% effective in killing bedbugs. When left in place, and used according to directions, KiltreX Fabric can help prevent a bedbug reinfestation.

Active Ingredients: 1-malic acid, 2-phenethyl propionate, 3-potassium sorbate, 4-rosemary, 5-eugenol, 6-thyme, 7-sodium lauryl sulfate, and 8-lemon grass oil. Each active ingredient represents one to five percent of formulation in a proprietary carrier of minimal risk inert ingredients, including diatomaceous earth, Fuller's earth, sawdust, and amorphous silica. Ingredients total 100% of formulation.

Product Guarantee: Kiltronx Enviro Systems, LLC offers a 30-Day Money-Back Guarantee on products. Products are guaranteed effective when used as directed. To obtain a refund, customers are required to register their product purchase at www.KiltronX.us and return the product to:

KiltronX Enviro Systems, LLC
Brooklyn Navy Yard
Building 3, Suite 805
Brooklyn, NY 11210

www.KiltronX.us
1.877.5.VAMPIRE
1.877.5.6747