

The EPA recently issued new guidelines on electrostatic sprayers, which is attached. Victory views the new EPA guidelines as a positive. A summary of the guidelines, and the potential impact on Victory, is below.

Summary of EPA Guidance	Impact to Victory
Guidance give chemical companies an expedited path to add electrostatic instructions to the label	 Increases the universe of chemicals that professionals and end-users can utilize with confidence when using electrostatic sprayers Based on Victory's call with EPA on July 9th, 2020, using an electrostatic sprayer is not a FIFRA violation and will continue to be that way
Adds a particle size minimum of 40 microns	• Eliminates foggers as an approved device, as particle size is smaller than EPA guidelines
Adds a wetness test for electrostatic sprayers	 This is a competitive advantage for Victory, compared to alternative solutions Competitors will struggle to balance user instructions and spray distance with the numerous dwell times required for the kill claims pertaining to multiple bacteria and viruses
Adds a testing requirement to confirm distance from which chemical needs to be sprayed	Competitors' optimum spray distance (more than 6 ft) will work against their ability to get higher dwell times and coverage, which will reduce their efficacy rates
Review process is confirmatory in nature	Chemical companies do not need to re-register and can add labels immediately that state efficacy when sprayed through Victory's electrostatic sprayer
Chemical companies are required to provide users with instructions to achieve dwell times with each specific brand of electrostatic sprayer including the optimal spraying distance for each device	 Any water-based chemical can achieve required dwell time through Victory sprayer's proprietary variable nozzle size and double charging technology
Provides guidance on PPE to use based on vapor pressure of chemicals	Chemical companies will need to provide varying instructions for each chemical when used with a competitor

