

Memorandum

Date: March 20, 1981

Subject: EPA File Symbol: 44599-R CAUBO REPELLENT
Caswell # 346

From: Cheryl A. Peterson
IRB/TSS

To: Mr. Franklin D.R. Gee
Product Manager (17)

Applicant: Claubo Corp.
413 W. Henry Street
Savannah, GA 31401

Active Ingredients:

N,N-diethyl-m-toluamide.....9.5%
Other isomers.....0.5%

Inert Ingredients.....90.0%

Background:

This product is intended for human topical use as a repellent against gnats, flies and mosquitoes. The company has submitted an application for conditional registration of a new product. The "cite-all" method of support is being used, and no data have been submitted.

Recommendations:

1. IRB/TSS would have no objection on the basis of acute toxicological considerations to the conditional registration of the above product under the "cite-all" method of support with the labeling revisions indicated below.
2. Prior experience with products similar to this one indicates that the appropriate signal word for this product is WARNING. The inert ingredients, namely those with emollient properties, increase the absorption of the material into the eye. Similar products have produced corneal opacity in primary eye irritation studies due to this characteristic. Therefore, IRB/TSS recommends this product be classified in Toxicity Category II on the basis of eye effects. Information submitted in the future, if the applicant so desires, in the form of a primary eye irritation^{study} conducted on the above product would aid in further evaluation of its acute toxicity.
3. Similar products are not currently subject to child-resistant packaging.

4. The above recommendations apply for conditional registration of the above product. Full registration of this product would entail a primary eye irritation study and a dermal sensitization study. -2-

Labeling:

1. The appropriate signal word for this product is WARNING.
2. The PRECAUTIONARY STATEMENTS should be similar to the following:

WARNING: Causes eye irritation. Do not get in eyes. Harmful if swallowed. Avoid contact with lips. Do not allow children to rub eyes if hands have been treated. In case of contact, immediately flush eyes and lips with plenty of fresh water. Get medical attention if irritation persists.

front label

CIAUBO

REPELLENT

REPELS MOSQUITOS, GNATS, FLIES

ACTIVE INGREDIENT:	N,N-diethyl-m-toluamide	9.5%
	Other Isomers	.5%
INERT INGREDIENTS:		90.0%
Total		100.0%

4 FL. OZ.

KEEP OUT OF REACH OF CHILDREN

CAUTION

See side panel for additional precautionary statement

back label

REPELS GNATS, FLIES, AND MOSQUITOES

DIRECTIONS FOR USE

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

APPLY GENEROUSLY TO ALL EXPOSED AREAS

Precautionary Statements
Hazards to Humans

CAUTION

Harmful if swallowed. Avoid contact with eyes and lips. Do not allow children to rub eyes if hands have been treated. In case of contact, immediately flush eyes and lips with plenty of water. Get medical attention if irritation persists.

Disposal: Do not reuse empty container. Wrap container and put in trash collection.