

20 APR 1992

Ms. Julie Spagnoli  
Miles Inc.  
Consumer Household Products Division  
7123 West 65 Street  
Chicago, IL 60638

Dear Ms. Spagnoli.

Subject: Label Amendments Associated with the DEET LIP  
Cutter Evergreen Scent Insect Repellent Stick  
EPA Reg. No. 121-20  
Cutter Insect Repellent Cream  
Evergreen Scent Cutter Insect Repellent Cream -MM  
EPA Reg. No. 121-32  
Submissions: April 6, 1992

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

- 1) Remove the claim of effectiveness "up to five hours" from both products. This claim is not on the last accepted labels and you have provided no justification for placing this claim on the new labels.
- 2) Remove the claim "incredibly effective" from product #121-20 and the claim "gives you the protection you need for a day outdoors" from product #121-32. These claims constitute misbranding as defined in 156.10(a)(5).

Sincerely,

RFM

Richard F. Mountfort  
Product Manager 10  
Insecticide & Rodenticide Branch  
Registration Division (H7505C)

**CUTTER EVERGREEN SCENT INSECT REPELLENT STICK**

Long Lasting Protection  
From Mosquitoes, Chiggers, Gnats  
Ticks, Fleas and Biting Flies

**KEEP OUT OF REACH OF CHILDREN**

**CAUTION**

Read Cautions on Back Panel

Net Wt. 1 oz. (28 gms)

ACCEPTED  
with COMMENTS  
in EPA Letter Dated  
**20 APR 1992**  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.  
121-20

Back Panel

**READ ALL DIRECTIONS BEFORE USING PRODUCT**

**PRECAUTIONARY STATEMENTS:**

**HAZARD TO HUMANS. CAUTION:** May be harmful if swallowed. Avoid contact with eyes, lips, open cuts or irritated skin. May cause skin reactions in rare cases. If so, wash with soap and water. Get medical attention if irritation persists.

**DIRECTIONS:** It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Apply to all exposed skin. For ticks and chiggers, apply around openings of clothing. Do not apply under clothing or to hands of young children. Frequent reapplication is unnecessary. Excess amounts may damage finishes and synthetic fabrics except nylon. After returning indoors, wash treated skin with soap and water.

**DISPOSAL:** Do not reuse empty container. Wrap container and put in trash.

**ACTIVE INGREDIENTS:** N,N-Diethyl-meta-toluamide. 31.35%, other isomers 1.65%.

**INERT INGREDIENTS:** 67%.

Dist. by Miles Inc., Consumer Household Products, Chicago, IL 60638 USA

EPA Reg. No. 121-20

EPA Est. No. 121-YG-1

Mfd. in Yugoslavia

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(back of blister card - supplemental labeling)

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**CUTTER  
LONG LASTING PROTECTION**

Incredibly effective Cutter Evergreen Scent Insect Repellent Stick is easily applied to arms, legs, neck and face. Keeps repellent off your hands, but keeps you free from mosquitoes and other biting bugs for up to five full hours.

**READ ALL DIRECTIONS BEFORE USING THIS PRODUCT**

**PRECAUTIONARY STATEMENT: HAZARD TO HUMANS. CAUTION:** May be harmful if swallowed. Avoid contact with eyes, lips, open cuts or irritated skin. May cause skin reactions in rare cases. If so, wash with soap and water. Get medical attention if irritation persists.

**DIRECTIONS:** It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Apply to all exposed skin. For ticks and chiggers, apply around openings of clothing. Do not apply under clothing or to hands of young children. Frequent reapplication is unnecessary. Excess amounts may damage finishes and synthetic fabrics except nylon. After returning indoors, wash treated skin with soap and water. Wash treated clothing after use.

**DISPOSAL:** Do not reuse empty container. Wrap container and put in trash

**ACTIVE INGREDIENTS:** N,N-Diethyl-meta-toluamide, 31.35%, other isomers, 1.65%

**INERT INGREDIENTS: 67%.**

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