



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

November 6, 2008

Mr. William H. Metzger,
Division Vice-President - Regulatory Affairs
SPECTRUM, Division of United Industries Corporation
P.O. Box 142642
St. Louis, MO 63114-0642

**Subject: Amended Reregistration Label
CUTTER Maximum Strength Insect Repellent Formula 100, EPA Reg. No. 121-25
Your Submission Dated August 20, 2008**

Dear Mr. Metzger:

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 reregistration of CUTTER Maximum Strength Insect Repellent Formula 100 (EPA Reg. No. 121-25), in connection the DEET Reregistration Eligibility Decision (RED), and have concluded that your submission is acceptable with the following label revision provision(s):

Storage and Disposal Statement section comment(s):

1. To facilitate inclusion of language from PR Notice 2007-1, replace the "Container Disposal:" section with: "Container Disposal: **If empty:** Nonrefillable container. Do not reuse or refill this container. 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."

Warranty & Disclaimer section comment(s):

2. Within forty-five (45) days from the date of this letter, SPECTRUM should submit a label amendment revising the "WARRANTY & DISCLAIMER" section (label statement at bottom left-hand side of page 2 of 2, starting with "NOTICE: Buyer assumes ...") in accordance with the guidance document entitled, "Guidance on Warranty Statements," dated October 17, 2006. This update can be found at the following hyperlink:
<http://www.epa.gov/pesticides/regulating/labels/warranty.pdf>
3. The "WARRANTY & DISCLAIMER" section heading must be placed on the top and in a central position above the WARRANTY & DISCLAIMER section.

General Comment(s):

4. Current labels on DEET repellent products tend to dissolve from contact with the repellent (usually liquids). All reregistered DEET product labels must use materials that remain permanent and readable for the reasonable life of the product.

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The Agency is in the process of developing and improving the current Efficacy Assessment Guidelines for repellent products. The Agency intends to defer the determination of any related efficacy data requirements supporting the claims that may appear on this label until these Efficacy Assessment Guidelines are complete. When the guidelines are finalized, the Agency expects to issue a Data Call-In to address the revised guidelines to all registrants with registrations for personal repellent products that have not previously submitted efficacy data sufficiently consistent with the revised guidelines.

Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under FIFRA 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) lists 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 be substantially differ from those claims approved through the registration process. 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 EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions.

If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely Yours,



Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7505P)

Enclosure: Label stamped "Accepted with Comments"
000121-00025 D400839

Front Panel

CUTTER

Maximum Strength Insect Repellent Formula 100

[Maximum strength insect repellent for maximum protection against biting insects • Won't stain • Not greasy or oily • Makes You Invisible to Bugs • Tough on bugs • Effective, dependable protection • Long-lasting, effective protection • Repels mosquitoes, chiggers, ticks, biting flies, no-see-ums, gnats and fleas • Repels biting insects for hours • Long-lasting, effective protection from mosquitoes, chiggers, ticks, biting flies, no-see-ums, gnats and fleas]

ACCEPTED
With COMMENTS
In EPA Letter Dated:

November 6, 2008
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

121-25

ACTIVE INGREDIENT:

DEET 98.11%
OTHER INGREDIENTS 1.89%

KEEP OUT OF REACH OF CHILDREN
WARNING Read cautions on back panel

Net Wt 1 OZ (28 g)

OPTIONAL MARKETING LANGUAGE

[LONG-LASTING PROTECTION THAT'S EFFECTIVE FOR HOURS]

OPTION 1

Cutter Maximum Strength Insect Repellent Formula 100 is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums.

OPTION 2

Cutter Maximum Strength Insect Repellent Formula 100 provides hours of protection from mosquitoes and biting flies. Also repels ticks, chiggers, no-see-ums, gnats, and fleas.

OPTION 3

Cutter Maximum Strength Insect Repellent Formula 100 repels biting insects for hours. It is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums.

OPTION 4

Cutter Maximum Strength Insect Repellent Formula 100 gives you the protection you need for a day outdoors. Used sparingly on arms, legs, neck and face, it keeps you free from mosquitoes and other biting insects for up to five full hours.]

BACK PANEL

STOP. Read and follow all directions and precautions on this product label.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. *For outdoor use only.*

Do not use in enclosed areas. To apply, put a few drops in palm of hand, and rub palms together, then spread evenly over exposed skin. Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. When using on face, apply sparingly, avoiding eyes. Do not apply near eyes and mouth. Apply sparingly around ears. Do not apply over cuts, wounds or irritated skin. Do not apply to sunburned skin. Do not apply to children's hands. Do not allow children to handle this product. When using on children, apply to your own hands and then put it on the child. [For extra protection from [crawling] ticks, chiggers and fleas, apply along all openings of clothing, such as neckband, waistband, pant and sleeve cuffs, sock tops and other areas where insects may crawl under clothing.] Avoid over-application of this product. After returning indoors, wash treated skin with soap and water [and double-check yourself, other family members and pets for ticks.] Wash treated clothing before wearing it again. Will not damage nylon, cotton, or wool. May damage some synthetic fabrics, plastics, watch crystals, leather, painted or varnished surfaces. Use of this product may cause skin reactions in rare cases. If you suspect reaction to this product,

discontinue use, wash treated skin and call your local Poison Control Center. If you go to a doctor, take this product with you.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Store the product in a cool and dry place. Keep out of reach of children. **PESTICIDE DISPOSAL:** If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans

WARNING – Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes. Use of this product may cause skin reactions in rare cases Wash treated clothing before wearing it again. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.

First Aid

If in Eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a Poison Control Center or doctor for treatment advice. **If Swallowed:** Call a Poison Control Center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a Poison Control Center or doctor. Do not give anything by mouth to an unconscious person. **IF YOU SUSPECT A REACTION TO THIS PRODUCT:** Discontinue use. Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for treatment advice.

HOT LINE NUMBER: In case of an emergency call toll free [1-800-767-9927].

Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Questions or Comments? Call 1-800-767-9927

[Visit our web site at www.skeeterbites.com]

Made in the USA for Spectrum,
Division of United Industries Corporation,
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St. Louis, MO 63114-0642