

JUL 14 1998

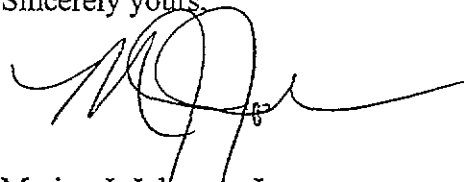
Ms. Kathie J. Tryson  
Spectrum  
Division of United Industries Corporation  
P.O. Box 15842  
St. Louis, MO 63114

Subject: Label Amendment/Efficacy Data  
Cutter Insect Repellent #CA23  
EPA Registration Number: 121-68  
Cutter Original Insect Repellent Pump Spray Formula MMI  
EPA Registration Number: 121-34  
Submissions Dated: March 17, 1998

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to comments listed below:

The data support the eight hour claims against mosquitoes only. Delete the 8 hour claim for fleas, chiggers, ticks, biting flies and no-see-ums from the label. Efficacy data must be submitted or cited to support repellency claims for these hours. The data must prove the specified period of protection in hours.

Sincerely yours,



Marion J. Johnson, Jr.  
Product Manager 10  
Insecticide Branch  
Registration Division 7505c

# Cutter

## Original Insect Repellent Pump Spray Formula MMI

[Unscented • Long lasting protection from mosquitoes, ticks, biting flies, gnats, chiggers, no-see-ums and fleas • Lasts up to 8 hours • With Extender - Provides up to 8 hours of protection • Protection that lasts up to 8 hours • Provides protection for up to 8 hours • Makes you invisible to bugs]

Active Ingredients	
N, N-diethyl-m-toluamide .....	21.85%
Other Isomers .....	1.15%
Inert Ingredients .....	77.00%

KEEP OUT OF REACH OF CHILDREN

WARNING Read cautions on back [panel]

NET 4 FL. OZ. (118 mL)

### OPTIONAL MARKETING CLAIMS

[NOW . . . LONG LASTING PROTECTION WITHOUT UNPLEASANT SCENT

#### OPTION A

Cutter Original Insect Repellent Pump Spray Formula MMI spray provides up to 8 hours of protection from mosquitoes. Also repels biting flies, ticks, chiggers, fleas and no-see-ums. Cutter's unique formula is not greasy, won't stain, and has no unpleasant odor.

#### OPTION B

Cutter Original Insect Repellent Pump Spray Formula MMI provides hours of protection from mosquitoes, and biting flies. Also repels ticks, chiggers, fleas and no-see-ums. Cutter Original Insect Repellent Pump Spray Formula MMI is not greasy, and ideal for those who dislike strong repellent odor.

This pump allows you to hold the bottle and spray at any angle . . . even upside down . . . to cover ankles, legs, even your back.]



[STOP.] READ ALL DIRECTIONS BEFORE USING THIS PRODUCT

### DIRECTIONS FOR USE

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

Hold bottle 6 - 8 inches from skin or clothing while spraying, keeping sprayer pointed away from face. Slightly moisten skin or clothing. For maximum protection on skin, spread by hand after application. Frequent reapplication or saturation is unnecessary. Apply on face by first spraying small amounts in palm of hand and spreading on face and neck. Do not apply to skin under clothing or to the hands of young children. Wash treated skin after returning indoors. To repel ticks, chiggers, and fleas, spray pant cuffs, socks and around openings in outer clothing. Will not damage nylon, cotton or wool.

May damage some synthetic fabrics, plastics, leather, painted or varnished surfaces. Wash treated clothing after use. If you suspect that you or your child is reacting to this product, wash treated skin and call your local poison control center. If you go to a doctor, take this bottle with you.

**DISPOSAL:** Do not reuse empty container. Rinse thoroughly before discarding in trash.

### PRECAUTIONARY STATEMENTS HAZARDS TO HUMANS

**WARNING:** For external use only. May cause eye injury. Do not get in eyes or mouth. Harmful if swallowed. Avoid contact with lips, open cuts or irritated skin. Do not apply to excessively sunburned skin. Do not spray directly on face. Do not spray in enclosed areas and avoid breathing spray mist.

#### FIRST AID

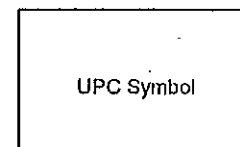
*If Swallowed* - Call a physician or Poison Control Center. Get medical attention. *If on Skin* - May cause skin reactions in rare cases. If so, wash thoroughly with soap and water. Get medical attention if irritation persists. *If In Eyes* - Flush with plenty of water. Get medical attention.

### PHYSICAL/CHEMICAL HAZARDS

**FLAMMABLE:** Do not use or store near heat sources, sparks or open flame.

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

Questions or Comments? Call 800-767-9927



UPC Symbol

Made in the USA for Spectrum Division of United Industries Corporation  
P. O. Box 15842  
St. Louis, MO 63114-0842

EPA Reg. No. 121-34

EPA Est. Nos. 769-GA-1 (S), 44616-MO-1 (G),  
44616-GA-1 (D), 9688-MO-1 (U), 39754-WI-1 (R),  
901-KS-1 (Q), 6658-MO-1 (P)

Circled letter is first letter of lot number.

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ACCEPTED  
with COMMENTS  
In EPA Letter Dated:  
JUL 14 1998

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.

121-34

[Bracketed Text] = Optional Language

page 1 of 1

2062