

MAR 27 2003

Bradley M. Kollath
Spectrum
Division of United Industries Corp.
P.O. Box 15842
St. Louis, MO 63114

Subject: Amended Label For:
Cutter Original Insect Repellent Pump Spray Formula MMI
EPA Registration No. 121-34
Application dated August 4, 1999
Application July 18, 2001

Dear Mr. Kollath:

The proposed amendment to the label and Confidential Statements Of Formula(CSFs) for the product cited above are acceptable subject to the comments listed below:

1) Change the Precautionary Statements to read as follows:

⌘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.⌘

2) Change the First Aid section to read:

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 five 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 by a poison control center or a 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 emergency call toll free(insert number). 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.

3) Add a Storage And Disposal section to read:

PESTICIDE STORAGE: Store the product in a cool and dry place. Keep out of reach of children.

CONTAINER 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 toll free number which meets the criteria in paragraph II.E of PR Notice 2001-6) for disposal instructions. Never place unused product down any indoor or outdoor drain.

This product is not being re-registered at this time. Product specific efficacy data will be required. Once the efficacy guidelines are in place, you will be notified of the efficacy requirements.

Also, to be eligible for reregistration, the product must be packaged in containers utilizing a concave trigger to help aim the product or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes.

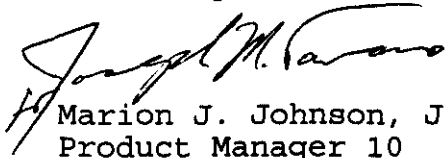
A stamped copy of the revised label is enclosed for your records. Submit two copies of the revised finished label before the product is released for shipment under this amended label.

The CSF date June 11, 2001 for the basic formulation and the CSF dated August 23, 2001 for the alternate formulation are acceptable and have been made a part of the file for this

product.

If you have any questions or comments please contact Joseph Tavano at (703) 305-6411.

Sincerely,



Marion J. Johnson, Jr.
Product Manager 10
Insecticide Branch
Registration Division (7505C)





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 against mosquitoes • With Extender - Provides up to 8 hours of protection against mosquitoes • Protection that lasts up to 8 hours against mosquitoes • Provides protection for up to 8 hours against mosquitoes • Makes you invisible to bugs • It won't stain • Not greasy or oily • Tough on bugs • Effective, dependable protection • Pleasant, effective protection • Repels mosquitoes, chiggers, ticks, biting flies, no-see-ums, gnats and fleas • Repels biting insects for hours • Pleasant, effective protection from mosquitoes, chiggers, ticks, biting flies, no-see-ums, gnats and fleas • Water-based]

Active Ingredient:
 DEET 23.0%
 Other Ingredients 77.0%

KEEP OUT OF REACH OF CHILDREN

WARNING Read cautions on back

NET 4 FL. OZ. (118 mL)

OPTIONAL MARKETING LANGUAGE

[Now . . . Long lasting protection without unpleasant scent

Now . . . Pleasant protection that's effective for hours!]

OPTION 1

Cutter Original Insect Repellent Pump Spray Formula MMI is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Cutter Original Insect Repellent Pump Spray Formula MMI offers long-lasting protection that's never greasy or oily and has no unpleasant odor.

OPTION 2

Cutter Original Insect Repellent Pump Spray Formula MMI provides hours of protection from mosquitoes and biting flies. Also repels ticks, chiggers, no-see-ums, gnats, and fleas. Cutter Original Insect Repellent Pump Spray Formula MMI offers long-lasting protection: it's not greasy and has no unpleasant odor.

OPTION 3

Cutter Original Insect Repellent Pump Spray Formula MMI repels biting insects for hours. It's specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Cutter Original Insect Repellent Pump Spray Formula MMI is never greasy and has no unpleasant odor.

OPTION 4

Cutter Original Insect Repellent Pump Spray Formula MMI spray provides up to 8 hours of protection from mosquitoes. It 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 5

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, and your back.]

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 spray in enclosed areas. Hold bottle 6 - 8 inches from skin and clothing while spraying, keeping sprayer pointed away from face. Slightly moisten skin. Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. [For maximum protection on skin, spread with hand after application.] Do not spray directly onto face. Spray on hands first, and then apply sparingly to face, 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, spray along all openings of clothing, such as neckband, waistband, pant and sleeve cuffs, sock tops and other areas where insects may crawl under clothing.] [Frequent reapplication or saturation is unnecessary.] 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.

DISPOSAL

Do not reuse empty container. Discard in trash.

PRECAUTIONARY STATEMENTS

Hazards to Humans

WARNING - Causes substantial but temporary eye injury. Do not get in eyes. Avoid excessive contact with skin. Wash thoroughly with soap and water after returning indoors. Remove contaminated clothing and wash clothing before reuse. Harmful if swallowed. Harmful if absorbed through skin.

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First Aid

If in Eyes - Hold eyelids open. Flush with a gentle, steady stream of water for 15 minutes. Get medical attention. *If Swallowed* - Call a physician or Poison Control Center. Drink 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Do not induce vomiting or give anything by mouth to an unconscious person. *If on Skin* - Wash with plenty of soap and water after returning indoors. Get medical attention if irritation persists.

Physical/Chemical Hazards

COMBUSTIBLE Do not use or store near heat or open flame.

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

Questions or Comments? Call 800-767-9927

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

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. 9688-MO-1 U , 39754-WI-1 R , 50757-WI-1 V

Circled letter is first letter of lot number.

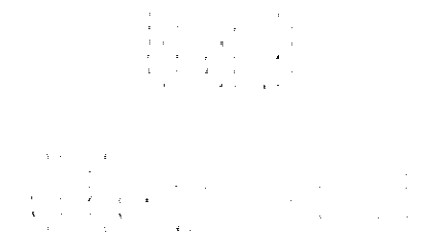
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**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

MAR 27 2003

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

121-34



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