

PM 03

121-56

11/14/97

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SPECTRUM
P.O. Box 15842
8825 Page Boulevard
Saint Louis, MO 63114

Dear Ms Tryson:

Subject: Submission for Label and Formula Amendment
Cutter Insect Repellent #10TL
EPA Reg Number 121-56
Application dated May 23, 1997

The revised Confidential Statements of Formula(basic and alternate) dated May 23, 1997, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended are acceptable. A copy of both statements have been placed in your file as a matter of record.

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. Five copies of finished labeling must be submitted prior to releasing the product for shipment.

On the label, modify all references to the efficacy and duration of the product to state:
"Effective for up to two hours". Delete references to "effective for hours"; this is inconsistent with the terms of the registration of this product.

Sincerely,



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



INSECT REPELLENT #10TL

[Towelette • Pleasant effective protection from mosquitoes, ticks, gnats, biting flies, chiggers, fleas and no-see-ums • It won't stain • Not greasy or oily • Makes You Invisible to Bugs • Fresh Scent • With Aloe Vera • With vitamin E • Contains skin conditioners like soothing Aloe Vera and has a fresh, clean scent • Soft on skin because it contains skin conditioners like Aloe Vera • Soft on skin, tough on bugs • Feels great on you, tough on bugs too • Leaves skin feeling soft and smooth • Moisturizes skin • Moisturizes with Aloe Vera • Clean, fresh scent • 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 • Contains Aloe & Vitamin E]

Active Ingredients:
 N, N-DIETHYL-M-TOLUAMIDE 6.79%
 OTHER ISOMERS 0.36%
 Inert Ingredients 92.85%

KEEP OUT OF REACH OF CHILDREN

WARNING: Read cautions on back

NET WT. 4 OZ./ 113.4 g

[OPTIONAL MARKETING LANGUAGE
NOW . . . PLEASANT PROTECTION THAT'S EFFECTIVE FOR HOURS!

(OPTION 1 - FOR SCENTED FORMULA)

Cutter Insect Repellent #10TL is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Cutter Insect Repellent #10TL offers pleasant protection that's never greasy or oily, and the fresh, clean scent won't leave you smelling like a bug repellent. Convenient towelette for easy application.

(OPTION 2 - FOR SCENTED FORMULA)

Cutter Insect Repellent #10TL provides hours of protection from mosquitoes and biting flies. Also repels ticks, chiggers, no-see-ums, gnats, and fleas. Cutter Insect Repellent #10TL offers pleasant protection: It has a fresh, clean scent and is not greasy. Convenient towelette for easy application.

(OPTION 3 - FOR SCENTED FORMULA)

Cutter Insect Repellent #10TL feels great on you because it contains skin conditioners like soothing aloe vera while it repels biting insects for hours. New towelette is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Cutter Insect Repellent #10TL is never greasy or oily and has a fresh scent. Cutter Insect Repellent is also available in pump, aerosol and soothing clear gel too.

(OPTION 4 - FOR SCENTED FORMULA)

Cutter Insect Repellent #10TL is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums for hours. Cutter Insect Repellent #10TL contains soothing Aloe Vera, and it is never greasy or oily. Convenient towelette for easy application to skin.

(OPTION 5 - FOR UNSCENTED FORMULA)

Cutter Insect Repellent #10TL is convenient, ready-to-use and specially formulated to repel mosquitoes, biting flies, gnats and no-see-ums for up to two hours. It offers pleasant protection with its smooth skin feel and unscented formula.]

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.

Lift flap on lid. Remove the lid from the container by lifting upward. Pull up the center towelette and thread the corner of towelette through opening in lid; DO NOT push finger through lid opening. Replace lid on container.

Towelettes should be pulled at an angle to dispense one at a time. Untold towelette and wipe evenly over exposed skin. The lid should be tightly closed on container between uses to keep towelettes from drying out.

Do not apply to skin under clothing or to hands of young children. Frequent reapplication is unnecessary. Wash treated skin after returning indoors. Wipe hands after application as product may damage some synthetic fabrics, plastics, watch crystals, leather, painted or varnished surfaces. Will not damage nylon, cotton, wool, but wash 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 container with you.

DISPOSAL: Do not reuse towelette. Discard 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 expose treated skin to sparks or flame until liquid has evaporated.

FIRST AID

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

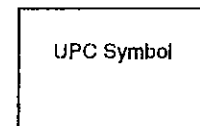
PHYSICAL/CHEMICAL HAZARDS

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

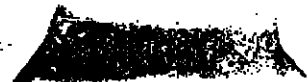
Made in the USA for Spectrum, Division of United Industries Corporation, P. O. Box 15842, St. Louis, MO 63114-0842



EPA Reg. No. 121-56
EPA Est. Nos. 9688-MO-1 U, 39754-WI-1 R,
50757-WI-1 V [Superscript] [Circled letter]
used is first letter of lot number.
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ACCEPTED with COMMENTS in EPA Letter Dated



Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 121-56

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[Bracketed Text] = Optional Language