

121-56

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1/4



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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

March 18, 2009

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, Response to EPA Letter Dated November 6, 2008
CUTTER Insect Repellent #10TL, EPA Reg. No. 121-56
Your Submission Dated January 28, 2009**

Dear Mr. Metzger:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following label revision provision(s):

Net Contents/Net Weight Statement section comment(s):

1. The net contents must be expressed in terms of liquid measure (fluid ounces) per individual wipe and also total fluid ounces per package. ¹

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.

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.

¹ For more detailed information, please refer to Chapter 17, Section III(A)(2) of EPA's Label Review Manual.

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,

FOR


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

Enclosure: Label stamped "Accepted with Comments"
000121-00056 D405276

FRONT PANEL

CUTTER

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 • [Also] Repels mosquitoes, chiggers, ticks, biting flies, no-see-ums, gnats and fleas • Repels Mosquitoes That May Carry West Nile Virus! • Mosquito Repellent • Repels biting insects for up to two hours • Pleasant, effective protection from mosquitoes, chiggers, ticks, biting flies, no-see-ums, gnats and fleas • Contains Aloe & Vitamin E • with Aloe & Vitamin E • CONTAINS DEET [n, n-Diethyl-m-toluamide] • Cooling Clean Scent]

ACCEPTED
With COMMENTS
In EPA Letter Dated:
March 18, 2009
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

Active Ingredient:
DEET 121-56 7.15%
Other Ingredients 92.85%

KEEP OUT OF REACH OF CHILDREN
WARNING Read cautions on back

CONTAINS 18 TOWELETTES
Total Net Wt 3 oz (85g)

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 up to two 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 [and vitamin E] while it repels biting insects for up to two 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, soothing clear gel, and insect repellent with sunscreen 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 up to two hours. Cutter Insect Repellent #10TL contains soothing Aloe Vera [and vitamin E], 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.]

OPTION 6
The Cutter Insect Repellent #10TL towelette is convenient and easy to apply, and leaves skin feeling soft and smooth. It feels great on you while it repels mosquitoes and other biting insects for up to 2 hours. Look for Cutter Insect Repellent #10TL towelette in a convenient 18 ct canister.

3/4

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.*

Remove the lid from the container by pulling upward. Remove the protective foil. Lift flap on lid. Pull up the center towelette and thread the corner of towelette through the open flap 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. The lid should be tightly closed on container between uses to keep towelettes from drying out. [Optional directions for a single packet towelette: Tear open foil pack.]

Unfold towelette and wipe evenly over exposed skin. Use just enough repellent to cover exposed skin. 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. [Frequent reapplication is un-necessary.] 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. Wipe hands after application as product 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, dry place, out of reach of children.
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.

PRECAUTIONARY STATEMENTS**Hazards to Humans and Domestic Animals**

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

Physical/Chemical Hazards

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

NOTICE: To the extent consistent with applicable law buyer assumes all responsibility for safety and use not in accordance with directions.

Questions or Comments? Call 1-800-332-5553

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

Made in the USA for Spectrum,
Division of United Industries Corporation
P. O. Box 142642
St. Louis, MO 63114-0642

EPA Reg. No. 121-56

EPA Est. No. 9688-M0-1

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