

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 Insect Repellent #30ST
EPA Registration No. 121-59
Application dated September 27, 1999
Letter dated 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:

⌘Harmful if swallowed. Causes moderate eye irritation. Avoid contact with 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.

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.

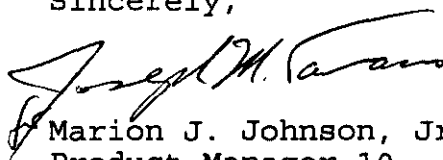
This product is not being re-registered at this time. Product specific efficacy data will be required. Once the efficacy guidelines are in place, you will be notified of the efficacy requirements.

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 dated 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)



Cutter®

Convenient Protection Insect Repellent #30ST

[Pocket size • Stick [Keeps repellent off hands] • Long lasting protection from mosquitoes, ticks, biting flies, gnats, chiggers and fleas • Not greasy or oily • It won't stain • Makes You Invisible to Bugs • Fresh Scent • Tough on bugs • 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]

Active Ingredient:
DEET 30.0%
Other Ingredients 70.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION: Read cautions on back panel

NET WT 1 OZ. (28 gms)

OPTIONAL MARKETING CLAIMS

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

OPTION 1 - Cutter Convenient Protection Insect Repellent #30ST is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Cutter Convenient Protection Insect Repellent #30ST offers pleasant protection that's never greasy or oily, and the fresh, clean scent won't leave you smelling like a bug repellent.

OPTION 2 - Cutter Convenient Protection Insect Repellent #30ST stick provides hours of protection from mosquitoes and biting flies. Also repels ticks, chiggers, no-see-ums, gnats, and fleas. Cutter Convenient Protection Insect Repellent #30ST offers pleasant protection: it has a fresh, clean scent and is not greasy.

OPTION 3 - Cutter Convenient Protection Insect Repellent #30ST repels biting insects for hours. It's specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Cutter Convenient Protection Insect Repellent #30ST is never greasy or oily and has a fresh scent. Cutter Insect Repellent is also available in a convenient pocketsize lotion, popular pump and aerosol spray.

OPTION 4 - Cutter Convenient Protection Insect Repellent #30ST 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 a clean, fresh scent.

OPTION 5 - *LONG LASTING PROTECTION.* Convenient, effective Cutter Convenient Protection Insect Repellent #30ST is easily applied to face, arms, neck and legs. Keeps repellent off your hands and keeps you free from mosquitoes and other biting bugs for up to six hours. Its perfect to take along in your golf bag, tackle box or backpack.

Carry [economical, compact Cutter Convenient Protection Insect Repellent #30ST] it in your golf bag, tackle box, purse or backpack.]

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, spread evenly over exposed skin.

Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. If used on face, apply sparingly and avoid 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.] [Frequent reapplication 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

CAUTION - Cause moderate eye irritation. Do not get in eyes. Harmful if swallowed. 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.

Physical/Chemical Hazards

COMBUTIBLE - 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. 121-59

EPA Est. No. 121-YG-1 Mfd. in Slovenia
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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
registration under EPA Reg. No.

121-59