NOV 9 2005

Kathie J. Tryson Spectrum, A Division of United Industries Corp. P.O. Box 142642 St. Louis, MO 63114-0642

Subject: Amended Label For:

Cutter Insect Repellent #30ST EPA Registration No. 121-59 Application dated October 4, 2005

Dear Ms. Tryson:

The proposed amendment to the registration of the product cited above under The Federal Insecticide, Fungicide And Rodenticide Act, as amended revising the label is accepted subject to the comment listed below. A stamped copy of the label is enclosed. Submit two copies of the final label.

Wherever the statements, Long Lasting protection and hours of protection, occur on the label they must be qualified by the supported duration times.

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

Sincerely,

Richard Gebken

Acting Product Manager 10

Insecticide Branch

Registration Division(7505C)

Front Panel

CUTTER

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 • [Also] 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 DEET [n, n-Diethyl-m-toluamide] • Mosquito Repellent • Repels Mosquitoes That May Carry West Nile Virus • Resists perspiration • Water resistant [formula] • Water resistant [sports formula] • Sweat resistant [formula]

ACCEPTED with COMMENTS In EPA Letter Dated:

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

Active Ingredient:

KEEP OUT OF REACH OF CHILDREN CAUTION Read cautions on back panel

Net Wt 1 oz (28 g)

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-seeums. 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.]

OPTION 6 - Cutter Convenient Protection Insect Repellent #30ST provides up to 8 hours of protection from mosquitoes. It's easily applied to face, arms, neck and legs.

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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.

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, chiqgers 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 vou.

STORAGE AND DISPOSAL

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 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION. 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.

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. Ringles skin immediately with plenty of water for 15-20 minutes. Call a Poison Control Center or doctor for treatment advice.

HOTLINE 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 or 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 1-800-767-9927 [Visit our web site at www.skeeterbites.com)

Text for Stick:

Made for Spectrum,
Division of United Industries Corporation
PO Box 142642,
St. Louis, MO 63114-0842

EPA Reg. No. 121-59

EPA Est. No. 121-YG-1 Mfd, in Slovenia

Text for Blister Card:

Made for Spectrum,
Division of United Industries Corporation
PO Box 142642,
St. Louis, MO 63114-0842

EPA Reg. No. 121-59

EPA Est. No. 80202-MO-1

Stick made in Slovenia

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