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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

April 8, 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 September 3, 2008
CUTTER Insect Repellent #CS314, EPA Reg. No. 121-65
Your Submission Dated February 4, 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):

Precautionary Statements, Hazards to Humans and Domestic Animals section comment(s):

1. Revise the section header to read "Hazards to Humans" since this product is not to be applied to domestic animals.

The Agency determined in the DEET RED document that all aerosol and pump spray formulations must be packaged in containers utilizing a concave trigger to help aim product or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes. In addition, 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

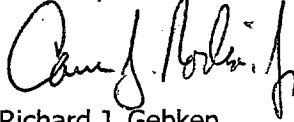
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to EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

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,

POP


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

Enclosure: Label stamped "Accepted with Comments"

000121-00065 D406223

FRONT PANEL

Unscented

CUTTER

Insect Repellent #CS314

[Unscented • pleasant, effective protection • Makes you invisible to bugs • Repels mosquitoes, chiggers, ticks, biting flies, no-see-ums, gnats and fleas • It won't stain • Not greasy or oily • Makes You Invisible to Bugs • 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 • Long-lasting protection from mosquitoes, ticks, chiggers, no-see-ums, biting flies, gnats and fleas • Repels Mosquitoes That May Carry West Nile Virus • Mosquito Repellent • CONTAINS DEET [n, n-Diethyl-m-toluamide]]

ACCEPTED
With COMMENTS
In EPA Letter Dated:

April 8, 2009

Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:

122-65

Active Ingredient:
DEET10.0%
Other Ingredients90.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION Read precautions on back

Net Wt 6 oz (170g)

OPTIONAL MARKETING CLAIMS

[NOW . . . PLEASANT PROTECTION THAT'S EFFECTIVE FOR HOURS!]

OPTION 1

Unscented Cutter Insect Repellent #CS314 is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Unscented Cutter Insect Repellent #CS314 offers long-lasting protection that's never greasy or oily, and has no unpleasant odor.

OPTION 2

Unscented Cutter Insect Repellent #CS314 provides hours of protection from mosquitoes and biting flies. Also repels ticks, chiggers, no-see-ums, gnats, and fleas. Unscented Cutter Insect Repellent #CS314 offers long-lasting protection: it's n greasy and has no unpleasant odor.

OPTION 3

Unscented Cutter Insect Repellent #CS314 repels biting insects for hours. It's specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Unscented Cutter Insect Repellent #CS314 is never greasy or oily and has no unpleasant odor. Cutter Insect Repellent is also available in pump, soothing clear gel, and insect repellent with sunscreen too.

OPTION 4

LONG LASTING PROTECTION. Convenient, effective Unscented Cutter Insect Repellent #CS314 is now in a convenient aerosol spray for quick coverage. You can spray from any angle, even upside down . . . to cover your arms, legs and back. It keeps you free from mosquitoes and other biting bugs for hours. Cutter Insect Repellent is also available in pump, soothing clear gel, and insect repellent with sunscreen.]

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 spray in enclosed areas. Hold can 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

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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.

STORAGE AND DISPOSAL

Pesticide Storage: Store the product in a cool, dry place, out of reach of children.
Container Disposal: If empty: Do Not Puncture or Incinerate! 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

CAUTION - 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

FLAMMABLE. Contents under pressure. Do not use or store near heat, sparks or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

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.skeeterbites.com]

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

EPA Reg. No. 121-65

EPA Est. No. 9688-MO-1

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