

JUN 28 2004

Glenda L. Mah
Spectrum, A Division of United Industries Corp.
P.O. Box 142642
St. Louis, MO 63114-0642

Subject: Amended Label For:
Cutter Insect Repellent #30CA23
EPA Registration No. 121-68
Application dated June 18, 2003

Dear Ms. Mah:

The proposed amendment to the registration for the product cited above under the Federal Insecticide, Fungicide And Rodenticide Act, as amended requesting a 10 hour repellency claim for mosquitoes is acceptable subject to the comments listed below:

1) This 10 hour claim applies only to mosquitoes. It does not support a repellency time for any other pest on the label.

2) Regarding the claim, "Repel mosquitoes that may carry West Nile virus", you must submit or cite data showing efficacy against *Culex* spp. Mosquitoes that transmit WNV to humans.

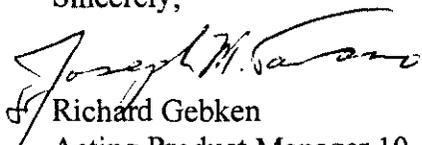
3) Any duration claims for other pests listed on the label must be supported by data showing efficacy against them.

A copy of the efficacy review is enclosed for your records. Refer to this review for details.

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

A stamped copy of the amended label is enclosed for your records. Submit two copies of the final label before this product is released for shipment under this revised label.

Sincerely,



Richard Gebken
Acting Product Manager 10
Insecticide Branch
Registration Division(7505C)



FRONT PANEL

CUTTER *Insect* Repellent #CA23

[Unscented • Long lasting protection • From mosquitoes, ticks, biting flies, gnats, chiggers, no-see-ums and fleas • Makes you invisible to bugs • 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 • with Extender • Lasts up to 8 hours against mosquitoes • Provides up to 10 [8] hours of protection against mosquitoes • Provides protection for up to 10 [8] hours. against mosquitoes • Protects for up to 10 [8] hrs • Repels for up to 10 [8] hrs • 10 [8] Hr Protection • Repels Mosquitoes that may Carry West Nile Virus • Repels Mosquitoes and other Biting Insects • Water-based • CONTAINS DEET [n, n-Diethyl-m-toluamide]]

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

JUN 28 2004

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

121-68

Active Ingredient:

DEET 23.0%
Other Ingredients 77.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION Read cautions on back

Net wt 6 oz (170 g)

OPTIONAL MARKETING CLAIMS

[NOW . . . PLEASANT PROTECTION THAT'S EFFECTIVE FOR HOURS!
NOW . . . LONG LASTING PROTECTION WITHOUT UNPLEASANT SCENT

OPTION 1

Cutter Insect Repellent #CA23 is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Cutter Insect Repellent #CA23 offers long-lasting protection that's never greasy or oily, and has no unpleasant odor.

OPTION 2

Cutter Insect Repellent #CA23 provides hours of protection from mosquitoes and biting flies. Also repels ticks, chiggers, no-see-ums, gnats, and fleas. Cutter Insect Repellent #CA23 offers long-lasting protection: it's not greasy and has no unpleasant odor.

OPTION 3

Cutter Insect Repellent #CA23 repels biting insects for hours. It is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums. Cutter Insect Repellent #CA23 is never greasy or oily and has no unpleasant odor. Cutter Insect Repellent is also available in a convenient pump spray too.

OPTION 4

Cutter Insect Repellent #CA23 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 no unpleasant odor.

OPTION 5

LONG LASTING PROTECTION. Convenient, effective Cutter Insect Repellent #CA23 is now in an 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 a convenient pump.]

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 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 and dry place. Keep out of reach of children. **Container Disposal:** Do Not Puncture or Incinerate! **If empty:** 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.

PRECAUTIONARY STATEMENTS

Hazards to Humans

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. 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. Keep away from heat, sparks, and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

Questions or Comments? Call 1-800-767-9927

[Visit us on 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. 121-68

EPA Est No. 9688-MO-1

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