

121-81

09/12/2008

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

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

September 12, 2008

Mr. William Metzger, Division Vice President
Spectrum, Division of United Industries, Corp.
P.O. Box 142642
St. Louis, MO 63114-0642

Subject: Amended Reregistration Label For: Cutter Insect Repellent RDD OO3RL
EPA Registration No. 121-81

Dear Mr. Metzger;

The Agency in accordance with the Federal Fungicide and Rodenticide Act as Amended (FIFRA) has completed reviewing all of the information submitted with your application to support the reregistration of the aforementioned product in connection the DEET, and has concluded that your submission is acceptable with the following label revision provisions:

Remove the following statement from the directions for use: "Spread evenly and completely over exposed skin before sun exposure."

Revise the Hazards to Humans section of the label as follows:

"HAZARDS TO HUMANS

Causes moderate eye irritation. Avoid contact with eyes. Wash hands before eating, drinking, chewing gum, or using tobacco or using the toilet."

Revise the First Aid section of the label as follows:

"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 eye. Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-XXX-XXXX¹ for emergency medical treatment information."

Revise the Storage and disposal statement to:

"STORAGE AND DISPOSAL

Pesticide Storage: Store this product in a cool dry place. Keep out of reach of children.

Pesticide Container Disposal:

If empty: Do not reuse this container. Place in trash or offer for recycling if available. **If partially filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain."

¹ An appropriate phone number that is available 24/7 should be inserted into the section denoted with XXX-XXXX.

A toll-free telephone number must appear on all product labels for consumers to call for additional product information and to report incidents.

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 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.

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 the Federal Insecticide Fungicide and Rodenticide Act 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) list 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 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 the EPA's Office of Enforcement and Compliance Assurance. As an alternative, you may refer consumers to the company's phone number or email address.

NOTE: This product is not being re-registered under FIFRA Sec. 4(g) at this time.

~~You must submit two copies of the final printed label revised in accordance with the comments listed above before the product is released for shipment under this label. If you have any questions, you may contact Carmen Rodia at (703)-306-0327 or rodia.carmen@epa.gov.~~

A copy of your label stamped "Accepted with Comments" is enclosed for your records.

Sincerely,



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



Insect Repellent RDD 003RL

[Pleasant, Effective Protection from Mosquitoes, Ticks, Gnats, Biting Flies, Chiggers, Fleas and No-See-Ums • Makes You Invisible to Bugs and Protects You from the Sun • with Sunscreen • SPF 15 • Waterproof • Contains Vitamin E • Contains Aloe Vera]

**ACCEPTED
with COMMENTS
In EPA Letter Dated**

September 12, 2008
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No.

Active Ingredient: DEET 121-81 7.0%
Other Ingredients: 93.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION Read cautions on back

NET WT. 3 OZ. (85g)

OPTIONAL MARKETING CLAIMS

[Not greasy or oily • With aloe vera • With Vitamin E • Effective, dependable protection • Clean, fresh scent • Repels biting insects for hours • Soft on skin, tough on bugs • Leaves skin feeling soft and smooth • Moisturizes skin • Moisturizes with aloe vera and vitamin E • Feels great on you, tough on bugs too • Soft on skin because it contains skin conditioners like aloe vera • Contains skin conditioners like soothing aloe vera and vitamin E • Waterproof • Retains its sun protection for at least 80 minutes in the water • Resists perspiring (sweating) • Sweat (perspiration) resistant • Makes you invisible to bugs

Now there's pleasant protection against biting insects and sunburn. Cutter 3-in-1 Lotion:

1. **INSECT REPELLENT:** Repels mosquitoes, ticks, biting flies, gnats, chiggers, fleas and no-see-ums for hours.
2. **SPF 15 SUNSCREEN:** PABA free protection gives you 15 times longer sun exposure without sunburn. Protects against both UVA and UVB rays. Plus, it's waterproof so it retains its sun protection for at least 80 minutes in the water.
3. **SKIN CONDITIONER:** Contains Aloe Vera and vitamin E skin conditioners that moisturize and leave skin feeling smooth and soft.

New Cutter Insect Repellent RDD 003RL ... for 3-in-1 protection that leaves skin feeling and smelling great!

NOW ... pleasant protection that's available for hours! Feels great on you, tough on bugs too. This product is specially formulated to repel mosquitoes, ticks, biting flies, gnats, chiggers, fleas, and no-see-ums for hours. The moisturizing lotion offers pleasant protection that's never greasy or oily, and the fresh, clean scent won't leave you smelling like a bug repellent.

Active Sunscreen Ingredients:
Octyl methoxycinnamate 7.5%
Oxybenzone 5.0%

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.

Do not use in enclosed areas. Adults and children 6 months of age and over:

Spread evenly and completely over exposed skin before sun exposure. To apply, put a small amount in palm of hand, rub palms together, then spread evenly over exposed skin and/or clothing. 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 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. Wrap in newspaper and discard in trash.

PRECAUTIONARY STATEMENTS Hazards to Humans

CAUTION - Causes moderate eye irritation. Avoid contact with eyes.

First Aid

In Eyes - Flush with plenty of water. Call a physician if irritation persists.

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

Questions or Comments? Call 800-767-9927

Made in the USA for Spectrum, Division of United Industries Corporation
P. O. Box 15842, St. Louis, MO 63114-0842

EPA Reg. No. 121-81

EPA Est. Nos. 9688-MO-1 U, 39754-WI-1 R, 50757-WI-1 V

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