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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 12, 2008
CUTTER Insect Repellent RDD 003RL, EPA Reg. No. 121-81
Your Submission Dated February 5, 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

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,



FOR

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

Enclosure: Label stamped "Accepted with Comments"

000121-00081 D406228



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:

April 9, 2009

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

121-81

Active Ingredients:
DEET 7.0%
Inert Ingredients 93.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION Read precautions on back

NET WT. 3 OZ./85 g

[Bracketed Text] = Optional Language

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. For outdoor use only.

Adults and children 6 months of age and over: Spread evenly and completely over exposed skin before sun exposure. For face, dispense into hand and then spread on face and neck. To apply to clothing, put a small amount in palm of hand, rub palms together and then spread on clothing. Do not apply to skin under clothing or the hands of young children. Do not apply over cuts, wounds or irritated skin. Do not apply to eyes and mouth. Excessive or frequent application is unnecessary. Reapply after swimming, excessive perspiring or anytime after towel drying. Wash treated skin after

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returning indoors. May cause skin reactions in rare cases. If you suspect you or your child is reacting to this product, wash treated skin and call your local Poison Control Center. If you go to the doctor, take this bottle with you. Will not damage nylon, cotton, wool. May damage some synthetic fabrics, plastics, watch crystals, leather, painted or varnished surfaces. Wash treated clothing after use.

STORAGE AND DISPOSAL

Pesticide Storage: Store the product in a cool, dry place, out of reach of children.
Container Disposal: If empty: 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 moderate eye irritation. Avoid contact with eyes. Wash hands before eating, drinking, chewing gum, or 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.

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 1-800-767-9927

[Visit our web site at www.skateerbites.com]

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

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EPA Est. No. 9688-MO-1

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