

121-91

10/20/2005

1/5



U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (H7505C)
401 "M" St., S.W.
Washington, D.C. 20460

EPA Reg. Number: 121-91
Date of Issuance: OCT 20 2005

NOTICE OF PESTICIDE:
 x Registration
 Reregistration

Term of Issuance:
Conditional

Name of Pesticide Product:
CUTTER Insect Repellent 15KP

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Spectrum
Division of United Industries
P.O. Box 142642
St. Louis, MO 63114-0642

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

1. Submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.

2. Make the following label changes:

- a. Revise the EPA Registration Number to read, "EPA Reg. No.121-91".
- b. Due to the existing risk assessment for Picaridin, use of this product must be limited to one application per day. The statement, "**Do Not Apply more than once per day**", must appear in bold print on the label directly under the statement, "It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.", in the **DIRECTIONS FOR USE** section. If data

Signature of Approving Official
See page 3

Date:
October 20, 2005

are submitted or cited in the future that would change the risk assessment and allow for additional applications per day, you may amend the label accordingly.

- c. Change the statement, "Read Entire Label Before Each Use.", to read "Read and follow all directions and precautions on this product label."
- d. Add a 1-800 phone number to the First Aid Section for medical treatment information.
- e. Add the following statements to the label:

Do not apply over cuts, wounds, or irritated skin.
Do not apply near eyes and mouth. Apply sparingly around ears.
When using on children, apply to your own hands and then put it on the child.
Use just enough repellent to cover exposed skin.
Do not use under clothing.
Avoid over application of this product.
Do not spray in enclosed areas.
If used on face, spray on hands first and then apply sparingly and avoid eyes. Do not spray directly onto face.
After returning indoors, wash treated skin with soap and water
Wash treated clothing before wearing it again.

- f. Label claims for the following pests are not supported and must be deleted from the label. Data may be submitted or cited to support the inclusion of these claims in a future label amendment:

Biting flies, ticks, Deer Ticks, Gnats, No-see-ums, Chiggers, Fleas

- g. The claim for use on clothing is being accepted under the following conditions:

Data must be submitted to support the efficacy of the product when applied to clothing. A protocol for running the study must be submitted. Once the protocol has been approved, the data must be submitted within one year or you must delete the claim by submitting a label amendment to that effect. You must agree to these conditions.

- h. Refer to the enclosed Efficacy review for comments on the marketing claims which must be deleted or modified.
- i. In addition delete the following marketing claims:

Does not need to be washed off when returning indoors.
2X the level of Picaridin [of Cutter Insect Repellent 7K]
Insect protection without the repellent odor

No repellent odor
For extreme conditions
Does not need to be washed off when returning indoors
Water resistant [sport][formula]

- j. The product must be packaged in containers utilizing a concave trigger to help aim the product or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes.
- k. Delete "water resistant" wherever it appears on the label.
- l. Copies of the Efficacy, Acute Toxicity and Product Chemistry reviews are enclosed.
- 3. Submit two (2) copies of the revised final printed label for the record.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions.

A stamped copy of the draft label is enclosed.

Sincerely,

Joseph M. Savano

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

RG

Front Panel

CUTTER

Insect Repellent 15KP

See back panel for Marketing Claims

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
OCT 20 2005**

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
121-91**

Active Ingredient:
Picaridin 15.0%
Other Ingredients 85.0%

KEEP OUT OF REACH OF CHILDREN

WARNING Read cautions on back

Net [Contents] 6 fl oz (177 mL)

OPTIONAL MARKETING TEXT

[Now . . .]Long lasting protection in an odorless formula that feels light and clean!

[Cutter Insect Repellent 15KP provides up to 8 hours [of] protection against mosquitoes. It also provides effective protection against ticks, biting flies, deer flies, gnats, no-see-ums, chiggers, and fleas.]

[Cutter Insect Repellent 15KP with Picaridin is specially formulated for [fishermen, hunters and other Outdoorsmen] [active lifestyles]. Cutter Insect Repellent 15KP is water resistant and will not damage plastics or other synthetic materials.]

[Because Cutter Insect Repellent 15KP provides protection without the odor, it is perfect for hunters. And now formulated with Picaridin so it will not damage fishing lines or other synthetic materials.]

[Works on clothing too! Spray socks, cuffs, hats and other clothing openings. Will not damage cotton, wool, nylon, acetate or spandex.]

Back Panel

STOP. READ ENTIRE LABEL BEFORE EACH USE.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

- Hold 4 to 6 inches from skin while spraying, keeping nozzle pointed away from face.
- Slightly moisten skin.
- Reapply every 6 to 8 hours. Excessive amounts or more frequent reapplication should be unnecessary. Do not apply more than 2 times a day.

WHEN USING PRODUCT ON CHILDREN:

- Do not apply to their hands.
- To apply to child's face and neck, spray the product into your hands and apply to the child.
- Take care to avoid mouth and eyes and apply sparingly around their ears.
- Do not allow children to handle the product.

STORAGE AND DISPOSAL

Pesticide Storage: Store the product in a cool, dry place, 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-

5/5

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

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING. Causes substantial but temporary eye injury. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and 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.

Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment.

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 1-800-332-5553

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

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

EPA Reg. No. 121-

EPA Est. No. 9688-MO-1

© 2005

OPTIONAL MARKETING CLAIMS

1. New! (to be used for 6 months from first date of shipment)
2. [Formulated] [Contains] [With] Picaridin
3. [Long][Longer]-lasting formula
4. 2X the level of Picaridin [of Cutter Insect Repellent 7K]
5. Twice as strong [as Cutter Insect Repellent 7K]
6. Twice the protection of Cutter Insect Repellent 7K
7. Fragrance Free
8. Unscented
9. Light feel, strong protection
10. Strong protection
11. Feels light and clean
12. Effective, dependable protection
13. Repels mosquitoes, ticks, [biting flies, deer flies, no-see-ums, chiggers, gnats, and fleas] [and other biting insects].
14. Repels mosquitoes that may [transmit] [carry] West Nile virus
15. Repels deer ticks that may carry Lyme disease
16. No odor [formula]
17. No one will know you're wearing repellent except the bugs
18. You won't smell it, and neither will the deer
19. Next generation [insect repellent][formula](to be used for 6 months from the first date of shipment)
20. Protection for the entire family
21. Repels mosquitoes for up to 8 Hours
22. Up to 8 hour protection from mosquitoes
23. Not sticky or greasy
24. No oily residue
25. Non-staining
26. [Heavy duty] [Sport] Formula
27. Can be applied to clothing
28. Will not damage cotton, wool, nylon, [acetate, rayon, spandex] or other synthetic materials
29. Will not damage [plastics] [watch crystals] or other synthetic materials
30. Will not damage [fishing line, gun barrel, plastic lenses] [sporting equipment]
31. [Insect] protection without the [repellent] odor
32. No repellent odor
33. For active lifestyles
34. Long Lasting Protection
35. For extreme conditions
36. Does not need to be washed off when returning indoors
37. Water resistant [sport] [formula]
38. Dermatologist tested
39. Scientifically tested
40. Sprays upside down