



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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Mr. William Metzger
Vice President, Regulatory and Government Affairs
Spectrum, a Division of United Industries Corp.
Box 142642
St. Louis, MO 63114-0642

DEC 22 2006

Dear Mr. Metzger,

Subject: Non-Fast Track Label Amendment
Product Name: Cutter Insect Repellent 15KP
EPA Reg. No. 121-91
Submission dated August 11, 2006

The amendments referred to above, submitted in connection with registration under Section (3)(c)(7) of the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended is acceptable subject to the comments and terms for conditional registration outlined below.

1. You will 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 registration of your product under FIFRA section 4.
2. Make the following label changes to EPA Reg. No 121-91
 - a. Remove "Cutter Insect Repellent 15KP is water [sweat] resistant.
 - b. Remove claim 1 - "New"
 - d. Remove claims 30, 31, and 33.
 - e. Remove claim number 35: "8 hours protection against Culex mosquitoes." Retain the approved 4.5 hour claim for mosquitoes. The eight hour claim would increase the reapplication interval despite the fact that a user will not be aware of the types of mosquitoes biting them. Other species may attempt to bite besides *Culex* spp.
3. The cited acute toxicity and product chemistry data are acceptable for both products. Updated DERs are attached.

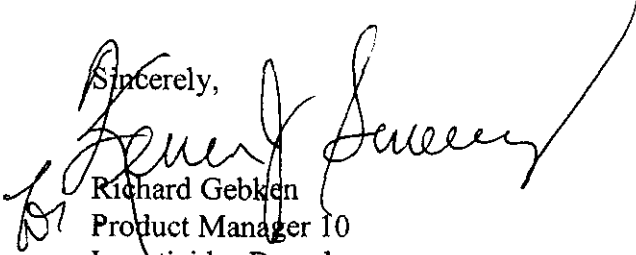
4. The request to add biting flies, ticks, deer ticks, chiggers, no-see-ums and fleas is conditionally acceptable provided you agree to submit product specific efficacy data as described in draft EPA Product Performance Guideline 810.3700 for each pest by May 5, 2009. Testing protocols should be submitted by July 1, 2007.

Please refer to Kevin Sweeney's efficacy study review dated December 2, 2004 that describes data to be generated for each pest together with a mosquito field study.

5. With regard to product performance studies cited in your data matrix, I attached copies of the ethics reviews of two of the efficacy studies conducted with humans. Note that one study review requires you to submit additional information. For the other study, you must submit additional information so that it may be cited for registration purposes. Please respond to the findings of these ethics reviews by March 7, 2007. Additional product performance data will be required to support mosquito repellency claims for these products if these two studies cannot be used for registration purposes. If this is the case, these data should be submitted by May 5, 2009. If these data are necessary, test protocols should be submitted by July 1, 2007.

You should note that if you fail to satisfy any of the conditions imposed on this registration, e.g., you fail to submit the required data by the specified deadlines or the data submitted were not generated in accordance with the applicable test guidelines, or agreed upon protocols, EPA may issue notice to cancel this use under FIFRA 6(e).

A stamped copy of the label is enclosed for your records. If you have questions or concerns, please contact Kevin Sweeney at (703) 305-5063.

Sincerely,

Richard Gebken
Product Manager 10
Insecticides Branch
Registration Division (7505P)

Enclosure

Front Panel

CUTTER

Insect Repellent 15KP

See back panel for Marketing Claims

**ACCEPTED
with COMMENTS
in EPA Letter Dated
DEC 22 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 . . . protection in an odorless formula that feels light and clean!]

[Cutter Insect Repellent 15KP provides up to 4.5 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 provides up to 8 hours [of] protection against the Culex mosquito. 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 [sweat] 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 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 Apply more than once per day.**

Hold 4 to 6 inches from skin while spraying, keeping nozzle pointed away from face. Slightly moisten skin. Excessive amounts or more frequent reapplication should be unnecessary. 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 overapplication 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. **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.

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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-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 irritation. 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. Use of this product may cause skin reactions in rare cases.

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. **Hotline Number:** In case of an emergency call 1-800-767-9927.

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
 P O Box 142642
 St. Louis, MO 63114-0642
 EPA Reg. No. 121- 91 EPA Est. No. 9688-MO-1 © 2006

OPTIONAL MARKETING CLAIMS

1. New! (to be used for 6 months from first date of shipment)
2. [Formulated] [Contains] [With] Picaridin
3. Fragrance Free
4. Unscented
5. Light feel, strong protection
6. Strong protection
7. Feels light and clean
8. Effective, dependable protection
9. Repels mosquitoes
10. Repels mosquitoes that may [transmit] [carry] West Nile virus
11. No odor [formula]
12. No one will know you're wearing repellent except the bugs
13. You won't smell it, and neither will the deer
14. Protection for the entire family
15. Repels mosquitoes for up to 4.5 Hours
16. Up to 4.5 hour protection from mosquitoes
17. Not sticky or greasy
18. No oily residue
19. Non-staining
20. [Heavy duty] [Sport] Formula
21. Can be applied to clothing
22. Will not damage cotton, wool, nylon, [acetate, rayon, spandex] or other synthetic materials
23. Will not damage [plastics] [watch crystals] or other synthetic materials
24. Will not damage [fishing line, gun barrel, plastic lenses][sporting equipment]
25. For active lifestyles
26. Long Lasting Protection
27. Sprays upside down
28. Repels mosquitoes, ticks, [biting flies, deer flies, no-see-ums, chiggers, gnats and fleas] [and other biting insects].
29. Repels deer ticks that may carry Lyme disease
30. Water resistant [sport] [formula]
31. Sweat resistant [sport] [formula]
32. A better smelling way to keep bugs [away] [at bay]!
33. From [the makers' of] Cutter Advanced, the #1 brand of picaridin insect repellents.
34. Clean, dry feel
35. with 8 hours of protection against the Culex mosquito
36. Light, clean feel
37. Light, Clean, [Odorless]

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