

777-101

9/16/2010

1/14

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



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

SEP 16 2010

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Mary C. Pisculli  
Reckitt Benckiser Inc.  
Morris Corporate Center IV  
399 Interplace Parkway  
Parsippany, NJ 07054-0225

Subject: ADP 10106  
EPA Reg. No. 777-101  
Application Dated: August 8, 2010  
Receipt Date: August 20, 2010

Dear Ms. Pisculli:

This letter acknowledges receipt of the following notification submitted in connection with registration under the provisions of PR Notice 98-10 and the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) section 3(c).

**Proposed Notification:**

- Add price value statement to 16 oz. for the price of 10"

**General Comments:**

Based on a review of the material submitted, the notification to add a price value statement is acceptable. A copy has been placed in our records for future reference.

Should you have any questions or comments concerning this letter, please contact me at [Campbell-mcfarlane.jacqueline@epa.gov](mailto:Campbell-mcfarlane.jacqueline@epa.gov) or call (703) 308-6416.

Sincerely,

Jacqueline McFarlane  
Product Manager (34)  
Regulatory Management Branch II  
Antimicrobials Division (7510P)

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							



**EPA**

United States  
**Environmental Protection Agency**  
 Washington, DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number  
**305969**

**Application for Pesticide - Section I**

1. Company/Product Number 777-101	2. EPA Product Manager Jacqueline Campbell	3. Proposed Classification  <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) ADP 10106	PM# # 34	
5. Name and Address of Applicant (Include ZIP Code)  Reckitt Benckiser Inc. Morris Corporate Center IV 399 Interpace Parkway Parsippany, NJ 07054-0225  <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling to: EPA Reg. No. _____  Product Name _____	

**Section - II**

- Amendment - Explain below.
- Final printed labels in response to Agency letter dated \_\_\_\_\_
- Resubmission in response to Agency letter dated \_\_\_\_\_
- "Me Too" Application
- Notification - Explain below.
- Other - Explain below

**Explanation:** Use additional page(s) if necessary. (For Section I and Section II.)

Non-Notification:                      to add the price value statement to master text label:

16 oz. for the price of 10

This non-notification is consistent with the provisions of PR Notice 98-10 and EPA regulations 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this non-notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container				
Child-Resistant Packaging		Unit Packaging		Water Soluble Packaging		<input checked="" type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)		
<input type="checkbox"/> Yes*		<input type="checkbox"/> Yes		<input type="checkbox"/> Yes				
<input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> No				
		If "Yes" Unit Packaging wgt.		If "Yes" Package wgt.				
		No. per container		No. per container				
* <b>Certification must be submitted</b>								
3. Location of Net Contents Information			4. Size(s) Retail Container			5. Location of Label Directions		
<input checked="" type="checkbox"/> Label <input type="checkbox"/> Container			10 oz.			<input checked="" type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product		
6. Manner in Which Label is Affixed to Product				<input checked="" type="checkbox"/> Lithograph				
				<input checked="" type="checkbox"/> Paper glued				
				<input type="checkbox"/> Stenciled				
				<input type="checkbox"/> Other _____				

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Mary C. Pisculli	Title Regulatory & Registration Compliance Specialist	Telephone No. (Include Area Code) 973-404-2715
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature: 		
3. Title: Regulatory & Registration Compliance Specialist		
4. Typed Name: Mary C. Pisculli		5. Date: August 19, 2010



August 19, 2010

Document Processing Desk (NON-NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, 4<sup>th</sup> Floor  
One Potomac yard  
2777 S. Crystal Drive  
Arlington, Virginia 22202

Attention: Ms. Jacqueline Campbell, PM-34

Reference: Non-notification to add price value statement  
Product Name: ADP 10106  
EPA Registration Number: 777-101  
OPP ID Number: 305969

Dear Ms. Campbell:

This letter is to inform the agency that Reckitt Benckiser would like to add the follow price value statement to our master text label for the above referenced registration number.

16 oz. for the price of 10

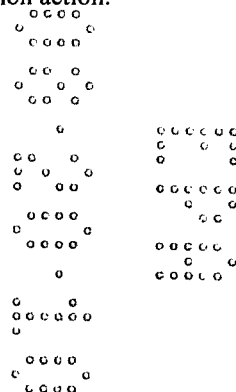
As per PR Notice 98-10, Section IV. F. 7. this action is considered a non-notification; however, we would like this information added to the file.

In support of this registration action, I have enclosed (1) copy of the master text label with the above listed price value statement appearing as double underlined red font and the required EPA Application for Pesticide Registrtration Form 8570-1: OPP ID No. 305969. For convenience, I have included the Certification Statement per PR Notice 98-10 directly on this form.

If there is any other information that the agency needs to complete this submission, please feel free to contact me at 973-404-2715 or via email at mary.pisculli@rb.com. Thank you for your assistance with this registration action.

Sincerely,

*Mary C. Pisculli*  
Mary C. Pisculli  
Regulatory & Registration Compliance Specialist



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14

<< Front Panel >>

**ACTIVE INGREDIENTS:**

Triethylene Glycol ..... 5.40%  
Alkyl (50% C<sub>14</sub>, 40% C<sub>12</sub>, 10% C<sub>16</sub>)  
dimethyl benzyl ammonium saccharinate ..... 0.05%

**OTHER INGREDIENTS:** ..... 94.55%  
**TOTAL:** ..... 100.00%

KEEP OUT OF REACH OF CHILDREN

**CAUTION:** See back (side) panel for additional precautionary statements.

NET WT.: 0.5 OZ. (14 g)  
1.0 OZ. (28 g)  
1.5 OZ. (42 g)  
7.0 OZ. (198 g)  
7.4 OZ. (209 g)  
8 OZ. (226 g)  
9 OZ. (255 g)  
10 OZ. (283 g)  
12 OZ. (340 g)  
15 OZ. (425 g)  
16 OZ. (454g)  
18 OZ. (510 g)  
19 OZ. (538 g)

**NOTIFICATION**  
Date Reviewed: 7/16/10  
Reviewed By: [Signature]

<< Front or Back Panel >>

EPA Reg. No.: 777-101  
EPA Est. No.: 777-NJ-2  
13891-IN-001  
61203-MA-001

See bottom or side (for Lot/Date code)  
Federal regulations prohibit CFC propellants in aerosols.  
Graphic Symbol (Contains no CFCs or other ozone depleting substances)

<< Back Panel >>

**Questions?** (symbol of telephone) **(1-800-228-4722)**  
For ingredient (and other) information, ([www.rbnainfo.com](http://www.rbnainfo.com))  
Distributed by: Reckitt Benckiser Inc., Parsippany, NJ 07054(-xxxx)  
Made in {insert country} © RBI {insert year}

<< Back Panel – Optional text >>

Steel Recycling Symbol  
Please recycle when empty  
Company Logo (Reckitt Benckiser) (rb)  
Important facts (about this product):  
This can is made from an average of (xx)% recycled steel (xx% post-consumer).  
Important: For directions for use and first aid instructions in Spanish, please call {insert phone number}.  
Encourage your local authorities to establish a program to recycle this (can) (container).  
(Licensed under) U.S. Patent Number 4,840,792 << Robertet's formula >>  
(Licensed under) U.S. Patent Number 5,795,566 << Robertet's formula >>  
(Licensed under) U.S. Patent Number 5,538,719 << Firmenich formula >>  
(Licensed under) U.S. Patent Number 6,610,648 << Givaudan formula >>

Learn more about (the importance of good hygiene habits) (and) (the many ways that Lysol® is promoting good hygiene habits) (for your family and community) go to [www.spreadinghealth.com](http://www.spreadinghealth.com)

**NOTE:** Bracketed information is denoted as: << directive >>, { insert as noted }, ( optional text ), [ required qualifier ]. The term "this product" used throughout this document may be replaced with the marketed product brand name. To use the term "germ" the product must be efficacious against 2 of the 3 major classes of organisms. The product label must identify the specific bacteria, virus, fungus & mold. The term "x" is a place holder for a number between 1 to 99.

5  
14

**<< Front or Back Panel - Marketing / Product Performance claims – use as bullet point or in paragraph format >>**

<< INTRODUCTORY 6-MONTH CLAIMS – will appear on the graphics label for 6 months the product is on shelf >>

Disinfects, deodorizes with new fresh, clean fragrance	New and Improved (Technology) (formula)	(New) (Patented) (Technology) (formula)
New (New) Advanced Odor Control (Formula) (Technology)	New Fragrance (New) Improved Odor (Elimination) (Eliminator) (Technology)	New Scent New Size
(New) Advanced Odor (Elimination) (Eliminator) (Technology)	(New) Improved Technology	(New) Ultimate Odor Eliminator
New (Advanced) (Patented) Technology	New {insert fragrance name} (scent)	

**<< Product Descriptors >>**

2 in 1	Disinfectant	Mildewcide
Absolutely Fresh	Disinfectant Spray	Multi-Purpose
Air + Surface	Disinfects	Multi-Room
Air and Surface Sanitizer	Double Action	Multi-Surface
Air Sanitizer	Dual Action	Odor Eliminator
Air Sanitizer & Surface Disinfectant	Dual Purpose	Odor Remover
Air Treatment	Duo	Odor Destroyer
All in One	Finishing Touch	Odor Buster
All Over Freshness	Fresh Air	Odor Sweeper
Antibacterial Action	Freshness Enhancer	Sanitizer
Antibacterial Spray	Fungicidal	Sanitizing Spray
Bactericidal	Fungistat	Twin
Bactericide	Mildewcidal	Universally Fresh
Clean & Fresh (Scent)		

**<< Fragrance Descriptors >>**

Blissful Escape Scent	Marine Coral Scent	Summer Sunset Scent
Calming Tides Scent	MORNING DEW Scent	Sundrenched Garden Scent
Citrus Scent	Morning Linen Scent	Sun-Kissed Linen Scent
Coral & Ocean Breeze Scent	Moonlight Dream Scent	Sunny Fields Scent
Coral Summer Scent	Ocean Escape Scent	Sunset Calm Scent
Crisp Linen Scent	Pacific Mist Scent	Sun Sparkle Scent
Fragrance Free	Pure Shores Scent	Warmth & Light Scent
Fresh Laundry Scent	Pure Zen Scent	WHITE BLOSSOM Scent
Fresh Scent	Shimmering Sunrise Scent	Wind Blown Sheets Scent
Ginger & Green Tea Scent	Soothing Chai Scent	Zen Calm Scent
Herbal Renewal Scent	SPARKLING WATERS Scent	Zen Escape Scent
Lavender Mist (Scent)	Summer Coral Scent	

**<< Packaging Claims >>**

Better Value	Limited Time (offer) (value) (bonus) (pack)	Travel Pack	
Big	Multi-Pack	Travel Size	
Bonus Pack	Mega Value Pack	Trial Size	
Club Pack	Mega Value Size	Value-Pack	
Club Size	Personal Size	Value Size	
Convenient Size	Purse Size	60% (Bonus) (More) (Free)	
Discreet Size	Save Money By Buying Our Convenient Club Pack Size!	Up to 100 uses per can	
Economy Size	Special Pack	<u>16 oz for the price of 10</u>	

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9/2

<< Front or Back Panel - Marketing / Product Performance claims – use as bullet point or in paragraph format >>

<< **Fragrance Related Claims** >>

Air so (clean) (clear) (pure) (fresh) (refreshed) you (can) (will) (immediately) (instantly) (smell) (notice) (welcome) (distinguish) (appreciate) the (freshness) (improvement) (difference).  
Complete Freshness  
Destroy odors  
For a (fresher) (healthier) home  
For (exceptional) (extraordinary) freshness  
For freshness that lasts  
(For) Long lasting freshness  
(For) ultimate freshness  
Fresh air  
Freshness lasts  
Remarkable Freshness  
(Simply) Air so clean you can smell the freshness  
(Unlike Air Fresheners,) (Unlike some Air Fresheners,) (Unlike regular air fresheners,) (Unlike ordinary Air Fresheners,) there is no overpowering (smell) (fragrance) (scent)  
(This product) Leaves (behind) a (fresh) (light) (clean) (fresh) (refreshing) (lasting) (scent) (fragrance) (smell) (in) (the) (your) (air) (home)  
(This product) Eliminates odors (with no) (without a(n)) (heavy) (overpowering) (strong) (floral) fragrance  
(This product) Eliminates odors (at the source) (for) (ultimate) (complete) (freshness) (throughout your home) (a fresher home)  
(This product) Leaves (no odors behind) (an odor free room)  
(This product) lets you open your door to a clean and fresh smelling home.  
(This product) Makes your home a fresher place to be.  
Use this product for (ultimate) (complete) (freshness) (a light, fresh scent) (for a fresher home)  
(Use this product for) Ultimate Freshness

<< **Brand Claims** >>

Because it's from (the makers of) Lysol, you can trust it (to) (work) (remove) (destroy) (eliminate) (odors caused by bacteria in the air) (odors caused by airborne bacteria)  
Because it's from (the makers of) Lysol, you can trust it (to temporarily reduce airborne bacteria) (to temporarily reduce bacteria in the air).  
Helps protect your family from odor causing bacteria (with this product)  
(Life Stinks:) (Neutra Air) (your odors) (it)  
(This product) (is) from the makers of Lysol (brand products)

<< **Formulation Claims** >>

Our Best Ever (formula) (Technology)  
(This product's) Formula binds to and then chemically reacts with odor molecules (in mid-air) (in the air) to neutralize them (and effectively make them odorless.)  
This product contains (patented technology) (odor-eliminating) (ingredients) (that work in the air) (to) (eliminate) (remove) (destroy) (temporarily reduce) (odors) (in the air) (leaving) (the air) (smelling) (clean) (fresh)  
(This product) (Works) (Patented technology) (combines with) (attacks) the odors to eliminate (it) (them) (from the air)

<< **Use Site Claims** >>

Great for bathrooms!  
(This product) can be used {insert USE SITES from list on page 10}  
Use (this product) to temporarily reduce (the number of)(odor-causing bacteria) in your {insert USE SITES from list on page 10}  
Use (this product) to eliminate (destroy) (take away) (sweep away) (tough) (odors) in your {insert USE SITES from list on page 10}  
Spray may leave hard floors slippery. Do not concentrate spray over hard floors.

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**<< Odor Removing Claims >>**

3 in 1 – odor elimination (air sanitization) (surface disinfection)  
Cleans (cleanses) (your air of odors) (the air you breathe)  
Clean the air with (this product)  
Directly targets source of odors  
Eliminate (removes) (controls) (destroys) bacterial odors at the source (with this product) (for ultimate freshness) (and in the air)  
Eliminate (removes) (controls) (destroys) bacterial odors (in the air)  
Eliminate (removes) (controls) (destroys) odors caused by odor-causing bacteria (in the air)  
Eliminate (removes) (controls) (destroys) odors (at the source) (&) in the air  
(Eliminate(s)) (remove(s)) (control(s)) (destroy(s)) (odors) {insert ODORS from list on page 10} (caused by odor-causing bacteria)  
(Eliminate(s)) (remove(s)) (control(s)) (destroy(s)) (odors) {insert ODORS from list on page 10} unlike air fresheners (that) (which) only mask odors (temporarily).  
(Eliminate(s)) (remove(s)) (control(s)) (destroy(s)) (tough) (problem) odors (around)(such as) {insert ODORS from list on page 10}. {insert list of ROOMS from the USE SITES list on page 10}  
(Eliminate(s)) (remove(s)) (control(s)) (destroy(s)) odors unlike air fresheners that only mask odors temporarily.  
Eliminate tough odors such as bathroom odors, pet odors, smoke and food odors  
Eradicate odors.  
Get odors out with (this product)  
Kills (99.9%) of odor-causing bacteria  
Kills (99.9% of) (odor-causing) bacteria at the source (for ultimate) (complete) (freshness) (for a light, fresh scent) (for a fresher home)  
Kills (eliminates) (reduces) (controls) {list of ODORS from list on page 10} (odors) (caused by) (airborne) odor-causing bacteria.  
Leaves no odors behind  
This product ... air so clean you can smell the freshness  
Odor (eliminator) (elimination)  
Odor fighter  
Solve odor problems at the source (with this product)  
Targets odor causing bacteria for long lasting freshness  
(This product) cleans the air we breathe  
(This product) doesn't just (mask) (disguise) (cover up) odors, (it eliminates them).  
(This product) doesn't just (mask) (disguise) (cover up) odors, (it eliminates them).  
(This products) (Eliminates) (Destroys) odors (caused by odor-causing bacteria)  
(This product) eliminates odors by (removing)(killing) (controlling) odor causing bacteria (in the air)  
(This product) (eliminates) (gets rid of) the (odors) (smells) (stinks) without just masking them.  
(This product) is effective (against) (in) (eliminating) (removing) (destroying) (tough) {insert ODORS from list on page 10}  
Ultimate odor eliminator  
Unlike air fresheners that only mask odors temporarily, this product destroys odors in the air and kills 99.9% of odor-causing bacteria at the source, so odors do not come back  
Unlike air fresheners that only mask odors, this product sanitizing spray eliminates tough odors such as smoke, food, mold, mildew, bathroom, and pet odors  
Unlike air fresheners that only mask odors, this product sanitizing spray eliminates tough odors such as smoke, food, mold, mildew, bathroom, and pet odors for freshness  
Unlike air fresheners, which only mask odors temporarily, (this product) eliminates {insert ODORS from list on page 10}.  
Unlike (other) (ordinary) (regular) air fresheners that (only) mask odors (temporarily), (this product) eliminates tough odors, such as {insert ODORS from list on page 10}  
(With this product) (You can) (be sure) (be confident) (that) (even) (tough) (lingering) (odors) (are not just masked) (but) (are) (actually) (eliminated) (removed).  
Works to eliminates odors.

**<< Bacterial Claims >>**

Clean (cleanse) your air of bacteria and their (bad) (odors) (smells) (stinks)  
Keeps odors away by (destroying) (removing) (killing) (eliminating) (reducing) (controlling) odor-causing bacteria in the air.  
Keeps (on) (killing) (destroying) (eliminating) (reducing) (Removing) (controlling) odor-causing bacteria in the air.  
(Kills) (destroys) (controls) (eliminates) (reduces) (Removes) odor causing bacteria (and eliminates their odors)

**NOTE:** Bracketed information is denoted as: << directive >>, { insert as noted }, ( optional text ), [ required qualifier ]. The term "this product" used throughout this document may be replaced with the marketed product brand name. To use the term "germ" the product must be efficacious against 2 of the 3 major classes of organisms. The product label must identify the specific bacteria, virus, fungus & mold. The term "x" is a place holder for a number between 1 to 99.

8  
14

- (This product) (controls) (kills) (eliminates) (destroys) odor-causing airborne bacteria (and eliminates their odors).
- (This product) (controls) (kills) (eliminates) (destroys) odor-causing bacteria in the air (and eliminates their odors).
- (This product) (controls) (kills) (eliminates) (destroys) airborne odor-causing bacteria (and eliminates their odors).
- (This product) (controls) (kills) (eliminates) (destroys) odor-causing bacteria in the air (and eliminates their odors).
- (This product) eliminates odors in the air by (killing) (controls) (reduces) (destroying) (eliminating) odor-causing airborne bacteria
- (This product) eliminates odors in the air by (killing) (controls) (reduces) (destroying) (eliminating) odor-causing airborne bacteria
- (This product) (kills) (destroys) (controls) (reduces) (eliminates) (Removes) odor causing bacteria in the air (and eliminates their odors)
- (This product) (kills) (controls) (destroys) (eliminates) (reduces) (Removes) odor causing airborne bacteria (and eliminates their odors)
- (This product) (kills) (destroys) (controls) (eliminates) (reduces) (Removes) odor causing bacteria in the air (and eliminates their odors)
- (This product) (kills) (destroys) (controls) (eliminates) (reduces) (Removes) odor-causing bacteria in the air – unlike air fresheners, which only mask odors.
- (This product) (kills) (destroys) (eliminates) (reduces) (Removes) (controls) the odor-causing bacteria that cause (bad)(tough) {insert ODORS from list on page 10} (in the air)
- (This product) (kills)(controls) (Eliminates) (Removes) (Destroys) (Reduces) odors caused by (airborne bacteria) (bacteria in the air) (such as) (around) {insert ODORS from list on page 10}
- (This product) (kills) (controls) (Eliminates) (Removes) (Destroys) (reduces) (bacterial odors) (non-bacterial odors) (such as) (around) {insert ODORS from list on page 10}

**<< Air Sanitizing Claims >>**

- It takes more than fresh air to clean your (home) (air) from (odor(s)) (odor-causing bacteria) (airborne bacteria)
- (This product) (Cleans) (Sanitizes) the air (you breathe) (from odor-causing bacteria)
- (This product) (Cleans) (Sanitizes) the air by temporarily (reducing) (removing) (odor-causing) (bacteria) (airborne bacteria) (from) (in) (the air)
- (This product) refreshes the air
- Sanitizes the air (you breathe) (in your home)

**<< Temporarily Action Claims >>**

- Temporarily reduces odor-causing (airborne) bacteria in the air
- (This product) (Helps) (temporarily reduce) the number of airborne odor causing bacteria in virtually any room (to leave your home smelling clean and fresh)
- (This product) (Helps) (temporarily reduce) the number of airborne odor-causing bacteria (in any room) {insert ROOM from USE SITES list on page 10}
- (This product) Temporarily Reduces (odor causing) inanimate airborne contaminants
- (This products) temporarily (reduces) (Removes) (Sweeps away) (Takes away) (airborne bacteria) (odor-causing bacteria in the air) (odor causing bacteria in the air)
- (This product) temporarily (reduces) (Removes) (Sweeps away) odor causing bacteria from) {insert ODORS from list on page 10}
- (Use) (With) (This product) (helps) Temporarily reduce (the number of) (airborne odor-causing bacteria) (contaminants) (in your home) (in virtually any room) (by) (eliminating odors) (removing) (destroying odors) (temporarily reducing) (sweeping away) (odors) (temporarily reducing airborne odor-causing bacteria) (temporarily reducing odor causing bacteria) (in the air) (leaving) (to leave) (your home) (behind) (smelling) (a) (clean) (fresh) (pure) (light) (crisp) (fragrance) (scent)

**<< Front or Back Panel - Marketing / Product Performance claims – use as bullet point or in paragraph format >>**

**<< Sanitizing – Hard non-porous, non-food contact surface claims >>  
( front / back panel claim )**

- An effective (fast acting) non-food contact surface sanitizer (for use in {insert USE SITES from list on page 10})
- Fast Acting (Sanitizer)
- Great for use as a non-food contact surface sanitizer in {insert USE SITES from list on page 10}.
- Kills (Destroys) (Eliminates) 99.9% of bacteria\*\*\* on hard, non-porous surfaces
- Kills (Destroys) (Eliminates) 99.9% of bacteria on hard, non-porous surfaces in 5 minutes.\*\*\*

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9  
14

Kills (Destroys) (Eliminates) 99.9% of bacteria on hard, non-porous (kitchen)(bathroom)(household) surfaces in 5 minutes.\*\*\*  
Kills (99.9%) (of) (household) bacteria in (5 minutes) on hard, non-porous surfaces.\*\*\*  
Leaves (household) surfaces sanitized  
(Sanitizes) (Kills) (99.9% of) (illness causing) bacteria\*\*\* and (neutralizes) (eliminates) (bacterial) odors (at the source) (for) (complete) (freshness) (throughout your home) (a fresher home) (a healthier home) (a fresh and healthy home) (a fresher and healthier home) (for a fresher and healthier home)  
Sanitizes (kitchen) (household) (bathroom) (restroom) (non-food contact) surfaces in (5 minutes).  
Sanitizes (Kitchen) (household) (bathroom) (hard non-porous) (surfaces) in 5 minutes.  
Sanitizer (Sanitizes)  
5 minutes is all it takes to kill 99.9% of bacteria.\*\*\*

**(back panel qualifier)**

\*\*\*Kills (destroys)(eliminates) 99.9% of (Enterobacter aerogenes) (Staphylococcus aureus) on hard, non-porous surfaces in 5 minutes.

**<< Front or Back Panel – Surface Disinfecting & Deodorizing claims – use as bullet point or in paragraph format >>**

An effective disinfectant, sanitizer (non-food contact surfaces) for use in the kitchen, bathroom, bedroom and other household areas.  
(Controls)(Kills) odor-causing (germs\*\*) (bacteria\*)  
Controls kitchen odors caused by bacteria\*.  
Controls pet odors caused by (bacteria\*) (fungi).  
Controls the flu virus (on hard non-porous surfaces)  
Deodorizes by killing (many) (bacteria\*) (germs\*\*) (fungi) that cause odors, (ordinary non-germicidal sprays can't do this)  
Disinfection Control (Formula)  
Disinfects {insert 'A – B' organisms from list on page 9} on hard non-porous surfaces.  
Disinfects hard non-porous (food) (non-food) contact surfaces (in {insert USE SITES from list on page 10})  
Disinfects ({insert USE SITES from list on page 10}) (and) ({insert USE SURFACES from list on page 10})  
Disinfects and deodorizes by killing common (household) germs\*\* and controlling their odors.  
Disinfects (sanitizes) and deodorizes by killing common (household) bacteria\* and controlling their odors.  
Dries quick, kills (germs\*\*) quick  
Effective against (bacteria\*) (fungi)(virus†)(germs\*\*): {insert 'A – B' organisms from list on page 9}  
Eliminate odors at the source and in the air  
Eliminates odors at their source  
Eliminates (germs\*\*) (and) (odors) on hard non porous surfaces that you come into contact with everyday.  
Eliminates (removes) odors (caused by) (bacteria\*)(germs\*\*) (mildew)  
Eliminates (Removes) (bacteria\*) (fungi\*) (viruses†) (germs\*\*) from {insert USE SURFACES from list on page 10}  
Fights germs and odors  
Fights the Flu Virus (on hard non-porous surfaces)  
Flu Virus Control (on hard non-porous surfaces)  
(For use in) (homes) (as a) (disinfectant)  
Gets rid of odors by killing the germs\*\* (that cause them)  
Gets to the heart of odors  
Great for spot disinfection – target performance  
Helps prevent the build-up of odors by killing odor-causing bacteria\* (on hard non-porous food contact surfaces)  
Keeps (controlling) (killing) odor-causing germs (bacteria\*).  
Keeps (eliminating)(controlling)(killing) odor-causing germs\*\*.  
Keeps on (controlling) (killing)odor causing germs\*\*.  
Keeps odors away by (eliminating)(controlling)(killing) the (bacteria) (germs\*\* ) that cause odor.  
Kills (disinfects) against {insert 'A – B– C' organism from list on page 9}  
Kills 99.9% of germs\*\* and odor causing bacteria  
Kills 99.9% of germs\*\* and odor causing bacteria so odors do not come back  
Kills (99.9% of) (illness causing) bacteria and (neutralizes) (eliminates) odors (at the source)  
Kills (99.9% of) (illness causing) (odor-causing) bacteria at the source  
Kills germs\*\*, helps your house (home) smell cleaner  
Kills germs\*\* (whenever) (where-ever) you need it  
Kills (household) (kitchen) germs\*\*  
Kills Influenza A (Flu virus)  
Kills (kitchen)(household)(bathroom)(germs\*\*)(bacteria\*)(fungi)

**NOTE:** Bracketed information is denoted as: << directive >>, { insert as noted }, ( optional text ), [ required qualifier ]. The term "this product" used throughout this document may be replaced with the marketed product brand name. To use the term "germ" the product must be efficacious against 2 of the 3 major classes of organisms. The product label must identify the specific bacteria, virus, fungus & mold. The term "x" is a place holder for a number between 1 to 99.

10  
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Kills more than 99.9% of bacteria\* and viruses†  
 Kills (most) Household germs\*\*  
 Kills the (Influenza) (flu) virus  
 Kills (the following) (household) (kitchen) (germs\*\*)(bacteria)(viruses†)(fungi): {insert 'A – B– C' organisms from list on page 9} (in 10 minutes)  
 Kills (bacteria\*)(germs\*\*)  
 Prevents the growth of mold and mildew (on) (in) {insert USE SURFACES from list on page 10} {insert USE SITES from list on page 10}  
 On hard, non-porous, non-food contact surfaces this product kills the following (bacteria\*)(virus†)(fungi)(germs\*\*): {insert 'A – B' organisms from list on page 9}  
 Starts to kill on contact  
 Surface Disinfectant  
 (This product) (controls) (kills) the (germs\*\*), (bacteria\*) that cause unpleasant odors (at the source).  
 (This product) deals with the root cause of the odor, leaving behind a fresh clean (home) (scent)  
 (This product) (disinfects) (and) (sanitizes) the following surfaces {insert use surface from list on page 10}  
 (This product) (disinfects) (and) (sanitizes) (in) (the following areas) {insert USE SITES from list on page 10}  
 (This product) (eliminates) (kills) germs\*\* on surfaces and (removes) odors in the air  
 (This product) is a mildewstat and will effectively inhibit the growth of mildew and the odor caused by it when applied to hard non-porous surfaces.  
 (This product) kills {insert 'A – B' organisms from list on page 9} (in 10 minutes)  
 (This product) kills the germs\*\* that cause (bad) odors

<< Front or Back Panel – Surface Disinfecting & Deodorizing claims – use as bullet point or in paragraph format Cont. >>

(This product) kills bacteria\* on environmental surfaces in your home and in public places.  
 (This product) kills (the following virus) (Influenza A) (on hard, non-porous surfaces) (in 10 minutes)  
 (This product) prevents odors at their source caused by (germs\*\*), (bacteria\*)  
 Treats, does not cover up  
 Use this product (in) (under) (around) (on) {insert use site from list on page 10}  
 Use this product (on) {insert USE SURFACES from list on page 10}

Kills 99.9% of (bacteria\*) (germs\*\*) (on) (in)(odor) (hot spots) (such as) {insert USE SURFACES from list on page 10} {insert USE SITES from list on page 10}  
 Kills 99.9% of germs\*\* and odor causing bacteria\* (on hard surfaces)  
 Kills 99.9% of odor causing (bacteria\*) (germs\*\*) (on) (in)(odor) (hot spots) (such as) {insert USE SURFACES from list on page 10} {insert USE SITES from list on page 10}

(back panel qualifier for disinfecting "germs" – must choose at least 1 bacteria and/or 1 virus and/or fungus)

\*\* (This product) kills 99.9% of (Staphylococcus aureus) (Salmonella enterica) (Pseudomonas fluorescens) (Escherichia coli) (Escherichia coli O157:H7) (Proteus mirabilis) and (Influenza A) (Candida albicans) on hard, non-porous surfaces in 10 minutes

<< DISINFECTING CLAIMS (Hard non-porous, non-food contact surface) >>

Respiratory illnesses attributable to Pandemic 2009 H1N1 are caused by Influenza A Virus. This product (product name) is a broad-spectrum hard surface disinfectant that has been shown to be effective against (Influenza A Virus tested and listed on the label) and is expected to inactivate all Influenza A Viruses including Pandemic 2009 H1N1 (formerly called Swine Flu).

This product has demonstrated effectiveness against Influenza A Virus and is expected to inactivate all Influenza A Viruses including Pandemic 2009 H1N1 Influenza A Virus.

This product has demonstrated effectiveness against (Influenza A Virus tested and listed on the label) and is expected to inactivate all Influenza A Viruses including Pandemic 2009 H1N1 (formerly called Swine Flu).

Kills Pandemic 2009 H1N1 Influenza A Virus (formerly called Swine Flu).

Kills Pandemic 2009 H1N1 Influenza A Virus.

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12  
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<< Back Panel >>

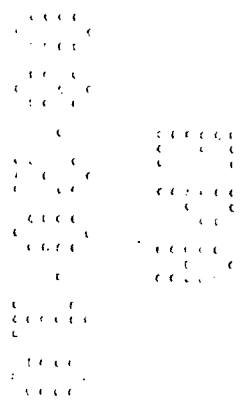
<< IMPORTANT: All organisms must be identified by genus & species.  
Abbreviations may be included but must appear in (parens). >>

<< Hard non-porous surfaces >>

- << A. 10-min Disinfection against Bacteria >> (Methicillin Resistant) Staphylococcus aureus (Staph) (MRSA) (ATCC # 33592)  
Staphylococcus aureus (Staph) (ATCC # 6538)  
Salmonella enterica (Salmonella) (ATCC # 10708)  
Pseudomonas fluorescens (ATCC # 6972)  
Escherichia coli (E. coli) (O157:H7) (ATCC # 43888)  
Proteus mirabilis (ATCC # 25933)
- << B. 10 Min. Disinfection against Virus >> Influenza A Virus (Flu virus) (ATCC VR-544, Strain Hong Kong)
- << C. 10 Min. Disinfection against Fungi >> Candida albicans (ATCC # 10231)
- << D. Fungistatic against Fungi >> Aspergillus niger (mold & mildew) (ATCC # 6275)
- << E. \*\*\* 5 minute Sanitization against Bacteria >> Enterobacter aerogenes (ATCC # 13048)  
Staphylococcus aureus (Staphylococcus) (ATCC # 6538)

**Symbol Designation – sued on product labels:**

Single asterisk (*) bacteria*	used for identifying disinfection against specific bacteria
Dagger (†) viruses†	used for identifying disinfection against specific viruses.
Double asterisk(**) germs**	used for identifying disinfection against specific bacteria and virus and fungi.
Triple asterisk (***) sanitizes***	used for claims of sanitization



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