

777-104

05/26/2011

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

MAY 26 2011

Mary C. Pisculli, Regulatory & Registration Compliance Specialist
Reckitt Benckiser, LLC
Morris Corporate Center IV
399 Interpace Parkway
Parsippany, NJ 07054-0225

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Subject: Notification per PR Notice 98-10
Vanity GP
EPA Reg. No. 777-104
Application Date: May 10, 2011
Application Receipt: May 11, 2011

Dear Ms. Pisculli:

This acknowledges receipt of your notification submitted under the provisions of FIFRA section 3 (c) 9 and PR Notice 98-10.

Proposed Notification:

Reckitt Benckiser is adding the following packaging and cleaning claims for EPA Reg. No. 777-104:

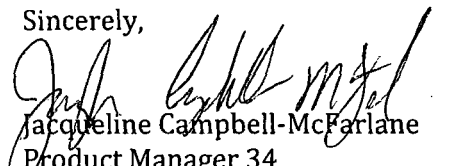
- (Family) (Household) (Multi-Room) (Pack)
- X% (more) (cleaning ingredients) (removal of lime scale)

General Comments:

Based on a review of the submitted materials, your notification to add the packaging and cleaning claims as referenced above are acceptable. A copy of this letter has been made a part of the permanent file for 777-104.

If you have questions concerning this letter, then please contact me at 703-308-6416 or by email at campbell-mcfarlane.jacqueline@epa.gov or Killian Swift at 703-308-6346 or by email at swift.killian@epa.gov. When you are submitting information or data in response to this letter, send a copy of this letter to accompany the submission in order to facilitate processing.

Sincerely,


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

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

☐ **Registration**
☐ **Amendment**
☒ **Other**

 OPP Identifier Number
MP0012
Application for Pesticide - Section I

1. Company/Product Number 777-104	2. EPA Product Manager Jacqueline Campbell-McFarlane	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Vanity GP	PM# # 34	
5. Name and Address of Applicant (Include ZIP Code) Reckitt Benckiser LLC (d/b/a: Reckitt Benckiser) Morris Corporate Center IV 399 Interpace Parkway Parsippany, NJ 07054-0225 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. 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

- | | |
|--|--|
| <input type="checkbox"/> Amendment - Explain below. | <input type="checkbox"/> Final printed labels in response to Agency letter dated _____ |
| <input type="checkbox"/> Resubmission in response to Agency letter dated _____ | <input type="checkbox"/> "Me Too" Application |
| <input checked="" type="checkbox"/> Notification - Explain below. | <input type="checkbox"/> Other - Explain below |

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)**Notification:** to add the following packaging and cleaning claims to the master text label:
 (Family) (Household) (Multi-Room) (Pack)
 X% (more) (cleaning ingredients) (removal of lime scale)

This 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 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:**

Child-Resistant Packaging <input checked="" type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Unit Packaging wgt. No. per container	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt. No. per container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
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***Certification must be submitted**

3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container various	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On labeling accompanying product
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		

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
Certification 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 May 10, 2011	

May 10, 2011

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

Attention: Ms. Jacqueline Campbell-McFarlane, PM-34

Reference: Notification to add packaging & cleaning claims to master text label
Product Name: Vanity GP
EPA Registration Number: 777-104
OPP ID Number: MP0012

Dear Ms. McFarlane:

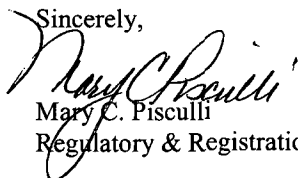
This letter is to inform the agency that Reckitt Benckiser would like to add the following packaging and cleaning claims on our master text label for the above referenced registration number.

(Family) (Household) (Multi-Room) (Pack)
X% (more) (cleaning ingredients) (removal of lime scale)

In support of this submission, I have enclosed one (1) copy of the master text label with the above listed packaging and cleaning claims appearing as double underlined red font and the required EPA Application for Pesticide Registration Form 8570-1: OPP ID No. MP0012. 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
Regulatory & Registration Compliance Specialist

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<< Front Panel >>

ACTIVE INGREDIENT:

Hydrochloric Acid 12.0%

OTHER INGREDIENTS: 88.0%

TOTAL: 100.0%

NOTIFICATION
Date Reviewed: 5/20/11
Reviewed By: [Signature]

KEEP OUT OF REACH OF CHILDREN

DANGER: CORROSIVE. See back (side) panel for additional precautionary statements and first aid.
Harmful if swallowed.

NET CONTENTS:	16 FL. OZ. (1 PT.)	473 mL	28 FL. OZ. (1 PT. 12 FL. OZ.)	828 mL
	20 FL. OZ. (1 PT. 4 FL. OZ.)	591 mL	30 FL. OZ. (1 PT. 14 FL. OZ.)	887 mL
	22 FL. OZ. (1 PT. 6 FL. OZ.)	650 mL	32 FL. OZ. (1 QT.)	946 mL
	24 FL. OZ. (1 PT. 8 FL. OZ.)	709 mL	36 FL. OZ. (1 QT. 4 FL. OZ.)	1.06 L
	26 FL. OZ. (1 PT. 10 FL. OZ.)	768 mL	40 FL. OZ. (1 QT. 8 FL. OZ.)	1.18 L
	(2) 24 FL. OZ. (1 PT. 8 FL. OZ.)	709 mL	TOTAL: 48 FL. OZ. (1 QT. 1 PT.)	1.41 L
	(3) 24 FL. OZ. (1 PT. 8 FL. OZ.)	709 mL	TOTAL: 72 FL. OZ. (2 QTS. 8 FL. OZ.)	2.12 L
	(6) 28 FL. OZ. (1 PT. 12 FL. OZ.)	828 mL	TOTAL: 1.31 GAL. (5.25 QTS.)	4.96 L
	(4) 32 FL. OZ. (1 QT.)	946 mL	TOTAL: 1 GAL. (4 QTS.)	3.78 L
	(6) 32 FL. OZ. (1 QT.)	946 mL	TOTAL: 1.5 GAL. (6 QTS.)	5.67 L
	(4) 40 FL. OZ. (1 QT. 8 FL. OZ.)	1.18 L	TOTAL: 1.25 GAL. (5 QTS.)	4.73 L
	(6) 40 FL. OZ. (1 QT. 8 FL. OZ.)	1.18 L	TOTAL: 1.87 GAL. (7.5 QTS.)	7.09 L

<< Front or Back Panel >>

EPA Reg. No.:	777-104			
EPA Est. No.:	777-NJ-2	55179-IN-1	09019-OH-001	68777-NY-1
	777-OH-1	11525-IL-1	09019-OH-002	75371-IN-001
	8791-MO-1	8155-OH-1	312-WI-1	75371-IN-002

<< Back Panel >>

Questions? (symbol of telephone) (Call:) (1-800-228-4722) (1-800-677-9218)

For ingredient (and other) information, (www.rbnainfo.com)

Distributed by: Reckitt Benckiser Inc., Parsippany, NJ 07054 (-xxxx)

Made in {insert country} © RBI {insert year}

Contains no phosphates (Phosphate free)

This (bottle) (container) is made of x% post-consumer recycled plastic.

Company Logo (Reckitt Benckiser) (rb)

<< Back Panel – Optional text >>

Consumer Commodity ORM-D

Important facts (about this product)

Encourage your state and local authorities to establish a program to recycle this (bottle) (container).

Recycle Symbol

IMPORTANT: For directions for use and first aid instructions in Spanish, please call 1-877-843-3817.

Spanish Translation:

IMPORTANTE: Para instrucciones de uso y primeros auxilios en español por favor llame al 1-877-843-3817.

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.

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*.

<< FRONT or BACK PANEL CLAIMS - use as bullet point or in paragraph format >>

<< INTRODUCTORY 6-mos. CLAIMS – will only appear on graphic labels for the first 6 months the product is on shelf >>

(New) (Improved) (Formula) (Angel neck bottle) (Cap) (Fragrance) (Pack) (Package) (Scent) (Size)
(Better) (Improved) (Stain Removal) (Rust Removal) (Lime Scale Removal) (Bowl coverage than before)
Better hard water stain – dissolving power {insert: (than before) (than previous formula) (than prior formula)}
Better hard water stain removal {insert: (than before) (than previous formula) (than prior formula)}
Dissolves hard water stains better {insert: (than before) (than previous formula) (than prior formula)}
(Improved) (Bowl) (Coverage) than (other) Lysol® Brand Disinfectant (Liquid Bleach) (APC(s) (TBC(s)
(Improved {insert soil} removal)
(New) (Improved) (Formula) contains (cleaning) (cleaning power) (agents) (stain fighters)
(New) (Improved) (Formula) with (stain fighting agents) (with stain fighting action)
Thick liquid coats bowl for better cleaning than prior formula

<< PACKAGING CLAIMS >>

(2 PACK) (3 PACK) (4 PACK) (6 PACK) (x PACK) (Family) (Household) (Multi-Room) (Pack)
(x Uses per pack) (x Uses per bottle) (Cleans x toilets) (x Uses)
(Multi-Toilet Pack) (Value Pack) (Limited Time Value Pack) (Limited Time Value) (One for each bathroom)
(Place 1 in each bathroom) (Buy x get x free) (x% discount) (x% more free) (x% more product) (25% More Product)
(Great) (Bonus) (Economy) (Value) (Trial) (Pack) (Size) (Mega Value Pack) (Mega Value Size)
(2 for 1 Pack) (2 in 1 Pack) (32 oz. for the price of 16 oz.) (x x FL. OZ.)
(2 x 24 FL. OZ.) (3 x 24 FL. OZ.) (4 x 32 FL. OZ.) (6 x 28 FL. OZ.) (6 x 32 FL. OZ.) (4 x 40 FL. OZ.) (6 x 40 FL. OZ.)
More value for same price; now also removes allergens††
Save \$x (by mail) (when you buy Lysol® Toilet Bowl Cleaner)
(Bonus x%) (x% Free) (x oz. for Free) (x oz. for the price of x oz.)
(Bonus 50%) (50% Free) (16 oz. for Free) (32 oz. for the price of 16 oz.)
(Bonus 40%) (40% Free) (16 oz. for Free) (40 oz. for the price of 24 oz.)
(Bonus 33%) (33% Free) (8 oz. for Free) (32 oz. for the price of 24 oz.) (24 oz. for the price of 16 oz.)
(Bonus 25%) (25% Free) (8 oz. for Free) (40 oz. for the price of 32 oz.)

Best value bottle
Buy me again
Click & Close (Indicator)
Click stop – audible close
Contains up to x uses
Convenient cap
Easy grip bottle
Easy to close
Easy to reach under the rim
(Easy) (Easier) to (open) (squeeze) cap
Easy to use (bottle)
Entire bottle can be recycled
Ergonomic bottle grip
Helps reach under the rim
Leak-proof cap
Long (angle) neck bottle (reaches under the rim)
No slip grip
Non-drip
Non-removable cap
Open / Close indicator in contrasting colors – let's you know if the bottle is open / closed
Removable cap
(Repurchase time) (Shopping time) (Time to replace) (Time to buy a new Lysol® toilet bowl cleaner)
(Senior friendly cap) (Senior tested cap)
Specially designed angle neck – gets all the way up under the rim
(Specially) designed (cap) for better (bowl) coverage
Specially designed neck makes it easy to clean under the rim
Twist and go cap
(Unique) Angle neck bottle (for hard to reach areas) (reaches under the rim)

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<< MARKETING CLAIMS >>

(Antibacterial) (Antibacterial Action) (Antimicrobial) (Antiviral) (Bactericidal) (Bactericide) (Disinfectant)
(Disinfects) (Germicidal**) (Sanitizer) (Sanitizes) (Virucidal†)

(Completely) (Easily) (Effectively) (Quickly) (Thoroughly) (Cleans) (Shines) (Whitens) (Deodorizes)
(Fast / Easy / Effective) (Toilet Bowl Cleaner) (Toilet Bowl Disinfectant)

(Clean) (Fragrance) (Fresh) (Minty) (Pleasant) (Spearmint) (Wintergreen) (Scent)

(Deep cleaning) (Bowl & Beyond) (Easy to use) (Non-abrasive) (Rust destroying) (Thick) (Tough stain) (Formula)
(Breaks down) (Cleans) (Cleans away) (Destroys) (Dissolves) (Easily) (Penetrates) (Quickly) (Removes) (Stubborn)
(Tough) (Hard Water) (Lime Scale) (Mineral) (Rust) (Stains) (Deposits) (Toilet Rings)
(Lime & Rust Remover) (Lime Scale Remover) (Lime Scale & Rust Remover)

(Maximum coverage) (Powerful cleaning) (Maximum bowl coverage) (Improved coverage)

(Maximum) (Max) (Bowl) (Coverage) (Powerful) (Clean) (Cleaning action)

(Maximum) (Power) (Protection) (Strength) (Cleaner) (Cleaning)

(5X (the) Cleaning Power)

Dual Action Toilet Bowl Cleaner

2-in-1: Cleans, Disinfects

Triple Action: Cleans, Disinfects, Deodorizes

3-in-1 (Formula): (Cleans, Disinfects, Deodorizes) (Cleans, Disinfects, Refreshens) (Cleans, Disinfects, Removes Stains)

4-in-1: Cleans, Disinfects, Deodorizes, Sanitizes

Accepted for hospital disinfection

Better reach under the rim

Coats the entire bowl

Complete Clean

Confidence of Lysol®

Depend-a-bowl toilet bowl cleaner

Gives your bowl the Lysol® clean you trust

Go beyond clean

Great for everyday (cleaning) (deodorizing) (disinfecting) (and) (&) (sanitizing)

(Home) (Hospital) disinfectant toilet bowl cleaner

Hospital disinfectant

Hospital toilet bowl cleaner

Keep your toilet looking new

Meets AOAC Use-dilution Efficacy test standards for hospital disinfectant toilet bowl cleaners

Quality household disinfection

Quick and easy

The clean you trust

The confidence you get from the Lysol® name

The right tool for a nasty job

Trusted toilet disinfection

Use in conjunction with other Lysol® products for a clean bathroom

Efficacy tests have demonstrated that (this product) is effective as a one-step toilet bowl cleaner and disinfectant in the presence of organic soil (5% blood serum).

(This product) has a thick formula that coats above and below the waterline. This coating action provides longer contact time to help dissolve tough rust stains and mineral deposits (on contact) to make cleaning easier.

This product contains no phosphates and is germicidal when used as directed but differs in composition from other Lysol® Brand products.

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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*.

<< PERFORMANCE CLAIMS >>

Clings to the bowl to stay where the germs are
Coating action above and below the waterline provides extended contact time.
Coats the bowl above and below the waterline
Coats the bowl to stay in contact longer
Coats the bowl to stay where the germs are
Designed to (remove) (penetrate) (destroy) (dissolve) tough (stubborn) {insert soils}
Designed to (remove) (penetrate) (destroy) (dissolve) the toughest {insert soils}
Does not just whiten ({insert soils}) stains, (this product) removes them
Easily dissolves stubborn hard water stains
Formulated especially for hard water mineral deposits, limescale and rust
Hard water formulation
Helps keep water flow optimal
Leaves toilet sparkling clean and disinfected
No hard scrubbing
Rinses away easily
Specially designed for hard water problems
Specially designed for hard water (stains) (areas)
Specially designed for the removal of rust and (&) lime scale stains
Specially designed for the removal of rust stains and mineral deposits
Specially designed to breakdown rust and (&) lime scale stains
Specially designed to breakdown stains and mineral deposits
Specially designed to clean the toilet
Specially designed to (remove) (penetrate) (destroy) (dissolve) the toughest {insert soils}
Specially designed to (remove) (penetrate) (destroy) (dissolve) tough (stubborn) {insert soils}
Specially formulated to (remove) (penetrate) (destroy) (eliminate) {insert soils}
Special rust formula makes stain and mineral deposits easy to remove
Thick clinging action
Thick coating formula for prolonged contact time
Thick formula adheres to stains for better cleaning
Thick formula coats above and (&) below the waterline
Thick formula coats the entire bowl
Thick formula that cleans, deodorizes, disinfects and sanitizes
Thick liquid coats bowl for better cleaning
Thick liquid sticks to stains
Thick powerful formula
Toilet bowl cleaner with lime and (&) rust remover
Whitens and brightens toilet bowl
(Won't) (Will not) stain the bowl
Works best in hard water areas
Works best on hard water stains

<< USAGE CLAIMS >>

A great toilet bowl disinfectant and sanitizer for use in {insert site}
An effective (disinfectant) (&) (sanitizer) for use in {insert surface}
Can be used in white and colored bowls
For better results use at least (once) (twice) a week
For use as a toilet bowl (cleaner) (deodorizer) (disinfectant) (&) (sanitizer) found in {insert site}
(Intended) For use (only) in {insert site}
For use in {insert surface} as a cleaner, disinfectant (and) (&) sanitizer found in {insert site}
Good on American and European toilets
Great for use as a toilet bowl (cleaner) (deodorizer) (disinfectant) (and) (&) (sanitizer) in {insert site}
Recommended for use in {insert site}
Recommended usage: twice daily to maintain a clean toilet
(This product) is recommended for use in {insert surface}

Note: Bracketed information is denoted as: <<directive>>, {insert as noted}, (optional text), [required qualifier].
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The product label must identify the specific bacteria*, virus*, fungus* & mold*.

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*.

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<< CLEANING CLAIMS – continued >>

Powerful cleaning (formula)
Powerful cleaning formula dissolves tough stains
Powerful stain (fighting) (fighter)
Powers out {insert soils}
Powers through (thru) hard water stains
Prevents the build-up of {insert soils} in the ('S' bend) (and) (pipes) when used
Prevents the build-up of {insert soils} in the 'S' bend and pipes when used regularly to help water flow optimally
Professional strength cleaning
Quickly removes {insert soils}
Releases powerful cleaning agents on contact
Removes {insert soils} (above) (and) (below) (the waterline)
Removes lime and (&) rust
Removes rust and (&) mineral stains
Removes rust stains and (&) mineral stains
Removes {insert soils} through the 'S' bend (and pipes)
Removes stains fast with less work
Removes stains right before your eyes
Removes tough rust and (&) mineral stains
Removes (tough) rust (stains)
Removes tough stains (on contact)
Stain grabbing power
(Starts to) Dissolve(s) {insert soils} right before you eyes
Starts to dissolve stains instantly
(Starts to) remove (dissolve) stains (on contact) (instantly)
Starts to remove stains on contact
Strong enough for the dirtiest toilet bowl
Strong enough to clean the dirtiest toilet bowl
The professional strength cleaning power leaves the bowl sanitary
(The) Toughest stains (instantly) disappear
Tough cleaning power
Use daily to prevent build-up of (lime scale) (rust) stains
Use regularly to help prevent (build-up of) {insert soils}
Use regularly to maintain a clean, fresh and shiny toilet bowl (even under the rim)
Watch {insert soils} (start to) disappear
Watch {insert soils} (start to) (disappear) (dissolve) right before your eyes
Watch stains disappear right before your eyes
Watch the toughest stains disappear

<< INSERT >>

Use Sites:	Clinics Day Care Centers Dental Offices Doctor Offices Health Care Facilities Homes (Households)	Hospitals Hotels / Motels Infirmaries Institutions Laboratories	Nursing Homes Office Buildings Physician's Offices Restaurants Schools
Surfaces:	Bidets Toilets Urinals	Porcelain Vitreous china	
Soils:	Hard water Lime Lime scale	Mineral Rust Toilet Rings	Build-up Deposits Stains

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The product label must identify the specific bacteria*, virus*, fungus* & mold*.

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*.

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<< DISINFECTING CLAIMS >>

Cleans and disinfects the bowl and beyond
Disinfects above and below the waterline
Disinfects and breaks down stains
Disinfects and deodorizes by killing common bathroom germs**
Disinfects and sanitizes toilets, (bidets) (and) (urinals)
Disinfects beyond the bowl (and) (in the mouth trap)
Disinfects in 10 minutes
Disinfects in hard to reach areas (like) (under the rim) (and) (into the 'S' bend)
Disinfects, sanitizes and deodorizes by killing common (household) germs** and controlling their odors
Disinfects the bowl and beyond (in the mouth trap) (where you can't see)
Disinfects the bowl (and in the mouth trap)
Disinfects where you can't see (under the rim)
Easily and effectively disinfects toilet bowls (and urinals)
Gives you (full) (complete) (total) disinfection inside the toilet
Helps reduce germs** by killing bacteria and viruses found in the toilet
It clings to the surface to kill germs** and clean tough stains
Kills bacteria*
Kills (more than) (99.9% of) bacteria and (&) viruses**
Kills (more than) (99.9% of) viruses and (&) bacteria**
Kills (99.9% of) bacteria and (&) viruses above and below the waterline**
Kills (99.9% of) bacteria and (&) viruses in hard to reach areas (like) (under the rim) (and) (into the 'S' bend)**
Kills (99.9% of) bacteria and (&) viruses where you can't see (like) (under the rim) (and) (into the 'S' bend)**
Kills (99.9% of) Germs**
Kills (99.9% of) germs above and below the waterline**
Kills (99.9% of) germs beyond the bowl in the mouth trap**
Kills (99.9% of) germs in hard to reach areas**
Kills (99.9% of) germs in hard to reach areas (like) (under the rim) (and) (into the 'S' bend)**
Kills (99.9% of) germs in the bowl and beyond (in the mouth trap)**
Kills (99.9% of) germs in the bowl and in the mouth trap (where you can't see)**
Kills (99.9% of) germs in the bowl and the mouth trap**
Kills (99.9% of) germs where you can't see**
Kills (99.9% of) germs where you can't see (like) (under the rim) (and) (into the 'S' bend)**
Kills (99.9% of) viruses and bacteria**
Kills germs without the harshness of bleach**
Kills household Germs**
Kills (household) (bathroom) (bacteria*) (viruses[†]) (germs**) in the toilet
Kills in 10 minutes: {insert organisms}
Kills (the) most common germs**
Kills odor causing bacteria*
Kills Rotavirus WA (a leading cause of children's diarrhea) in 30 seconds
Kills the germs** (you know are there but) (you) can't see
Kills the following (bacteria) (and) (viruses): {insert organisms}
Kills the following (germs): {insert organisms}
Kills viruses and bacteria**
May help keep (bacteria*) (and) (viruses[†]) from cross-contamination (throughout the home)
May help keep (germs**) from cross-contamination (throughout the home)
May help prevent (bacteria*) (and) (viruses[†]) from cross-contamination (throughout the home)
May help prevent (germs**) from cross-contamination (throughout the home)
Penetrates to (kill) (eliminate) (and) destroy tough (stains) and bacteria*
Proven to kill: {insert organisms}
Starts killing 99.9% of germs on contact**
Starts to kill 99.9% of germs on contact**
This product is (bactericidal) (and) (virucidal) in killing: {insert organisms}
Total disinfection for inside your toilet (above and below the waterline)
Use daily to ensure maximum protection against {insert organisms}

Note: Bracketed information is denoted as: <<directive>>, {insert as noted}, (optional text), [required qualifier].
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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*.

Back Panel Disinfection Qualifiers – must appear before Directions For Use:

- * Kills: (Enterococcus faecalis) (Escherichia coli) (Klebsiella pneumoniae) (Pseudomonas aeruginosa) (Salmonella enterica) (Shigella dysenteriae) (and) (Staphylococcus aureus) (on hard, non-porous surfaces.)
- ** Kills: (Enterococcus faecalis) (Escherichia coli) (Klebsiella pneumoniae) (Pseudomonas aeruginosa) (Salmonella enterica) (Shigella dysenteriae) (Staphylococcus aureus) and (Hepatitis A Virus) (Human Immunodeficiency Virus Type 1 [HIV-1 AIDS Virus]) (Poliovirus Type 1) (Rotavirus WA) (on hard, non-porous surfaces.)
- † Kills: (Hepatitis A Virus) (Human Immunodeficiency Virus Type 1 [HIV-1 AIDS Virus]) (Poliovirus Type 1) (and) (Rotavirus WA) (on hard, non-porous surfaces.)

<< INSERT >>

MICROORGANISMS – must be identified by genus & species.

Disinfection – Hard, non-porous surfaces:

10-min. against Bacteria:

Enterococcus faecalis	(ATCC # 828)	(leads to blood infections)
Escherichia coli	(ATCC # 11229)	
Klebsiella pneumoniae	(ATCC # 4532)	(a leading cause of pneumonia & lung illnesses)
Pseudomonas aeruginosa	(ATCC # 15442)	(associated with pneumonia & lung illnesses)
Salmonella enterica	(ATCC # 10708)	(a fecal / orally transmitted bacteria which may lead to food borne disease, food poisoning, diarrhea, dehydration, stomach cramps, fever & vomiting)
Shigella dysenteriae	(ATCC # 11835)	(a leading cause of bloody diarrhea, breaks-down intestinal lining)
Staphylococcus aureus	(ATCC # 6538)	(a leading cause of skin infections, boils, food poisoning, blood infections)

10-min. against Viruses†:

Hepatitis A Virus		
Human Immunodeficiency Virus Type 1 [HIV-1]		(cause of AIDS Virus)
Poliovirus Type 1		
Rotavirus WA	(ATCC # VR-2018)	(a leading cause of infectious diarrhea in children)

30-sec. against Viruses†:

Rotavirus WA	(ATCC # VR-2018)	(a leading cause of infectious diarrhea in children)
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Sanitization – Hard, non-porous, non-food contact surfaces:

30-sec. against Bacteria:

Enterobacter aerogenes	(ATCC # 13048)
Escherichia coli O157:H7	(ATCC # 43888)
Staphylococcus aureus	(ATCC # 6538)

Symbol Designation – used on product labels:

Single asterisk (*)	Bacteria*	used for identifying disinfection against specific bacteria
Dagger (†)	Viruses†	used for identifying disinfection against specific viruses
Double asterisk (**)	Germ**	used for identifying disinfection against specific bacteria and virus or fungi
Triple asterisk (***)	Sanitizes***	used for all claims of sanitization against specific bacteria
Double Dagger (††)	Allergens††	used for identifying removal claims against specific non-living allergens

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The product label must identify the specific bacteria*, virus*, fungus* & mold*.

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<< USE DIRECTIONS >>

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read the entire label before using product.

<< OPENING INSTRUCTIONS >>

To Open Child Resistant Cap: Hold bottle firmly with one hand on a flat surface. With other hand, while pushing down on top of cap, turn cap counterclockwise. **Avoid squeezing bottle when opening.** To reseal, twist cap clockwise until tightly closed.

To Open Child Resistant Cap: Hold bottle firmly with one hand on a flat surface. With other hand, squeeze sides of cap where indicated while turning counterclockwise. (Do not remove cap.) **Avoid squeezing bottle when opening.** To reseal, twist cap clockwise until tightly closed.

<< Non-removable cap >>

To Open Child Resistant Cap: Hold bottle firmly with one hand. **DO NOT SQUEEZE BOTTLE WHEN OPENING.** With other hand:
1. Place fingers on marked ridges on opposite sides of cap.
2. Squeeze cap firmly and turn counterclockwise until it stops. **Do not remove cap.**
3. To reseal, squeeze cap again and turn clockwise until tightly closed.

<< Removable cap >>

To Remove Child Resistant Cap: Hold bottle firmly with one hand. **DO NOT SQUEEZE BOTTLE WHEN OPENING.** With other hand:
1. Place fingers on marked finger pads on opposite sides of cap.
2. Squeeze cap firmly and turn counterclockwise to unscrew.
3. Remove cap. 4. To reseal, replace cap and turn clockwise until tightly closed.

<< Optional Side panel pictograms - can only be used in conjunction with required back panel instructions >>

<< Non-removable >>



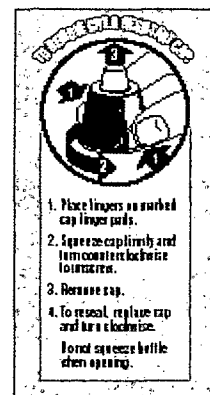
1. Place fingers on marked cap ridges.
 2. Squeeze cap firmly and turn counterclockwise until it stops. Do not remove cap.
 3. To reseal, squeeze cap again and turn clockwise.
- DO NOT squeeze bottle when opening.

<< Removable - 1 >>



1. Place fingers on marked cap finger pads.
 2. Squeeze cap firmly and turn counterclockwise to unscrew.
 3. Remove cap.
 4. To reseal, replace cap and turn clockwise.
- DO NOT squeeze bottle when opening.

<< Removable - 2 >>



<< Pictogram text >>

To Open Child Resistant Cap:
1. Place fingers on marked cap ridges.
2. Squeeze cap firmly and turn counterclockwise until it stops.
Do not remove cap
3. To reseal, squeeze cap again and turn clockwise.
DO NOT squeeze bottle when opening.

To Remove Child Resistant Cap:
1. Place fingers on marked cap finger pads.
2. Squeeze cap firmly and turn counterclockwise to unscrew.
3. Remove cap.
4. To reseal, replace cap and turn clockwise.
DO NOT squeeze bottle when opening.

To Remove Child Resistant Cap:
1. Place fingers on marked cap finger pads.
2. Squeeze cap firmly and turn counterclockwise to unscrew.
3. Remove cap.
4. To reseal, replace cap and turn clockwise.
DO NOT squeeze bottle when opening.

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<< CLEANING / DISINFECTING / SANITIZING – Hard, non-porous surfaces & non-porous, non-food contact surfaces >>

To Clean / Disinfect (/ Sanitize) (and Remove Allergens††) (follow these easy steps):

1. Flush first and remove excess dirt and grime before cleaning and disinfecting.
2. Wet all surfaces of bowl interior, including sides of bowl and under the rim, with at least 4 oz. of liquid [squeeze bottle approximately 15 seconds]. (Replace cap securely.) **Do not close toilet bowl lid.**
3. **Disinfect:** Let stand for at least 10 minutes. (**Sanitize:** Let stand for 30 seconds.)
4. Brush entire bowl thoroughly with a bowl brush and flush.
5. Rinse brush in fresh water after use.

To Clean / Disinfect (/ Sanitize) (and Remove Allergens††) (follow these easy steps):

1. Flush toilet.
2. Wet all surfaces of bowl interior, including sides of bowl and under the rim, with at least 4 oz. of liquid [squeeze bottle approximately 15 seconds]. (Replace cap securely.) **Do not close toilet bowl lid.**
3. **Disinfect:** Let stand for at least 10 minutes. (**Sanitize:** Let stand for 30 seconds.)
4. Brush entire bowl thoroughly (with a bowl brush) and flush.
5. Rinse brush in fresh water after use.) (Repeat if necessary.)

To Clean / Disinfect (/ Sanitize) (and Remove Allergens††) (follow these easy steps):

1. Flush toilet.
2. Apply 4 oz. (of product) under and around the rim (to coat the bowl). **Do not close toilet bowl lid.** (Replace cap securely.)
3. **Disinfect:** Let stand for 10 minutes. (**Sanitize:** Let stand for 30 seconds.)
4. Brush (entire bowl) thoroughly and flush.
5. Rinse brush in fresh water after use.) (Repeat if necessary.)

To Remove Tough Stains: Apply a generous amount of liquid directly onto the tough stains. For severe rust stains, if possible, remove water from bowl before applying liquid. Let soak for 15 minutes. **Do not close toilet bowl lid.** Follow cleaning steps #4 and #5 above. Repeat if necessary.

To Clean, Disinfect / Sanitize: Raise toilet seat. Flush bowl and remove heavy soil by scrubbing with a stiff brush prior to (application of) (using) this product. Point top of bottle down into bowl. Squeeze (gently,) at least 4 oz. [squeeze approximately 15 seconds] of the thick formula under the rim and on the sides of the bowl, letting it run down into the water. **Do not close toilet bowl lid.**

Disinfect: Let stand for at least 10 minutes. **Sanitize:** Let stand for 30 seconds.

Brush entire bowl even under the rim and flush. Rinse brush in fresh bowl water after each use.

To Remove Tough Stains: Apply a generous amount of liquid directly onto the tough stains. For severe rust stains, if possible, remove water from bowl before applying liquid. Let soak for 15 minutes. **Do not close toilet bowl lid.** Brush entire bowl thoroughly with a bowl brush and flush. Rinse brush in fresh water after use. Repeat if necessary.

<< IMPORTANT: The following is required for Professional use products making claims against HIV-1 AIDS Virus: >>

KILLS HUMAN IMMUNODEFICIENCY VIRUS TYPE 1 [HIV-1 AIDS Virus] ON PRE-CLEANED ENVIRONMENTAL SURFACES / OBJECTS PREVIOUSLY SOILED WITH BLOOD / BODY FLUIDS, in health care settings or other settings in which there is an expected likelihood of soiling of inanimate surfaces / objects with blood or body fluids; and in which the surfaces / objects likely to be soiled with blood or body fluids can be associated with the potential for transmission of Human Immunodeficiency Virus Type 1 [HIV-1] [associated with AIDS].

SPECIAL INSTRUCTIONS FOR CLEANING AND DECONTAMINATION AGAINST HIV-1 OF SURFACES / OBJECTS SOILED WITH BLOOD / BODY FLUIDS:

PERSONAL PROTECTION: When handling items soiled with blood or body fluids, use disposable latex gloves, gowns, masks and eye coverings.

CLEANING PROCEDURES: Blood and other body fluids must be thoroughly cleaned from surfaces and objects before application of this product.

CONTACT TIME: Allow surface / object to remain wet for 10 minutes.

DISPOSAL OF INFECTIOUS MATERIALS: Blood and other body fluids must be autoclaved and disposed of according to local regulations for infectious waste disposal.

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<< ADVISORY STATEMENT – MUST BE INCLUDED >>

This product has been specially formulated for use only in (vitreous china) (glazed porcelain) toilet bowls (bidets) (and urinals). It should not be used or placed on toilet bowl lids, vanities, sinks, bathtubs, cabinets, countertops, rugs, etc. Clean up spills and drips immediately. **Do not use with chlorine bleach or any other chemical products.** Will not harm plumbing or septic systems.

<< PRECAUTIONARY / FIRST AID / STORAGE-DISPOSAL INSTRUCTIONS >>

PRECAUTIONARY STATEMENTS: Hazards to Humans and Domestic Animals

DANGER: CORROSIVE. Causes irreversible eye damage and skin burns. Harmful if swallowed. Do not get in eyes, on skin or on clothing. Wear protective eyewear [safety glasses / goggles], protective gloves and protective clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Do not breathe vapor or fumes. Keep out of reach of children.

NOTE: First Aid statement may not appear in "box" format on less than 32 oz. individual containers due to label constraint

FIRST AID	
If in Eyes	<ul style="list-style-type: none">• 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.
If on Skin or Clothing	<ul style="list-style-type: none">• 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.
If Swallowed	<ul style="list-style-type: none">• 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 the Poison Control Center or doctor.• Do not give anything by mouth to an unconscious person.
If Inhaled	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth if possible.• Call a Poison Control Center or doctor for further treatment advice.
CONTACT NUMBER	
Questions? Comments or In case of an emergency call toll free (1-800-228-4722) (1-800-677-9218). 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.	

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<< Storage and Disposal language – Residential containers >>

STORAGE AND DISPOSAL:

STORAGE: Store in original container, in a cool, well-ventilated area, inaccessible to small children. Keep securely closed.

PESTICIDE DISPOSAL: To avoid waste, use all material in this container according to label directions.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. If empty: Place in trash or offer for recycling, if available. If partly filled: Call you local solid waste agency for disposal instructions.

<< Storage and Disposal language – Commercial / Institutional / Industrial containers >>

NOTE: Residue removal statement is not be applicable for this container because it has a CRC plug

STORAGE AND DISPOSAL:

Do not contaminate water, food, or feed by storage and disposal.

STORAGE: Store in original container in a cool, well-ventilated area, inaccessible to children. Keep securely closed.

PESTICIDE DISPOSAL: Pesticide wastes may be hazardous. Improper disposal of excess pesticide, spray mixture or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to the label directions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. (To avoid waste, use all material in this container according to label directions.) If empty: Place in trash or offer for recycling, if available. If partly filled: Call your local solid waste agency for disposal instructions.

<< 'S' bend graphic >>



Note:

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