

777-104

9/13/2011

10 of 18



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

SEP 13 2011

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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Subject: Notification per PR Notice 98-10
Vanity GP
EPA Registration Number: 777-104
Application Date: August 24, 2011
Application Receipt: August 25, 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, LLC is adding the following product performance cleaning claims to the master label for 777-104:

- 1.) (X%) more lime scale removal;
- 2.) destroys hard water stains;
- 3.) destroys hard water stains immediately;
- 4.) easily removes hard water stains;
- 5.) eliminates hard water stains;
- 6.) eliminates hard water stains in seconds;
- 7.) fast action on hard water stains;
- 8.) instantly dissolves hard water stains;
- 9.) powers through hard water stains;
- 10.) removes (X%) of hard water stains.

General Comments:

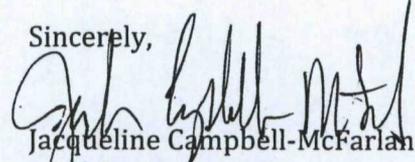
Based on a review the submitted material, your notification revising the label as referenced above is acceptable. A copy of this letter has been made a part of the permanent file for EPA Reg. No. 777-104.

CONCURRENCES

CONCURRENCES							
SYMBOL							
SURNAME							
DATE							

If you have further questions concerning this letter, then please contact me by telephone at 703-308-6416 or by email at campbell-mcfarlane.jacqueline@epa.gov or Killian Swift by telephone 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 to facilitate processing.

Sincerely,



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

CONCURRENCES

SYMBOL							
SURNAME							
DATE							

30918



United States
Environmental Protection Agency
Washington, DC 20460

- Registration
- Amendment
- Other

OPP Identifier Number
MP0044

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

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

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

Notification: to add the following product performance cleaning claims to the master text label in accordance to PR Notice 98-10, Section II. N.:

(x%) more lime scale removal	Eliminates hard water stains in seconds
Destroys hard water stains	Fast action on hard water stains
Destroys hard water stains immediately	Instantly dissolves hard water stains
Easily removes hard water stains	Powers through hard water stains
Eliminates hard water stains	Removes (x%) of hard water stains

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:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
*Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container
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: August 24, 2011	

50918

<< Front Panel >>

ACTIVE INGREDIENT:

Hydrochloric Acid 12.0%

OTHER INGREDIENTS: 88.0%

TOTAL: 100.0%

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)

NOTIFICATION
Date Reviewed: 9/13/14
Reviewed By: K. S. J.

<< 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].
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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*.

<< 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) (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 ___ 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)

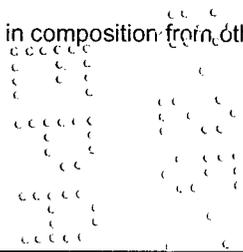
(Maximum coverage) (Powerful cleaning) (Maximum bowl coverage) (Improved coverage) (Maximum) (Max) (Bowl) (Coverage) (Powerful) (Clean) (Cleaning action) (Maximum) (Power) (Protection) (Strength) (Cleaner) (Cleaning) (5X (the) Cleaning Power) Dual Action Toilet Bowl Cleaner 2-in-1: Cleans, Disinfects 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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The product label must identify the specific bacteria*, virus*, fungus* & mold*.

<< PERFORMANCE CLAIMS >>

(x%) more lime scale removal

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}

Destroys hard water stains

Destroys hard water stains immediately
Does not just whiten ({insert soils}) stains, (this product) removes them
Easily dissolves stubborn hard water stains

Easily removes hard water stains

Eliminates hard water stains

Eliminates hard water stains in seconds

Fast action on hard water stains

Formulated especially for hard water mineral deposits, limescale and rust
Hard water formulation
Helps keep water flow optimal

Instantly dissolves hard water stains

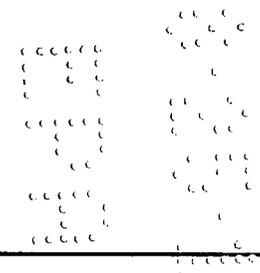
Leaves toilet sparkling clean and disinfected
No hard scrubbing

Powers through hard water stains

Rinses away easily

Removes (x%) of hard water stains

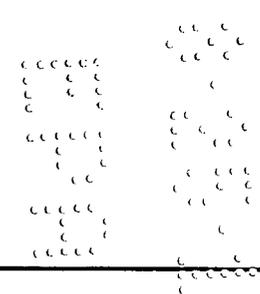
Specially designed for hard water problems
Specially designed for hard water (stains) (areas)
Specially designed for the removal of rust and (&) lime scale stains
Specially designed for the removal of rust stains and mineral deposits
Specially designed to breakdown rust and (&) lime scale stains
Specially 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



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

<< USAGE CLAIMS >>

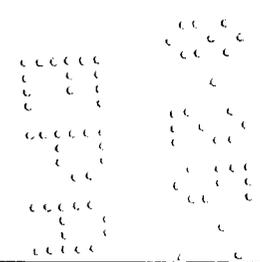
A great toilet bowl disinfectant and sanitizer for use in {insert site}
An effective (disinfectant) (&) (sanitizer) for use in {insert surface}
Can be used in white and colored bowls
For better results use at least (once) (twice) a week
For use as a toilet bowl (cleaner) (deodorizer) (disinfectant) (&) (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}



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<< CLEANING CLAIMS >>

All the power you need to clean your toilet bowl
 An efficient way to clean your bowl
 Begins to destroy {insert soils} instantly
 Breaks down stains without brushing or scrubbing
 Brightens as it cleans
 Cleans above and below the waterline
 Cleans above, below and beyond the waterline
 Cleans and disinfects above and below the waterline
 Cleans as it disinfects
 Cleans away everyday dirt and grime
 Cleans to a shiny finish
 Contains Hydrogen Chloride to remove rust and lime scale
 Deep Down Clean
 Designed to clean under the rim
 Destroys hard water stains (on contact)
 Destroys {insert soils} on impact
 (Destroys) (Dissolves) toilet bowl rings
 Destroys tough stains
 Destroys (tough) (the toughest) ({insert soils})
 (Dissolves) (Destroys) (Removes) stains right before your eyes
 Dissolves the toughest hard water deposits
 Dissolves tough rust stains and mineral deposits (but will not harm porcelain)
 Dissolves tough rust and mineral stains (but will not harm porcelain)
 Easily breaks down stains without (heavy) (hard) brushing or scrubbing
 Easy under-the-rim cleaning
 (Even) The tough(est) {insert soils} (start to) disappear right before your eyes
 Extra strength cleaner
 Fast acting formula
 Fast-acting toilet bowl cleaner
 For a (bright) (shiny) (white) (clean) toilet bowl
 For a super-clean toilet
 For a thoroughly clean toilet bowl surface
 For an absolutely clean toilet bowl surface
 For an ultra-clean toilet
 For hard water (stains) (areas)
 Frequent use prevents rust build-up (lime scale) (mineral stains)
 Hard water cleaning formula
 Hard water cleaner
 Heavy-duty cleaner
 Heavy-duty cleaning (formula)
 (Helps) (Remove(s) Toilet Rings
 Instant action cleaner
 Leaves bowl disinfected, clean and shiny
 Leaves (your) toilet bowl sanitary
 Lime scale remover
 Lime (scale) & rust remover
 Make your bowl look like you clean it everyday (even though you don't)
 Maximum (cleaning power) (stain fighting power)
 Maximum stain fighting (power) (and complete disinfection)
 Maximum power [(cleaner) (cleaning)]
 Mineral dissolving action
 (Penetrates) (Dissolves) (Removes) (Destroys) even the toughest {insert soils}
 (Penetrates) (Loosens) (Eliminates) (tough) stains (like) ({insert soils})
 Powerful cleaner for the toilet bowl



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1/04/18

<< 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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<< DEODORIZING CLAIMS >>

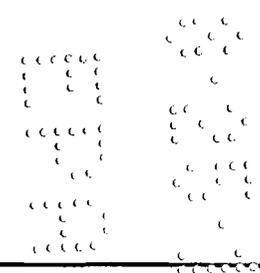
Controls odors at their source
Controls odors caused by bacteria
Controls toilet odors caused by bacteria
Deodorizes by killing bacteria* that cause odors
Deodorizes with a fresh, clean scent
(Eliminates) (Controls) (Kills) the bacteria* that cause (bad) (unpleasant) odors (at the source)
Eliminates odors at their source caused by bacteria
Eliminates odors caused by bacteria
Helps to destroy odors
Kills odors
Kills the bacteria* that cause bad odors
Removes odors
Removes offensive odors from toilets
Reduces odor-causing bacteria*
Reduces odor-causing bacteria* above and below the waterline
Reduces odor-causing bacteria* in toilets

<< SANITIZING CLAIMS – Hard, non-porous, non-food contact surfaces >>

Kills bacteria in seconds***
Kills 99.9% of bacteria in seconds***
Kills 99.9% of bacteria commonly found in toilets in 30 seconds***
Kills 99.9% of common bacteria***
Kills 99.9% of (household) bacteria***
Kills 99.9% of (household) bacteria in 30 seconds***
Kills 99.9% of (household) bacteria in 30 seconds above the waterline***
Kills in 30 seconds: (Enterobacter aerogenes) (Escherichia coli O157:H7) (and) (Staphylococcus aureus)
Leaves your toilet bowl sanitized
Sanitizes toilet surfaces in 30 seconds***
Sanitizes in 30 seconds: (Enterobacter aerogenes) (Escherichia coli O157:H7) (and) (Staphylococcus aureus)

Back Panel Sanitization Qualifier – must appear before Directions For Use:

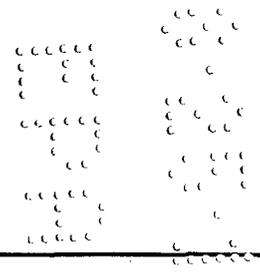
***Kills 99.9% of (Enterobacter aerogenes) (Escherichia coli O157:H7) (and) (Staphylococcus aureus) inside the toilet above the waterline in 30 seconds.



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*.

<< 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}



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

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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*.

<< 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 >>



- 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.

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

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

<< 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:

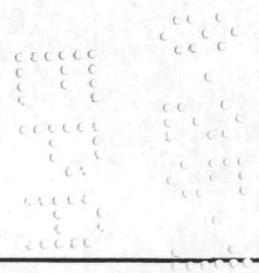
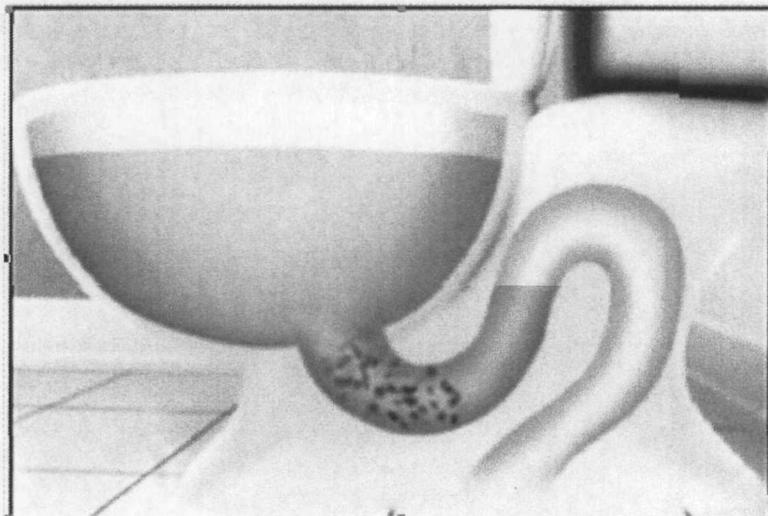
Do not contaminate water, food, or feed by storage and disposal.

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 >>



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