



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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

January 13, 2017

Nicole Perkinson  
Authorized Representative for New Avon LLC  
c/o Toxcel Toxicology & Regulatory Affairs  
7140 Heritage Village Plaza  
Gainesville, VA 20155

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – Adding additional marketing claims, including claims against mosquitoes carrying the Zika virus, and updating the company name.  
Product Name: Avon SSS Skin-So-Soft Bug Guard Plus IR3535 Insect Repellent SPF 30 Moisturizing Sunblock Lotion Cool 'n Fabulous  
EPA Registration Number: 806-14  
Application Date: 09/28/2016  
OPP Decision Number: 522185

Dear Mrs. Perkinson:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company’s website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product’s label, claims

Page 2 of 2  
EPA Reg. No. 806-14  
OPP Decision No. 522185

made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Menyon Adams by phone at (703) 347-8496 or via email at [adams.menyon@epa.gov](mailto:adams.menyon@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Bryceland". The signature is written in a cursive style with a large initial "A" and "B".

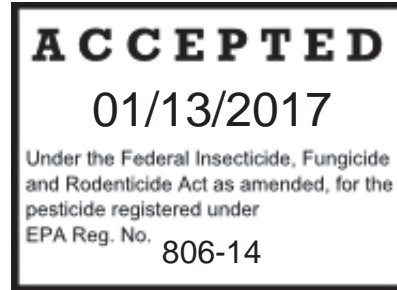
Andrew Bryceland, Team Leader  
Biochemical Pesticides Branch  
Biopesticides and Pollution  
Prevention Division (7511P)  
Office of Pesticide Programs

Enclosure

FRONT OF CONTAINER:

[Original Brand Name]

AVON  
S  
S  
S  
SKIN-SO-SOFT  
BUG GUARD PLUS  
IR3535®  
INSECT REPELLENT  
SPF 30  
MOISTURIZING SUNBLOCK LOTION  
COOL 'N FABULOUS™



[Alternate Brand Name #1 (Notification 12/7/01) - Bracketed information confined to use on Disappearing Color Lotion]

AVON  
S  
S  
S  
SKIN-SO-SOFT  
BUG GUARD  
*PLUS*  
IR3535®  
INSECT REPELLENT  
SPF 30 SUNSCREEN  
VERY WATER RESISTANT  
WITH VITAMIN E & ALOE  
[DISAPPEARING COLOR]  
COOL 'N FABULOUS™

[Alternate Brand Name #2 – Bracketed information confined to use on Disappearing Color Lotion]

AVON  
SKIN-SO-SOFT  
S BUG  
S GUARD  
S *PLUS*  
IR3535®  
INSECT REPELLENT  
COOL 'N FABULOUS™  
[DISAPPEARING COLOR]  
SPF 30 SUNSCREEN  
VERY WATER RESISTANT  
MOISTURIZING LOTION

[Alternate Brand Name #3 – Bracketed information confined to use on Disappearing Color Lotion]

AVON  
SKIN-SO-SOFT  
S BUG  
S GUARD  
S *PLUS*  
IR3535®  
INSECT REPELLENT  
COOL 'N FABULOUS™  
[DISAPPEARING COLOR]  
SPF 30 SUNSCREEN  
WATER RESISTANT (80 MINUTES)  
MOISTURIZING LOTION

FOLLOWING IS APPLICABLE ALL FRONT LABELS [Bracketed information is optional package size]:

KEEP OUT OF REACH OF CHILDREN  
 CAUTION

ACTIVE INGREDIENTS:  
 beta-alanine, n-acetyl-N-butyl-, ethyl ester\* / carboxylic acid 7.5%  
 OTHER INGREDIENTS: 92.5%  
 TOTAL: 100.0%  
 \* IR3535®

4 FL. OZ. (118 ml) [2.5 FL. OZ. (75 ml)]

BACK OF CONTAINER:

[Bracketed information confined to use on Disappearing Color Lotion]

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Apply liberally 15 minutes before sun and insect exposure. An adult must apply this product to children under 10. Children under 6 months: Ask a doctor. For insect protection, reapply about every 2 hours or sooner if effectiveness diminishes. For sunscreen protection, reapply immediately after towel drying, after 80 minutes of swimming, or sweating, at least every 2 hours. Do not exceed 9 applications per day.

<b>STORAGE AND DISPOSAL:</b>	
STORAGE: Store in cool, dry place away from heat or flame.	DISPOSAL: <b>If empty:</b> Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available. <b>If partly filled:</b> Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Protect this product from sun.

**PRECAUTIONARY STATEMENTS:** HAZARDS TO HUMANS. **Caution.** For external use only. Causes moderate eye irritation. **When using this product** keep out of eyes. **Do not use** on damaged or broken skin. **Stop use and ask a doctor** if rash occurs. **Keep out of reach of children. Skin Cancer/Skin Aging Alert:** Spending time in the sun increases your risk of skin cancer and early aging. This product has been shown only to prevent sunburn, **not** skin cancer or early aging.

<b>FIRST AID</b>	
If in eyes:	<ul style="list-style-type: none"> <li>• Hold eye open and rinse slowly and gently with water for 15 – 20 minutes.</li> <li>• Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.</li> <li>• Call a Poison Control Center or doctor for treatment advice.</li> </ul>
Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment. You may also contact 1-800-FOR-AVON for emergency medical treatment information.	

ACTIVE SUNSCREEN INGREDIENTS: Octinoxate 7.5%, Oxybenzone 6%, Octisalate 5%

OTHER INGREDIENTS: Water, Butylene Glycol, Glycerin, PVP/Eicosene Copolymer, Aloe Barbadensis Gel, Isostearic Acid, Propylene Glycol Myristyl Ether Acetate, Stearic Acid, Benzyl Alcohol, Cetyl Alcohol, DEA-Oleth-3 Phosphate, Diglycol/CHDM/Isophthalates/SIP Copolymer, Dimethicone, Glyceryl Stearate, Magnesium Aluminum Silicate, Tocopheryl Acetate, Barium Sulfate, Fragrance, Imidazolidinyl Urea, Xanthan Gum, Disodium EDTA, [Blue 1], [Red 33]

TO ORDER, SEE AN AVON REPRESENTATIVE, OR CALL 1-800-FOR-AVON [www.avon.com](http://www.avon.com)

Not for sale or use after expiration date.

EPA Reg. No. 806-14 EPA Est. No. 806-IL-1

[Distributed by] NEW AVON LLC

777 THIRD AVE. NEW YORK, N.Y. 10017

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Day Lot Code

Exp. Year / Month

**Note to reviewer: The following statements, including those within brackets, are optional AND may appear on the product label AND / OR in marketing collateral materials AND the use of punctuation marks for each statement is optional**

[Bracketed information confined to use on Disappearing Color Lotion]

IR3535® is a registered trademark of Merck KGaA

Avoid contact with plastics, costume jewelry, leather and synthetic fibers

May damage painted or varnished surfaces, including nail polish

With vitamin E and aloe

REPELLENCY – IR3535® provides effective and dependable repellency against mosquitoes, deer ticks, black flies, sand flies, gnats, no-seeums and biting midges

Suitable for the entire family

Mild gentle formula does not need to be washed off when returning from the outdoors

Pediatrician-Tested

Hypoallergenic

SPF 30 water resistant (80 minutes)

Helps prevent sunburn

PABA-Free

Moisturization

Non greasy formula helps replenish moisture and leaves skin soft and smooth

[Disappearing color has a] Fresh summer scent developed especially for the entire family

[Care of Fabrics:

Color can be cleaned from most fabrics

Avoid direct contact with silk, nylon and cotton

Color does not stain skin

If necessary, color can be cleaned from skin with soap and water]

Protects against mosquitos that may carry the Zika virus

Repels mosquitos that may carry the Zika virus

Protects against mosquitos that may carry the Dengue virus

Repels mosquitos that may carry the Dengue virus

Protects against mosquitos that may carry the Chikungunya virus

Repels mosquitos that may carry the Chikungunya virus

Designed for active people

Low odor formula

Won't harm your clothing or bathing suit

Effective, dependable insect repellency

Non-sticky

Long lasting protection for the entire family

Smart (dependable) protection for the entire family

Fights off mosquitos and unwanted (certain) insects

Easy on skin, tough on bugs

The right protection for your family