

806-30

06/28/2007

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

J. Michael Kelley, Ph.D.  
Authorized Representative for Avon Products, Inc.  
c/o toXcel  
P.O. Box 363  
7140 Heritage Village Plaza  
Gainesville, VA 20156

JUN 28 2007

Dear Dr. Kelley,

Subject: Non-Fast Track Amendments (PRIA)  
Product Name: Avon Skin-So-Soft SSS Bug Guard Plus Picaridin Insect  
Repellent Towelettes  
EPA Reg. No. 806-30  
Product Name: Avon Skin-So-Soft SSS Bug Guard Plus Picaridin Insect  
Repellent Spray  
EPA Reg. No. 806-31  
Applications dated December 16, 2006

The label amendments above, submitted in connection with the Federal Insecticide, Rodenticide, and Fungicide Act, are acceptable provided you make the following changes to both of the subject labels.

1. Remove the following claims from the labels:

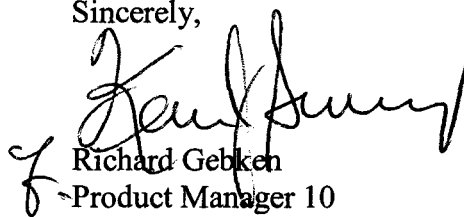
- a. "Creates an invisible, unseen, hidden, barrier of protection to repel insects mosquitoes, deer ticks, mosquitoes and deer ticks, gnats, non-see-ums, sand flies and biting midges."
- b. "Repels mosquitoes that may carry transmit West Nile virus up to 8 hours."
- c. "Repels mosquitoes that may carry transmit West Nile virus for 8 hours."
- d. "Repels mosquitoes that may carry transmit West Nile virus."

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Copies of the Product Performance Data Evaluation Review and Ethics Review for the subject products are attached for your information and file.

A stamped copy of each label is enclosed for your records. Please submit two (2) copies of the final printed label before releasing the product for shipment. If you have any questions, please contact Kevin Sweeney at (703) 305-5063. Thank you for your cooperation in this matter.

Sincerely,

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

Enclosure

FRONT OF CONTAINER:

AVON  
SKIN-SO-SOFT  
S  
S  
S  
BUG GUARD PLUS  
PICARIDIN  
INSECT REPELLENT TOWELETTE(S)

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
JUN 28 2007**  
Under the Federal Insecticide,  
Fungicide, and Rodenticide Act,  
as amended, for the pesticide  
registered under EPA Reg. No.  
806-30

**[ALTERNATE BRAND NAME #1:]**

AVON  
SKIN-SO-SOFT  
S  
S  
S  
PICARIDIN  
INSECT REPELLENT TOWELETTE(S)

**[ALTERNATE BRAND NAME #2:]**

AVON  
BUG GUARD PLUS  
PICARIDIN  
INSECT REPELLENT TOWELETTE(S)

KEEP OUT OF REACH OF CHILDREN  
CAUTION  
See back panel for additional precautionary statements

ACTIVE INGREDIENT:	
Picaridin	10.0%
OTHER INGREDIENTS:	<u>90.0%</u>
TOTAL:	100.0%

1 TOWELETTE  
Total Net Weight: 0.386 oz (10.94 g)

[8 TOWELETTES]  
[Total Net Weight: 3.09 oz (87.52 g)]

[10 TOWELETTES]  
[Total Net Weight: 3.86 oz (109.4 g)]

[Text within brackets is optional and may appear on the back of container label]

**BACK OF CONTAINER:**

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label. Open package, remove and unfold towelette. Use as many towelettes as necessary to ensure even and liberal coverage before insect exposure. Adults may need to use more than one towelette. Do not apply near eyes and mouth. Apply sparingly around ears. Do not apply under clothing, on cuts, wounds, freshly shaved, excessively sunburned or irritated skin. Use just enough repellent to cover exposed skin. Avoid over application of product. Do not allow children to handle this product. Do not apply directly to children's hands. FOR CONTINUED PROTECTION from deer ticks reapply after 12 hours, and for mosquitoes reapply after 8 hours, and for gnats, no-see-ums, sand flies and biting midges reapply after 6 hours. Do not exceed 2 applications per day.

<b>STORAGE:</b> Store in cool, dry place away from heat or flame.
<b>DISPOSAL:</b> <b>If empty:</b> Place in trash or offer for recycling if available. <b>If partly filled:</b> Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

**PRECAUTIONARY STATEMENTS:** Hazards to Humans. Caution: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes. Wash thoroughly with soap and water after handling, returning indoors, and before eating, drinking, chewing gum, or using tobacco. Wash treated clothing before wearing again. Discontinue use and consult a doctor if irritation or rash occurs.

FIRST AID	
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>
If swallowed	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to by a poison control center or doctor.</li><li>• Do not give anything to an unconscious person.</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.	

**PHYSICAL HAZARDS - Flammable.** Keep away from heat and open flame.

[ALERT: To avoid danger of suffocation, keep this and all other plastic bags away from babies and children. Do not use in cribs, beds, carriages or playpens. The thin film may cling to nose and mouth and prevent breathing.]

To order, see an Avon Representative, or call 1-800-FOR-AVON. [www.avon.com](http://www.avon.com)  
EPA Reg. No. 806-30  
EPA Est. No. [052631-NJ-001[AP], 052631-NJ-001, 74058-CA-001[IO], 74058-CA-001, 806-OH-001]  
[Boxed letters are first letters of lot number]  
AVON PRODUCTS, INC., DISTR.  
1251 AVE. OF THE AMERICAS, NY, NY 10020  
© AVON 200X [- ALL RIGHTS RESERVED]

**[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]**

Contains Vitamin E

With Vitamin E

Vitamin E

Contains Aloe

With Aloe

Aloe

Contains Vitamin E & Aloe

(Contains) Bayrepel®

Bayrepel® is a registered trademark of Lanxess

U.S. Patent No. 6,719,959

Gentle Breeze™ Scent

Gentle Breeze™

Pleasantly scented

Easy to apply

Wipe on protection

Convenient [towelette] [wipe] for easy application

Convenient [towelettes] [wipes] for easy application

Portable protection

(Towelettes) (Wipes) will not dry out

Non-oily

Not oily

Non-greasy

Not Greasy

Light feel

Quick drying

Fast drying

Will not harm most plastics or synthetic fabrics

May damage painted or varnished surfaces, including nail polish

For active [family] lifestyles

All day protection from mosquitoes

All day protection from deer ticks

All day protection from mosquitoes and deer ticks

Suitable for the [entire] [whole] family

Provides the whole family with an effective [broad-spectrum] outdoor insect repellent

Protection for the [entire] [whole] family

Strong protection for the [entire] [whole] family

[Strong] [Dependable] Protection

Effective, dependable protection

Provides strong and dependable [protection] [repellency]

[Repellency -] Avon's exclusive formula [with Picaridin] provides strong and dependable [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

[Repellency -] Patented technology that provides strong and dependable [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Exclusive patented technology

Exclusive patented enhanced duration technology

Exclusive patented time-release technology

Patented time-release technology

Time-release formula

Time-release

Patented controlled-release technology

Controlled-release formula

Controlled-release

[Creates an] [invisible] [unseen] [hidden] barrier of protection to repel [insects] [mosquitoes] [deer ticks] [mosquitoes and deer ticks] [gnats, no-seeums, sand flies and biting midges]

Creates an effective barrier of protection to repel [insects] [mosquitoes] [deer ticks] [mosquitoes and deer ticks] [gnats, no-seeums, sand flies and biting midges]

Strong and long-lasting [repellency] [protection] against mosquitoes [for] [up to] 8 hours

Strong and long-lasting [repellency] [protection] against deer ticks [for] [up to] 12 hours

Strong and long-lasting [repellency] [protection] against mosquitoes [for] [up to] 8 hours and deer ticks [for] [up to] 12 hours

Strong [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Long-lasting [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Strong and long-lasting [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Strong [repellency] [protection] against mosquitoes

Long-lasting [repellency] [protection] against mosquitoes

Prevents mosquitoes from biting [for 8 hours]

Strong [repellency] [protection] against deer ticks

Long-lasting [repellency] [protection] against deer ticks

Strong [repellency] [protection] against mosquitoes and deer ticks

Repels mosquitoes

Repels mosquitoes up to 8 hours

Repels mosquitoes for 8 hours

Repels mosquitoes that may [carry] [transmit] West Nile Virus up to 8 hours

Repels mosquitoes that may [carry] [transmit] West Nile Virus for 8 hours

Repels mosquitoes that may [carry] [transmit] West Nile Virus

Repels deer ticks

Repels deer ticks up to 12 hours

Repels deer ticks for 12 hours

Repels deer ticks that may [carry] [transmit] Lyme Disease up to 12 hours

Repels deer ticks that may [carry] [transmit] Lyme Disease for 12 hours

Repels deer ticks that may [carry] [transmit] Lyme Disease

Made in the USA