

806-33

04-30-2008

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

April 30, 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

J. Michael Kelley, Ph.D.
Authorized Representative
of Avon Products, Inc.
P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA 20156

RE: Product Name: Avon Skin-So-Soft SSS Bug Guard Plus IR3535 Expedition Insect Repellent SPF 30 Sunscreen Spray Very Water Resistant Gentle Breeze
EPA Reg. No: 806-33
Application for label Notification dated April 21, 2008 to Revise Storage and Disposal Section

Dear Dr. Kelley:

The Biopesticides and Pollution Prevention Division is in receipt of your application for Notification under 98-10 dated above. A preliminary screen of this request has been conducted for its applicability under PRN 98-10 and it has been determined that the action(s) requested falls within the scope of PRN 98-10. Our records have been duly noted, and the label submitted with this application has been stamped "Notification, received and reviewed" and will be placed accordingly in our records.

Questions concerning this action should be directed to Ms. Diana Hudson at (703) 308-8713 or email at hudson.diana@epa.gov.

Sincerely,

Linda Hollis

Linda Hollis, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention
Division (7511P)

	United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number
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Application for Pesticide – Section 1

1. Company/Product Number Avon Products, Inc. / 806-33	2. EPA Product Manager Linda Hollis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Avon Skin-So-Soft SSS Bug Guard Plus IR3535® Expedition™ Insect Repellent SPF 30 Sunscreen Spray Very Water Resistant Gentle Breeze™	PM# 90	
5. Name And Address Of Applicant (Include ZIP Code) Avon Products, Inc. 1251 Avenue of the Americas New York, NY 10020 <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.

NOTIFICATION
Date Reviewed: 4-30-08
Reviewed By: D. Hudson

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

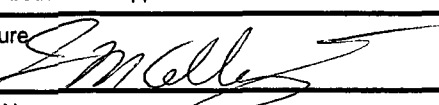
Notification of revisions to the storage and disposal section per PR Notice 2007-4.

Notification of label change relative to PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. 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 the amended label is not consistent with the requirements of 40 CFR §§ 156.10, 156.140, 156.144, 156.146, and 156.156, 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 type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" No. per Unit Packaging wgt. Container	If "Yes" No. per Unit Packaging wgt. Container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(S) Retail Container	5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product
6. Manner in Which Label is Affixed to Product		<input type="checkbox"/> Lithographed <input type="checkbox"/> Other <input 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 J. Michael Kelley, Ph.D. / toXcel, LLC	Title Avon Authorized Representative	Telephone No. (Include Area Code) (703) 335-5670
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 both under applicable law.		6. Date Application Received
2. Signature 	3. Title Avon Authorized Representative (toXcel, LLC)	
4. Typed Name J. Michael Kelley, Ph.D.	5. Date April 21, 2008	

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FRONT OF CONTAINER:

AVON
SKIN-SO-SOFT
S
S
S
BUG GUARD PLUS
IR3535®
EXPEDITION™
INSECT REPELLENT
SPF 30 SUNSCREEN SPRAY
VERY WATER RESISTANT
GENTLE BREEZE™

NOTIFICATION

Date Reviewed: 4-30-08
Reviewed By: D. Hudson

[ALTERNATE BRAND NAME #1:]

AVON
SKIN-SO-SOFT
S
S
S
IR3535®
EXPEDITION™
INSECT REPELLENT
SPF 30 SUNSCREEN SPRAY
VERY WATER RESISTANT
GENTLE BREEZE™

[ALTERNATE BRAND NAME #2:]

AVON
BUG GUARD PLUS
IR3535®
EXPEDITION™
INSECT REPELLENT
SPF 30 SUNSCREEN SPRAY
VERY WATER RESISTANT
GENTLE BREEZE™

KEEP OUT OF REACH OF CHILDREN
WARNING
See back panel for First Aid

ACTIVE INGREDIENT:

3-[N-butyl-N-acetyl]-aminopropionic acid, ethyl ester*

19.6%

OTHER INGREDIENTS:

80.4%

TOTAL:

100.0%

*IR3535®

- 1 FL. OZ. (29.5 ml)
- 2 FL. OZ. (59 ml)
- 4 FL. OZ. (118 ml)
- 6 FL. OZ. (177 ml)
- 8 FL. OZ. (236 ml)

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[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. An adult must apply this product to children under age 10. Do not apply over wounds, freshly shaved or irritated skin. **TO APPLY TO FACE:** Spray palm of hand and rub on, avoiding the eye area. **TO APPLY TO SKIN:** Spray liberally and rub product on evenly before sun and insect exposure. **FOR CONTINUED PROTECTION** from deer ticks reapply after 10 hours, and for mosquitoes reapply after 8 hours, and for gnats, no-seeums, sand flies and biting midges reapply after 6 hours. For sunscreen protection, reapply after towel drying, swimming or sweating. **REAPPLY AS NEEDED, NOT TO EXCEED 3 APPLICATIONS PER DAY.**

STORAGE AND DISPOSAL

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

PRECAUTIONARY STATEMENTS: Hazards to Humans. **WARNING.** Causes substantial but temporary eye injury. Do not spray on face, clothing or in eyes. Do not rub eyes with fabric that has contacted product or treated skin. Discontinue use and consult a doctor if irritation or rash occurs. Ask a doctor before using on children under 6 months of age. For external use only.

PHYSICAL OR CHEMICAL HAZARDS: Flammable. Keep away from heat and open flame.

[Avoid contact with plastics, costume jewelry, leather and synthetic fibers. May damage painted or varnished surfaces, including nail polish.]

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.
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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:

- Octocrylene 10.0%
- Octinoxate 7.5%
- Oxybenzone 6.0%
- Octisalate 5.0%

[OTHER INGREDIENTS: SD Alcohol 40-B, Water, Hexylene glycol, Polyurethane-1, Fragrance, Aloe barbadensis extract, Tocopheryl acetate (Vitamin E)]

To order, see an Avon Representative, or call 1-800-FOR-AVON. www.avon.com
Not for sale or use after expiration date.

EPA Reg. No. 806-33 EPA Est. No. 806-OH-001

AVON PRODUCTS, INC., DISTR. 1251 AVE. OF THE AMERICAS, NY, NY 10020

© AVON 200X – ALL RIGHTS RESERVED

Bottom of Container:

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]

Dual protection from sun and certain insects

Combined sun and insect protection in one product

Light feel, strong protection

SPF 30 Very Water Resistant

Helps prevent sunburn

Higher SPF gives more sunburn protection

Retains SPF after 80 minutes of activity in the water or sweating

PABA-free

U.S. Patent Nos. 6,719,959 and 7,150,878 [and other patents pending]

Contains Vitamin E

[With] Vitamin E

[Contains] IR3535®

IR3535® is a registered trademark of Merck KGaA

IR3535® is chemically similar to β-alanine [, which occurs naturally]

Gentle Breeze™ [scent]

Pleasantly scented

Easy to apply

Sprays at any angle

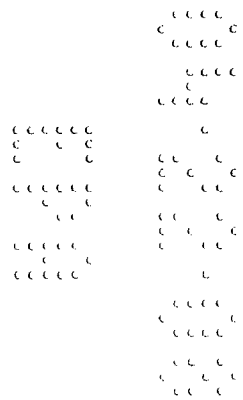
Light feeling spray

Non-oily

Not oily

Non-greasy

Not greasy



Light feel

Quick drying

Fast drying

For active [family] lifestyles

Suitable for the [entire] [whole] family

[Gentle] [Mild] formula

Gentle and mild formula

Formula does not need to be washed off when returning from the outdoors

Dermatologist tested

Hypoallergenic

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]

When used as directed, works anytime to prevent mosquitoes from biting

[Repellency -] Avon's exclusive formula [with IR3535®] 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

[Repellency -] Provides effective and long-lasting [repellency] [protection] from deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

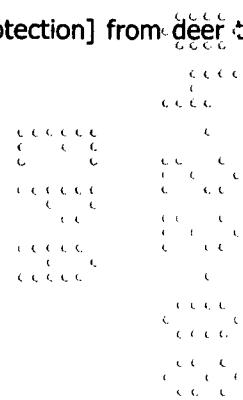
Exclusive patented enhanced duration technology

Patented time-release technology

Time-release formula

Patented controlled-release technology

Controlled-release formula



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9

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

Strong and long-lasting [repellency] [protection] against deer ticks [up to] [for] 10 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

Provides hours of [repellency] [protection] from 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 [up to 8 hours] [for 8 hours]

Repels mosquitoes [up to] [for] [8 hours]

Strong [repellency] [protection] against deer ticks

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

Repels deer ticks [up to] [for] [10 hours]

Repels gnats, no-seeums, sand flies and biting midges [up to] [for] [6 hours]

[Creates an] [invisible] [unseen] [hidden] [layer] [barrier] of protection to repel [certain insects] [mosquitoes]

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

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

Repels deer ticks that may [carry] [transmit] Lyme Disease [up to] [for] 10 hours

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

Made in the USA

