

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

APR 16 2004

Ms. Martha Macy-Ruhe
Proctor and Gamble
Sharon Woods Technical Center
11530 Reed Hartman Highway
Cincinnati, OH 45241-2422

Subject: Z-1
EPA Registration No. 3573-69
Amendment Date: October 17, 2003
EPA Receipt Date: October 21, 2003

Dear Ms. Ruhe,

The following amendment submitted in connection with registration under FIFRA, as amended, is acceptable with the conditions listed below.

- Response to Agency letter dated May 3, 2002

Conditions

Revise the label as follows:

1. Before this product can make a "sanitizing" claim, efficacy data must be submitted according to DIS/TSS 10 on porous surfaces. The Agency does not accept a "sanitizing" claim based on the acceptance of efficacy data that supports a disinfection claim. Therefore, all "Sanitizing" claims must be deleted from the label.
2. The phrase "hard surface" is unacceptable because it implies that this product may be used on porous and nonporous surfaces. The data submitted to support the disinfection claim was conducted on hard nonporous surfaces. You must either submit disinfection data that supports the use of this product on porous surfaces or clarify the phrase, hard surfaces, to read as "Hard Nonporous Surfaces."
3. The Agency considers the organisms, *S. aureus*, *P. mirabilis*, and *K. pneumoniae*, as public health organisms. If you want to list these organisms in relationship to the fabric refresher claim, you must submit data that demonstrates the product's efficacy. Until data has been submitted and accepted, this claim must be deleted from the label.

| CONCURRENCES | | | | | | | |
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| SYMBOL | | | | | | | |
| SURNAME | | | | | | | |
| DATE | | | | | | | |

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

- 4. The Agency has determined that the claim, Kill/Eliminates/Reduces 99.9% of bacteria is equivalent to a "sanitizing" or "disinfecting" claim. If you wish to make a quantitative claim on organism reduction, they must be linked to disinfection. Once you submit the efficacy data to support the sanitization claim on porous surfaces, and the Agency accepts it, you may make the claim in relation to the fabric refresher.

You may continue to state that the product "Kills/removes/reduces odor causing bacteria; however, you cannot add the quantitative claim, 99.9%.

- 5. The list of surfaces this product may be used on as a fabric odor eliminator and disinfectant must be clearly delineated. The section must read:

Z-1 has antibacterial action and kills household bacteria on the following hard, nonporous surfaces: empty garbage cans, recycling bins, plastic laundry hampers, bathroom basins, toilet seats, under sinks, diaper pails, finished wood changing tables, nonwood cribs/ baby furniture, potty, toys, door knobs, shower stalls, bathtubs, sinks, telephones, lamps, desks, nonwood/ plastic furniture, high chairs, walls, no-wax floors, glazed ceramic tile, glazed porcelain tiling, portable toilets, microwave oven exteriors, tools, plastic, non-wood window sills and enamel.

Delete grouting from the list of surfaces because it is considered porous.

Z-1 is a fabric deodorizer on the following soft surfaces: upholstered furniture, window treatments, hard to launder clothing/jackets/coats, and plush toys.

General Comments

A stamped copy of the labeling accepted with conditions is enclosed. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

Should you have any questions or comments concerning this letter, please contact Jacqueline McFarlane at (703) 308-6416.

Sincerely,

Velma Noble
Product Manager (31)
Regulatory Management Branch I
Antimicrobials Division (7510C)

CONCURRENCES

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FRONT LABEL

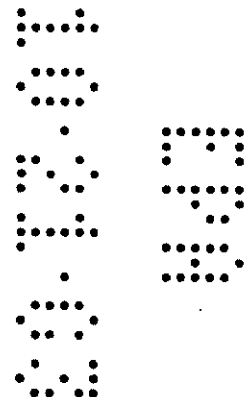
Z-1 (or alternate brand name, or this product)

Active Ingredients: Didecyl dimethyl ammonium chloride.....0.13%
Other Ingredients:99.87%

KEEP OUT OF REACH OF CHILDREN
CAUTION: See back panel for other precautions.

Net Weight Statement

ACCEPTED
with COMMENTS
in EPA Letter Dated:
APR 16 2004
Under the Federal Insecticide,
Fungicide, and Rodenticide Act as
amended, for the pesticide,
registered under EPA Reg. No. 3573-69



BACK LABEL

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with it's labeling.

Clean (any) soiled areas before application.

To Eliminate Odors on/in Fabric: (From a distance of 6 to 8 inches) Spray evenly until damp to kill bacteria that causes odors. As item dries, odors are eliminated, and bacteria that cause odors are killed. Allow sprayed surfaces to dry completely before reuse. Reapply as needed.

To Disinfect ~~hard~~ hard, non-porous surfaces: (From a distance of 6 to 8 inches) Spray until thoroughly wet. Allow to stand 10 minutes, then wipe dry with a clean cloth or paper towel. For surfaces that may come into contact with food or children's toys/high chair trays, a potable rinse is required.

(Note to Reviewer: Directions for disinfecting the interior toilet surface may appear on label)
For Toilet Bowls: Empty water from the toilet bowl (or urinal). Hold 6-8" from surface. Spray covering exposed surfaces. Brush thoroughly over surfaces including under the rim to completely wet surfaces, let stand for 10 minutes, then flush.

SURFACE SAFETY: Will not harm fabrics. On fabrics that may water spot (such as silk), test a small area of fabric that cannot be seen. Not recommended for use on leather, suede, or wood. On glass and chrome – if streaking appears, wipe the surface with a clean cloth, or paper towel.

(Note to Reviewer: Boxed format as listed below will be used if label space permits; otherwise a paragraph format will be used.)

| |
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| PRECAUTIONARY STATEMENT |
| CAUTION: May cause eye irritation. Avoid contact with eyes. |
| FIRST AID: IF IN EYES, hold eyes open and rinse gently with water for 15-20 min. If wearing contacts, remove lenses after first 5 min., and continue rinsing. If irritation persists, call a physician. |
| Have the product container or label with you when calling or going for treating. |

EPA Reg. No. 3573-69
EPA Est. No.

STORAGE AND DISPOSAL: Store at room temperature. Discard empty container in trash.
(phone icon) Questions? Comments? Good Housekeeping Symbol
Call toll free 1-800-308-EASY (3279) Institute Pasteur Symbol Woolmark Symbol
Distributed by PROCTER & GAMBLE, Cincinnati, OH 45202
Made in USA

CLAIMS – May appear on FRONT or BACK LABEL

- Eliminates Odor on Fabrics
- Eliminates Odor at the Source
- Leaves your fabrics free of odors and the bacteria that cause them.
- Cleans away odors and kills the bacteria that cause them.
- Eliminates odors and kills the bacteria that cause them.
- Eliminates odors and kills [REDACTED] the bacteria that cause them.
- Eliminates odors and removes [REDACTED] the bacteria that cause them.
- Eliminates odors and gets rid of [REDACTED] the bacteria that cause them.
- Effective against bacteria that cause odors.
- Effective against bacteria that cause odors on fabrics.
- Effective against bacteria that cause odors trapped in fabrics.
- Effective against [REDACTED] bacteria that cause odors.
- Effective against [REDACTED] bacteria that cause odors on fabrics.
- Effective against [REDACTED] bacteria that cause odors trapped in fabrics.
- Kills bacteria that cause odors.
- Kills bacteria that cause odors on fabrics.
- Kills bacteria that cause odors trapped in fabrics.
- Kills [REDACTED] bacteria that cause odors.
- Kills [REDACTED] bacteria that cause odors on fabrics.
- Kills [REDACTED] bacteria that cause odors trapped in fabrics.
- Removes bacteria that cause odors.
- Removes bacteria that cause odors on fabrics.
- Removes bacteria that cause odors trapped in fabrics.
- Removes [REDACTED] bacteria that cause odors.
- Removes [REDACTED] bacteria that cause odors on fabrics.
- Removes [REDACTED] bacteria that cause odors trapped in fabrics.
- Gets rid of bacteria that cause odors.
- Gets rid of bacteria that cause odors on fabrics.
- Gets rid of bacteria that cause odors trapped in fabrics.
- Gets rid of [REDACTED] bacteria that cause odors.
- Gets rid of [REDACTED] bacteria that cause odors on fabrics.
- Gets rid of [REDACTED] bacteria that cause odors trapped in fabrics.
- Helps to eliminate bacteria that cause odors.
- Helps to eliminate bacteria that cause odors on fabrics.
- Helps to eliminate bacteria that cause odors trapped in fabrics.
- Helps to eliminate [REDACTED] bacteria that cause odors.
- Helps to eliminate [REDACTED] bacteria that cause odors on fabrics.
- Helps to eliminate [REDACTED] bacteria that cause odors trapped in fabrics.
- As it dries cleans away the odors trapped in fabrics leaving your fabrics free of odor causing bacteria.
- In one step cleans away the odors trapped in fabrics leaving your fabrics free of odor causing bacteria.
- Deodorizes and cleans away the odors trapped in fabrics.
- Antibacterial Spray
- Multi-Purpose Disinfectant
- Multi-Room Disinfectant

- Hard Surface Disinfectant and Odor Eliminator
- Hard Surface Disinfectant
- Hard Surface Disinfectant and Fabric Refresher
- Fabric Refresher and Hard Surface Disinfectant
- Z-1 Antibacterial
- Hard Surface Antibacterial Spray
- Hard Surface Antibacterial Spray and Fabric Refresher
- America's First Fabric Refresher Now Disinfects [REDACTED] hard surfaces
- Deep Penetrating to Kill Odor-Causing Bacteria at their source in fabric or soft surfaces
- Penetrates Deeper to Kill Odor-Causing Bacteria in fabric or soft surfaces
- The (Fastest Acting) (Deepest Penetrating) Fabric Refresher (Z-1) now Disinfects (Sanitizes) hard surfaces
- Specially-formulated/Uniquely-formulated to Kill Odor-Causing Bacteria on Fabrics and hard surfaces
- For use on Fabrics and Hard Surfaces
- Eliminates odor causing bacteria that build up deep down in fabrics
- From the Name (insert brand name) You've Come to Trust, Z-1 now Comes in Antibacterial Form
- (For Use In) Home(s) (As A) Hard Surface Disinfectant
- Disinfects (Sanitizes) Hard Surfaces
- (Kills) Eliminates 99.9% of bacteria on hard surfaces.
- Kills 99.9% of these household bacteria: Salmonella choleraesuis (Salmonella), Staphylococcus aureus (Staph) and Escherichia coli (E. coli).
- Kills 99.9% of Salmonella choleraesuis (Salmonella) and/or Escherichia coli (E. coli) commonly found in kitchens.
- Kills common household bacteria on hard surfaces.
- An effective hard surface disinfectant for use in the kitchen, bathroom, and other (household) areas.
- (Kills) Reduces odor-causing bacteria on soft surfaces such as dog beds, couches, pillows, mattresses, window treatments, carpets, and chairs.
- Disinfects [REDACTED] and eliminates odors by killing common (household) bacteria found on hard surfaces and controlling their odors
- Eliminates Odors Caused By Bacteria
- Eliminates Odors in the Air [REDACTED]
- Eliminates bacteria and odors on hard surfaces that you come into contact with everyday.
- Kills [REDACTED] bacteria that cause odors on fabrics and hard surfaces.
- [REDACTED]
- (Controls) (Kills) odor-causing bacteria.
- Keeps odors from returning by (eliminating) (controlling) (killing) the bacteria that cause odor.
- Controls kitchen odors caused by bacteria.
- Z-1 prevents odors at their source caused by bacteria.
- Z-1 prevents odors at their source.
- Z-1 eliminates odors by killing the bacteria that cause odors.
- Z-1 (controls) (kills) the bacteria that cause odors (at the source).
- Controls pet odors caused by bacteria.
- Antibacterial Action on Hard Surfaces
- PLUS Kills (Eliminates) Bacteria on hard surfaces
- Eliminates [REDACTED] Odor Causing Bacteria on hard surfaces

↑ disregard deletion; its a mistake

- Kills 99.9% of Odor Causing Bacteria on Hard Surfaces
- Kills 99.9% of Bacteria that cause odors on hard surfaces

ANTIBACTERIAL ACTION/KILLS COMMON HOUSEHOLD BACTERIA

Z-1 has antibacterial action and kills bacteria on environmental hard [REDACTED] surfaces in your home. Z-1 kills household odor-causing bacteria. Use Z-1 on upholstered furniture, window treatments, hard-to-laundry clothing/jackets/coats, and plush toys. Use Z-1 in empty garbage cans, recycling bins, plastic laundry hampers, bathroom basins, toilet (seats) areas, under sinks, pet areas, diaper pails, on wood changing tables (use after each diaper change), many non-wood crib surfaces, potty, toys, door knobs, shower stalls (showers), bathtubs, sinks, telephones, lamps, desks, non-wood outdoor (patio) furniture, door handles, countertops or counters, sinks, refrigerator exteriors, non-wood tables, non-wood highchairs, bed frames, (washable) walls, (no wax) floors, non-wood baby furniture, tubs (and) –or– (ceramic) tile, portable toilets, porcelain tiling, [REDACTED], garbage cans, microwave oven exteriors, tools, (hard) plastic, non-wood window sills, and enamel.

FAST/EASY/EFFECTIVE/SMART

Use on finished surfaces in basements, bathrooms/rest rooms/toilets, closets, attics, laundry rooms, storage areas, summer cottages, vacation homes, boat and car interiors, shower stalls, and recycling bins.

(GREAT) FOR USE as a DISINFECTANT on hard surfaces located IN:

or

(GREAT) FOR USE on fabric surfaces located IN:

Homes, Bathrooms, Kitchens, Attics, Garage, Basement, Dorm, Gymnasium, Home Workshop, Recreational Center, Boat, Camper, RV, Trailer, Mobile Home, Campground Facility, Motor Home, Vacation Home, Moat Boat or House Boat or Boat House, Automobile or Car, Summer Cottage

(Disinfects) or (Kills) (bacteria) or (99.9% of bacteria) found in household, bathroom or restroom, kitchen, garage, basement, bedroom, living room, sunroom, playroom, office, dorm, shelter, health club, spa, gymnasium, recreational facility, boat, camper, RV, trailer, mobile home, campground, playground, motor home, vacation home, motor boat or house boat or boat house, automobile or car, summer cottage.

On hard non-porous surfaces, Z-1 kills the following bacteria: *Salmonella choleraesuis* (Salmonella), *Staphylococcus aureus* (Staph), *Escherichia coli*, (*E. coli*) (in ten (10) minutes). [REDACTED]

[REDACTED]
odor causing
pneumonia

Z-1 is a part of a system of odor elimination (fabric refresher) products provided by Procter & Gamble. People respect the Z-1 brand name, recognize Z-1 for providing quality odor elimination, and gain the added benefit of a fresh smelling environment. We invite you to call us at 1-800-XXX-XXXX, Monday through Friday, XXX am to XXX pm (Eastern time), if you have any questions or comments on our products.

www.Z-1.com

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USE SITES

For Use On:

or

On Virtually all Types of Fabrics:
(may be shown by icon)

Shoes/Sneakers
Children Mattresses
Pet Bed
Sports Bag/Equipment
Furniture Upholstery
Teddy Bear
Carpet
Couch
Mattress
Curtains
Coat

For Fabrics with Odors such as:
(may be shown by icon)

Pet
Mold and Mildew
Smoking
Cooking
Body Odor
Fish
Barbeque

For Hard Surfaces such as:
(may shown by icon)

Lawn Furniture
Countertop
Toilet exterior surfaces
Garbage Cans
Floors
Hard Surface Pet Areas
Stovetops
Sinks
Doorknobs
Baby Toys
Bathroom surfaces

Or

Disinfectant on hard surfaces located in:

Or

Use this product on all (washable) hard (environmental) surfaces located in:

| | |
|--------------------|--|
| Kitchen | Hotel |
| Attic | Gymnasium |
| Garage | Recreational Center (facility) |
| Household | Camper |
| Boat | Trailer |
| RV | Campground Facility |
| Mobile Home | Motor Home |
| Vacation Home | Motor Boat or House Boat or Boat House |
| Automobile or Car | Basement |
| Summer Cottage | Business |
| Home | Office |
| Dorm | Motel |
| Convenience Stores | Bathrooms |

Fabric Surfaces

Deodorizes/Refreshes the following soft surfaces:

Or

Use this product on fabric surfaces such as:

| | |
|----------------------------|---------------------------------|
| Mattress | Lawn Furniture Cushions |
| Mattress Covers | Drapes/Curtains |
| Pillow covers | Office Chairs |
| Gym bags | Sneakers |
| Upholstered Couches (Sofa) | (Canvas) Shoes |
| Upholstered Chairs | Hard-to-Launder Clothes |
| Drapes | Coats/Jackets |
| Carpet/Rug Surfaces | Bed Clothes/Quilts/Throws/Duvet |
| Plush Toys | Car Interiors/Trunks |

Surfaces for Disinfecting

Use this product on all (washable) hard (environmental) surfaces:

| | |
|-----------------------------------|---|
| Refrigerator exteriors | (Resilient) (and/or ceramic) Flooring |
| (Kitchen) Counters | Shower(s) (stall) (Bath) Tubs |
| (Washable) (No Wax) Floors | Bidet |
| (Non-wood) Cabinets | Non-wood Diaper Changing Tables |
| Glazed (Ceramic) Tile | Shower Curtains |
| Laminated Surfaces | Table(s) (Tops) |
| Vinyl Tile | Door (Handles) Knobs |
| Synthetic or Cultured Marble | Children's Toys |
| Marlite | Cat Litter Boxes |
| Plastic | Dish Racks |
| Non-wood Outdoor Furniture | Colored Hard Surfaces |
| Plastic Mattress Covers | Fiberglass |
| Plastic Laminate | Floors (Hard) (Solid) |
| Plastic Laundry Hampers (baskets) | Non-wood Countertops |
| Linoleum | (Washable) Walls |
| Sealed Granite | Enamel |
| Glazed Porcelain | Toilets/Urinals |
| Urinals | Fountains |
| Bed Frames | Diaper Pails |
| Baby Toys | Portable Toilets |
| Telephones | Non-wood High Chairs |
| Sinks |  |
| Microwave Oven Exteriors | Vehicles |
| Fixtures | Bathroom Surfaces |
| RVs | Bed Springs |
| Toilet Seats | Bed Frames |
| Garbage Cans | Tools |
| Boats | Auto Surfaces |
| Garage Surfaces | Trailers |
| Non-wood Windowsills | Sports Equipment |

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Non Disinfectancy Related Claims:

- New Size
- New Scent
- Travel Size
- Pleasant Scent
- Trial Size
- Z-1 has a fresh, clean scent.
- Eliminates odors in the air.
- An Easy Way to Clean Away (Eliminate) Odors
- New (allowed for 6 months)
- Trademarks
- Patents
- Copyrights