



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

February 7, 2025

Jennifer DePietro
Arxada, LLC
412 Mt. Kemble Avenue
Suite 2005
Morristown, New Jersey 07960

Electronic Transmittal: jennifer.depietro@arxada.com

Subject: PRIA Amendment – Revising Basic, Alternate Formulations 1-21, and Adding DfE logo
Product Name: NUGEN
EPA Registration Number: 6836-455
Application Date: 06/30/2023
Action Case Number: 00486576

Dear Ms. DePietro:

The amended label and CSF(s) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, are acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing 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. Pursuant to 40 CFR 156.10(a)(6), you must submit one copy of the final printed labeling before you release the 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.

Please note that the record for this product currently contains the following CSF(s):

- Basic CSF dated 05/06/2024
- Alternate CSFs 1-4 dated 05/06/2024
- Alternate CSFs 5-6 dated 11/04/2024
- Alternate CSFs 7-18 dated 05/06/2024
- Alternate CSFs 19-21 dated 11/04/2024

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. See FIFRA section 2(p)(2). If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process, FIFRA section 12(a)(1)(B). Therefore, should the Agency 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 Assurance.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Stacey Grigsby via phone at 202.566.0821, or via email at grigsby.stacey@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Marcel Howard", is positioned above the printed name.

Marcel Howard, Product Manager (34)
Regulatory Management Branch II
Antimicrobials Division (7510M)

Note: Bracketed information is denoted as: [optional text], {informational purposes}, (insert as noted), <<must choose one of the “or” options>>
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The term “X” is a place holder for a number between 0 to 100.
The term “Y” is a place holder for a character A – Z.

NUGEN® Citric-Guard Wipes

[READY TO USE]

Active Ingredients:

Citric acid..... 0.67%
Other Ingredients:..... 99.33%
Total..... 100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION [PRECAUCIÓN]

See [left] [side] [right] [back] panel for Precautionary Statements and First Aid

Manufactured by:

Arxada, LLC
412 Mt. Kemble Ave., Suite 200S
Morristown, NJ 07960

ACCEPTED

02/07/2025

Under the Federal Insecticide, Fungicide
and Rodenticide Act as amended, for the
pesticide registered under
EPA Reg. No. 6836-455

EPA Reg. No. 6836-455

EPA Est. No. 6836-NJ-1

6836-PA-1

XXXX-YY-X

Net Contents: (insert # number) [premoistened] [towelettes] [wipes] [disinfecting] [antibacterial] [cleaning] [wet]
[multi-purpose] [touch-up] [pre-moistened cloths] [sheets]

Net Contents: X [___ oz.] [___ lb. ___ oz.] [___ g]

[Minimum Wt.]

[Wipe dimensions:] X x X [inches] [in.]

[Barcode]

[DOT symbols]

[QR Code]

[Country of origin (insert country)]

[Manufactured in (insert country)]

{Optional Emergency contact information}

[For emergency information on (product, usage, etc.), call (1-XXX-XXX-XXXX), Monday through Friday, 9 a.m.
to 5 p.m. After 5 p.m. call your poison control center at 1-800-222-1222.]



[Do not flush]

NUGEN® Citric-Guard Wipes

EPA Reg. No. 6836-455

EPA Submission 2024-08-05 (Updated 02/03/2025)

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PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Caution. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum or using tobacco, or using the toilet.

FIRST AID

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the container or label with you when calling a poison control center or doctor, or going for treatment. For general information on product use, etc., call the National Pesticides Information Center (NPIC) at 1-800-858-7378, Monday through Friday, 8 AM to 12 PM PST, or at <http://npic.orst.edu>. You may also contact the poison control center at 1-800-222-1222 for emergency medical treatment information.

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{Note to reviewer: The following formatting notes are applicable for all claims: (1) Optional marketing claims may appear on either the front or back panel. (2) Capitalization, plurals, or singular, bold and italics are all variable. (3) The word “and” and symbol “&” can be used interchangeably. (4) The terms “Wipe[s]”, “Towel[s]”, “Towelette[s]” and “Cloth[s]” can be used interchangeably throughout except for the product primary brand name which can be only changed by notification or amendment. (5) All designators (i.e. asterisks and numbers) used throughout the label may be interchanged as needed on final printed label. (6) A footnote can be used to list organisms. (7) Bacteria and virus can be separated into footnotes if desired. (8) When organisms are listed next to a claim, the organisms may be listed in a footnote instead of directly next to the claim.}

{Note to reviewer: The following claims containing “New” may only be used for a period of six months after EPA’s approval of a revised or alternate formula, beginning when the product is first sold or distributed.}

- Introducing [new]
- New [Convenient] [Amazing] [Package] [Top]
- New [easy] [EZ] [to] [dispense] [start lid] [Start Package] [Grab Lid]
- New [thick] [textured] wipe[s]

CLEANING CLAIMS:

- [A] Clean you can trust
- Clean [more with less] [with just a wipe]
- Clean surfaces at your fingertips
- Cleaning [just got a whole lot easier]
- Cleans [away] [up] (insert one or more soils from Types of Soils table)
- Cleans faster because the [scrubbies] [texture] removes [stubborn] [stuck on] (insert one or more soils from Types of Soils table)
- Cleans [things you never thought a wipe could] [what you can’t see]
- Cleans to a [Sparkle] [Shine]
- Convenience of a [wipe] [cloth]
- Convenient
- Cuts through [tough] (insert one or more soils from Types of Soils table)
- [Everyday] cleaning wipes
- [Effectively] [Spot] Cleans [soft surfaces] [fabrics]
- Extra [Power] [strength] wipe[s] for [your] [extra] [tough] cleaning [jobs] [messes]
- Leaves no <<dull {or} sticky>> residue
- For [light touch ups] [quick clean-ups] [in one easy step]
- For [a] [an] [Powerful] [Everyday] [Regular] Clean[ing]
- For non-scratch cleaning of (insert one or more Types of Surfaces)
- For the quick touch ups, try (insert product name)
- For when a regular wipe [just] can’t get the job done
- Gets up stuck-on messes [so you don’t have to get on hands and knees]
- Gives [a] [deep] [deeper] [clean] [than a mop]
- [Great] [Designed] [Built] [Tough] [Textured Design] for your Toughest Messes
- [Great] [Designed] [Built] [for] [tough] [cleaning] [up] (insert one or more soils from Types of Soils table) (insert one or more Area of Use) (insert one or more Types of Surfaces)
- [Great] for [everyday] [daily] [touch-up] [Spring] cleaning [your] {insert one or more Area of Use}
- Great [for cleaning] [on] (insert one or more soils from Types of Soils table) (insert one or more Area of Use) (insert one or more Types of Surfaces)
- Handles daily clean-ups with no need for additional sprays, sponges or buckets.
- Helps you finish cleaning [fast] [quickly]
- Is a (insert one or more Area of Use) cleaner
- Leaves [no residue] [a streak free shine]

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CLEANING CLAIMS (Cont.):

- Leaves your (insert one or more Area of Use) fresh and clean
- Life doesn't stop for messes, [Wipe] [Clean] it up
- Life is Messy, [Wipe] [Clean] it up
- Low-streak formula is great on [glass] [mirrors] [stainless steel] [stainless]
- Makes [your job] [cleaning] [easier] [easy]
- [Multi-purpose] [Multi-surface] cleaner
- No [mixing] [spraying] [sprays] [sponges] [mess]
- No need to get on your hands and knees to [scrub] [or clean] stubborn spots.
- No rinsing required¹
- Powerful cleaner for (insert one or more Area of Use) (insert one or more Types of Surfaces)
- Powers through (insert one or more soils from Types of Soils table) [in [the] [your] (insert one or more Area of Use)]
- Quick easy clean-ups.
- Removes [the] (insert one or more soils from Types of Soils table) [to give you] [so you have] more time
- [Spot clean[ing]] [Touch-up] clean[ing] with a [fresh] [pleasant] [nice] [good] [great] [relaxing] [pleasing] [warm] (insert fragrance descriptor(s))
- Streak-free
- The convenient way to keep your home looking “just cleaned”
- The wipe to use when you don't have much time
- Tough cleaning [made easy] [made easier] [at your fingertips] [without the tough cleaning smell][!]
- Tough Enough to Clean [a] (insert one or more Area of Use)
- Tough enough to do the bigger cleaning jobs.
- Traps [&] [and] locks [away] (insert one or more soils from Types of Soils table)
- Use [daily] to clean-(insert one or more soils from Types of Soils table).
- [wipes] [cloths] [sheets] help you [to] accomplish things you never thought a wipe could do
- [Wipes] [are] [good] for [quick] [light] [touchups] [clean-ups] [in one easy step]
- Wipes [Away] [Out] [Through] [Up] [Tough] [Everyday] (insert one or more soils from Types of Soils table).
- Wipes to a [Clean] Shine [Sparkle]

ALLERGEN CLAIMS:

- Control allergens [all around your home]
- Controls common household allergens
- [reduces the following allergens] {or} [removes X% of the following allergens] [(insert one or more allergens from Allergens table)][:]
- [Removes][Reduces][Controls][Traps][and][&][Locks][Cleans][Picks up][Wipes off] [up to] [more] [than] [X%] [of] [common] [pet] [household] [inanimate] [messes] [allergens] [soils] [on [from] surfaces] [with (insert product name)][:] [(insert one or more allergens from Allergens table)] [(insert one or more soils from Types of Soils table)]

CLEANING AND ODOR ELIMINATION CLAIMS:

- A fresh take on tough cleaning
- An effective way to clean and deodorize against odor-causing bacteria.
- Deodorizes [by killing [microorganisms] [bacteria] that cause offensive odors]
- Don't just mask odors – [eliminate][neutralize] them
- Effectively controls [odor] [malodors]
- Eliminate dirt and [neutralize] odor
- [Eliminates][Neutralizes] odors [and freshens] on contact
- Eliminates odor-causing bacteria

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CLEANING AND ODOR ELIMINATION CLAIMS (Cont):

- Freshens [as you clean]
- [Fights] [Eliminates] [Neutralizes] even the [toughest] [strongest] [odors] [malodors]
- For a cleaner, fresher (insert one or more Area of Use)
- [Leaves] [a] [light][,] [clean][,] [fresh] scent
- [Powers through] [Tough on] [Wipes out] odor[s]
- Power[s] through [tough] [messes] [dirt] [and grease] (insert one or more soils from Types of Soils table) and [help[s]] [eliminate[s]] [neutralize[s]] odors
- [This product] [product name] is specially formulated to [eliminate] [neutralize] odors from (insert one or more Area of Use) (insert one or more Types of Surfaces)

FRAGRANCE CLAIMS:

- Fragrance Free {*Note to reviewer: Only to be used on labels with no added fragrance*}
- Leaves a [light] [,] [clean] [,] [fresh] scent
- Long lasting scent
- [With] (insert scent name) [scent]

Fragrance Descriptors

{*Note to reviewer: The following can be used in any order as a fragrance descriptor:*}

[and] [&] [Air] [Almond] [Aloe] [Apple] [Azure] [Bay] [Berries] [Blast] [Blend] [Bliss] [Bloom] [Blossom] [Bouquet] [Breeze] [Burst] [Calming] [Cascading] [Citrus] [Clean] [Cool] [Country] [Crisp] [Crystal] [Cucumber] [Dew] [Early] [Energy] [Escape] [Essence] [Fields] [Fresh] [Fresh cut] [Fresh picked] [Fruits] [Fruit[y]] [Fusion] [Garden] [Gentle] [Glacier] [Grapefruit] [Harvest] [Herbal] [Herbs] [Hint of] [Infusion] [Invigorating] [Island] [Lavender] [Lemon] [Lime] [Linen] [Lush] [Mango] [Meadow[s]] [Medley] [Mineral] [Mist[y] s]] [Modern] [Moonlight] [Orange] [Original] [Peach] [Petals] [Pleasant] [Pomegranate] [Power] [Pure] [Rain] [Refreshing] [Revitalizing] [Ripe] [Scent] [Sea[s]] [Serene] [Sheer] [Simple] [Simply] [Sky] [Soft] [Sparkling] [Splash] [Spring[s]] [Spritz] [Summer] [Sun-Kissed] [Sunlit] [Tea] [Tropical] [Ultimate] [Valley] [Water(s)] [Waterfall] [Wave[s]] [Whisper] [Wild] [Wildberry] [Wisp] [Verbena] [Zest]

ANTIMICROBIAL CLAIMS:

- 3 [steps] in 1- wipes, scrubs and [disinfects<<[2] {or} [3]>>] [sanitizes⁴] [so you finish faster]
- 99.9% of bacteria⁴ killed in [just] 10 seconds[!]
- 99.9% of bacteria⁷ killed in [just] <<1 minute {or} 60 seconds>>[!]
- [99.9%] [3 [three] log] reduction for [SARS-CoV-2] [the COVID-19 virus]⁵
- Aids in the reduction of cross contamination between treated, hard, non-porous surfaces in the (insert one or more Area of Use)
- [Antimicrobial] [Antibacterial] [Disinfecting<<[2] {or} [3]>>] [Sanitizing⁴] [Formula] [Wipes]
- Bactericidal³
- Clean and [Disinfect<<[2] {or} [3]>>] [Sanitize⁴] from Classroom to Playground [and everything in between]
- [Clean and] Disinfect<<[2] {or} [3]>> in just [5] [five] minutes
- [Clean and] [disinfect<<[2] {or} [3]>>] [sanitize⁴] [commonly touched] [household] surfaces [including (insert one or more Types of Surfaces)]
- Cleans and [disinfects<<[2] {or} [3]>>] [sanitizes⁴] [without scratching] [surfaces]
- Cleans and [disinfects<<[2] {or} [3]>>] [sanitizes⁴] in one [easy] step
- [Daily] [Everyday] [Surface] [Disinfectant<<[2] {or} [3]>>] [Sanitizer⁴] [Cleaner]
- [Designed] [Built] for [disinfecting<<[2] {or} [3]>>] [sanitizing⁴] and [cleaning] [wiping] everyday
- [Designed] [Built] [Great] for Everyday [Disinfecting<<[2] {or} [3]>>] [Sanitizing⁴] [Cleaning] [Wiping]
- [Disinfect<<[2] {or} [3]>>] [Sanitize⁴] [Your] (insert one or more Area of Use) (insert one or more Types of Surfaces) [Daily] [Everyday]
- Disinfects<<[2] {or} [3]>> [as it cleans] [and scrubs in one easy step] [without [a] [the] [that] disinfectant smell]

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ANTIMICROBIAL CLAIMS (Cont):

- Disinfects² surfaces by killing [99.9%] [of] [SARS-Related Coronavirus 2] [SARS-CoV-2]⁵ [USA-WA1/2020] [in 15 seconds] [in one-step⁴]
- Disinfecting<<[2] {or} [3]>> wipes with scrubbing action
- Effective against [bacteria²] [and] [viruses²][:] [(insert one or more pathogens from the Organism table)]
- Effective against [SARS-Related Coronavirus 2] [SARS-CoV-2]⁵ [USA-WA1/2020] [in 15 seconds]
- [Effective against] [Kills] [99.9%] [of] [SARS-CoV-2] [the COVID-19 virus]⁵ [in 15 seconds]
- Effective in sanitizing⁴ [your] (insert one or more Area of Use) [surfaces]
- Effectively [disinfects<<[2] {or} [3]>>] [sanitizes⁴] common household surfaces
- A wipe that cleans and [disinfects<<[2] {or} [3]>>] [sanitizes⁴]
- [is] a [one-step] disinfectant³ cleaner [that is effective against a broad spectrum of bacteria]
- [Kills] [Wipe out] [Wipe Away] [Wipe Up] 99.9% of [Germs] [Bacteria] [and] [Viruses]² [including [:] (insert one or more Organisms)]
- Kills bacteria<<3 or 4> [while it cleans]
- Kills Cold & Flu Viruses⁸
- Kills common [household][kitchen][bathroom] bacteria³
- [Kill[s]] [Destroys] [Eliminates] [99.9% of] Viruses² [in [1 minute] [60 seconds]][:] [(insert one or more viruses at 1 minute from the Organism table)]
- [Kill[s]] [Destroys] [Eliminates] [99.9% of] Viruses² [in 5 minutes][:] [(insert one or more viruses at 5 minutes from the Organism table)]
- Kill[s] germs² [to reduce cross-contamination between treated surfaces]
- Kills 99.9% of [household] [kitchen] [bathroom] germs² [in] [just] [5 minutes]
- Kills 99.9% of bacteria⁷ in [just] <<1 minute {or} 60 seconds>>[!]
- Kills viruses² [all over] [in] [on] [your] [home] [house] (insert one or more Area of Use) (insert one or more Types of Surfaces)
- [Kills] [Eliminates] [Removes] [Destroys] [99.9% of] [Bacteria [and] [Viruses]²] [on [pre-cleaned] environmental surfaces]
- [Kills] [Wipes out³] [Removes] 99.9% [of](insert one or more Organisms) [on [pre-cleaned] environmental surfaces]
- [Kills] [Eliminates] [99.9%] [of] [SARS-Related Coronavirus] [SARS-CoV-2]⁵ [USA-WA1/2020] [causative agent of COVID-19] [the virus that causes COVID-19]
- [Kills] [Removes] 99.9% of bacteria[:], leaving surfaces [clean and] disinfected³
- Leaves surfaces clean and disinfected<<[2] {or} [3]>>
- [One-step] [cleaning] [and] [disinfecting<<[2] {or} [3]>>] [and] [deodorizing]
- Remove 99.9% of [Bacteria³] [Germs²] [from Your] (insert one or more Area of Use) (insert one or more Types of Surfaces)
- [Sanitize⁴][Disinfect<<[2] {or} [3]>>] any room in the house
- Sanitize⁴ [commonly touched] [household] surfaces in [just] 1 minute[!]
- [Sanitize⁴][Disinfect<<[2] {or} [3]>>] (insert one or more Area of Use) (insert one or more Types of Surfaces)
- [Sanitize⁴][Disinfect<<[2] {or} [3]>>] [your][common] [household] [surfaces][items][:] [such as] (insert one or more Types of Surfaces)
- Sanitizes⁴ [the following surfaces] [:] [(insert one or more Types of Surfaces)]
- The [convenient] [smart] way to [disinfect<<[2] {or} [3]>>] [sanitizes⁴] your household surfaces
- The wipe that [disinfects<<[2] {or} [3]>>] [sanitizes⁴] while it cleans
- This product will clean and disinfect<<[2] {or} [3]>> hard, non-porous surfaces.
- [This product] [product name] [help[s]] [aid[s]] in the reduction of cross-contamination of [germs] [and] [bacteria]²
- [This product] [product name] is a broad-spectrum [hospital] disinfectant³

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ANTIMICROBIAL CLAIMS (Cont):

- [This product] [product name] is an effective sanitizer⁴ against [Staphylococcus aureus] [,][and] [Klebsiella aerogenes] [,][and] [Salmonella enterica] [,][and] [Escherichia coli] [and] [Listeria monocytogenes].
- Two in one action [cleans and [disinfects<<[2] {or} [3]>>] [sanitizes⁴] in one easy step¹]
- [Will] disinfect³, clean and deodorize surfaces in (insert one or more Area of Use) [,] [where bacterial growth can cause malodors.]
- Use on commonly touched surfaces [in] [around] [the] (insert one or more Area of Use) [including
- (insert one or more Types of Surfaces)] to kill [99.9% of] [bacteria] [viruses] [germs]²
- Use [this product] [in] [on] (insert one or more Area of Use) (insert one or more Types of Surfaces) [where [bacteria] [viruses] [germs]² may be a concern.]
- Virucidal²
- Wipes out³ 99.9% of the [coronavirus⁵] [virus⁵] that causes COVID-19
- Wipes out³ 99.9% of [the] COVID-19[-causing] [coronavirus⁵] [virus⁵]
- [With proven] Antibacterial Action

VALUE CLAIMS:

- X [-] [canisters] [pack]
- [X%] [Bonus] [Free] [More] Wipes
- (Insert number) [Wipes] for the Price of (Insert number)
- [2] [Two] [1] [One] For You [1] [One] For School
- [Assorted] [Mixed] [Special] [Variety] [Multiple] [Multi] [Canister] [Bundle] [Pack]
- [Bonus] [Twin] [Convenient] [Size] [Pack]
- [Bonus] [Free] [(Insert number) [count] [ct]] Wipes
- Convenience
- Get it done with one
- Guaranteed [to clean longer] [you'll use fewer wipes to clean more]
- [Large] [Small] Size
- More cleaning [power] [per] [in one] wipe
- One wipe goes a long way
- [Special] [Back to] [School] [Spring Cleaning] [Bonus] [Value] [Variety] [Canister] [Bundle] [Pack]
- [Value] [Variety] [Family] [Travel] [Pack] [Size]

SURFACE SAFETY CLAIMS:

- Non- [abrasive] [corrosive] [to many hard, non-porous surfaces]
- Non-scratch[ing]
- [These] [wipes] [towelettes] [cloths] will not [harm] [damage] [most] [hard, non-porous] surfaces.
- Will not scratch

SUBSTRATE CLAIMS:

{Note to reviewer: The following may only be used if the Supplemental Registrant has documentation to support these claims. A representative graphic of a substrate may be added to the label. Only a graphic of the substrate actually being used can be added to the final printed label.}

- [2] [-Sided] [Sides] [wipe] [:] [scrubbing power for tough messes] [wiping side for quick cleanups]
- [Cloth-like texture] [Textured] [Strong] for scrubbing power
- [Cloths] [Wipes] quickly remove (insert one or more soils from Types of Soils table)
- Dual [action] [purpose] [sided] [wipes]
- Grooved for (insert one or more soils from Types of Soils table)
- [Improved] [Made with] scrubbing [texture] [fibers]
- [Less Oil Consumption] [,][and] [Landfill Waste] [,][and] [Production Energy] [and] [Freight Energy]

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The term “Y” is a place holder for a character A – Z.

SUBSTRATE CLAIMS (Cont):

- [Long lasting] [substrate] [wipe] [towelette] [cloth] [material]
- [Premoistened] [wet] [disinfecting] [textured] [antibacterial] [wipes] [towelettes] [cloths]
- [Unique] [Special] [Thick] [Quilted Texture] [Textured] [for] [to] [Scrub] [Power] [Fight] [Through] Tough [Messes] [Cleaning]
- [Scrubbing Action] [Strong(er)] [Thick] Wipe[s]
- [Substrate] [Wipe] [Towelette] [Cloth] [Material] [lasts a long time] [goes further] [lasts longer]
- Textured [cloths] [towelettes] clean (insert one or more Types of Surfaces) faster [and easier]
- Textured [Wipe] [cloth] [towelette] [for] [to] [gets up] [tough jobs] [tough cleaning] [pick up particles] [stubborn stuck on messes]
- Textured for better <<cleaning {or} scrubbing>> power
- The wipe that is [strong] [durable] [thick] [heavy] enough to scrub [and] [clean]
- [The] [This] [product] [was] [manufactured] [produced] with [X%] [Wind] [Solar] Energy
- Thick [wipe], cloth-like texture
- Thicker [wipe] [cloth-like feel for tough messes] [than an ordinary wipe]
- Tough like a towel
- [Tough(er)] [Thick] [Textured] wipe[s] [for tough(er) [cleaning] [messes] [jobs]]
- [With a] [Special] [Unique] [Cloth-like] 3D texture [for tough messes]
- With [extra] <<cleaning {or} scrubbing>> power [wipes] [sheets] [cloths]

BIODEGRADABLE SUBSTRATE CLAIMS (Cont): *{Note to reviewer: The following may only be used for the regenerated cellulose substrate specified on CSFs for Alternate Formulations 7 – 21.}*

- [Biodegrades] [degrades] within [X] weeks [after disposal]
- [Contains] biodegradable [wipes] [cloth] [made from] [and] [X%] [plant-based] [cellulosic] [plant-derived] [ingredients] [fibers]
- [Contains] [biodegradable] [ingredients] [made] [with] [from] [biobased] [plant-based] [ingredients] [materials] [content]
- Environmentally friendly wipes
- [Free from] [no] plastic [wipe] [material] [cloth] [made from 100% plant-based fibers]
- [Fully] [Completely] [X%] [Biodegradable] [Plant-derived] [Disinfecting] <<Wipe[s] {or} Material {or} Cloth {or} Fibers>>
- <<Substrate {or} Wipe {or} Towelette {or} Cloth {or} material {or} fabric>> [derived] [made] [from] [composed of] [X%] [regenerated cellulose] [renewable materials]
- This product contains [Lyocell] [Viscose] [Tencel] fibers
- [Wipes] made from [X%] [fully] [biodegradable] [plant-derived] [plant-based] [cellulosic] fibers
- [Wipes] made with [X%] [viscose] [and] [X%] [Tencel] [and] [X%] [Lyocell]
- [Wipes] made [with] [from] biobased [ingredients] [materials] [content]
- Wipes will [biodegrade] [compost] under backyard or municipal composting conditions, tested as per ASTM <<D6868 {or} D6400>> [under home & municipal conditions]

PACKAGING CLAIMS:

- [Breakthrough] packag[e][ing]
- [Convenient] [Hassle-free] [One-hand] dispensing
- [Converted] [Packaged] [Produced] with [X%] [wind] [solar] energy
- Dispenses Like A Tissue [Cleans Like a Cloth] [Tough Like A [Cloth] [Towel]]
- Eas[y][ier] [EZ] [Great] [dispens[e][ing]] [to use] [glide] [lid] [package]
- [Easy] [EZ] [start] [dispens[er][ing]] [and] [tough texture] [for the ultimate wipes experience]
- Easy to [use] [open] [thread] [access lid] [dispense]
- [Easy] [EZ] [-] [glide] dispensing [top] [lid]
- [Eco-shape] [Energy efficient] Canister

Note: Bracketed information is denoted as: [optional text], {*informational purposes*}, (insert as noted), <<must choose one of the “or” options>>

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The term “Y” is a place holder for a character A – Z.

PACKAGING CLAIMS (Cont):

- [Fewer] [No more] [rips] [tears] [,][and] [bunches] [,][and] [snags] [pinched fingers]
- [Help] Take the hassle out of dispensing disinfecting wipes.
- [Just like a tissue box] [Tissue box dispensing]
- Just [pull] [pop] clean and toss.
- [Made with] X% less plastic [than similar size containers][than previous[ly] used container[s]]
- One [wipe] at a time [dispensing] [,] [like a tissue box]
- Only use approved refill packs.
- Package [contains] [is] X% [post-consumer waste] [recycled materials] [recyclable]
- Pop [up] [and] [go] [clean]
- Portable
- Recyclable packaging
- Refill [size] [pack] [for (insert product name)] [container] [tub]
- Specially designed package that easily dispenses one at a time

FLOOR MOP CLAIMS:

- Fits [insert name of mop]
- For mopping

OTHER CLAIMS:

- [After use], just toss wipe away [in trash][in garbage].
- Assembled in the USA
- Best if used by (insert date)
- Bleach Free [formula]
- Botanical [cleaning] [ingredient[s]]
- Botanical[ly] [derived] [based] [active] ingredient[s]
- Call (Insert phone number)
- Clear drying formula
- [Comments] [Questions]?
- [Contains no] [Does not contain] [[added] dyes] [added colors] [perfumes] [synthetic fragrances]
- Does not contain bleach.
- Fragrance-free
- Good for use around cats and dogs
- If you are not completely satisfied with this product, return it for a refund or replacement.
- (Insert Brand name) is registered in the United States and Trademark Office to (Insert Company Name).
- (Insert Brand name) is a registered trademark of (Insert Company Name).
- Not for sale [or use] after {*insert date*}
- Quality Guaranteed
- Ready to Use
- [This product] contains no [phosphate[s]] [or] [phosphorous] [compounds].
- [USDA BioPreferred] [certified] [with] [94% bio-based content]
- Use by (insert date)
- When used as directed, safe for use around [pets][cats and dogs]

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The term “Y” is a place holder for a character A – Z.

{Note to reviewer: The following is considered optional marketing language. Each item below also represents a graphic depicting the corresponding area of use. The graphics will only represent individual objects or outsides or insides of buildings as described below. No people, animal, or food will be depicted in graphics.}

[AREAS OF USE:]

Use (insert product name) on hard, non-porous surfaces in:

Bathroom[s]	Hotels
[Children's] Room	Institutional facilities
Home[s] [households]	Institutions
Kitchen[s]	Laundry rooms
Living room	[Locker] [Weight] rooms
[Dental] [Medical] Office[s]	Motels
Hospitals	Playrooms
Nursing homes	Prisons
Waiting rooms	Public [facilities] [areas]
[Daycare] [Childcare] [centers] [facilities]	Public rest rooms
Nurseries	Salons
Bars	Schools
Cafeterias	Shower and bath areas
Convenience stores	Sick rooms
Dairies	Camp grounds
Food [storage] [handling] areas	Play ground equipment
Grocery stores	Airports
Institutional kitchens	Ambulances
Restaurants	Boats
[[USDA] [Federally] inspected] [food] [meat] [&] [poultry] [processing] [facilities] [plants] [areas] ¹⁰	Buses
Athletic facilities	Campers
Barber shops	Car[s] [Automobiles]
[Business] [and] Office buildings	Emergency [Police] [EMS] [Fire] [Rescue] vehicles
Classroom[s]	Mobile homes
Colleges	Ships
Correctional facilities	Taxis
Dorm[itory]	Trailers
Dressing rooms	Trains
Exercise [facilities] [rooms]	Transportation terminals
Factories	
Family Rooms [Dens]	
[Health clubs] [Gyms]	

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{Note to reviewer: Each item below also represents a graphic depicting the corresponding type of surface. No people, animal, or food will be depicted in graphics. Only exteriors of microwaves and refrigerators will be depicted. Toy graphics will be submitted to Agency for review.}

[TYPES OF SURFACES:]

[Use (insert product name) on washable hard, non-porous surfaces of:]

{or}

[This product] will clean and disinfect³ washable hard, non-porous surfaces of:

Appliances ⁶	[School] Desk[s] [tops]
Bathroom fixtures	Sealed floors
Bathtubs [Fiberglass]	Showers
Cabinets	[Shopping] [Grocery] cart[s] [handles]
Cages	Shower[s] [stalls] [walls] [doors]
[Camping] [Hiking] [Boating] equipment	Sinks [bathroom, kitchen]
Car seat[s]	Storage areas
Cart[s]	[Stoves ⁶] [stovetops ⁶]
[Cell][Mobile][phones]	Strollers
Chairs	Tanning Beds
Computer[s] [keyboard[s]] [mouse] [touchpad[s]]	Telephones
Counter[s][tops] [Bathroom] [Kitchen]	[Television] [TV] remote controls
Cupboards	Exterior Toilet bowl surfaces
Diaper changing [tables][counters]	Toilet [seats] [flush handle[s]]
Diaper pails	[Baby] [Children's] Toys ¹
Door[knobs] [handles]	Tub walls
Equipment tables	Tubs
Exercise machines	Tiles, glazed
Faucets	Vanit[ies][y] [tops]
Faucet Handles	Walls
Finished floors	Work [areas] [stations]
[Garbage] [Trash] [cans] [receptacle[s]] [bin[s]]	[Wrestling][Gymnastic][Gym][Athletic][Yoga]
Glass	[Tumbling] [mats][pads]
[Gym] [Gymnastics] [Sport[s][ing] [Athletic]	[Personal Protective Equipment] [PPE] ⁹
[Workout] [equipment] [machines]	[Face shields] [Goggles] ⁹
[Handrails] [Stair railings]	[Hearing protection] [Ear covers] [Safety earmuffs] ⁹
Highchairs	[Helmets] [Protective head gear] [Hard hats] ⁹
Lab benches	[Respirators] [Full face breathing apparatus] [Gas
Linoleum	mask] ⁹
Light switches	
Laminate flooring	
Microwave ovens - exteriors	
Non-Wooden Outdoor [patio] furniture except	
cushions and wood frames	
[Picnic] Table[s][tops]	
[Plastic] Booster Seats	
Plastic [Laundry Basket] [Hamper]	
Refrigerators - exteriors	
Refrigerated storage and display equipment ⁶	

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[TYPES OF SURFACES:] (Cont.)

Non-critical medical device surfaces:

Beds [Medical] [Hospital]

Bed frames

Bed rails

Crutches

Defibrillators

Gurneys

Non-critical [hospital] [medical] equipment surfaces

[Medical] Examining tables

[Medical] [Hospital] Lamps

Rescue tools

Resuscitators

[Medical] [Hospital] Scales

Stands

Stretchers

Stethoscopes

Walkers

Wheel chairs

Ultra-sound transducers and equipment

Other hard, non-porous surfaces made of:

Acrylic

Finished woodwork

Formica®

Glass

Glazed ceramic

Glazed enameled surfaces

Glazed porcelain

Metal

Plastic [such as polystyrene or polypropylene]

Sealed granite

Sealed marble

Sealed quartz

Sealed stone

Stainless steel

Upholstery- vinyl and plastic

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[TYPES OF SOILS:]

[Build Up]	[Hand] [Body] lotion
[Built] Up]	Hard Water [stain]
[Burnt on] Food [stains]	Honey
[Burnt on] Grease	Jelly
[Dried on] Stains	Juice stains
[Dried on] Toothpaste	Limescale
[Heel] [scuff] marks	Lint
[Pen] [or] [ink] marks	[Kitchen] Grease
[Pet] Hair	Makeup
Bacon fat	Mildew [mold] stains
Baked on cheese	Mud
Bathtub rings	Oil
Beverage stains	Outdoor grime
Chicken juice	Pancake mix
Coffee stains	Particles [residues]
Cooking splashes	Peanut butter
Cosmetics	Pencil
Crayon	Pet messes
Crumbs	Pet stain[s]
Dirt	Shaving cream
Dried on food	Small spills
Dust	Smudges
[Everyday] [Grimy] [Tough] messes	Soap [Scum]
Fingerprint	Sticky messes
Food [residues] [particles]	Tea [stains]
Footprints	Tomato sauce
Gravy	Toothpaste
Grime	[Tough] soil[s]
Hair [spray] [gel]	Wine [stains]

[ALLERGENS:]

cockroach debris	hair
cockroach matter	household surface dust
cockroach particles	pollen [particles] [from timothy grass]
[cat] [dog] [pet] [dander] [hair]	residue from [burning materials] [fireplace soot]
dust mite debris	[cigarette smoke] [candles]
dust mite matter	rodent feces
dust mite particles	rodent saliva

Note: Bracketed information is denoted as: [optional text], {*informational purposes*}, (insert as noted), <<must choose one of the “or” options>>
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[ORGANISMS:]

BACTERICIDAL
5 MINUTE CONTACT TIME:
<i>Escherichia coli</i> [ATCC 11229]
<i>Pseudomonas aeruginosa</i> [ATCC 15442]
<i>Salmonella enterica</i> [ATCC 10708]
<i>Staphylococcus aureus</i> [ATCC 6538]
<i>Staphylococcus aureus</i> – Hospital Acquired Methicillin-Resistant [ATCC 33591]
VIRUCIDAL
15 SECOND CONTACT TIME:
SARS-Related Coronavirus 2 [SARS-CoV-2] [cause of COVID-19] [Strain USA-WA1/2020]
1 MINUTE CONTACT TIME:
Human Coronavirus [ATCC VR-740, Strain 229E]
Influenza A Virus H1N1 [Novel H1N1] [Strain A/4108/2009, CDC #2009712192]
Influenza A Virus H3N2 [Influenza] [ATCC VR-544]
Measles Virus [ATCC VR-24, Strain Edmonston]
Respiratory Syncytial Virus [RSV] [ATCC VR-26, Strain Long]
[Animal Viruses:]
Avian Influenza Virus H7N9 [A/Anhui/1/2013]
5 MINUTE CONTACT TIME:
Mumps Virus [ATCC VR-1438, Strain Jones]
Rhinovirus Type 37 [ATCC VR-1147, Strain 151-1]
NON-FOOD CONTACT SANITIZER FOR HARD, NON-POROUS SURFACES
{Note to reviewer: Below claims will only be used when non-food contact sanitizing directions are included on final label}
10 SECOND CONTACT TIME:
<i>Klebsiella aerogenes</i> [ATCC 13048]
<i>Staphylococcus aureus</i> [Staph] [ATCC 6538]
1 MINUTE CONTACT TIME:
<i>Escherichia coli</i> [ATCC 11229]
<i>Listeria monocytogenes</i> [ATCC 19117]
<i>Salmonella enterica</i> [ATCC 10708]

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{Note to Reviewer: These statements for claims against large non-enveloped, and/or enveloped emerging viral pathogens shall not appear on marketed (final print) product labels.}

EMERGING VIRAL PATHOGEN CLAIMS

This product qualifies for emerging viral pathogen claims per the EPA’s ‘Guidance to Registrants: Process for Making Claims Against Emerging Viral Pathogens not on EPA-Registered Disinfectant Labels’ when used in accordance with the appropriate use directions indicated below.

This product meets the criteria to make claims against certain emerging viral pathogens from the following viral category[ies]:

- Enveloped viruses
- Large, non-enveloped viruses

For an emerging viral pathogen that is a/an...	...follow the directions for use for the following organisms on the label:
Enveloped virus	Rhinovirus Type 37 [ATCC VR-1147, Strain 151-1]
Large, non-enveloped viruses	Rhinovirus Type 37 [ATCC VR-1147, Strain 151-1]

[NUGEN® Citric-Guard Wipes] has demonstrated effectiveness against viruses similar to **[name of emerging virus]** on **hard, non-porous surfaces**. Therefore, **[NUGEN® Citric-Guard Wipes]** can be used against **[name of emerging virus]** when used in accordance with the directions for use against **[Rhinovirus]** on **hard, non-porous surfaces**. Refer to the **[CDC or OIE]** website at **[pathogen-specific website address]** for additional information.

OR

[Name of illness/outbreak] is caused by **[name of emerging virus]**. **[NUGEN® Citric-Guard Wipes]** kills similar viruses and therefore can be used against **[name of emerging virus]** when used in accordance with the directions for use against **[Rhinovirus]** on **hard, non-porous surfaces**. Refer to the **[CDC or OIE]** website at **[website address]** for additional information.”

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{Note to reviewer: Not all these use directions will appear on the label}

DIRECTIONS FOR USE:

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

{Note to reviewer: Representative graphic of wipe tub and/or hand pulling out wipe fabric may be added to the label}

{For canister}

To Open Package: [Open] [Remove] [cover] [lid]. [Gently] Pull [up] [out] [one] [towelette] [wipe] [cloth] [corner] [at a time] from center [of roll]. Thread through [small] [hole] [opening] in the [cover] [lid]. Replace [cover] [lid] [and pull [towelette] [wipe] [cloth]]. [The next [towelette] [wipe] [cloth] pops up automatically.] [Open center cap on cover to remove wipe.] [When not in use] [When not using], close [center cap] [lid flap] [securely] to [prevent moisture loss] [retain moisture].

To Refill [Wipes Canister]: Remove the [cover] [lid] from the empty canister. Discard any remaining [liquid] [product]. [Rinse out canister with water.] [Tear pouch open [at notch]]. [Remove tear strip [from pouch] [completely] and discard.] Place the new [roll] [stack] [of] wipes into the canister and replace [cover] [lid]. [Use as instructed on the canister label].

{or}

Remove canister lid and place [bag with] roll into empty canister. Locate wipe [edge] at center of roll and thread wipe through canister opening [at angle]. Do not push finger through opening. Replace lid on canister and close tightly. Finish pulling wipe through opening. Wipes will [feed] [pop up] automatically.

{or}

{For carton or tub with pouch and/or refill}

To Open Package {and/or} To Refill [Carton] [Tub]: [Flip] Open [cover] [dispensing flap] [and remove lid by lifting upward]. [Slowly] Peel back [label] [seal] on pouch. [Place [refill] [pouch] in tub]. [Insert [wipe] [towelette] [cloth] through opening in lid.] Replace lid. [[Remove] [Pull out] [wipe] [towelette] [cloth] as needed.] [The next [towelette] [wipe] [cloth] pops up automatically.] [To retain moisture, reseal [pouch] [bag] by firmly pressing seal back on the [pouch] [bag] and close [carton] [tub] cover.] [Close lid to retain moisture].

{or}

{For Tub without pouch and/or refill}

To Open Package {and/or} To Refill [Carton] [Tub]: [Flip] Open cover and [slowly] peel back label. [Insert [wipe] [towelette] [cloth] through opening in lid.] [Remove] [Pull out] [wipe] [towelette] [cloth] as needed. [Open pouch and transfer wipes to tub]. Replace lid. [To retain moisture, [reseal] [reclose] by firmly pressing [tub] cover to close]. [When finished, close lid to retain moisture].

{or}

{For pouch, bag or flat pack, including travel pack}

To Open Package: [[Tear] [Cut] open wipe [pouch] [bag] [along dotted line]]. [Open Ziplock] [Tear edge of pack]. [Open [pouch] [bag] [pack] [by pulling on [the] tear strip] [tearing at notch] [removing seal].] [Pull out] [Remove] [wipe[s]] [towelette(s)] [cloth(s)] as needed. [When finished, close to retain moisture.] [Reseal [label] to retain moisture.] [Reseal Ziplock to retain moisture.]

{or}

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The term “Y” is a place holder for a character A – Z.

To Open Package: [Remove [package] [safety] seal[s].] [Flip] Open lid. To remove first [wipe] [sheet] [[wet] cloth] pull up on wipe and remove wipe through [wavy] [dispensing] [opening] [orifice] [The next wipe will pop up automatically]. [Always] [close] [snap] lid securely between uses [to retain moisture].
{or}

To Open Package: [Remove [package] [safety] seal[s].] [Flip] Open [lid] [package]. To [start] [remove] [first] [wipe] [sheet] [[wet] cloth] take the edge of [wipe] [sheet] [[wet] cloth] from large opening to the small dispensing opening and pull up. [The next [wipe] [sheet] [[wet] cloth] will pop up automatically.] [Always] [close] [snap] lid securely between uses [to retain moisture].

{or}

To Open Package: [Flip] Open [up] [the] [lid][cover][top][cap][dispensing lid]. [To start wipes, pull up on wipe and move wipe into the small dispensing [opening] [orifice] [aperture] [hole] [wave] and [pull sheet up to remove wipe. [Thread the [first] [wipe][cloth][cloth][sheet] through the dispensing lid and pull up to remove wipe from package.] [The next [wipe] [sheet][cloth] [will] pop[s] up automatically.] [Close lid securely between uses to retain moisture [prevent moisture loss]]. [[Always] close [snap] lid securely between uses [to retain moisture]].

{or}

To Open Package: Press the [three] [3] ridges with your thumb and push up on the [cap][top][lid] to open[lid]. [Thread the [wipe] [sheet] [wet cloth] [cloth] [towelette] through the dispensing lid and pull up to remove wipe from package.] [To remove wipe [sheet] [wet cloth] [cloth] [towelette] pull up on wipe and remove wipe through [dispensing] opening [wavy dispensing opening] [orifice]]. [The next wipe will [pop][pull] up automatically]. [Always] Close [snap] lid securely between uses [to retain moisture]. [Close lid securely between uses to retain moisture.]

{or}

To Open Package: Push the area marked [“Press [Here]”] [“Push [Here]”] with your thumb and push up on the lid to open. Thread the wipe through the dispensing lid and pull up to remove wipe from package. The next wipe will pop up automatically. Close lid securely between uses to retain moisture.

{or}

{For single cloth or sample pack}:

To Open Package: Tear [pouch] open [at top edge of pouch] [at tear notch] [along dotted line] [where indicated] [edge of pack]. [Pull out] [Remove] [wipe] [towelette] [cloth]. {For product supplied in a single use pouch with a folded towelette, include the following:} Unfold [wipe] [towelette] [cloth].

{Note to Reviewer: Every qualified FIFRA claim has mandatory “hard, non-porous surface” verbiage. Therefore, it remains optional in the use directions but is present in every FIFRA claim. See statements under Qualifiers.}

TO CLEAN [HARD, NON-POROUS SURFACES] [FLOORS] [/ DEODORIZE] [/ REMOVE ALLERGENS]:

Use fresh [wipe] [wet] [mopping] [cloth] on surface. [Repeat for stubborn stains.]

[TO [SPOT] CLEAN [/] [AND] DEODORIZE [SOFT SURFACES] [FABRICS]: Wipe the surface as needed and let air dry. [For difficult odors or heavy fabrics, repeat application]].

TO SANITIZE / DISINFECT [ON HARD, NON-POROUS SURFACES] [AND] [NON-CRITICAL MEDICAL DEVICE OR MEDICAL EQUIPMENT SURFACES]: [Pre-clean surface]. Use enough fresh [wipes] [wet] [cloths] to visibly wet surface. Surface must remain visibly wet for the entire contact time.

TO SANITIZE: Allow to remain visibly wet for 1 minute. [For [Klebsiella aerogenes] [and] [Staphylococcus aureus], treated surfaces must remain visibly wet for 10 seconds.]

TO DISINFECT: Allow to remain visibly wet for 5 minutes. [For [Human Coronavirus] [,][and] [Influenza A Virus H1N1] [,][and] [Influenza A Virus H3N2] [,][and] [Measles Virus] [and] [Respiratory Syncytial Virus] [cold and flu

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The term “X” is a place holder for a number between 0 to 100.
The term “Y” is a place holder for a character A – Z.

viruses⁸], allow surface to remain visibly wet for 1 minute.] [For <<SARS-Related Coronavirus 2 {or} SARS-CoV-2>>⁵, surfaces must remain visibly wet for 15 seconds.] Allow surface to air dry. Rinse all food contact surfaces, child / baby plastic toys and child / baby hard, non-porous surfaces with potable water or a damp cloth after use.

TO DISINFECT FLOORS: Pre-clean floor following the cleaning directions. [Attach a premoistened wipe to the mop head using the [velcro] [fasteners] provided.] Thoroughly wet floor with wipes. [Change wipe when soiled.] {or} [Replace with a fresh wipe once visibly soiled or no longer thoroughly wetting the surface.] Allow surface to remain visibly wet for 5 minutes. Let air dry. On average, one wipe will clean [10] [x] square feet of floor. For a larger area you may need to use more than one wipe.

OPTIONAL ADVISORY STATEMENTS:

- Contact manufacturer of wood floors prior to use.
- Do not flush [in toilet].
- Do not use as a diaper wipe or for personal cleansing.
- Do not use on [unpainted] [,][or] [unfinished] [,][or] [oiled] [or] [waxed] wood.
- Do not use on unsealed tiles or carpet.
- Do not use on natural marble or brass
- Do not use [this product] on dishes, glasses, or utensils.
- For food contact surfaces rinse with clean potable water after use.
- For other surfaces, spot test in an inconspicuous area.
- Keep container flat and lid securely closed to keep cloths moist.
- Not for personal hygiene
- Not recommended for use on computer or television monitor screens.
- This is not a baby wipe[!]
- [This product or product name] will not harm most surfaces: including acrylic, sealed fiberglass and vinyl.

{Note for reviewer: For labels that list medical premises and metal and / or stainless steel surfaces, one of the following statements must be used:}

This product is not to be used as a terminal sterilant / high level disinfectant on any surface or instrument that [1] is introduced directly into the human body, either into or in contact with the bloodstream or normally sterile areas of the body, or [2] contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. [This product may be used to preclean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection.]

{or}

This product is not for use on medical device surfaces.

Note: Bracketed information is denoted as: [optional text], {*informational purposes*}, (insert as noted), <<must choose one of the “or” options>>
The term “this product” used throughout this document may be replaced with the marketed product brand name.
To use the term “germ” the product must be efficacious against 2 of the 3 major classes of organisms.
The term “X” is a place holder for a number between 0 to 100.
The term “Y” is a place holder for a character A – Z.

{Note to reviewer: Nonrefillable container}

STORAGE AND DISPOSAL

Store in original container in areas inaccessible to children. Dispose of [wipe] [cloth] in trash after use. Keep securely closed between uses to retain moisture. Nonrefillable container. Do not reuse or refill this container. Offer empty container for recycling. If recycling is not available, discard in trash.

{Note to reviewer: Refillable container}

STORAGE AND DISPOSAL

Store in original container in areas inaccessible to children. Dispose of [wipe] [cloth] in trash after use. Keep securely closed between uses to retain moisture. Refillable container. [Reuse] [Refill] empty container only with [product name] [refills]. Do not reuse this container except as described. If not refilling, offer empty container for recycling. If recycling is not available, discard in trash.

[Contains no Phosphorus.]

{Note to reviewer: The organism name will either be included in the FIFRA claim or the Qualifier statement.}

[QUALIFIERS:]

¹Use as directed.

²Kills <<Pseudomonas aeruginosa {or} P. aeruginosa {or} Pseudomonas>>, <<Staphylococcus aureus {or} S. aureus {or} Staph>>, and/or (insert any virus or viruses at 5 minutes from Organism table) on hard, non-porous surfaces in 5 minutes, and (insert any virus or viruses at 1 minute from Organism table) on hard, non-porous surfaces in 1 minute.

³Kills 99.9% of <<Pseudomonas aeruginosa {or} P. aeruginosa {or} Pseudomonas>> and <<Staphylococcus aureus {or} S. aureus {or} Staph>> on hard, non-porous surfaces in 5 minutes.

⁴Kills 99.9% of <<Staphylococcus aureus {or} S. aureus {or} Staph>> and <<Klebsiella aerogenes {or} K. aerogenes>> on hard, non-porous surfaces in 10 seconds.

⁵Kills [99.9% of] [SARS-Related Coronavirus 2 {or} SARS-CoV-2] on hard, non-porous surfaces in 15 seconds.

⁶Allow the surface to adjust to room temperature before disinfection.

⁷Kills 99.9% of <<Escherichia coli {or} E. coli>> [,][and][&] Listeria monocytogenes [and][&] <<Salmonella enterica {or} S. enterica>> on hard, non-porous surfaces in 1 minute.

⁸Kills Human Coronavirus, Respiratory Syncytial Virus, Rhinovirus Type 37, Influenza A Virus H1N1 and Influenza A Virus H3N2.

⁹Rinse all PPE equipment that comes in contact with skin before reuse with clean warm water [about 120°F], and allow to air dry. [Precaution: Cleaning at 120°F temperature will avoid overheating and distortion of the personal [safety] [protection] equipment that would necessitate replacement.]

¹⁰In inedible product processing areas, non-processing areas and / or exterior areas of federally inspected meat & poultry plants.

Note: Bracketed information is denoted as: [optional text], {*informational purposes*}, (insert as noted), <<must choose one of the “or” options>>
The term “this product” used throughout this document may be replaced with the marketed product brand name.
To use the term “germ” the product must be efficacious against 2 of the 3 major classes of organisms.
The term “X” is a place holder for a number between 0 to 100.
The term “Y” is a place holder for a character A – Z.

{**PACKET LABEL TO BE USED WITH MASTER CONTAINER LABEL**}

NUGEN[®] Citric-Guard Wipes

EPA. Reg. No. 6836-455

EPA. Est. No. 6836-NJ-1

6836-PA-1

XXXX-YY-X

Net [Contents] [Weight]: X [___ oz.] [___ lb. ___ oz.] [___ g]

[Wipe dimensions:] X x X [inches] [in.]

Active Ingredients:

Citric acid0.67%

Other Ingredients:.....99.33%

Total.....100.00%

KEEP OUT OF REACH OF CHILDREN CAUTION [PRECAUCIÓN]

See outer container for Precautionary Statements and Use Directions

DISPOSAL: Dispose [wipe] [towelette] [cloth] in trash after use. Discard empty [pouch] [packet] in trash.

Arxada, LLC

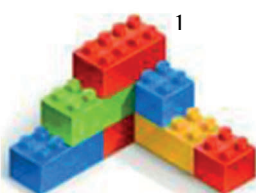
412 Mt. Kemble Ave., Suite 200S

Morristown, NJ 07960

{Note to reviewer: The following are optional graphics. The graphics may be presented as seen below or may differ slightly in graphic design but not intent on the market container label. Any final printed label containing an EPA-approved toy graphic will be required to include qualifier 1.}



Use on
mop
head.



{Note to reviewer: Allowed on back or side panel only.}



{RECYCLING LOGO: The below graphics can be used to build a recycling logo. Any combination of top, middle, material, and bottom section can be used to build the logo. A recycling logo is optional and may be presented as shown below or may differ slightly in graphic design but not intent on the final marketed product label.}

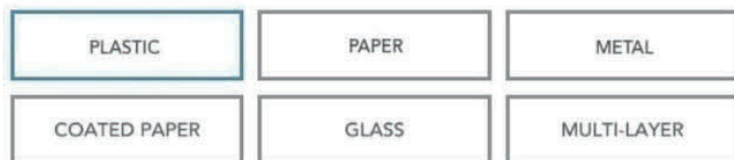
{TOP SECTION:}



{MIDDLE SECTION:}



{MATERIAL SECTION:}



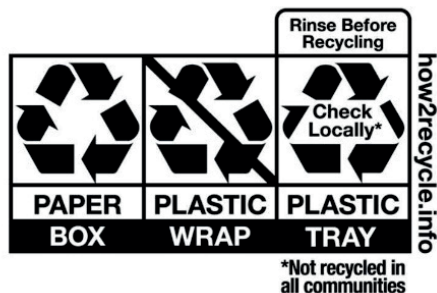
{BOTTOM SECTION:}



{OPTIONAL TEXT:}

*Not recycled in all communities
how2recycle.info

{Examples of final logos built from above sections:}

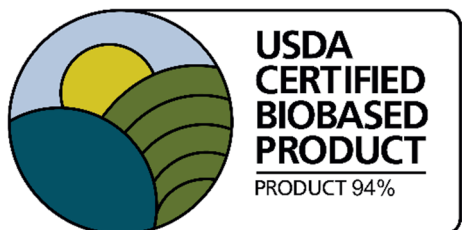


{Note to reviewer: Design for the Environment (DFE) logo can only be used if product is formulated with a CSF that has DfE Compliant in Box 3 of the CSF. }



<https://www.epa.gov/pesticide-labels/design-environment-logo-antimicrobial-pesticide-products>

{Note to reviewer: BioPreferred logo can only be used if product is formulated with a CSF that has BioPreferred Compliant in Box 3 of the CSF. }



{Note to reviewer: This disclaimer must be on pack when the BioPreferred logo is used.}
This mark is not an indication of safety. Read and follow all label instructions.

**THE FOLLOWING SECTIONS CONTAIN PROPRIETARY
LANGUAGE AND GRAPHICS.**

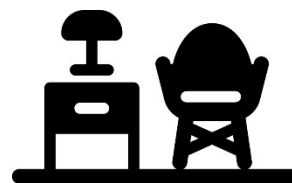
**THESE SECTIONS ARE ONLY AVAILABLE FOR SUPPLEMENTAL
REGISTRANTS. THE CLAIMS IN THIS SECTION MAY ONLY BE
USED BY SPECIFIC PARTIES AS NOTED / THE TRADEMARK
HOLDER.**

{Note to reviewer: The optional proprietary graphics may be presented as seen in the following sections or may differ slightly in graphic design but not intent on the market container label.}

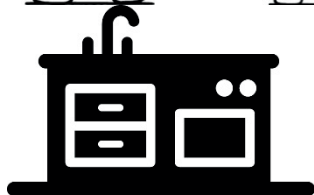
{Section 1 – Proprietary Claims for 6386-455-96867}



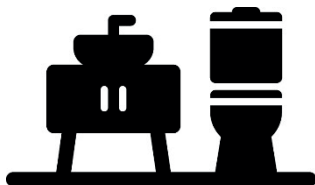
neatohome.com
@neatohome



Homes



Kitchens

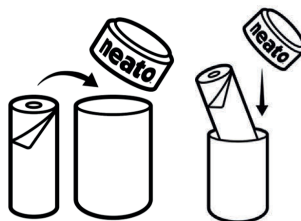


Bathrooms



Schools

**PLEASE
RECYCLE
CONTAINER**



refill