



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

May 29, 2024

Dana Thomas
Sr. Director, Regulatory Affairs
Chemsico, A Div. of United Industries Corp.
P.O. Box 142642
St. Louis, MO 63114

Subject: Notification per PRN 98-10 – Add optional marketing claims and graphics and revise tables
Product Name: Cutter Insect Repellent M
EPA Registration Number: 9688-356
Application Date: 5/3/2024
Case Number: 610730

Dear Dana Thomas:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "NOTIFICATION" and placed in our records.

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 the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the Agency. 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. 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 Compliance.

If you have any questions, please contact Elizabeth Andrews at 202-566-2467 or at Andrews.Elizabeth@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Scott Campbell", is written over a horizontal line.

For
Scott Campbell, Acting Product Manager 03
Invertebrate & Vertebrate Branch 1
Registration Division (7505T)
Office of Pesticide Programs

Cutter Insect Repellent M

For Outdoor Use Only

{ALTERNATE BRAND NAMES – all optional:}

- Cutter Eclipse Mosquito Repellent Device
- Cutter Eclipse Plus Mosquito Repellent Device
- Cutter Eclipse Repellent
- Cutter Eclipse Plus Repellent
- Cutter Eclipse Zone Mosquito Repellent
- Cutter Eclipse Zone Mosquito Repellent Device
- Cutter Eclipse Zone Mosquito Repellent Device Refill
- Cutter Eclipse Plus Zone Mosquito Repellent
- Cutter Eclipse
- Cutter Mosquito Repellent
- Cutter Mosquito Repellent Refill

- Repel Realm Mosquito Repellent Device
- Repel Realm Mosquito Repellent Refill
- Repel Realm Repellent
- Repel Realm Zone Mosquito Repellent
- Repel Realm Zone Mosquito Repellent Device
- Repel Realm Zone Mosquito Repellent Refill
- Repel Realm
- Repel Mosquito Repellent
- Repel Mosquito Repellent Refill

- Cutter Hero Mosquito Repellent Device
- Cutter Hero Plus Mosquito Repellent Device
- Cutter Hero Repellent
- Cutter Hero Plus Repellent
- Cutter Hero Zone Mosquito Repellent
- Cutter Hero Plus Zone Mosquito Repellent
- Cutter Hero

NOTIFICATION

9688-356

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

5/29/2024

{Optional Marketing Claims:}

- [Repels [protects against] [biting] mosquitoes, including those that may transmit encephalitis,[Chikungunya] [West Nile Virus], [Eastern equine encephalitis], [Western equine encephalitis], [La Crosse encephalitis], [California encephalitis], [St. Louis encephalitis] and [dengue]
- Repels [biting] mosquitoes
- Repels mosquitoes, including the Aedes mosquito that transmits Zika virus
- Repels mosquitoes that may transmit Zika virus

- Provides effective mosquito protection
- Easy to Use
- Convenient
- No Mess, no sprays, no creams
- Non-Staining
- Odorless
- Unscented
- Repellent you don't apply to [spray on] clothes [or skin]
- Repellent is odorless, [silent] [an invisible area of protection]

{Additional optional marketing claims at end of label}

ACTIVE INGREDIENT:
Metofluthrin 4%
***OTHER INGREDIENTS:** 96%
Total 100%
* Contains petroleum distillate

KEEP OUT OF REACH OF CHILDREN
CAUTION

See [side [back] panel] [inside [outside] packaging] insert for additional Precautionary Statements[,] [First Aid,] [Directions for Use] [and] [Storage & Disposal].

PRECAUCION AL CONSUMIDOR: Si usted no lee inglés, no utilice este producto hasta que la etiqueta le haya sido explicada ampliamente. **(TO THE USER:** If you cannot read English, do not use this product until the label has been fully explained to you.)

FIRST AID	
IF SWALLOWED:	<ul style="list-style-type: none">Immediately call a poison control center or doctor.Do not induce vomiting unless told to do so by a poison control center or doctor.Do not give any liquid to the person. Do not give anything by mouth to an unconscious person.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. In case of Medical emergencies or health and safety inquiries or in case of fire, leaking or damaged containers, information may be obtained by calling 1-888-740-8712.	
NOTE TO PHYSICIAN	
Contains petroleum distillate – vomiting may cause aspiration pneumonia.	

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION: Harmful if swallowed. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

ENVIRONMENTAL HAZARDS
Do not apply to directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters or rinsate.

IMPORTANT: READ ENTIRE LABEL BEFORE USE.

Net Contents:_____ {Contents will appear at the bottom of the front panel of marketed label.}

Contains: 1 Device(s) [Unit] and 1 x 0.075 fl oz (2.22 ml) (1.8 g) or 1 x 0.088 fl oz (2.6 ml) (2.08 g) or 1 x 0.190 fl oz (5.7 ml) (4.53 g) Cutter Insect Repellent M [bottle name] [Repellent Bottle(s)] [Repellent Cartridge(s)] [Repellent Refill(s)]

{Bottle only}
Contain(s): 1 x 0.075 fl oz (2.22 ml) (1.8 g) or 1 x 0.088 fl oz (2.6 ml) (2.08 g) or 1 x 0.190 fl oz (5.7 ml) (4.53 g) Cutter Insect Repellent M [bottle name] [Repellent Bottle(s)] [Repellent Cartridge(s)] [Repellent Refill(s)]

{OPTIONAL TEXT}

[IMPORTANT: READ BEFORE USE]

[Read the entire Directions for Use, Conditions, Disclaimer of Warranties and Limitations of Liability before using this product. If terms are not acceptable, return the product container at once.

By using this product, user or buyer accepts the following conditions, disclaimer of warranties and limitations of liability.

CONDITIONS: The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as weather conditions, presence of other materials, or the manner of use or application, all of which are beyond the control of Chemsico. All such risks shall be assumed by the user or buyer.

DISCLAIMER OF WARRANTIES: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, CHEMSICO MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE OR OTHERWISE, THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. No agent of Chemsico is authorized to make any warranties beyond those contained herein or to modify the warranties contained herein. To the extent consistent with applicable law, Chemsico disclaims any liability whatsoever for special, incidental or consequential damages resulting from the use or handling of this product.

LIMITATIONS OF LIABILITY: TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER FOR ANY AND ALL LOSSES, INJURIES OR DAMAGES RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, WHETHER IN CONTRACT, WARRANTY, TORT, NEGLIGENCE, STRICT LIABILITY OR OTHERWISE, SHALL NOT EXCEED THE PURCHASE PRICE PAID, OR AT CHEMSICO'S ELECTION, THE REPLACEMENT OF PRODUCT.]

{Or alternate text}

[Note [Notice]: Seller warrants that this product complies with the specifications expressed in this label. To the extent consistent with applicable law, seller makes no other warranties, and disclaims all other warranties, express or implied, including but not limited to warranties of merchantability and fitness for the intended purpose. To the extent consistent with applicable law, seller's liability or default, breach or failure under this label shall be limited to the amount of the purchase price. To the extent consistent with applicable law, seller shall have no liability for consequential damages.]

[Device Directions for Use]

For Outdoor Use Only

DIRECTIONS FOR USE

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

{NOTE TO REVIEWER: Emanation rate is based on 89.4 mg/hr used to calculate bottle fill as shown in below table.} {See also expanded chart in claims section on page 12}

Refill Bottle Fills (hours of protection by volume)			
Hours (Y)	Volume in fluid ounces (X)	Volume in grams (X)	Volume in milliliters (X)
12	0.075	1.78	2.23
15	0.088	2.08	2.59
40	0.192	4.53	5.67

Do not use indoors.

Do not pry repellent bottle [bottle name] [Repellent Cartridge] [Repellent Refill] open.

Place [install] one fixture [Product Name] [Device] [Unit] every 10 to 12 ft around [throughout] the area you wish to protect [from biting mosquitoes].

[A set of] 4 [Devices] [Units] provide[s] up to 440 square feet of mosquito protection.]

[A set of] 5 [Devices] [Units] provide[s] up to 550 square feet of mosquito protection.]

[A set of] 6 [Devices] [Units] provide[s] up to 660 square feet of mosquito protection.]

{Note to reviewer: The above statements will be used with sets that contain 4,5 or 6 fixtures}

{Only 1 of the following: devise(s) or units will be used throughout the label}

Use outdoors on patios, decks, unenclosed porches, walkways, and other areas where mosquito protection is desired. For protection [coverage] [for a deck or patio] place [install] one device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] every 10 to 12 ft around [throughout] the area you wish to protect [from biting mosquitoes].

Do not use or leave device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] in conditions where temperatures are below 40°F or exceed 110°F.

Always pick up the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] by the base, not by the cover.

Let the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] run for 15 minutes to establish complete protection.

Operate only with device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] standing [sitting] upright.

[The device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] and ambient light [light [fixture] [lamp] [LED]light]] [ambient LED light] work [operate] together.] Turn off the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] when not in use.

Prior to transporting or storing the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system], remove the repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] and replace the repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] cap.

The claimed hours of repellency are an average based on lab testing, and are presumed using 90% of repellent provided. The last 10% of repellent is not claimed, as repellency effectiveness may diminish with reduced wick exposure. Your [The] repellent usage rate will vary based on the temperature and relative humidity.

OPERATING INSTRUCTIONS:

[UNLOCK THE DEVICE [DIFFUSER] [REPELLER] [PRODUCT NAME] [UNIT] [MOSQUITO REPELLENT SYSTEM] FROM LOCK MODE

1. The device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] is locked to prevent accidental powering on during transport/storage.
2. To unlock/[lock] the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] from lock mode:

[{Premium version – Option 1}

- a. Press and hold POWER [ON] button [and light intensity button at the same time] for 5s [5 seconds] to unlock the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] from lock mode.
- b. [Press and hold the two buttons again for 5s [5 seconds] to activate lock mode. In lock mode, heating and ambient light [light [fixture]] [lamp] [LED [light]] [ambient LED light] are disabled.
- c. Once in lock mode, the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] cannot be turned on by pressing the POWER [ON] button briefly.]]

[{Premium version – Option 2}

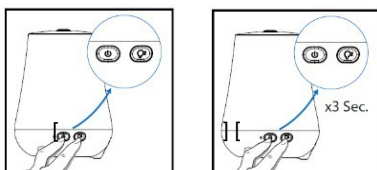
- a. Remove the cover [top] of the device
- b. Remove the pull tab [to deactivate lock mode]]

[{Mid-Tier version – Option 1}

- a. Press and hold the POWER [ON] button for 3 to 5s [3 to 5 seconds] to unlock the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] from lock mode.
- b. [Press and hold POWER [ON] button again for 3 to 5s [3 to 5 seconds] to activate lock mode. In lock mode, heating is disabled.
- c. Once in lock mode, the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] cannot be turned on by pressing the POWER [ON] button briefly.]]

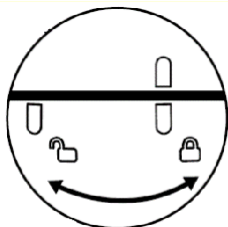
[{Mid-Tier version – Option 2}

- c. Remove the cover [top] of the device
- d. Remove the pull tab [to deactivate lock mode]]



INSERT REPELLENT BOTTLE [[PRODUCT] [BOTTLE] NAME] [REPELLENT [REFILL] [CARTRIDGE]] [REFILL] [CONTAINER] [BOTTLE]

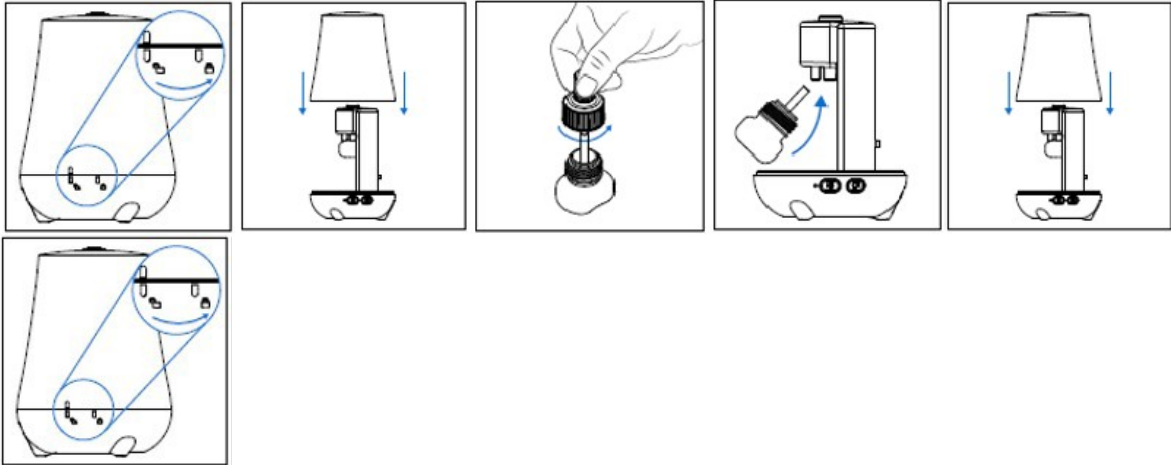
1. Insert repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] only when device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] is turned OFF. [Replace empty repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle]] only when device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] is turned OFF.]
2. Open the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] by unlocking [twisting] the cover and pulling it up and off. Rotate the cover [counter] clockwise to LOCK / Rotate [counter] clockwise to UNLOCK. Do not pry open the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system].



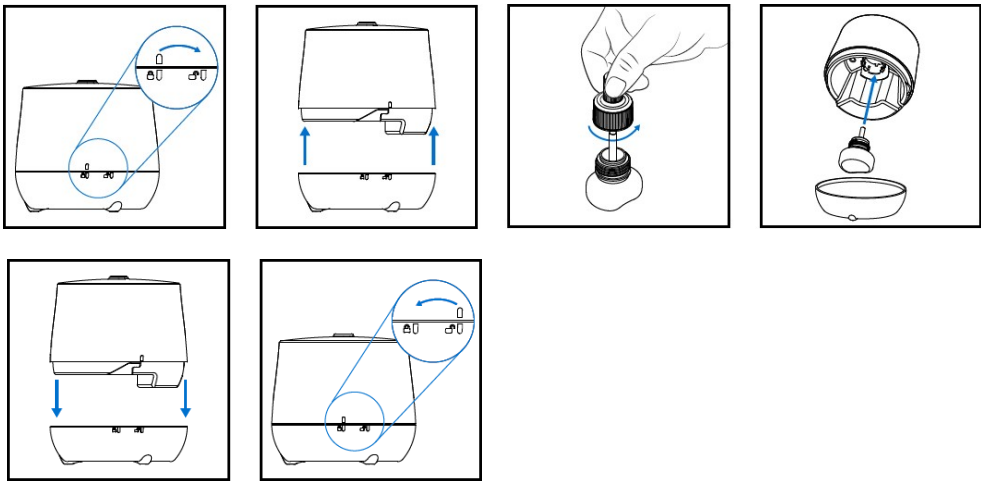
3. Remove cap from repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle]. Retain the repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] cap for future use. [Do not dispose of repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] cap, place the cap back on the repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] when transporting the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system]].
4. Insert [push] the repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] into the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system]. Repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] will snap [click] into place when properly [fully] inserted.
5. Replace the cover and rotate into the LOCK position to close the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system].

NOTE: DEVICE [DIFFUSER] [REPELLER] [PRODUCT NAME] [UNIT] [MOSQUITO REPELLENT SYSTEM] WILL NOT REPEL MOSQUITOES UNLESS REPELLENT BOTTLE [[PRODUCT] [BOTTLE] NAME] [REPELLENT [REFILL] [CARTRIDGE]] [REFILL] [CONTAINER] [BOTTLE] IS PROPERLY INSERTED. [Status light will blink green [color] if the repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] is not properly inserted.]

{Graphical Depictions – Premium Device}



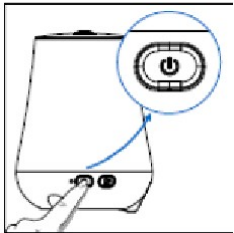
{Graphical Depictions – Mid-tier Device}



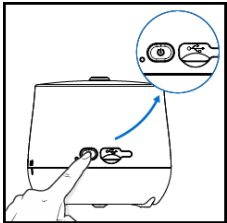
OPERATING DEVICE [DIFFUSER] [REPELLER] [PRODUCT NAME] [UNIT] [MOSQUITO REPELLENT SYSTEM]

1. To turn ON, press [and hold] the POWER [ON] button [for 2 seconds]. [The ambient light [light [fixture]] [lamp] [LED [light]] [ambient LED light] will turn on.] [Status light will appear green.] [The light will blink [red] [green].]
2. To turn OFF, press [and hold] the POWER [ON] button [for 2 seconds] [and status light will flash]. [The ambient light [light [fixture]] [lamp] [LED [light]] [ambient LED light] will turn off [to signal device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] is off].]

{Graphical Depiction – Premium Device}

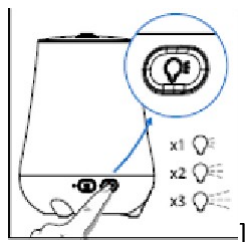


{Graphical Depiction – Mid-tier Device}



[AMBIENT LIGHT [LIGHT [FIXTURE]] [LAMP] [LED [LIGHT]] [AMBIENT LED LIGHT]

1. When powered [turned] ON, the ambient light [light [fixture]] [lamp] [LED [light]] [ambient LED light] will start at LOW.
2. Press once [1x] to set the ambient light [light [fixture]] [lamp] [LED [light]] [ambient LED light] [ON] [Button] to MEDIUM.
3. Press twice [2x] to set the ambient light [light [fixture]] [lamp] [LED [light]] [ambient LED light] to HIGH.
4. Press three times [3x] to set the ambient light [light [fixture]] [lamp] [LED [light]] [ambient LED light] back to LOW.



STATUS LIGHT FUNCTION DESCRIPTIONS

DEVICE [DIFFUSER] [REPELLER] [PRODUCT NAME] [UNIT] [MOSQUITO REPELLENT SYSTEM] IS ON, BUT NOT CONNECTED TO EXTERNAL POWER:

[Blinking Green - Refill not present, battery voltage is good]

[Blinking Green – Once Device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] is unlocked LED will flash green 3[X] [times]]

Blinking Red - Battery voltage good for at least 1 hour of use [with 50% intensity of ambient light [light [fixture]] [lamp] [LED [light]] [ambient LED light]]

Solid Red – Battery voltage sufficient only for a few minutes of use, indicating that the recharge is needed.

[Solid Green – Device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] on]

WHEN CONNECTED TO EXTERNAL POWER (WHEN DEVICE [DIFFUSER] [REPELLER] [PRODUCT NAME] [UNIT] [MOQUITO REPELLENT SYSTEM] IS OFF):

Blinking Green: Charging [Ready to Use]

Solid Green: Fully Charged

[Blinking Yellow: Charging but not working. [Not ready to use.]]

REPLACING THE REPELLENT BOTTLE [[PRODUCT] [BOTTLE] NAME] [REPELLENT [REFILL] [CARTRIDGE]] [REFILL] [CONTAINER] [BOTTLE]

- Replace repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] when liquid is no longer visible in the bottle.
- Do not attempt to refill the repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle].
- The repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] and wick will get hot while in use. Always allow repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] and wick to cool before replacing the [with a new] repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle]. Do not touch or break the wick.
- Replace the repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] only when power to the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] is turned [powered] off.
- Do not insert [use] anything other than [product name] [model #] repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] in the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system]. Only use [product name] [model #] repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] in this device [diffuser] [repeller] [product name] [unit] [mosquito repellent system].

[Quick Start Guide *{Premium Device – May be accompanied by pictograms as shown throughout label.}*

- Charge [the] device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] before initial use
- Twist, unlock, and remove the cover
- Remove the cap from the repellent bottle [[product] [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle]
- Turn [Rotate] [Orient] repellent bottle [refill] [as shown] [so the indented [concave] curvature of the bottle aligns [lines up] with the protruding [convex] curvature of the device]
- Insert the bottle [refill] into to the top of the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] [until it clicks]
- [Refill will snap [click] [into place] when inserted]
- Replace cover, twist to lock in place
- Press [and hold] power [on] button for 5 seconds] [Press [and hold] power and light button at the same time [together] for 5 seconds]
- Press light ON Button to cycle [change] [through] [the] [ambient] light intensity]

[Quick Start Guide *{Mid-tier Device – May be accompanied by pictograms as shown throughout label.}*

- Charge device before initial use [charging block not included]
- Twist, unlock, and remove the cover
- Remove pull tab
- Remove the cap from the refill
- Turn [Rotate] [Orient] repellent bottle [refill] [as shown] [so the indented [concave] curvature of the bottle aligns [lines up] with the protruding [convex] curvature of the device]
- Insert the bottle [refill] into [to the] [top] [of] [the] device [until it clicks in]
- [Refill will snap [click] [into place] when inserted]
- Replace cover, twist to lock in place
- Press [and hold] ON Button for 3-5 seconds]

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage and disposal of repellent unit.

PESTICIDE STORAGE: Store in a cool, dry place. Keep container tightly closed. Store refills out of direct sunlight.

PESTICIDE DISPOSAL AND CONTAINER HANDLING: Non-refillable container [bottle][cartridge]. Do not reuse or refill this container [bottle][cartridge]. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Use remaining product according to label directions for use or call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

[QUESTIONS & COMMENTS: Call 1-800-XXX-XXXX or visit our website at www.XXXXXX.com]

{Refill}

*Guaranteed Results[!] [or Your Money Back] [100% Satisfaction Guaranteed]

*If you are not satisfied with this product for any reason, send your written request for a refund to the address below, together with the original dated store receipt showing the price you paid. Please allow 6-8 weeks for processing.]

NOTICE: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

Chemsico, A Division of United Industries Corporation
PO Box 142642, St. Louis MO 63114-0642
EPA Reg. No. 968-356 • EPA Est. No.
[Label Part Number] [Copyright] [All Rights Reserved.]

{Note to Reviewer: Label text may also appear in Spanish [foreign language] in addition to English.}

Active Ingredient: Metofluthrin 4%
Other 96%
Total 100%

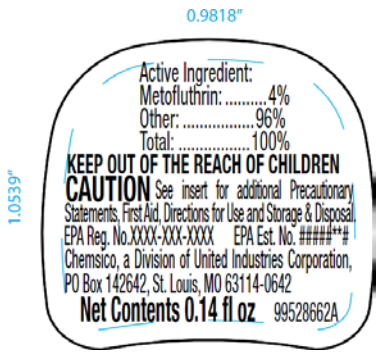
KEEP OUT OF REACH OF CHILDREN
CAUTION

See [insert] [booklet] [pamphlet] [outer packaging] for additional Precautionary Statements, First Aid, Directions for Use and Storage & Disposal.

Chemsico, A Division of United Industries Corporation
PO Box 142642, St. Louis MO 63114-0642
EPA Reg. No. 968-356 • EPA Est. No.
[Label Part Number] [Copyright]]

Net Contents:

{Example}



{REPELLENT BOTTLE REFILL PACK QUICK GUIDE {Refills will be sold separately and will include full label.}}

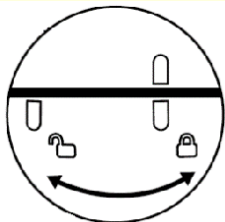
{NOTE TO REVIEWER: All optional images bracketed in the text below are to only be used individually; both options will not appear in use at the same time}

[Useful Tips] [Usage Tips] [Directions for Use]

READ AND FOLLOW ALL DIRECTIONS FOR USE FOR THE DEVICE [DIFFUSER] [REPELLER] [PRODUCT NAME] [UNIT] [MOSQUITO REPELLENT SYSTEM]

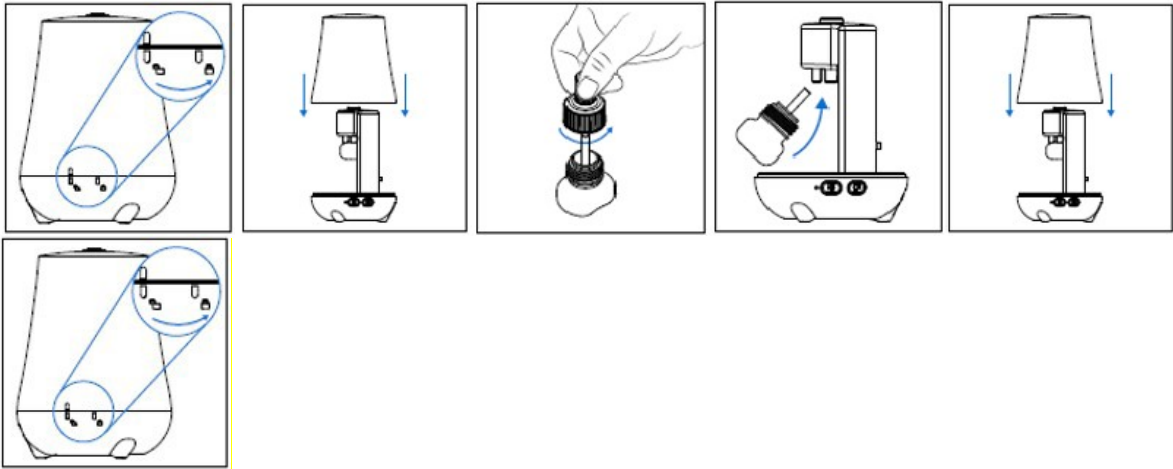
INSERT [INSERTING] [REPLACE] REPELLENT BOTTLE [(PRODUCT) [BOTTLE] NAME] [REPELLENT [REFILL] [CARTRIDGE]] [REFILL] [CONTAINER] [BOTTLE]

1. Insert repellent bottle [(product) [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle] only when device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] is turned OFF. [Replace empty repellent bottle [(product) [bottle] name] [repellent [refill] [cartridge]] [refill] [container] [bottle]] only when device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] is turned OFF.]
2. Open the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] by unlocking [twisting] the cover and pulling it up and off. Rotate the cover [counter] clockwise to LOCK / Rotate [counter] clockwise to UNLOCK. Do not pry device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] open.

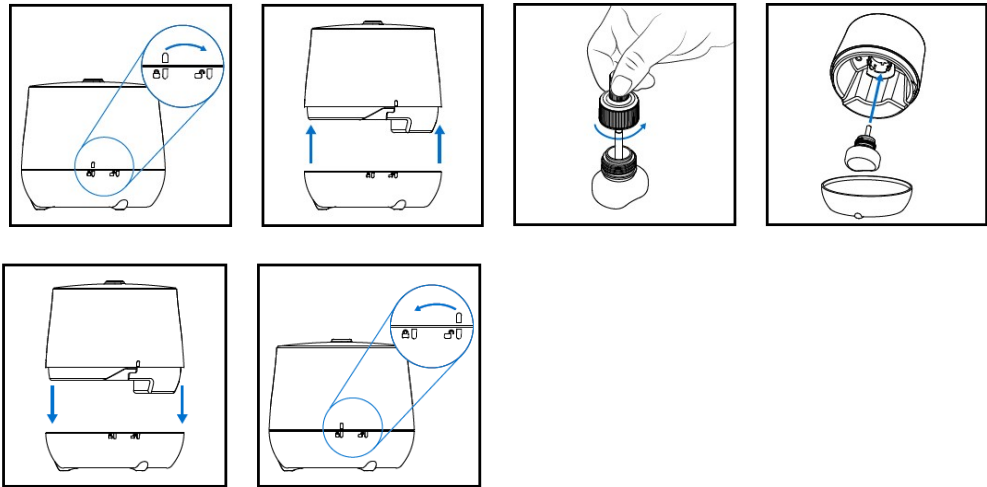


3. Remove cap from repellent bottle [product] [bottle] name [repellent [refill] [cartridge]] [refill] [container] [bottle]. Retain the repellent bottle [product] [bottle] name [repellent [refill] [cartridge]] [refill] [container] [bottle] cap for future use. [Do not dispose of repellent bottle [product] [bottle] name [repellent [refill] [cartridge]] [refill] [container] [bottle] cap, place the cap back on the repellent bottle [product] [bottle] name [repellent [refill] [cartridge]] [refill] [container] [bottle] when transporting the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system]].
4. Insert [push] the repellent bottle [product] [bottle] name [repellent [refill] [cartridge]] [refill] [container] [bottle] into the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system]. Repellent bottle [product] [bottle] name [repellent [refill] [cartridge]] [refill] [container] [bottle] will snap [click] into place when properly [fully] inserted.
5. Replace the cover and rotate into the LOCK position to close the device [diffuser] [repeller] [product name] [unit] [mosquito repellent system].

{Graphical Depictions – Premium Device}



{Graphical Depictions – Mid-tier Device}



[OPTIONAL MARKETING CLAIMS:**Hands-Free Device Claims**

1. [Repel mosquitoes with the push of a button
2. A hands-free way to repel mosquitoes
3. Creates a[n] bubble [area] [zone] of protection [against mosquitoes]
4. Provides an area of protection for [your] outdoor entertaining
5. Protects your [the] area [space] [patio] to enjoy the outdoors
6. Protects your [the] patio [space] from [against] mosquitoes
7. Intelligent solution [to keep away mosquitoes] [to keep mosquitoes at bay]
8. Protection shield
9. Freedom to enjoy your [the] outdoor[s] [space]
10. Freedom to be outdoors
11. Long lasting protection – Lasts up to [4.5] [5] 5.5 [6] [6.5] hours on a single charge] [with [12 hr] 40 hr [x hr]refills] {Hours of protection are tied to the table related to refill volumes on pg 12}
12. [x] hours of protection {tied to table related to refill volumes on pg 12}
13. Ideal for your [the] patio [balcony] [poolside] [deck] [picnic area] [campsite]
14. Patio space repellent
15. Provides a zone of invisible protection against mosquitoes
16. Invisible protection
17. Device continually diffuses [releases] repellent to create a Zone of Protection
18. Device creates a Zone of Protection
19. Continually releases [diffuses] repellent to [keep mosquitoes away] maintain protection
20. We've Got You Covered
21. [Powered] Diffusion Technology
22. No Skin Application
23. Mosquito protection you don't spray on
24. Enjoy your time outdoors
25. Extend your time outside
26. Simple and easy to use
27. Perfect to enhance your patio [deck] space and to protect from mosquitoes
28. Protect Your People with an Invisible Shield
29. Compact
30. Long-Lasting Refills – 40 hr [12 hr] [x hr] {See table on pg 12}
31. Repels in as fast as 15 minutes
32. Protects [Protection] in as fast as 15 minutes
33. Protect Your People
34. Activates [Protection] in [15] minutes
35. Heat-Activated
36. Bubble [zone] [invisible shield] of protection
37. Invisible Armor
38. [I.D.S.] Invisible Defense System
39. No Scent [Scent-Free] [Fragrance Free] [No Fragrance] [No harsh chemical odor]
40. Effective Protection
41. Smart Protection
42. [Battery] Works for [operates for] 4.5 [5] [5.5] [6] [6.5] hours {Varying time points are based on actual performance of device battery: "Premium" device: 6.0 hr +/- 0.5 hr; "Mid-Tier" device: 5.0 hr +/- 0.5hr}
43. Continuously operates for up to 4.5 [5] [5.5] [6] [6.5] hours [hr] per charge
44. Built in rechargeable battery
45. Battery lasts for 4.5 [5] [5.5] [6] 6.5]hours
46. [Lithium-Ion] [Li-ion] Battery [powered] operated
47. [Contains] [non-replaceable] Rechargeable [Lithium-Ion [battery]] [included]
48. [Includes] USB cable for recharging battery
49. Device can be operated for up to 4.5 [5] [5.5] [6] [6.5] hours on a full charge
50. Lasts up to 4.5 [5] [5.5] [6] [6.5] hours on a single charge
51. Refill works [lasts] for [x][12][15]40 hours {based on refill size/volume, see table on pg 12}
52. Start and Stop Repelling Action [as [needed]] [You Need!]
53. Can be turned on and off without wasting repellent
54. Start and Stop as often as needed
55. Protects 110 square feet per unit
56. Contains a powerful and effective repelling technology
57. [Durable] [compact] [powerful] [Well-made] [sturdy] device to help you enjoy your time outdoors
58. A repellent device as beautiful as your outdoor space
59. Powerful [high-powered] device to help you enjoy your time outdoors
60. One-touch operation
61. Continuously operates for up to 4.5 [5] [5.5] [6] [6.5] hours per charge
62. Long-lasting [x hr] [12 hr] 40 hr refill {based on refill size/volume, see table on pg 12}
63. No [open] flame

64. No [smoky] candles
65. Flameless technology [that protects from mosquitoes]
66. No fuel cartridges needed
67. Smoke-free technology
68. Cordless
69. Lightweight
70. Lightweight Device [only] {#} [ounces]
71. Cord-free [No cord]
72. Easy to transport [move] [carry]
73. Made to endure season after season
74. A Must-Have for any outdoor occasion to keep mosquitoes away [at bay]
75. Ideal for use while entertaining guests [gardening] [around the backyard]
76. Perfect for your patio [deck] and more
77. Protect from [against] mosquitoes at outdoor parties [gatherings] [festivities]
78. Perfect for outdoor parties [gatherings] [festivities]
79. Use on [any] outdoor table [top]
80. [Gives you] Freedom to enjoy the outdoors
81. Allows you to connect with nature
82. Escape your routine
83. Enjoy your outdoor environment
84. Surrounds your outdoor space with a[n] zone [area] of protection to do what you want
85. Surround your loved ones with a zone of protection [against [from] mosquitoes]
86. Rechargeable
87. Refillable
88. Refill system
89. Creates a silent, odor free, invisible zone of [mosquito] protection up to 10 [12] feet
90. Odor-free
91. Silent
92. USB Charging Cable
93. Portable
94. Portable [mosquito] protection
95. No oily skin
96. No butane [required]
97. No torch fluid to refill
98. Leak resistant refill
99. [This] Package contains [#] [product name] device [[#] [[12] [15] 40 hour [repellent] refill]
100. Refill
101. 12 [40] [x] hr refill {based on refill size/volume, see table below}
102. 40[12][15][x]-hour [hr] refills sold separately {based on refill size/volume, see table below}
- 101.[12][15][x] 40 hours mosquito protection [per refill] {based on refill size/volume, see table below}
- 102.[#] refills [lasting] [12] [15] [x] 40 hours each, [#] hours total mosquito protection. {e.g.: 2 mosquito refills lasting 12 hours each, 24 hours total mosquito protection}
103. For use with [in] [Can only be used in [with]] [Product Name] device
104. [Refill] Available in [12] [15] [x] 40 and [12] [15] [x] 40 hour [refills] [sizes]
105. Includes [#] [[12] [15] [x] 40-hour] refill [initial][cartridge] [s]
106. [x] hour[s] [refill] [cartridge] [included]
107. Includes [x] hour refill
108. X [fl oz] [g] [ml] refill will protect a 110 sq ft [10 to 12 ft diameter] area for up to Y hours {See Table below}
109. Use only with [Product Name] [appliance] refills
110. No need to touch repellent
111. Hands-free Repellent

{Table}

Refill Bottle Fills (hours of protection by volume)			
Hours (Y)	Volume in fluid ounces (X)	Volume in grams (X)	Volume in milliliters (X)
12	0.075	1.78	2.23
15	0.088	2.08	2.59
40	0.192	4.53	5.67
50	0.233	5.52	6.90
60	0.275	6.50	8.13
70	0.316	7.48	9.35
80	0.358	8.47	10.58

Light Weight / Ambiance Claims

1. Luminix
2. Luminix Technology
3. Lumaguard [LumaGuard] [Jazz up a protected evening on the porch]
4. Protect from mosquitoes and illuminate [Light up] [Enhance] [Smart way to light up] [A light solution for] [Complement] [Provides illumination to] [Improve] [Create joy in] [your] [the] outdoor [living] [entertaining] space
5. All in one device- a repellent and a light.
6. Provides illumination and repellency [all] in one simple design
7. Designed specifically to illuminate your space while providing repellency from [pesky] mosquitoes
8. Illuminate and protect your [patio] [outdoor] space from mosquitoes
9. [Soft] [Candle like] illumination and protection from mosquitoes
10. Ambiance and protection from mosquitoes at the touch of a button [with multiple levels of light intensity]
11. Protection from mosquitoes [with Multiple levels of light intensity]
12. Decorate your outdoor space and protect from mosquitoes
13. Attractive to you, not [the] mosquitoes
14. Combines the latest in outdoor mosquito repelling technology with beautiful illumination [for your outdoor space]
15. Luminous mosquito repellent device for your outdoor space
16. Provides illumination by LED light and [&] protects from mosquitoes
17. Illuminates and [&} protects patio [deck] from mosquitoes

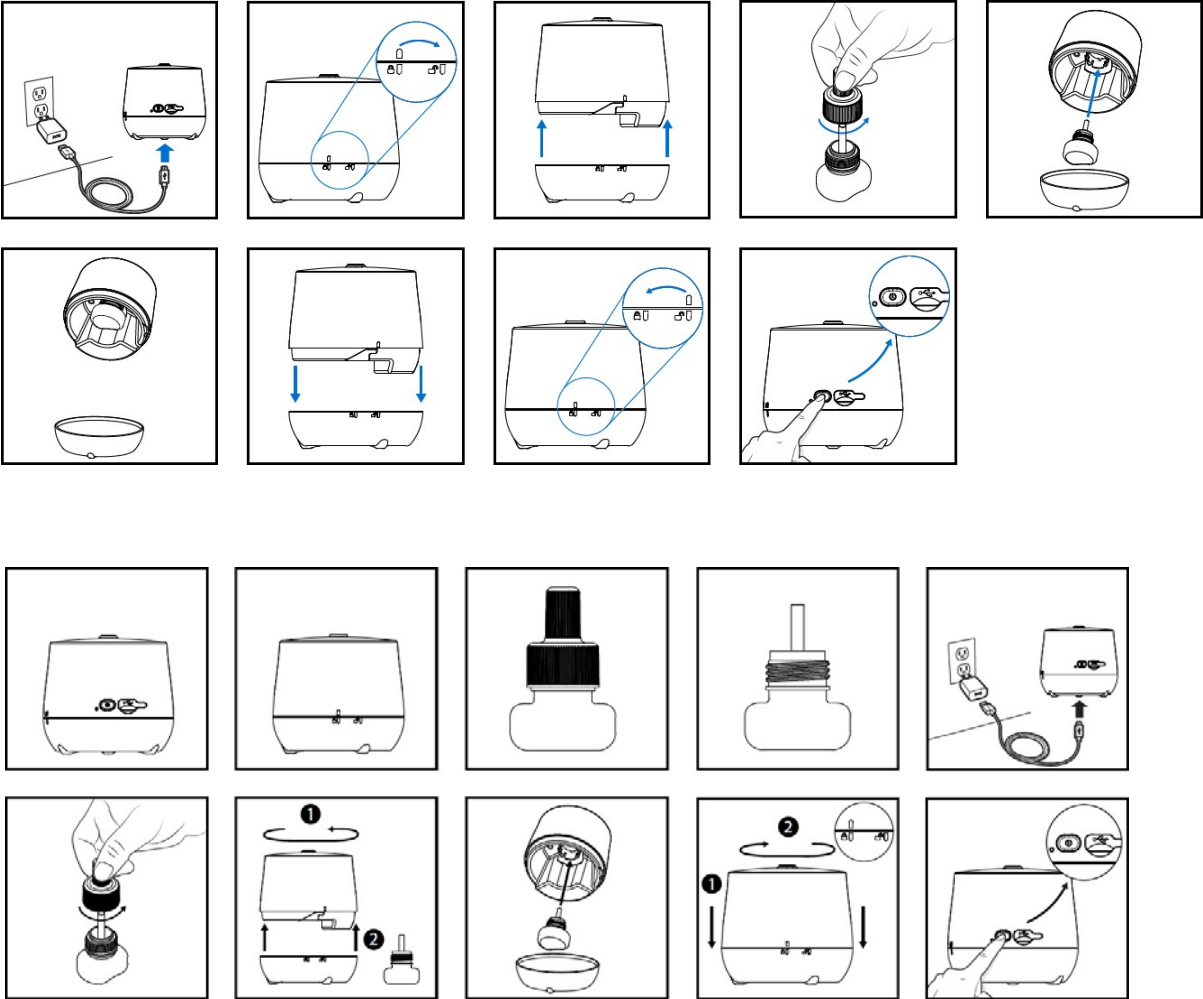
Design/Aesthetic Claims

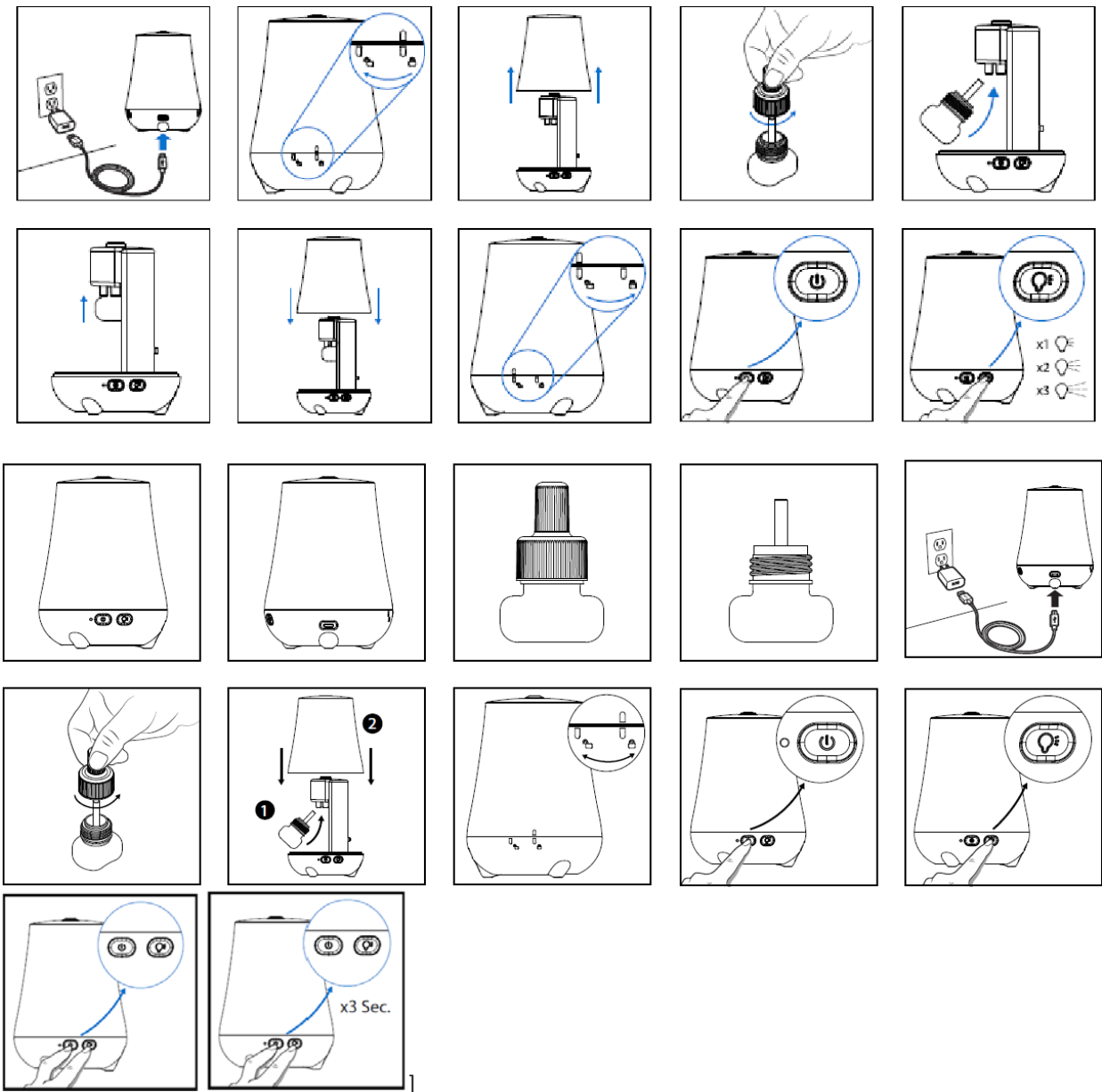
1. Designed in Italy
2. Italian designed device
3. Italian inspired design
4. Wood-grain design [from Italy]
5. European designed
6. Discreet design – mosquito protection
7. Discreet [mosquito] protection

Technology Claims

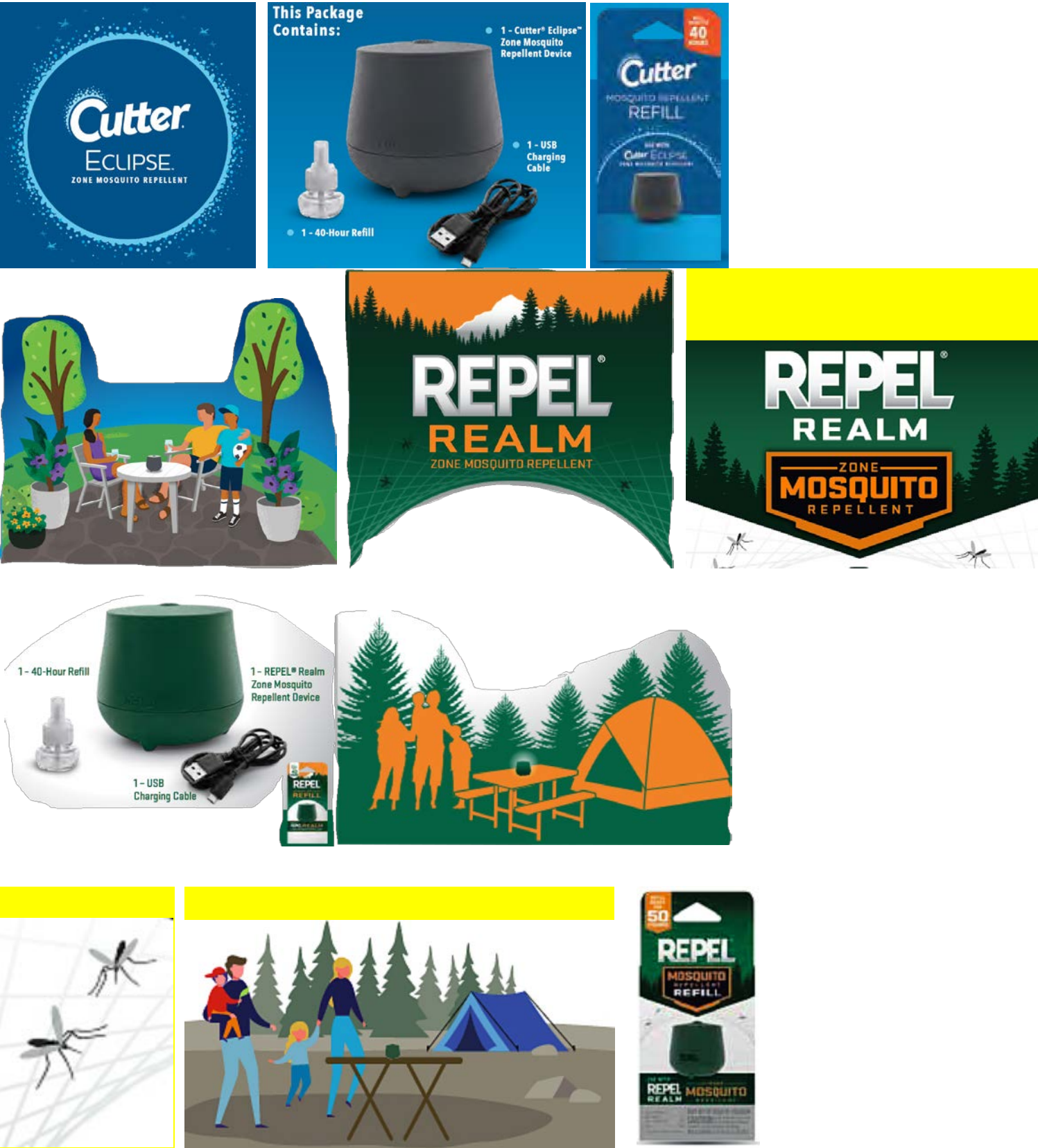
1. Optimized [diffuser] [technology] for repelling [annoying] mosquitos
2. Increased [Enhanced diffusion] wick [technology] for [enhanced] [optimum] performance
3. High performing wick technology for optimum performance
4. [Advanced] [Enhanced] [polymer] wick [technology] with consistent performance [from zero [beginning] to end] [throughout the life of the refill]
5. Porous wick technology for consistency from beginning to end
6. Polymer [plastic] wick [instead of a wooden wick]
7. Wick-Zone [Protection-Zone] Technology
8. Consistent [Steady] performance
9. Polymer [plastic] wick
10. Wick engineered for performance
11. High Tech Mosquito Repellent Device [Instrument to Repel Mosquitos]
12. Engineered Polymer [plastic] Wick
13. [Simple] intuitive design to repel annoying [biting] [pesky] mosquitoes
14. Enhanced refill technology
15. Consistent refill performance
16. Engineered for optimum performance
17. Heat activated repellent
18. Weather-resistant

{Additional optional pictograms:}





{Additional graphics appearing on product packaging}



{Additional optional marketing claims}

1. Provides protection within 15 minutes of use [activation]
2. Cutter Insect Repellent M [bottle name] [Repellent Bottle] [Repellent Cartridge] [Repellent] Refill]
3. Effective mosquito protection for your entire deck, porch or patio
4. Device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] with a [Liquid] Repellent [Emanator] [that] releases an odorless, invisible repellent [that] [and] protects up to 110 square feet [sq ft] [SF]
5. Protects [up to] a 110 sq ft [ft²] [square fee] area
6. Protects [provides] a 10 to 12 ft diameter [area] [of repellency]
7. 110 ft² [square feet] [sq ft] [SF] [area] [zone] of protection [from biting mosquitoes] from each Fixture [Product Name] [Device] [Unit]
8. Device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] produces an invisible area [cloud] [zone] of protection which repels [biting] mosquitoes
9. Device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] produces invisible [odorless] vapor to repel [that repels] [biting] mosquitoes
10. Device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] produces an invisible area [cloud] [zone] of protection which repels [biting] mosquitoes
11. Device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] produces invisible [odorless] vapor to repel [that repels] [biting] mosquitoes
12. [Cutter Insect Repellent M [Product Name] with] Mosquito Protection Technology
13. Easy to use [install]
14. No external fuel required
15. Use on patios, [unenclosed porches,] [decks,] [walkways,] [yards] and other outdoor areas where mosquito protection is desired [required] [needed].
16. Free Cutter Insect Repellent M [bottle name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] included
17. Cutter Insect Repellent M [bottle name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill] works with [in] [product name]
18. Cutter Insect Repellent M [bottle name] [Repellent Bottle] [Repellent Cartridge] [Repellent Refill]
19. Specially designed for use with [in] [product name]
20. For protection and added comfort outdoors
21. Works [when you want it] [day [and] [or] night]
22. [Helps you] enjoy your evening activities with fewer [less] annoying [biting] mosquitoes.
23. Won't harm plants, [flowers], [shrubs] or [and] [grass] [lawns]
24. Illuminated [Green] [Yellow] [Orange] [Blue] [Insert Color] LED indicator [light] on fixture [device] indicates [signals] that Device [diffuser] [repeller] [product name] [unit] [mosquito repellent system] [Liquid] [Repellent] [Emanator] is operating]
25. Convenient protection from [biting] mosquitoes
26. Effective against all types of mosquitoes
27. 1 YEAR LIMITED WARRANTY *{for the Device, not the refill}*
28. Up to [y] uses per [x] hour refill
29. Includes [#] refills
30. Includes [#] refills that last for [x] hours [each]
31. New - includes longer lasting refill *{New will only be used for 6 mo from introduction into the marketplace}*
32. [A set of] 2 devices [units] provide[s] up to 220 square feet of [mosquito] protection
33. [A set of] 3 devices [units] provide[s] up to 330 square feet of [mosquito] protection
34. To protect larger areas use multiple devices
35. Use multiple devices to protect larger areas
36. Value Size [Pack]
37. Twin Pack
38. Triple Pack
39. Club Pack

50 hr refill claims *{all "25%" claims relate to the 50 hr refill vs the 40 hr refill and will **only** appear on packaging (or advertising) for product containing the 50 hr refill}*

40. Lasts 25% longer vs 40 hr [hour] refill
41. Lasts 25% longer* * vs 40 hr [hour] refill
42. Lasts 25% longer than [our][previous] 40 hr [hour] refill
43. Lasts 25% longer* *than [our][previous] 40 hr [hour] refill
44. 50 hr refill lasts 25% longer than[vs] [our][previous] 40 hr [hour] refill
45. 50 hr refill lasts 25% longer* *than[vs] [our][previous] 40 hr [hour] refill
46. 25% more refill hours than[vs] [our][previous] 40 hr [hour] refill
47. 25% more refill hours* *than[vs] [our][previous] 40 hr [hour] refill