

02 MAR 1992

Ms. Karen C. Maass
3M/Personal Care Products Project
Bldg. 235-3E-06
St. Paul, MN 55144-100

Dear Ms. Maass:

Subject: Deer Tick Repellency Claims: MRID 42076-01
3M Insect/Arthropod Repellent Lotion
EPA Reg. No. 58007-1
3M Ultrathon Insect Repellent
EPA Reg. No, 58007-3
Submissions: October 15, 1991

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

1. The efficacy data submitted support claims for repelling deer ticks, Ixodes dammini, as explained in the attached review. The following claims however, are misleading and inconsistent with regulation at CFR 156.10(a)(5) and must be deleted:

- Greater Protection with less DEET!
- Contains DEET, the most effective tick protection xxx you can wear.

2. On the back label (#58007-1), delete the first two paragraphs beginning -3M has developed a revolutionary insect repellent xxx. You may retain the alternate text beginning -The

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Page 2, EPA Reg. 58007-1 & 58007-3

UltrathonTM formula was created for the U.S. Army xxx. For #58007-3, delete references to a revolutionary insect repellent, Maximum Protection and Controlled Release Technology.

3. Assure that these registered repellents have distinctly unique names; it appears that you are using 3M Ultrathon Insect Repellent for both, which is unacceptable - FIFRA Section 2(q)(1)(c).

4. Modify the military label (58007-1) to include appropriate statements from PR Notice 91-4. We believe the statements from copy approved October 30, 1991, #58007-1, beginning -Use just enough repellent xxx may cause skin reactions in rare cases. - would be appropriate.

Sincerely,



Richard F. Mountfort
Product Manager 10
Insecticide/Rodenticide Branch
Registration Division (H7505C)

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FRONT LABEL

3M ULTRATHON™
INSECT REPELLENT Cat. No. 631

Repels Mosquitoes, Deer ticks and other dangerous biting ticks, biting flies, chiggers, gnats, and fleas

- *UP TO 12 HOURS OF EFFECTIVE PROTECTION AGAINST MOSQUITOES
- *UP TO 6 HOURS OF EFFECTIVE PROTECTION AGAINST DEER TICKS
- *REPELS DEER TICKS UP TO 6 HOURS

*GREATER PROTECTION WITH LESS DEET!

- *REPELS DEER TICKS THAT CAN CAUSE LYME DISEASE (or)
PROVIDES EFFECTIVE PROTECTION AGAINST DEER TICKS THAT CAN
CAUSE LYME DISEASE (or)
PROVIDES EFFECTIVE PROTECTION AGAINST DANGEROUS BITING
TICKS. DEER TICKS TOO! (or)

REPELS DANGEROUS BITING TICKS - DEER TICKS TOO!

*CONTAINS DEET, THE MOST EFFECTIVE TICK PROTECTION (TICK
INGREDIENT, TICK FIGHTING INGREDIENT or TICK REPELLENT)
YOU CAN WEAR

*CONTROLLED RELEASE FORMULA

ACTIVE INGREDIENTS:

N,N-Diethyl-m-toluamide.....	31.58%
Other Isomers.....	1.75%
INERT INGREDIENTS.....	66.67%

ACCEPTED
with COMMENTS
In EPA Letter Dated

02 MAR 1992

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

58007-1

KEEP OUT OF REACH OF CHILDREN

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS - WARNING: For external use only.
Causes eye irritation. Do not get in eyes or mouth.
Do not apply to hands of young children. Do not apply over
cuts, wounds, or irritated skin.

PRACTICAL TREATMENT: If in eyes, flush with plenty of
water. Get medical attention if irritation persists.

2 FL.OZ. * 59 ml

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BACK LABEL

~~INSECT REPELLENT~~

~~3M has developed a revolutionary insect repellent with CONTROLLED RELEASE TECHNOLOGY. It provides a continuous shield of protection that lasts up to 12 hours. This CONTROLLED RELEASE TECHNOLOGY was developed for the U.S. Military and is for use in challenging situations requiring long lasting protection.~~

~~THIS UNIQUE FORMULA - Creates an effective barrier that repels mosquitoes, DEER TICKS and other biting insects - Provides maximum protection hour after hour - Resists rain, sweat, and water splashes.~~

[OR IN PLACE OF ABOVE PARAGRAPHS THE FOLLOWING]

The Ultrathon™ formula was created for the U.S. Army. It is effective in challenging environments and situations requiring long lasting protection. A special formula provides greater protection with less DEET. Ultrathon™ repellent provides up to 12 hours of protection from mosquitoes. Also repels DEER TICKS and other ticks, biting flies (stable flies, deer flies, gnats/black flies), chiggers, and fleas. The Ultrathon™ repellent is resistant to sweat, rain, and water splashes so you can enjoy the outdoors longer.

DIRECTION FOR USE:

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

READ ALL DIRECTIONS BEFORE USING THIS PRODUCT

Squeeze into hand and spread evenly in a thin layer. Use just enough repellent to cover exposed skin. Do not use under clothing. Frequent reapplication and saturation is unnecessary for effectiveness. Avoid overexposure and contact with eyes and lips. After returning indoors, wash treated skin with soap and water. Wash treated clothing. Use of this product may cause skin reactions in rare cases. If you suspect that you or your child is reacting to this product, wash treated skin and call your local poison control center. If you go to a doctor, take this repellent with you.

May damage some synthetic fabrics, plastics, painted or varnished surfaces. Avoid smearing on plastic eyeglasses, goggles, watch crystals, etc. WILL NOT DAMAGE nylon, cotton, or wool fabrics.

DISPOSAL: Do not reuse empty container. Wrap container and put in trash.

Distributed by 3M Sports Products, St. Paul, MN 55144-1000
EPA Reg. No. 58007-1, EPA Est. No. XXXXXX Made in U.S.A.