



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 29, 2023

Ms. Nicole Perkinson
Authorized Representative
EMD Performance Materials Corp.
1200 Intrepid Ave., Suite 300
Philadelphia, Penn. 19112

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 – Revising consumer access numbers; updating company address and copyright statement; adding bilingual labeling option; updating net contents; adding/revising label claims and graphics
Product Name: Bug Repell IR3535® 20% Aerosol
EPA Registration Number: 70759-4
EPA Receipt Date: 03/01/2023
Action Case Number: 00438086

Dear Ms. Perkinson:

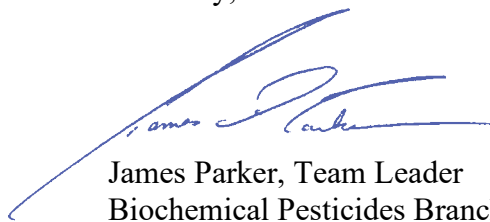
The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10.

The labeling submitted with this application has been stamped “Notification” and will be placed in our records. You must submit one (1) copy of the final printed labeling with the modifications.

Should you wish to add/retain a reference to your 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 EPA. If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the 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 EPA find or if it is brought to our attention that a website contains statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA’s Office of Enforcement and Compliance Assurance.

If you have any questions, please contact Nina Naimy via email at naimy.nina@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "James Parker", with a long, sweeping underline that extends to the left.

James Parker, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511M)
Office of Pesticide Programs

Enclosure

(Front Panel)

Bug Repell IR3535®
20% Aerosol

NOTIFICATION

70759-4
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:
03/29/2023

KEEP OUT OF REACH OF CHILDREN

WARNING

See back [panel] [booklet] for precautions & first aid

- [optional front and back panel]

ACTIVE INGREDIENT

3-[N-Butyl-N-acetyl]-amino
propionic acid ethyl ester*20.0%

OTHER INGREDIENTS.....80.0%

TOTAL100.0%

*IR3535®

FIRST AID - [optional front and back panel]

If in Eyes:

- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
- Call a Poison Control Center or doctor for treatment advice.
- Have the product container or label with you when calling a poison control center or doctor or going for treatment.

- For information on this pesticide product call [the

National Pesticide Information Center at
1-800-858-7378] [1-XXX-XXX-XXXX].

EPA Reg. No. 70759-4 EPA Est. No.

EMD Performance Materials Corporation

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RIGHTS RESERVED [optional front and back panel]

X OZ. (X g) {Alternate Containers}

[Batch Code or Lot Number]

[or similar phrase]

{Label text may also appear all or in part in [a foreign language] [insert one or more foreign language] in addition to English.}

(Back Panel)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS-Warning: For external use only. Causes substantial but temporary eye injury. Do not get in eyes. Do not spray on face. Do not rub eyes with product with fabric that has contacted product or treated skin. Discontinue use and consult a doctor if irritation or rash occurs.

PHYSICAL OR CHEMICAL HAZARDS

EXTREMELY FLAMMABLE: Contents under pressure. Keep away from heat, sparks and open flame. Exposure to temperatures above 180°F may cause bursting.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Do not spray in enclosed areas. Do not use near food.

REPELLENCY- REPELS MOSQUITOES AND TICKS FOR UP TO 8 HOURS [optional front and back panel]

Hold container 6 to 8 inches from skin and spray with a slow sweeping motion evenly over exposed skin. Do not apply over cuts, wounds, freshly shaven or irritated skin. Do not allow children to handle this product, and do not apply to children's hands. When using on children, apply to your own hands and then put it on the child. After returning indoors, wash your child's treated skin and clothes with soap and water or bathe. **TO APPLY TO FACE:** Spray palm of hand and rub on.

FOR CONTINUED PROTECTION: reapply about every 8 hours or sooner if effectiveness is diminished; not to exceed 3 applications per day.

STORAGE AND DISPOSAL

Storage: Store in cool dry place away from heat or flame.

Disposal:

If Empty: Nonrefillable Container. Do not reuse or refill this container. Place in trash or offer for recycling if available.

If Partly Filled: Call your local solid waste agency [or call] [1-800-CLEANUP] [1-XXX-XXX-XXXX] for disposal instructions. Never place unused product down any indoor or outdoor drain.

Optional Label Claims:

Use only as directed.

Avoid contact with plastics, costume jewelry, leather and synthetic fibers.

May damage painted or varnished surfaces, including nail polish.

DEET free

DEET alternative

Complete protection against mosquitoes and ticks for up to 8 hours

Effective, dependable protection

Protection [you can count on for up to 8 hours][from mosquitoes that may carry (transmit) (West Nile), (Zika), (chikungunya), (and) (dengue fever)]

Repels mosquitoes that may carry [transmit] [Zika] [chikungunya] [dengue fever] [and] West Nile [for up to 8 hours]

Helps to [repel mosquitoes and ticks] [that can transmit vector-borne diseases such as [dengue fever], [yellow fever], [chikungunya], [Lyme disease], [malaria], [and] [West Nile]]

Repels [Mosquitoes] [&] [and] [Ticks]

Ticks can transmit Lyme disease

Mosquitoes can transmit diseases like West Nile, Zika, chikungunya fever, dengue fever, malaria, yellow fever, and encephalitis

Long protection for the whole family

8-hour protection for the entire family

For the whole family

Optional Label Claims (continued):

- Lightweight
- Non-greasy
- Non-oily
- Pleasant feel
- Fragrance free
- No odor, no grease, no worries
- Odorless
- No odor
- Adults no need to wash off when returning from outdoors
- Tough on insects, gentle on skin

Touch/Feel descriptors [to be used as stand-alone statements or inserted into additional statements as indicated below]

Dry	Fresh	Not Greasy
Not Oily	Light	Non-Oily
Good	Comfortable	Pleasant
Greaseless	Not Sticky	Touchable
Non-Greasy	Not Wet	

- Feels [insert touch/feel descriptor] (on) (on your skin)
- [Insert touch/feel descriptor] feel (formula)
- [Insert touch/feel descriptor] touch (formula)
- [Insert touch/feel descriptor] formula
- [Insert touch/feel descriptor] protection
- [Insert touch/feel descriptor] skin feel
- (Insect repellent that) leaves (your) skin feeling [insert touch/feel descriptor]
- (Light feel) (Light weight) (Strong) (Effective) (Proven) protection
- Feel good protection for (the entire family) (your family)
- Dry (shield) (defense) (performance) (repellent) (aerosol)
- Smart (shield) (defense) (performance) (repellent) (aerosol)
- (Formulated) (with) feel dry technology
- (Formulated) (with) dry feel technology
- Quick dry (ing)
- Fast dry (ing)
- Dries fast

Optional Label Claims (continued):

- Protection for the whole family
- Complete protection (from mosquitoes and ticks) (for the entire family)
- 8-hour protection for the entire family
- May repeat application when used as directed
- (clear), (colorless), (odorless)
- Relax and rely on [insert brand name] IR3535 protection from mosquito bites
- 8-hour protection
- Repels mosquitoes which may carry Zika (and West Nile) virus
- Repels ticks which may carry Lyme disease
- Safety Shield for your family
- Your personal bodyguard
- Your best friend for protection
- Protect yourself (and your loved ones)
- IR3535® (is inspired from a naturally occurring amino acid)
- May be left on overnight for adults [when used as directed]
- Instructions do not require washing skin after returning indoors for adults
- IR3535®. Tough on [Mosquitoes] [Ticks]. Easy on you.
- IR3535®. Protection On. [Mosquitoes] [Ticks] Off.
- IR3535®. Guard On. [Mosquitoes] [Ticks] Off.
- IR3535®. Guard On. [Mosquitoes] [Ticks] Repelled.
- IR3535®. Protection On. [Mosquitoes] [Ticks] Repelled.
- Made to Guard Against Ticks and Mosquitoes
- Made to Protect Against Ticks and Mosquitoes
- **STOP. Read and follow all directions and precautions on this product label.**
- **Twin[-]Pack**
- **Triple[-]Pack**
- **Combo Pack**
- **Value Pack**
- **Club Pack**

Optional Label Claims/Graphics:



[IR3535 is a registered trademark Merck KGaA, Darmstadt, Germany]



Alternate to "Made to Guard",

