

Labeling changes-continued

According to FIFRA's labeling requirements [40 CFR 156.10(g)(6)]:

Deterioration. Pesticides which change in chemical composition significantly must meet the following labeling requirements:

(i) In cases where it is determined that a pesticide formulation changes chemical composition significantly, the product must bear the following statement in a prominent position on the label: "Not for sale or use after [date]."

(ii) The product must meet all label claims up to the expiration time indicated on the label.

Modify your proposed text to read:

Expiration Date: Not for sale or use after [insert date]. Then follow "Disposal" text.

Place this text under the Ingredient Statement, wherever it appears, in a separate section and in the same type size as the text "Active Ingredients" and "Inert Ingredients".

2. Delete the promotional claim "Will Not Freeze" as we have no data to support it. We will evaluate the claim when we receive the freezing-point data for this product.
3. Delete the promotional claim "Glow-in-the-Dark Safety Cap" We found nothing in the "market samples" that you submitted which appears to be a "Safety Cap". The orange clip which serves to block accidental depression of the trigger is not a "cap". It also failed to glow in the dark when we tested it for that property.
4. Insert a comma between "before" and "you" in the third sentence of the first paragraph of the "APPLICATION DIRECTIONS:" subsection of the "DIRECTIONS FOR USE". In the fourth sentence of the same paragraph, insert a comma between "container" and "wind".
5. Enclosed is guidance on the "Minimum Type Sizes for Final Printed Labels". Make sure that the following text is in the correct type size:
 - a. Signal Word
 - b. "Keep Out of Reach of Children"
 - c. "Storage and Disposal"
 - d. "DO NOT SEEK ... MIGHT BE ENCOUNTERED" (same size as "Keep Out of Reach of Children")
 - e. Other text (6 Point)

Chemistry
data-
submissions

B. Submit the following additional chemistry data on your source product, 6% Capsaicin, within 15 months of registration:

- 1. Description of material used to produce product,
- 2. Discussion of formula of impurities, if any, in manufacturing process
- 3. Confidential Statement of Formula (CSF) showing certified limits of active ingredient.

C. Submit the following additional chemistry data on your formulated product within 15 months of registration:

- 1. storage stability
- 2. corrosion characteristics
- 3. freezing point and
- 4. flash point

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A copy of the stamped label is enclosed for you records.

Sincerely,



Daniel B. Peacock, Biologist
Insecticide-Rodenticide Branch
Registration Division (7504C)

Enclosures

- 1. Stamped Label
- 2. Minimum Type Sizes for Final Printed Labeling

Copy to:

RegWest Company
P.O. Box 2220
Greeley, Co 80632-2220

Attention: Ms. Kim Davis

Letter
location

A:\Frontiersman\72265-1 Not of Reg.wpdJuly 17, 2000

Aerosol
Container
Label

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-325-9568 immediately for treatment advice.

IF ON SKIN OR CLOTHING - Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

Do not apply directly to water. Do not contaminate water by disposing of unused material.

DIRECTIONS FOR USE

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

USE RESTRICTIONS: This product may be used only to deter bears that are attacking or appear likely to attack humans. This product may not be effective in all situations or prevent all injuries. Do not spray this product on objects, tents or humans; such use has no deterrent effect on bears. Do not seek out encounters with bears or intentionally provoke them. Keep safety clip in place except when practicing with or using the product. Do not eat or allow to be eaten any food or feed materials that may have become contaminated with this product.

This product has an effective range of 18 to 25 feet. The canister empties in approximately 5 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you have not used this product before you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip out. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace orange safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. Dispose of when container is empty; press valve to release all pressure. Replace safety clip, empty container and discard in trash. Do not incinerate by puncture.

Exposure Data: None. Discard first after date of expiration.



Fig. 1



Fig. 2



Fig. 3

FRONTIERSMAN

BEAR ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

Glow-in-the-Dark Safety Cap

Will Not Freeze

ACTIVE INGREDIENTS:

Capsaicin and related capsaicinoids* 1.4%

INERT INGREDIENTS 98.6%

TOTAL 100.0%

*Includes 0.9% Capsaicin and 0.5% other Capsaicinoids derived from Oleoresin of Capsicum

DO NOT SEEK OUT ENCOUNTERS WITH BEARS. THIS PRODUCT IS A BEAR ATTACK REPELLENT THAT MAY PROTECT USERS IN SOME UNEXPECTED CONFRONTATIONS WITH BEARS BUT MAY NOT BE EFFECTIVE IN ALL SITUATIONS OR PREVENT ALL INJURIES. READ THIS ENTIRE LABEL BEFORE TAKING THIS PRODUCT INTO AREAS WHERE BEARS MIGHT BE ENCOUNTERED.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling.

See Back Panel for Additional Precautions

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1

NET CONTENTS: 9.2 OZ.

Manufactured by: Security Equipment Corporation
330 Sun Valley Circle, Foston, MO 63026 • (800) 325-9568
sales@se.com • www.se.com

Made in the U.S.A.

ACCEPTED
with COMMENTS

In EPA Letter Data

JUL 17 2000

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

72265-1

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 72265-1

JUL 17 2000

FRONTIER BRYAN BEAR-ATTACK DETERRENT

To Deter Bears From Attacking Humans

For Use When Hunting, Camping, Fishing, Hiking and Biking or whenever enjoying the great outdoors.

ACTIVE INGREDIENTS:
Capsaicin and related capsaicinoids 1.4%

INERT INGREDIENTS:
98.6%

TOTAL:
100.0%

Includes 0.9% capsaicin and 0.5% other capsaicinoids derived from *Neonemum oleosum*.

KEEP OUT OF REACH OF CHILDREN

DANGER

Strong temporary irritant to eyes, nose and skin. Wash thoroughly with soap and water after handling.

MADE AND PRINTED IN THE USA

MADE AND PRINTED IN THE USA

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-325-9568 immediately for treatment advice.

IF ON SKIN OR CLOTHING - Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

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.

Physical or Chemical Hazards

Flammable. Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

Environmental Hazards

Do not apply directly to water. Do not contaminate water by disposing of unused material.

DIRECTIONS FOR USE

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

Refer to canister and insert for complete Directions for Use.

Storage and Disposal

STORAGE: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. **DISPOSAL:** When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1



330 Sun Valley Circle
Fenton, MO 63026

Hang Tag Label

PRECAUTIONARY STATEMENTS

Hazards to Humans & Domestic Animals

DANGER: May cause irreversible eye damage if sprayed directly in the eyes at close range. Contact through touching or rubbing the eye may cause moderate eye irritation. Avoid contact with skin or clothing. Wash thoroughly with soap and water after handling.

First Aid

Have label with you when obtaining treatment advice. Call a poison control center, doctor, or 1-800-325-9568 immediately for treatment advice.

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This product has an effective range of 18 to 25 feet. The canister empties in approximately 5 seconds.

APPLICATION DIRECTIONS: Special procedures must be followed to arm the container, apply the product and restore the safety clip to disarm the container. Before taking this product into bear country, read the directions below and familiarize yourself with these procedures. If you have not used this product before you should obtain a training can and practice with it until you can perform these activities quickly and accurately. If you test-fire this container make sure the wind is at your back and depress the actuator tab for no more than half a second. Do not test-fire in areas inhabited by bears. After test firing, clean nozzle and can with soap and water to remove residue from the can.



Fig. 1



Fig. 2

To Arm and Apply: This product is designed for one-handed operation. Place forefinger through hole in handle with thumb on orange safety clip curl. Pull safety clip straight back and off using thumb (Fig. 1). Depress actuator tab for burst of spray (Fig. 2).



Fig. 3

Aim at face and eyes of bear. Press trigger for 3 seconds in order to create a barrier of spray between you and the bear. Stop to evaluate the impact of wind and other factors and adjust your aim if needed before spraying again.

To Disarm: Replace orange safety clip by firmly pushing with thumb until audible "snap" is heard (Fig. 3). Check to see if safety clip is securely in place. No gap should be visible between the actuator handle and the safety clip.

Storage and Disposal

Storage: Store in a cool, dry place inaccessible to children and pets. Do not store in places where the temperature may exceed 120°F. **Disposal:** When container is empty, press valve to release all pressure. Replace safety clip, wrap container and discard in trash. Do not incinerate or puncture.

EPA Reg. No. 72265-1 EPA Est. 72265-MO-1
SECURITY EQUIPMENT CORPORATION
330 Sun Valley Circle, Fenton, MO 63026

ACCEPTED
with COMMENTS
in EPA Letter Dated:

JUL 17 2000

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

72265-1