

74771-1

3/19/2003

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U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Pesticide Programs  
Antimicrobials Division (7510C)  
1200 Pennsylvania Avenue NW  
Washington, D.C. 20460

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY****NOTICE OF PESTICIDE:**

☒ Registration  
☐ Reregistration

(under FIFRA, as amended)

EPA Reg.  
Number:

74771-1

Date of Issuance:

3/19/03

Term of Issuance:

Conditional

Name of Pesticide Product:

Benefect® broad spectrum  
disinfectant

Name and Address of Registrant (include ZIP Code):

Sensible Life Products  
7 Innovation Drive, Suite 34  
Flamborough, Ontario L9H7H9

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec 3(c)(7)(A) provided that you:

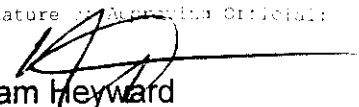
1. Submit and/or cite all data required for registration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.

2. Make the labeling changes listed below before you release the product for shipment:

a. Add the phrase "EPA Registration Number 74771-1"

b. The ingredient statement must total ..... 100%.

Signature of Approving Official:

  
Adam Heyward  
Product Manager Team-34  
Regulatory Management Branch II  
Antimicrobials Division (7510C)

Date:

March 19, 2003

EPA Form 8570-6

**CONCURRENCES**

SYMBOL

SIGNATURE

c. It is unclear to what "pet decorations" refers to. Therefore you must delete it from the label or provide clarification as to what is meant by "pet decorations."

d. The proposed label indicates that the product can be used on "footwear", which is not a hard porous surface. Also, the proposed label indicates that the product can be used on cutting boards, which may not be porous after use. The Agency requires specific testing on plastic with a rough surface for single-use towelettes. For the requirements, refer to the efficacy data requirements specified in item 2 of DIS/TSS-2. Therefore, these sites must be deleted from the label.

e. The use of the wording "hospital grade" is unacceptable and therefore must be deleted. The word "grade" must be deleted. Words or phrases implying that a product possesses a unique characteristic because of its composition are not acceptable. Also, in the same paragraph, revise "...odors on hard non-porous surfaces..." to read "and control odors produced by these microorganisms on hard, non-porous inanimate surfaces..."

f. The use of a superlative or wording such as "ideal" is unacceptable when used to describe the effectiveness of a product. Therefore, you must delete the word "Ideal" from the label.

g. Delete the phrase "...kills 99.99% of germs..." Data must be submitted to validate the percentage of kill. For detailed information refer to DSS/TSS-10.

h. Delete the phrase "All-Natural" formula. Non-numerical and/or comparative statements on the safety of the product, including but not limited to: contains all-natural ingredients is not acceptable. Refer to EPA label manual and/or web page under "False or Misleading statement" in the label manual.

i. The word "New" may only be used on the product labeling for 6 months after the date of registration.

j. In the ingredient statement, under the child signal word Caution, revise the child hazard statement to read:

"Keep Out of the Reach of Children".

k. The contents of the product must be listed on the label in English measurements.

l. Since the product efficacy data were developed in the absence of organic soil, the proposed label must be reflective of a use pattern for previously cleaned surfaces prior to addition of product. Therefore, the proposed label must be expanded to reflect the following instructions "Thoroughly clean surfaces prior to application of product". For specific label requirements, refer to item #3 of DIS/TSS-15.

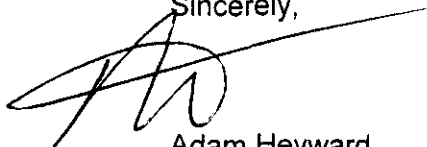
m. The proposed label claims (as supported by MRID Nos. 458017-05 and -06) are acceptable regarding the use of the product, Benefect Disinfectant against *Salmonella choleraesuis* and *Pseudomonas aeruginosa* on hard, non-porous surfaces for a contact time of 10 minutes. Even though the product is effective against the above test microorganisms, and to maintain this claim on the label, you **must provide** additional information relating to specific identification for each of the three product lots that was tested at least 60 days old at the time of efficacy testing. A letter from your company representative (dated November 19, 2002) states that one of the three product lots tested is at least 60 days old; however, neither this letter nor the MRIDs identified which product lot was at least 60 days old at the time of testing.

3. Submit three (3) copies of the revised final printed label bearing the revisions prior to releasing this product for sale.

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

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

Sincerely,



Adam Heyward  
Product Manager 34  
Regulatory Branch II  
Antimicrobials Division (7510C)

Enclosure

4 8 4

**SHAKE WELL**

**KILLS 99.99% of GERMS**

*Lemon & Clove  
Scent*

NEW Benefect is the first hospital grade **All-Natural** disinfectant. The patented technology is proven to kill over 99.99% of bacteria (such as: *Salmonella choleraesuis*, *Staphylococcus aureus* & *Pseudomonas aeruginosa*) & odors on hard, non-porous surfaces. Made from botanically pure, biodegradable plant extracts with pleasant aromatherapeutic vapors. No synthetic fragrances, dyes, ammonia, chlorine or other unnecessary or potentially hazardous chemicals.

**IDEAL FOR** using in residential, commercial or medical applications, including health care or food preparation facilities, where a natural product is sensible: countertops, cutting boards, toilets, pet habitats & decoration, garbage cans, children's toys, highchairs, changing tables, prostheses & orthotics, sports equipment such as footwear, jock cups & helmets, construction materials such as water damaged sheet metal, walls, floors, boat surfaces & cavities & any other surface where bacteria or unpleasant odors are a concern.

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product in a manner inconsistent with its labeling. 1. Remove any visible dirt & debris. 2. **SHAKE WELL** and wet the surface with the spray (test for surface compatibility on inconspicuous area first).

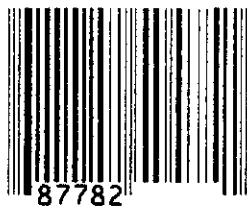
3. Leave for 10 minutes, allow to air-dry, **no rinsing or wiping required.**

**Storage / Disposal:** Store airtight at room temperature. Recycle empty container.

EPA Reg. No. xxxx-xxx  
EPA Est. No. 061423-CN-001



Patented Internationally  
Sensible Life Products (div of LBD Ltd)  
34-7 Innovation Dr. ON, CA L9H 7H9  
800-909-2813 [www.controlgerms.com](http://www.controlgerms.com)



**Benefect**  
broad spectrum disinfectant

NEW!  
**All-Natural  
formula**



Active Ingredient: Thymol, a natural active  
component of *Thymus* spp. & *Origanum* spp.  
Inert Ingredients: \_\_\_\_\_

**Caution**

Do Not Allow Children to Touch or Ingest

Net Contents \_\_\_\_\_

**REFILL**

**ACCEPTED  
with COMMENTS  
- EPA Letter Dated:**

**MAR 19 2003**

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

74771-1