



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Antimicrobials Division (7510C) 1200 Pennsylvania Avenue NW Washington, D.C. 20460

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Date of Issuance:

74771-3

July 14, 2006

Term of Issuance:

Unconditional

Nume of Pesticide Product:

Benefect® Botanical Daily Cleaner Disinfectant Spray

NOTICE OF PESTICIDE:

_x Registration Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include 2IP Code):

Sensible Life Products (Div. of LBD Ltd.) 7 Innovation Drive, Suite 34 Flamborough, Ontario L9H 7H9

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 unconditionally registered in accordance with FIFRA sec 3(c)(5) 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 re-registration of your product under FIFRA section 4.
 - 2. Make the labeling changes listed below before you release the product for shipment:
 - a. Revise the "EPA Registration Number to read, "EPA Reg. No. 74771-3".

Signature of Approving Off etal:

Date:

Adam Heyward

Product Manager Team-34

Regulatory Management Branch II

Antimicrobials Division (7510C)

July 14, 2006

EPA Form 8570-6

- b. The terms "Daily Strength, Weekly Strength, Monthly Strength" may only be associated with the cleaning directions on the labeling.
- c. In the inert ingredient statement, the statement "other grease cutting agents" must list the specific chemical name(s).
- d. The term "Advance" can only be used for a period of six months on the consumer product labeling.
 - e. Delete the phrase "that make you sick" wherever it appears on the labeling.
 - f. The claim "healthier home in minutes" must be deleted from the label.
 - g. Sites such as food preparation surface must specify the use of potable water rinse.
- h. Before any logo can be used on consumer products labeling in the United States, it must be approved by the EPA. The "Terrachoice Logo" has not been approved; therefore it can not be used on consumer products being sold in the United States.
 - i. Revise the statement "It's safe to use on all" to read, "Will not harm hard surfaces".
- j. The statement "suitable for use around children, pets and those with sensitive skin" is an implied safety claim and therefore must be deleted from the label.
 - k. Label must specify "hard non-porous surfaces of furniture and seating.
- I. Since the product will be used in hospital and other health related facilities, per PR Notice 94-4, the following paragraph must be added to the label:

"This product is not to be used as a terminal sterilant/high level disinfectant on any surface or instrument that (1) is introduced directly into the human body, either into or in contact with the bloodstream or normally sterile areas of the body, or (2) contacts intact mucous membranes but which does not ordinarily penetrate the blood barrier or otherwise enter normally sterile areas of the body. This product may be used to preclean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection".

3. Submit three (3) copies of your final printed labeling before distributing or selling the product bearing the revised labeling.

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 (7510P)

Enclosure: (Stamped Label)

(All text in brackets [xxx] is optional & may or may not be included on a final label.)

(All text in braces {xxx} is administrative & will not appear on a final label.)

Front Panel:

[A Better Way to Clean]

Benefect® Botanical Daily Cleaner Disinfectant Spray

[with IngeniumTM]

NEW! {can be present on label for 6 months from date of approval} Kills [over] 99.9[9]% of [household] germs*[,] [naturally] [botanically] on hard, non-porous surfaces

All Purpose [Anti-Bacterial] Cleaner [+] [Disinfectant]

[Daily Strength:]

[Streak-Free Spray for quick cleaning and routine disinfecting]

[Weekly Strength:]

[Power Spray for thorough cleaning/disinfecting and tougher stains]

[Monthly Strength:]

[Deep Cleaning] [Penetrating] [Foam for intensive cleaning and stubborn stains]

Controls [Eliminates] Odors [Deodorizer]

Botanical

Lemon [Lemongrass] [& Clove] [Citrus] [Spice] Scent

Ready To Use [RTU]

Disinfectant

Decontaminant

Kills Influenza Virus [Flu] [Virucidal against Influenza [Flu]]

Bactericidal

[Part of our] Sustainable Botanical Cleaning & Disinfection Solution

[Caution] Keep Out of the Reach of Children

Active Ingredients:	
Thymol (present as a component of Thyme Oil)	
Inert Ingredients: [includes][soap][detergent][and other grease cutting a	igents]99.95%
Total	

Net Contents ___

ACCEPTED with COMMENTS
EPA Letter Dated.

JUL 14 2006

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide, registered under EPA Reg. No. 7477/-3

Back Panel:

[Benefect is [a] [an] [advanced] [sensible, no compromise] botanical disinfectant cleaner [formula]. *The patented technology is proven to] *Kill[s] [over] 99.9[9]% of the germs that make you sick including [specifically]: Influenza A. Staphylococcus aureus, Salmonella enterica, Pseudomonas aeruginosa, and Escherichia coli [on hard, non-porous, inanimate surfaces]. [Tested in the presence of 5% organic soil load].

[Truth is, you don't actually need a different cleaning product for every room in your home. Benefect with Ingenium cuts through the dirt in your life and the clutter under your sink.

[Inspired by how people really clean, we developed the Benefect Daily-Weekly-Monthly system to make short work of most household chores: from quick cleanups on countertops and glass; to routine messes on tabletops and highchairs; to stubborn stains on stovetops and tiles.]

[Don't let the pleasant smell fool you. Benefect cuts through grease and grime with the best of them; wipes out odor-causing bacteria; controls mold and mildew odors; and kills [over] 99.9[9]% of the household germs that make you sick (including the flu). And with Ingenium, a patented botanical disinfectant made from essential oils, it's safe to use on all hard surfaces and suitable for use around children, pets and those with sensitive skin.]

[We set out to find a better way to clean,][and we're pretty happy with the results.] [and we hope you are too.] [We hope you will be too.]

[Benefect.] [A better way to clean] [Part of a sustainable solution.] [No ammonia, phosphates or chlorine bleach.] [No alcohol, dves or synthetic fragrances.]

[No VOCs.] [No fine print.]

[To learn more, visit www.benefect.com]

ACCEPTED with COMMENTS EPA Letter Dated:

JUL 14 7006

Under the Federal Insecticide. Fungicide, and Rodenticide Act as amended for the pesticide, registered under EPA Reg. No. 7477/-3

[Daily Strength: A streak-free spray for quick and easy cleaning and routine disinfecting throughout the home on countertops, vanities, tabletops, seating, sinks, mirrors, appliances, toys, changing tables, highchairs, cribs, windows and more]

[Weekly Strength: A power spray for thorough cleaning and disinfecting throughout the home and tougher stains on sinks, countertops, glazed tiles, stovetops, toilets, furniture, floors and more.]

[Monthly Strength: A penetrating foam for intensive cleaning throughout the home and stubborn stains on floors, surfaces, stoves, ovens, microwaves, sinks, toilets, bathtubs. showers and more.]

ACCEPTED with COMMENTS EPA Letter Dated:

[Cleans, disinfects and deodorizes.]
[Disinfects while you clean.]
[Clean and disinfect in one easy step.]
[More clean. Less time.]
[Tough on dirt. easy on you.]
[Clean easy, breathe easy.]
[A cleaner, healthier home in minutes.]

JUL 14 2006

Today the Tederal Insecticide,

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12tions for the pesticide,
12tions registered under EPA Reg. No. 74721-3

[Effectively controls odors produced by these microorganisms on non-porous & porous surfaces. Made from botanically pure plant extracts with pleasant aromatherapeutic vapors.]

SUITABLE FOR use in residential, commercial or medical applications, [including health care & food preparation facilities: hospitals, nursing homes, medical, veterinary & dental offices, health professional, chiropractic & physiotherapy clinics, day cares, nurseries, restaurants & bars, kitchens, cafeterias, food storage areas, fitness gyms, spas, schools, hotels & motels, zoos & kennels] on hard, non-porous surfaces.

SUITABLE FOR use on all hard, non-porous surfaces where bacteria or unpleasant odors are a concern [including countertops, sinks, food preparation surfaces, toilet seats, pet habitats, garbage cans, children's toys, highchairs, changing tables, prostheses & orthotics, sports equipment such as 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].

[SUITABLE FOR control & inhibition of odor causing bacteria, fungi & other odor-causing organisms.]

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. For heavily soiled areas, pre-cleaning is required.

[Cleans and disinfects hard nonporous surfaces throughout the home.]

[TO CLEAN: 1. Wet the surface [with the spray] & wipe clean.][For stubborn stains, let stand for a few minutes.][Allow foam to penetrate, then wipe clean.]

TO DISINFECT: 1. Wet the surface [with the spray] [(spot test to check surface compatibility)]. 2. Leave for 10 minutes. Allow to air-dry. No rinsing or wiping is required.

[TO CONTROL MOLD & MILDEW ODORS: 1. Wet the surface [with the spray] [(spot test to check surface compatibility)]. 2. Leave for 3 minutes, then wipe clean. Reapply as necessary.]

STORAGE/DISPOSAL: [Leave containers out for convenient & easy access.] Store airtight at room temperature. [Waste resulting from the use of this may be poured down the drain. No special handling is required.] Please recycle empty container.

EPA Reg. No. 74771-X EPA Est. No. 075840-CAN-001

Patented Internationally
Sensible Life Products (div of LBD Ltd)
34-7 Innovation Dr. ON, CA L9H 7H9
(800) 909-2813
www.Benefect.com
[TerraChoice.com] {with Graphic:} [Terrachoice logo]

MCCEPTED W COMMENTS EPALetter Dated. JUL 14 2006

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