



U.S. ENVIRONMENTAL PROTECTION AGENCY

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

EPA Reg. Number:
74771-4

Date of Issuance:
July 14, 2006

Term of Issuance:
Unconditional

Name of Pesticide Product:
Benefect® Botanical Daily Cleaner Disinfectant Towelette

NOTICE OF PESTICIDE:
 Registration
 Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP 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. 74771-4".

Signature of Approving Official:

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

Date:

July 14, 2006

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. 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 pre-clean or decontaminate critical or semi-critical medical devices prior to sterilization or high level disinfection".

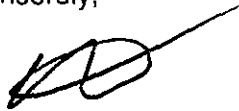
3. The policy on antimicrobial towelettes and wipes is under consideration by the Antimicrobial Division. Once the policy has been finalized, you will be informed if there are any changes that need to be made regarding the registration process and if there are any additional data that must be submitted to the Division for review.

4. 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 Towelette

with Ingenium[™]

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:]

[Gentle Wipe for quick cleaning and routine disinfecting]
[Weekly Strength:]

[Textured Wipe for thorough cleaning/disinfecting and tougher stains]
[Monthly Strength:]

[Power Wipe 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).....0.05%
Inert Ingredients: [includes][soap][detergent][and other grease cutting agents]99.95%
Total.....100%

Net Contents:

[1] [2] [6] [10] [12] [15] [20] [25] [30] [35] [70] [80] [100]
[Pouch] [Canister] [Box]
[6" x 8"] [3.5" x 8"] [7" x 8"] [7" x 9"]

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. 74774

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] Salmonella enterica, Pseudomonas aeruginosa, and Influenza A2 [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] [with] [essential oils] [plant extracts], 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, dyes or synthetic fragrances.]
[No VOCs.]
[No fine print.]

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

[Daily Strength: A gentle wipe 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 textured wipe 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 power wipe for intensive cleaning throughout the home and stubborn stains on floors, surfaces, stoves, ovens, microwaves, sinks, toilets, bathtubs, showers and more.]

[Cleans, disinfects and deodorizes.]

ACCEPTED
with COMMENTS
Label Date:

JUL 14 2006

United States Federal Insecticide,
Fungicide and Rodenticide Act as
in effect for the pesticide,
registered under EPA Reg. No. 74771-4

ACCEPTED
with COMMENTS
EPA Letter Label:

6/7

[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
EPA Reg. No. 74771-4
Act as
pesticide,
registered under EPA Reg. No. 74771-4

[Effectively controls odors produced by these microorganisms on non-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: 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].

[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 wipe] & wipe clean.][For stubborn stains, let stand for a few minutes.]

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

[TO CONTROL MOLD & MILDEW: 1. Wet the surface [with the wipe] [(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 - reseal container between uses. [No special handling is required.] [Dispose of wipe in trash (or compost) after use.] [Do not flush.] Please recycle empty container.

7/7

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]

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. 74771-4