



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

December 22, 2016

Micah T. Reynolds
Senior Regulatory Consultant
Citrefine International Ltd.
c/o Technology Sciences Group Inc. (TSG)
1150 18th Street, NW, Suite 1000
Washington, DC 20036

Subject: Pesticide Registration Improvement Act (PRIA) Labeling Amendment – Amendment for adding alternate packaging configuration “Bag-On-Valve”.
Product Name: Citrepel
EPA Registration Number: 84878-2
Application Date: July 08, 2016
OPP Decision Number: 519781

Dear Mr. Reynolds:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 § CFR 152.3.

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 FIFRA and is subject to review by the U.S. Environmental Protection Agency (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

Page 2 of 2
EPA Reg. No. 84878-2
OPP Decision No. 519781

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 false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Menyon Adams of my team by phone at (703) 347- 8496 or via email at adams.menyon@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Andrew C. Bryceland". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Andrew Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure

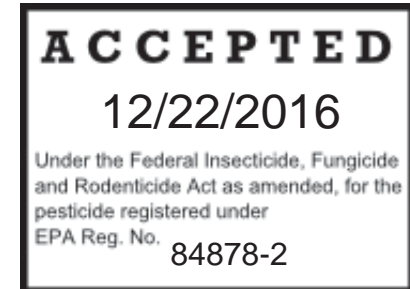
CITREPEL MASTER LABEL

MASTER LABEL includes:

- **Sublabel A:** Citrepel labeling for liquid pump spray packaging
- **Sublabel B:** Citrepel labeling for pressurized (bag-on-valve) packaging (for supplemental distribution by Wisconsin Pharmacal Company, LLC)
- **Optional Label Claims**

EPA Reg. No. 84878-2

Citrefine International Ltd.
Moorefield Road, Yeadon
Leeds, England LS19 7BN



Sublabel A: Liquid Pump Spray Packaging

CITREPEL

[Insect Repellent]

Alternate Brand Name: Citrapel™
Alternate Brand Name: Coleman™ botanicals insect repellent

KEEP OUT OF REACH OF CHILDREN

CAUTION: See back panel for precautions and first aid statements

| | |
|--------------------------------|--------|
| Active Ingredient: | |
| Oil of Lemon Eucalyptus* | 30.0% |
| Other Ingredients | 70.0% |
| TOTAL | 100.0% |

*Approx. 65% p-menthane-3,8-diol

NET X fl oz (XXmL)

[Bracketed Text] = Optional language

OPTIONAL MARKETING LANGUAGE

[Citrepel insect repellent is designed to repel mosquitoes for up to six hours. This unique formula is guaranteed to repel mosquitoes. You can use Citrepel with confidence knowing that it will not harm your fishing line, camping gear, watch crystals or tackle box. Apply Citrepel and get your adventure started.]

You can use Citrepel [insect repellent] with confidence knowing it will not harm your fishing line, camping gear, watch crystals or tackle box. Apply Citrepel and get your adventure started. The active ingredient in Citrepel is derived from the leaves of the Lemon Eucalyptus tree.

STOP. READ ENTIRE LABEL BEFORE EACH USE.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION. Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes. Wash Hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. After returning from outdoors, wash product from all exposed skin. Do not allow children to apply this product to themselves. Do not apply to the hands of children. Do not use this product on children under three years of age. May cause skin reactions for some people. Discontinue if irritation or rash appears. Do not apply over cuts, wounds or irritated skin.

First Aid

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. Call a poison control center or doctor for treatment advice.

If swallowed

Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment. In case of emergency call 1-XXX-XXX-XXXX.

PHYSICAL OR CHEMICAL HAZARDS

COMBUSTIBLE. Keep away from heat or open flame.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label.

To repel insects, apply to exposed skin and clothing. For best results, spread evenly with hand to moisten all exposed skin. Do not spray directly on face. To apply to face, dispense on palm of hand and spread on face and neck. Reapply once as needed. Do not apply more than twice per day.

STORAGE AND DISPOSAL:

Store the product in a cool, dry place, out of reach of children. If empty: Nonrefillable container. Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

[Questions or Comments?]

Made for Citrefine International Ltd
Moorfield Rd, Yeadon
Leeds, England LS19 7BN
(website)

EPA Reg. No. 84878-2
EPA Est. No. _____

Sublabel B: Pressurized (Bag-On-Valve) Packaging (for supplemental distribution by Wisconsin Pharmacal Company, LLC)

CITREPEL

[Insect Repellent]

Alternate Brand Name: Citrapel™
Alternate Brand Name: Coleman™ botanicals insect repellent

KEEP OUT OF REACH OF CHILDREN

CAUTION: See back panel for precautions and first aid statements

Active Ingredient:
Oil of Lemon Eucalyptus* 30.0%
Other Ingredients 70.0%
TOTAL 100.0%

*Approx. 65% p-menthane-3,8-diol

NET XX oz. (XX g)

[Bracketed Text] = Optional language

OPTIONAL MARKETING LANGUAGE

[Citrepel insect repellent is designed to repel mosquitoes for up to six hours. This unique formula is guaranteed to repel mosquitoes. You can use Citrepel with confidence knowing that it will not harm your fishing line, camping gear, watch crystals or tackle box. Apply Citrepel and get your adventure started.]

You can use Citrepel [insect repellent] with confidence knowing it will not harm your fishing line, camping gear, watch crystals or tackle box. Apply Citrepel and get your adventure started. The active ingredient in Citrepel is derived from the leaves of the Lemon Eucalyptus tree.

STOP. READ ENTIRE LABEL BEFORE EACH USE.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION. Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes. Wash Hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. After returning from outdoors, wash product from all exposed skin. Do not allow children to apply this product to themselves. Do not apply to the hands of children. Do not use this product on children under three years of age. May cause skin reactions for some people. Discontinue if irritation or rash appears. Do not apply over cuts, wounds or irritated skin.

First Aid

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. Call a poison control center or doctor for treatment advice.

If swallowed

Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment. In case of emergency call 1-XXX-XXX-XXXX.

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.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Read and follow all directions and precautions on this product label.

To repel insects, apply to exposed skin and clothing. For best results, spread evenly with hand to moisten all exposed skin. Do not spray directly on face. To apply to face, dispense on palm of hand and spread on face and neck. Reapply once as needed. Do not apply more than twice per day.

STORAGE AND DISPOSAL:

Store the product in a cool, dry place, out of reach of children. Avoid long term storage above 104 °F (40 °C). Do not store at temperatures above 120 °F (49 °C). Do Not Puncture or Incinerate! If empty: Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or 1-800-CLEANUP for disposal instructions.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

[Questions or Comments?]

Made for Citrefine International Ltd
Moorfield Rd, Yeadon
Leeds, England LS19 7BN
(website)

EPA Reg. No. 84878-2
EPA Est. No. _____

OPTIONAL MARKETING CLAIMS

[Bracketed Text] =Optional language

General Marketing claims:

1. Contains Lemon Eucalyptus Oil
2. Active Ingredient extract of Lemon Eucalyptus
3. Active Ingredient Derived from Plant Extracts
4. Gives Mosquitoes the Brush-Off
5. Active Ingredient derived from plant extracts
6. Active Ingredient Derived from Lemon Eucalyptus
7. Contains plant extracts [of Lemon Eucalyptus]
8. Repels [annoying] mosquitoes
9. Delivers up to 6 hours of repellency of Mosquitoes
10. Repels up to 6 hours against mosquitoes
11. Repels mosquitoes for up to 6 hours
12. Won't harm your gear
13. Will not [melt][damage][weaken] your fishing line
14. Will not harm watch crystals, tackle boxes, backpacks, fishing line, tents or bedding.
15. Goes on easy
16. Lemon Eucalyptus scent
17. Cool, refreshing [lemon eucalyptus] scent
18. Botanically-based active ingredient
19. Plant-based active ingredient
20. Effective, Dependable mosquito repellency for up to six hours
21. Unique formula
22. Unique plant-based active ingredient
23. New formula [to be removed 6 months after first shipment]
24. [Contains](made with) Oil of Lemon Eucalyptus
25. Powered by Citriodiol® OLE Nature's Repellent (logo)
26. Naturally-based active ingredient
27. Active ingredient derived from [the leaves of] Lemon Eucalyptus tree
28. [By][From][Brought to you buy] the makers of Citrepel®
29. Not Sticky or greasy

30. Repels mosquitoes [including those] that may [transmit] [carry] West Nile Virus [for up to six hours]
31. Repels annoying mosquitoes
32. Cool Lemon Eucalyptus scent
33. DEET Free
34. Contains no DEET
35. Protect(s)(ion) against (the) mosquitoes that may carry (Eastern Equine Encephalitis) EEE
36. Convenient GoReady™ Spray Pen
37. 180+ Sprays
38. [Protect(s)(ion) against] [Repels] (the) mosquitoes that may [transmit] [carry] Zika virus
39. [Protect(s)(ion) against] [Repels] (the) mosquitoes that may [transmit][carry] Dengue virus
40. [Protect(s)(ion) against] [Repels] (the) mosquitoes that may [transmit] [carry] Chikungunya virus

Claims specific to Sublabel B:

41. NEW (valid for 6 months from date of first product shipment with pressurized packaging)
42. Continuous spray
43. No rubbing required
44. Fine mist spray
45. Easy application
46. Easy to apply
47. No mess
48. Convenient, no mess, no rub protection
49. Sprays upside down
50. No pumping required
51. Quick and even coverage
52. Sprays at any angle
53. Easy continuous spray application
54. Contains no ozone depleting [propellants] [chemicals]
55. Sprays more evenly and consistently
56. Spray in any direction at any angle
57. [Simple] [Smooth] [Accurate] [Effortless]

Citrepel Insect Repellent; EPA Reg. No. 84878-2
AMENDMENT to add Bag-On-Valve label language and marketing claims
MASTER LABEL version (8) dated December 14, 2016