



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 14, 2017

Genevieve Faherty
Regulatory Affairs Director
Citrefine International, Ltd.
85 ROCK PLACE, PO Box 56
WEST TOPSHAM, VT 05086

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 – Changing name from “Citrepel” to “Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent” and remove the Alternate Brand Name “Citrapel”
Product Name: Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent
EPA Registration Number: 84878-2
Application Date: August 29, 2017
OPP Decision Number: 532690

Dear Genevieve:

The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The labeling submitted with this application has been stamped “Notification” and will be placed in our records. The alternate brand name “*Citrapel*” has been removed from the product’s records. Also, the primary brand name of this product has been changed from “*Citrepel*” to “*Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent*” and our records have been updated. You must submit one (1) copy of the final printed labeling with the modifications.

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 the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the 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 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.

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If you have any questions, please contact James Parker of my team by phone at (703) 306-0469 or via email at parker.james@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Andrew C. Bryceland". The signature is fluid and cursive, with the first name being the most prominent.

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

Enclosure

~~CITREPEL~~ MOSI-GUARD™ OIL OF LEMON EUCALYPTUS INSECT REPELLENT MASTER LABEL

MASTER LABEL includes:

- **Sublabel A:** ~~Citrepel~~ Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent labeling for liquid pump spray packaging
- **Sublabel B:** ~~Citrepel~~ Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent 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

NOTIFICATION

84878-2

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

09/14/2017

Sublabel A: Liquid Pump Spray Packaging

~~CITREPEL~~ Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent

~~[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 Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent is designed to repel mosquitoes for up to six hours. This unique formula is guaranteed to repel mosquitoes. You can use Citrepel Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent with confidence knowing that it will not harm your fishing line, camping gear, watch crystals or tackle box. Apply Citrepel Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent and get your adventure started.]~~

You can use ~~Citrepel [insect repellent] Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent~~ with confidence knowing it will not harm your fishing line, camping gear, watch crystals or tackle box. Apply ~~Citrepel Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent~~ and get your adventure started. The active ingredient in ~~Citrepel Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent~~ 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.

Citrepel Insect Repellent; EPA Reg. No. 84878-2

Notification to change product name and remove alternate brand name

MASTER LABEL version (9) dated September 13, 2017

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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~~ Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent

~~[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)

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Made for Citrefine International Ltd
Moorfield Rd, Yeadon
Leeds, England LS19 7BN
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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® Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent**
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]

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