



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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

June 23, 2021

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

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling and Formulation  
Amendment – Addition Two Alternate CSFs #6 and #7 and Related Label Claims to the  
Registration  
Product Name: Mosi-Guard Oil of Lemon Eucalyptus Insect Repellent  
EPA Registration Number: 84878-2  
Application Date: June 19, 2020  
OPP Submission Number: 1053605

Dear Mr. Reynolds:

The amended labeling and Confidential Statements of Formula (CSFs) referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, are 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.

Please note that the record for this product currently contains the following acceptable CSFs:

Basic CSF dated September 17, 2017  
Alternate CSF #1 dated June 21, 2019  
Alternate CSF #2 dated September 17, 2017  
Alternate CSF #3 dated June 21, 2019  
Alternate CSF #4 dated December 6, 2018  
Alternate CSF #5 dated December 6, 2018  
Alternate CSF #6 dated April 21, 2020  
Alternate CSF #7 dated April 21, 2020

Any CSFs other than those listed above are superseded/no longer valid.

Page 2 of 2

EPA Reg. No. 84878-2

OPP Submission No. 1053605

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 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 Gina Burnett via email at [burnett.gina@epa.gov](mailto:burnett.gina@epa.gov).

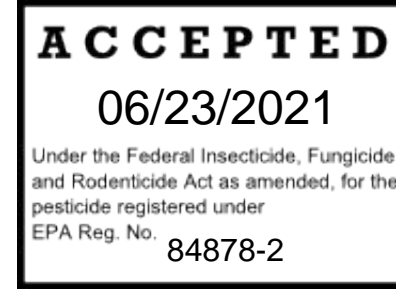
Sincerely,



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

Enclosure

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



## MASTER LABEL includes:

- **Sublabel A:** Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent labeling for liquid pump spray packaging
- **Sublabel B:** Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent labeling for pressurized (bag-on-valve) packaging
- **Optional Label Claims**

EPA Reg. No. 84878-2

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

## Sublabel A: Liquid Pump Spray Packaging

# Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent

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 .....	<u>70.0%</u>
TOTAL .....	100.0%

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

NET X fl oz (XXmL)

[Bracketed Text] = Optional language

### OPTIONAL MARKETING LANGUAGE

[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 and ticks. You can use 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 Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent and get your adventure started.]

You can use 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 Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent and get your adventure started. The active ingredient in 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 moderate eye irritation. Avoid contact with eyes. Harmful if swallowed. 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. 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.

Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent; EPA Reg. No. 84878-2

MASTER LABEL version (12) dated April 30, 2021

Page 2 of 7

## 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

# Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent

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

[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 and ticks. You can use 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 Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent and get your adventure started.]

You can use 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 Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent and get your adventure started. The active ingredient in 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 moderate eye irritation. Avoid contact with eyes. Harmful if swallowed. 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. 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.

Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent; EPA Reg. No. 84878-2

MASTER LABEL version (12) dated April 30, 2021

Page 4 of 7

## PHYSICAL OR CHEMICAL HAZARDS

**FLAMMABLE.** Contents under pressure. Do not use or store near heat or 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: 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. \_\_\_\_\_

---

## 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 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 [for up to (six) (6) hours]
39. [Protect(s)(ion) against] [Repels] (the) mosquitoes that may [transmit][carry] Dengue virus [for up to (six) (6) hours]
40. [Protect(s)(ion) against] [Repels] (the) mosquitoes that may [transmit] [carry] Chikungunya virus [for up to (six) (6) hours]
41. Provides 4 hours of [complete] protection against deer ticks [which may transmit Lyme disease]
42. Repels [lone star ticks] [and] [brown dog ticks] [for more than 8 hours]
43. Provides protection from mosquitoes and ticks [which may transmit Lyme disease]
44. Repels Ticks [which may [transmit] [carry] [spread] Lyme disease, Rocky Mountain Spotted Fever, Tick paralysis, Encephalitis, Ehrlichiosis, Powassan Virus]
45. Repels mosquitoes and ticks [from treated skin and clothing]
46. Effective protection from mosquitoes and ticks
47. Keeps ticks away
48. Lemon eucalyptus [scented] protection from mosquitoes and ticks
49. [Plant-based] [Botanical] protection from [ticks] [and] [mosquitoes]



50. [Great] protection for the entire family against ticks and mosquitoes while camping, hiking and enjoying other outdoor activities
51. Tick protection
52. [Protect[s]] [Defend] [Shield] your family from tick[s] [bites]
53. Repels deer ticks which may carry Lyme Disease
54. Long lasting tick protection
55. Long lasting protection from ticks
56. Effective, dependable tick protection
57. Proven protection from ticks/mosquitoes
58. Also repels ticks
59. Provides protection from Mosquitoes and Ticks (including Ticks that cause Lyme Disease)
60. Defends your [whole] family against tick bites
61. Keeps ticks away from you and your family
62. Repels [mosquitoes and ticks] [ticks] [so you can] [to help you] enjoy life outdoors.
63. [Powerful] [Extreme] [Instant] [Complete] [mosquito] [tick] [defense] [protection]
64. [Strong] [Maximum] [High quality] [Reliable] [Dependable] [Long lasting] [Effective] protection [from ticks] [against ticks] [from mosquitoes] [against mosquitoes]
65. Family Care Insect Repellent Spray
66. [Provides] Protection for the whole family
67. Suitable for application to all ages
68. Great for the whole family
69. Works great on the whole family
70. [Citriodiol®] [The active ingredient] has a carbon negative footprint [because it is made directly from the oil of Eucalyptus citriodora trees].
71. Eucalyptus citriodora trees [sequester] [absorb] [large amounts of] carbon [from the atmosphere] which [benefits the planet] [and] makes Citriodiol® [the active ingredient] [in this product] carbon negative.
72. We Love, Mosquitoes Hate

73. Mosquitoes hate [Product Name] plant extract repellent as much as chemical repellent. [Product Name] doesn't harm plastics, including cell phone covers and camping gear. It is effective against mosquitoes that may carry Dengue, West Nile, & Zika viruses.
74. *(Note to Reviewer – Fragrance Callouts for formulations containing fragrances):* [Purple Blossom], [Mint Geranium], [Yuzu Tea Tree Fresh]

*Claims specific to Sublabel B:*

75. NEW (valid for 6 months from date of first product shipment with pressurized packaging)
76. Continuous spray
77. No rubbing required
78. Fine mist spray
79. Easy application
80. Easy to apply
81. No mess
82. Convenient, no mess, no rub protection
83. Sprays upside down
84. No pumping required
85. Quick and even coverage
86. Sprays at any angle
87. Easy continuous spray application
88. Contains no ozone depleting [propellants] [chemicals]
89. Sprays more evenly and consistently
90. Spray in any direction at any angle
91. [Simple] [Smooth] [Accurate] [Effortless]