



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 3, 2021

Ms. Genevieve Faherty
Regulatory Affairs Director
Citrefine International Ltd.
Moorefield Rd., Yeadon
Leeds, LS19 7BN
United Kingdom

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 – Adding alternate brand names; marketing claims; removing DEET-related claims
Product Name: Mosi-guard™ Oil of Lemon Eucalyptus Insect Repellent
EPA Registration Number: 84878-2
Application Date: 9/02/2021
OPP Submission Number: 1074774
OPP Case Number: 00320469

Dear Ms. Faherty:

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.

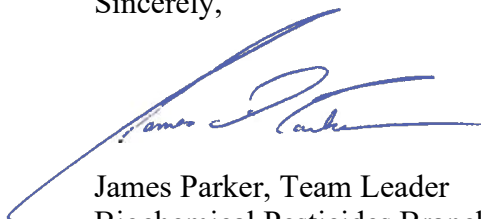
The labeling submitted with this application has been stamped “Notification” and will be placed in our records. The alternate brand names: Slay Mosquito Repellent; and Natrapel Lemon Eucalyptus have been added to the product’s records. You must submit one (1) copy of the final printed labeling with the 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 Nina Naimy via email at naimy.nina@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "James Parker", with a long, sweeping underline that extends to the left.

James Parker, 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

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:

11/03/2021

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 Names: Coleman™ botanicals insect repellent; **Slay mosquito repellent**; **Natrapel Lemon Eucalyptus**

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.

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] [mosquitoes and ticks], 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 Names: Coleman™ botanicals insect repellent; **Slay mosquito repellent; Natrapel Lemon Eucalyptus**

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 (13) dated September 2, 2021

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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] [mosquitoes and ticks], 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
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(website)

EPA Reg. No. 84878-2
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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 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]

75. Repels ticks for up to [4] [four] hours

Claims specific to Sublabel B:

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