



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

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

May 31, 2019

Mark Sloneker, CEO  
Entomol Products, LLC  
40 GOLD STREET  
SAN FRANCISCO, CA 94133

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – Correct the Entomol address, adding a Limitation of Warranty and Liability statement, amending the Directions for Use, and adding marketing claims.  
Product Name: Entomol 7% Liquid  
EPA Registration Number: 91889-1  
Application Dates: 10/11/2018 and 5/29/2019  
OPP Decision Numbers: 545068 and 551389

Dear Mr. Sloneker:

In an application dated October 11, 2018 (OPP Decision No. 545068), you notified the U.S. Environmental Protection Agency (EPA) that your correcting the Entomol address, adding a Limitation of Warranty and Liability statement, amending the Directions for Use, and adding marketing claims. Subsequently, the EPA determined the action requested does not fall under the scope of Pesticide Registration Notice 98-10 and therefore converted the notification to a non-PRIA amendment (OPP Decision No. 551389).

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 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 Menyon Adams by phone at (703) 347-8496 or via email at [adams.menyon@epa.gov](mailto:adams.menyon@epa.gov).

Sincerely,



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

Enclosure

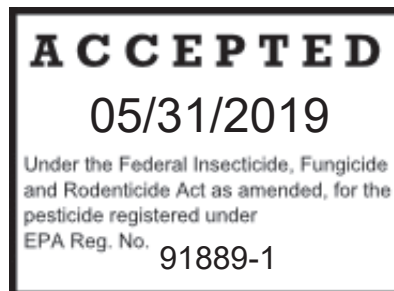
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EPA Reg. No. 91889-1  
Amendment 5/29/2019

**Refined Oil of *Nepeta cataria* (Entomol 7% Liquid)**

(Insect Repellent)(Liquid)  
(Repels Mosquitoes and Black Flies)  
(Insect Repellent Pump-Spray)

{Alternate Brand Names:} **Entomol 4**  
**Entomol Essential Oil Insect Repellent 4**



**ACTIVE INGREDIENT:**

Refined Oil of *Nepeta cataria*..... 7.0%

**OTHER INGREDIENTS:** ..... 93.0%

**(TOTAL: 100.0%)**

{Note to reviewer-Total: 100.0% optional placement on market label due to package size constraint}

**KEEP OUT OF REACH OF CHILDREN**  
**WARNING**

See (Inside) (Back) (or) (Side) (Label Panel(s)) (Product Leaflet) for Additional Precautionary Statements

<b>FIRST AID</b>	
If in eyes:	<ul style="list-style-type: none"><li>• Hold eyes 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.</li><li>• Call a poison control center or doctor for further treatment advice.</li></ul>
If swallowed:	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by a poison control center or doctor.</li><li>• Do not give anything to an unconscious person.</li></ul>
<b>HOTLINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information on this pesticide product (including health concerns, medical emergencies, or pesticide incidents), call the poison control center at 1-800-222-1222. For non-emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 (NPIC Web site: <a href="http://www.npic.orst.edu">www.npic.orst.edu</a> )	

EPA Reg. No. 91889-1  
EPA Est. No. XXXXX-YY-ZZZ

NET CONTENTS:  
BATCH NO.:

Manufactured By:  
Entomol Products, LLC  
40 Gold Street  
San Francisco, CA 94133

## PRECAUTIONARY STATEMENTS

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS. WARNING.** Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

## PHYSICAL AND CHEMICAL HAZARDS

**FLAMMABLE:** Keep away from Heat and Open Flame.

(Product Information)

(Bugs. Nature gave us the curse. And nature provides the cure. We searched the world over before we discovered an essential oil that acts as an effective, long-lasting insect repellent. It's found in only one plant – catmint – and it's safe for the whole family. We spent years perfecting methods to extract and process the oil, partnering with growers worldwide to produce a sustainable supply.)

(Now there's a better way to fight bugs. We searched the world over before we discovered an essential oil that repels mosquitoes and black flies. It's found in only one plant – commonly known as catmint – and we've partnered with growers worldwide to produce a sustainable supply. Safe for the whole family, Entomol offers proven protection – without any unpleasant odor or residue.)

## DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

**Repellency** – Repels mosquitoes up to 4 hours and black flies for up to 7 hours.

Do not allow children to handle the product or apply it to themselves. If used on the face, spray/dispense on hands first and then apply sparingly and avoid eyes. Do not spray directly onto face.

**Dispense/Spray apply a small amount of liquid directly onto skin.** Spread uniformly to completely cover any exposed skin surface. Use sparingly on face and avoid contact with eyes. Reapply after 4-6 hours (or as needed) When applying to children, dispense into an adult's hand and then spread evenly and completely over the child's exposed skin taking care not to contact the child's fingers and hands.

Do not apply over cuts or damaged skin. After returning indoors, wash treated skin with soap and water or bathe. Also wash treated clothing before wearing it again.

### **STORAGE AND DISPOSAL**

Do not contaminate water, food or feed by storage or disposal. Store away from children.

#### **Pesticide Disposal and Container Handling:**

**Nonrefillable container. Do not reuse or refill this container.**

**If empty:** Place in trash or offer for recycling, if available.

**If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

### **(LIMITATION OF WARRANTY AND LIABILITY)**

**(NOTICE:** Read this Limitation of Warranty and Liability Before Buying or Using This Product. Entomol Products, LLC will not be responsible for losses or damages resulting from the use of this product in any manner not specifically directed by Entomol Products, LLC.

User assumes all risks associated with such non-directed use. If the Terms Are Not Acceptable, Return the Product at Once, Unopened, and the Purchase Price Will Be Refunded.

It is impossible to eliminate all risks associated with the use of this product. Such risks arise from weather conditions, presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of Entomol Products, LLC. These risks can cause: ineffectiveness of the product. **WHEN YOU BUY OR USE THIS PRODUCT, YOU AGREE TO ACCEPT THESE RISKS.**

Entomol Products, LLC warrants that this product conforms to the chemical description on the label thereof and is reasonably fit for the purpose stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions.)

**(NOTICE:** To the extent consistent with applicable law, Entomol Products, LLC makes no other express or implied warranty of fitness or of merchantability or any other express or implied warranty. To the extent consistent with applicable law, in no event shall Entomol Products, LLC or seller be liable for any incidental, consequential or special damages resulting from the use or handling of this product. Buyer's or user's bargained-for expectation is insect repelling. To the extent consistent with applicable law, the exclusive remedy of the user or buyer and the exclusive liability of Entomol Products, LLC or seller, for any and all claims, losses, injuries or damages (including claims based on breach of warranty or contract, negligence, tort or strict liability), whether from failure to perform or injury to other, and resulting from the use or handling of this product, shall be the return of the purchase price of the product, or at the election of Entomol Products, LLC or seller, the replacement of the product.

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To the extent consistent with applicable law that allows such requirement, Entomol Products, LLC or its Ag Retailer must have prompt notice of any claim so that an immediate inspection of buyer's or user's can be made. Buyer and all users shall promptly notify Entomol Products, LLC or its Ag Retailer of any claims, whether based on contract, negligence, strict liability, other tort or otherwise, or be barred from any remedy. This Limitation of Warranty and Liability may not be amended by any oral or written agreement.)

{NOTE TO REVIEWER: All claims in this section are optional}

- Mosquito repellent
- Black fly repellent
- Repels mosquitoes
- Repels black flies
- Effective protection from mosquitoes and blackflies
- Effectively repels mosquitoes and blackflies
- (Effective) protection (from a range of mosquitoes and black flies)
- Repels mosquitoes that may carry (West Nile Virus) (and) (Eastern Equine Encephalitis)
- Works great on black flies
- Protection (from bites) from blackflies (for the whole family).
- Protection for people on the go
- Protection that fits your lifestyle
- Protects from mosquitoes for up to four hours (and) black flies for up to 7 hours
- Apply every 4-6 hours (or as needed)
- Repels mosquitoes for up to four hours and black flies (for up to 7 hours)
- (Smart) Outdoor protection (from annoying (mosquitoes) (for up to four hours) (and) (black flies) (for up to 7 hours)
- Repels flies (too!)
- Keeps mosquitoes and black flies off (your family)
- Protection that fits your (active) lifestyle
- Protect(s) your family at dusk and dawn
- An effective insect repellent
- Protection during outdoor activities
- (Sport) (Active) (Outdoor) formula
- Outdoor mosquito and black fly protection for play and on the go
- For yard work and camping
- Protects during work, play or recreation
- Contains (a) plant-based repellent
- Plant based repellent repels (mosquitoes) for (up to four hours) (and) (black flies) for (up to 7 hours)
- Contains plant extracts
- Contains the insect repellent found in (catmint) (catnip) (oil)
- (Plant based) (insect repellent without tradeoffs)
- Always carry (product name)
- For playing and relaxing outdoors
- Not oily, greasy or sticky

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- No added fragrance
- Contains no dyes (or added fragrances)
- No chemical odor
- No synthetic odor
- No unpleasant odor
- Leaves pleasant feeling on skin
- Won't stain
- (Readily) (Easily) washed off
- Won't harm plastics
- Specially formulated to (feel) (and) (smell) better on your skin
- (light) (gentle) (clean) (mild) (smooth) (non-greasy) (pleasant) (feels great) (comfortable) formula
- No residue on skin
- (It's) Pleasant smelling
- Feel's comfortable to touch
- DEET free
- Non-DEET
- Non-synthetic
- Readily washed off
- New!
- Repels (mosquitoes) (and) (black flies)
- Repels mosquitoes that may carry (West Nile) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis (for up to 4 hours)
- Provides protection from mosquitoes
- Up to 4 hour mosquito repellent; up to 7 hour black fly repellent
- Up to 4 hour mosquito protection; up to 7 hour black fly protection
- Up to 4 hours of protection from mosquitoes. Also (protects against) (works on) (repels) (black flies) (for up to 7 hours)
- Protects for up to 4 hours against (mosquitoes) (and) for up to 7 hours against (black flies)
- (Protects against) (Fights off) (Repels) (Works on) (mosquitoes) (and) (blackflies)
- Protects against mosquitoes (and) (black flies)
- Long-lasting protection against (mosquitoes) (and) (black flies)
- Effective protection from mosquitoes
- Effective protection from black flies
- Stay protected for up to 4 hours (from) (mosquitoes) (and) for up to 7 hours from (black flies)
- Stay protected for up to 4 hours from mosquitoes that may carry (West Nile Virus) (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) encephalitis
- Proven protection from mosquitoes
- Mosquito protection (for up to 4 hours)
- Biting (mosquito)(and)(black fly) protection that you can feel confident will last up to 4 hours
- Repels mosquitoes (for up to 4 hours)
- Repels black flies (for up to (7) hours)
- Easy to (Use) (Apply)
- For (hiking) (fishing) (hunting) (camping) (backpacking)



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- Relax and enjoy the (outdoors)(,) (the great outdoors)(,) (backyard)(,) (outside)(,) (park)(,) (woods/forest) with (up to 4 hours of) protection against (mosquitoes) (and) (up to 7 hours of protection from ) (blackflies)
- Portable repellent protection
- Comfortable feel with no chemical (odor)(smell)
- Comfortable feel with pleasant smell
- Long-lasting
- Contains Refined Oil of *Nepeta cataria*
- Essential oil based repellent, not a synthetic chemical.
- Plant based essential oil insect repellent.
- Essential oil insect repellent with up to 4 hours of effective protection [against] [mosquitoes] [and] (up to 7 hours against) [black flies]
- Insect repellent with up to 4 hours of effective protection (against mosquitoes) (and) (up to 7 hours against) (black flies)
- An essential oil repellent that protects against mosquitoes that may carry West Nile Virus.
- Repels mosquitoes that may carry West Nile Virus and Encephalitis.
- Effective mosquito repellent
- Repels mosquitoes for up to 4 hours, which may carry West Nile Virus and Encephalitis.
- Plant based, essential oil that repels mosquitoes for up to 4 hours
- A plant based insect repellent with up to 4 hours of effective protection
- Good for people
- Protects people
- Produced from a renewable resource
- Entomol HCO Inside
- Entomol HCO on guard
- Infused with Entomol HCO
- Powered by Entomol HCO
- The secret ingredient is Entomol HCO
- The secret is Entomol HCO
- Potent Entomol HCO inside
- Unique formula Entomol HCO
- Fortified with Entomol HCO
- Proven efficacy of Entomol HCO unique formula
- Trusted Entomol HCO
- Essence of catmint
- Entomol 7% HCO formulation
- Insect repellent\*
- \*Up to 4 hours mosquitoes (mosquito icon) {depiction of icon use below}
- \*Up to 7 hours black flies (black fly icon) {depection of icon use below}



- An Essential Oil
- Made from Essential Oil
- Proven effective repellent



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- Effective, dependable protection
- Complete protection from mosquitoes and black flies
- A new approach to fighting mosquitoes and black flies
- An effective, dependable way to battle mosquitoes and black flies
- Easy to apply
- Pleasant odor
- Safe for all ages
- Naturally occurring defense; plant-based active ingredient
- Safe alternative
- Non-toxic
- Sustainably produced
- Defense against mosquitoes and black flies
- Stain-free
- Extracted from plant(s)
- The only catmint essential oil product with high efficacy against biting black flies and mosquitoes
- Effective against bloodfeeding mosquitoes and biting black flies
- Rigorous quality control from field to bottle
- Entomol is the only source for HCO, the active ingredient in our products
- Exclusively Entomol
- Only Entomol produces HCO, the active ingredient in our products
- HCO is patented by DuPont
- Entomol is the exclusive licensor and distributor of HCO worldwide
- Entomol, the only source for HCO, the active ingredient in our products
- Our product is grown (starts) in the field, not created in a chemical production facility
- Why Entomol HCO is different from other repellents
- A product made from essential oil that is safe and effective protection
- We start with a seed, a plant, and it's oil to give you a safe and effective repellent for the whole family.
- An essential oil product that meets the requirements of the EPA
- An essential oil product registered with the EPA
- Registered with the EPA
- The active ingredient in Entomol is derived from the essential oil of the catmint plant.
- Only Entomol derives its essential oil product directly from the catmint plant.
- The active ingredient in Entomol occurs naturally, and is an essential oil harvested from the catmint plant.