



**OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION**

WASHINGTON, D.C. 20460

March 04, 2025

**SENT BY EMAIL**

Andrea Brubaker  
andreabrubaker@comcast.net  
MIMIKAI INC.

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 - Adding graphics and additional optional claims to the label.  
Product Name: Mimikai Lilly Pilly Insect Repellent  
Admin Number: 93616-1  
EPA Receipt Date: 11/25/2024  
Action Case Number: 00638895

Dear Andrea Brubaker:

The U.S. Environmental Protection Agency is in receipt of your application for notification under Pesticide Registration Notice 98-10 for the above referenced product. The EPA 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.

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 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 statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

If you have questions, please contact Sydnie Vergara via email at [vergara.sydnie@epa.gov](mailto:vergara.sydnie@epa.gov).

Sincerely,

James Parker, Team Leader  
BPB, BPPD  
Office of Pesticide Programs

NOTIFICATION

93616-1

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:

03/04/2025

Mimikai™ Lilly Pilly Repellent Reference Label

2/20/2025

EPA Reg. No. 93616-1

Alternate names: Lilly Pilly, Lilly Pilly Repellent, Mimikai Repellent, Mimikai Insect Repellent; Mimikai Mosquito Repellent; Mimikai Tick Repellent

**MASTER LABEL includes:**

**Sublabel A:** Mimikai™ Lilly Pilly Insect Repellent labeling for liquid pump spray packaging

**Sublabel B:** Mimikai™ Lilly Pilly Insect Repellent labeling for pressurized (bag-on-valve) packaging

**Optional Label Claims**

[Bracketed Text] = Optional language

{Braced Text} = Administrative, will not be on labels

Mimikai, Inc.

P.O. Box 1046, Warrenton, VA 20186

**{Sublabel A: Liquid Pump Spray Packaging}****Mimikai™ Lilly Pilly Insect Repellent**

KEEP OUT OF REACH OF CHILDREN

[See directions for use on the side of container[s].]

**Active Ingredients:**

Oil of Lemon Eucalyptus\* (CAS No. 1245629-80-4) ..... 11.00%

2-Undecanone\*\* (CAS No. 112-12-9) ..... 7.75%

**Other Ingredients** ..... 81.25%**Total** ..... 100.00%\*Approx. 65% *p*-menthane-3,8-diol

U.S. Pat. No. 11,627,739

NET X fl oz (XXmL)

EPA Reg. No. 93616-1

EPA Est. No. [as indicated on container]

READ ENTIRE LABEL BEFORE EACH USE

**First Aid**

Call a poison control center or doctor [or healthcare professional] for treatment advice. Have the product container or label with you when calling a poison control center (1-800-222-1222) or doctor [or healthcare professional] or going for treatment.

**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] [mosquitos] [and] [ticks], apply to all areas of 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.

Do not apply over cuts, wounds, irritated or sunburned skin.

**STORAGE AND DISPOSAL:**

Store the product in a cool, dry place, out of reach of children. If empty: nonrefillable container. Place in rubbish or please recycle. Call your local solid waste agency [or 1-800-CLEANUP] for disposal instructions. Never place unused product down any indoor or outdoor drain.

[Distributed by:]

MIMIKAI INC.

P.O. Box 1046 Warrenton, VA 20188

Support@mimikai.com

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**{Sublabel B: Pressurized (bag-on-valve) Packaging}****Mimikai™ Lilly Pilly Insect Repellent**

KEEP OUT OF REACH OF CHILDREN

[See directions for use on the side **back** of the container[s].]**Active Ingredients:**

Oil of Lemon Eucalyptus\* (CAS No. 1245629-80-4)..... 11.00%

2-Undecanone\*\* (CAS No. 112-12-9)..... 7.75%

**Other Ingredients** ..... 81.25%**Total** ..... 100.00%\*Approx. 65% *p*-menthane-3,8-diol\*\*U.S. Pat. **No. 11,627,739**

NET X fl oz (XXmL)

EPA Reg. No. 93616-1

EPA Est. No.[as indicated on container]

READ ENTIRE LABEL BEFORE EACH USE

**First Aid**

Call a poison control center or doctor [or healthcare professional] for treatment advice. Have the product container or label with you when calling a poison control center (1-800-222-1222) or doctor [or healthcare professional] or going for treatment.

**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] [mosquitos] [and] [ticks], apply to all areas of 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.

Do not apply over cuts, wounds, irritated or sunburned skin.

**STORAGE AND DISPOSAL:**

Store the product in a cool, dry place, out of reach of children. If empty: nonrefillable container. Place in rubbish or please recycle. Call your local solid waste agency [or 1800 CLEANUP] for disposal instructions. Never place unused product down any indoor or outdoor drain.

[Distributed by:]

MIMIKAI INC.

**P.O. Box 1046 Warrenton, VA 20188**[Support@mimikai.com](mailto:Support@mimikai.com)

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**{Mimikai Lilly Pilly Repellent Optional Marketing Claims}**

[Bracketed Text] =Optional language

{Braced Text} = Administrative, will not be on labels

**{General}**

[Mimikai™ believes in nature's genius and a way that lets us live in harmony, even with the bugs that bug us. Mimikai™ has created products that are effective and beautifully balanced.]  
[Mimikai's patented technology is a university collaboration, backed by science.]

**{Fragrance}**

[Mild] Scented Body Mist

A scent you will love

Clean fragrance

Clean scent

Fragrance made with essential oils

Fragranced with essential oils: [Frankincense]

No synthetic fragrance

Smells great

Synthetic Fragrance Free

**{Duration/ Repels}**

[4] [Four] hours proven protection [against ticks]

[8] [Eight] hours proven protection against mosquitoes

[Also] Repels [annoying] mosquitoes

[Also] Repels [annoying] ticks

[Gives] protection for the entire family against ticks and mosquitoes while camping, hiking, and enjoying other outdoor activities

[Instant] [Complete] [mosquito] [tick] [defense] [protection]

[Protect(s)(ion) against] [Repels] (the) mosquitoes that may carry

[West Nile Virus] [Malaria] [St. Louis Encephalitis] [for up to (eight) (8) hours]

[Protect(s)(ion) against] [Repels] [deer] [the] ticks that may[transmit] [carry] [Lyme Disease] [Rocky Mountain Spotted Fever] [Tick Paralysis] [Encephalitis] [Ehrlichiosis] [Powassan Virus] [for up to (four) (4) hours]

[Protect[s]] [Defend] [Shield] your family from mosquito[s] [bites]

[Protect[s]] [Defend] [Shield] your family from tick[s] [bites]

[Provides] Protection for the whole family

[Strong] [Maximum] [High quality] [Reliable] [Dependable] [Long lasting] [Effective] protection [from ticks] [against ticks] [from mosquitoes] [against mosquitoes]

Defends your [whole] family against mosquito bites

Defends your [whole] family against tick bites

Delivers up to [4] [four] hours of repellency of ticks

Delivers up to [8] [eight] hours of repellency of mosquitoes

Effective, dependable mosquito protection

Effective, dependable mosquito repellency for up to eight hours

Effective, dependable tick protection

Effective, dependable tick repellency for up to four hours

Family Care Insect Repellent Spray

Keeps mosquitos away from you and your family

Keeps ticks away from you and your family

Long lasting mosquito protection

Long lasting protection from mosquito

Long lasting protection from ticks  
Long lasting tick protection  
Mosquito protection

Mosquitoes hate [Mimikai™] plant extract repellent.

Proven protection from ticks/mosquitoes

Provides protection from mosquitoes and ticks

Provides protection from Mosquitoes and Ticks [including mosquitos that cause West Nile Virus, and ticks that cause Lyme disease, Rocky Mountain Spotted Fever, Tick paralysis, Encephalitis, Ehrlichiosis, Powassan Virus]

Repel don't kill

Repels [lone star ticks] [deer ticks] [and] [brown dog ticks] [for more than 4 hours]

Repels [mosquitoes and ticks] [ticks] [mosquito] [so you can] [to help you] enjoy life outdoors.

Repels mosquitoes and ticks [from treated skin and clothing]

Repels mosquitoes for up to [8] [eight] hours

Repels mosquitos [including those] [which] [that] may [transmit] [carry] [spread] [West Nile Virus] [Malaria] [and] [St. Louis Encephalitis] [for up to eight hours]

Repels ticks [including those] [which] [that] may [transmit] [carry] [spread] Lyme Disease, Rocky Mountain Spotted Fever, Tick Paralysis, Encephalitis, Ehrlichiosis, Powassan Virus] [for up to four hours]

Repels ticks and mosquitoes [for up to 4 (four) hours] [from treated skin and clothing]

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

Repels up to [4] [four] hours against ticks

Repels up to [8] [eight] hours against mosquitoes

Tick protection

### **{Actives}**

[Contains] (made with) 2-Undecanone

[Contains] (made with) Oil of Lemon Eucalyptus

A plant-based formula.

Active Ingredient 2-Undecanone

Active ingredient derived from [the leaves of] Lemon Eucalyptus tree

Active Ingredient derived from plant extracts

Active Ingredient extract of Lemon Eucalyptus

Contains 2-Undecanone

Contains Lemon Eucalyptus Oil

Contains plant extracts [of Lemon Eucalyptus]

Dual Active Technology

Exclusive Dual Active Technology

Exclusive Mimikai™ Technology

Naturally-based active ingredient.

Plant-based Active Ingredient

Powered by 2-Undecanone

Powered by Citriodiol® OLE Nature's Repellent (logo)

Powered by Mimikai™

Unique plant-based active combination

**{Other}**

[Citriodiol®] [The active ingredient] has a carbon negative footprint [because it is made directly from the oil of Eucalyptus citriodora trees].

[Simple] [Smooth] [Accurate] [Effortless]

180+ Sprays

Based on Biomimicry

Beat the bite

Botanically based active ingredients

Clean

Developed at [NC State] [North Carolina State University] [NCSU], trusted in the field.

Developed in a lab, trusted in the field.

Easy application

Easy to apply

Eucalyptus citriodora trees [sequester] [absorb] [large amounts of] carbon [from the atmosphere] which [benefits the planet] [and] make Citriodiol® [the active ingredient] [in this product] carbon negative.

Goes on easy

Great for [the whole family]

Make peace with mosquitos

Make peace with ticks

Mosquitoes hate [product name] plant extract repellent as much as chemical repellents.

Mosquito Protection 360°

No mess [and] [convenient]

No rubbing required

Non-drying

Non-toxic and not an irritant when used as directed

Not sticky or greasy

Plant Derived

Plant-based active ingredient

Powered by Plants

Quick and even coverage

Scientifically Proven Effective

Suitable for application to all ages

Technology 5 years in the making

Tick Protection 360°

Unique plant-based active ingredient

We Love, Mosquitoes Hate

Won't harm your gear

Works well on the whole family

Adults and Kids

All Ages

[Proven] Tick Protection

[Proven] Mosquito Protection

Tick Repellent

Mosquito Repellent

**{Claims specific to Sublabel B:}**

BOV Aerosol technology [no propellants]  
Contains no [propellants] [propellant chemicals]  
Continuous spray.  
Easy continuous spray application  
Fine mist spray

No pumping required.  
Not an Aerosol  
Propelled with air not chemicals  
Spray in any direction at any angle  
Sprays at any angle  
Sprays more evenly and consistently  
Sprays upside down

**Graphics and/or Symbols** {colors or images of mosquito and tick graphics may be updated.  
Airplane represents that the container is TSA approved size for carry on}







