



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

January 26, 2026

Maryanne Kellogg
Regulatory Consultant
Synovate Chemical Inc.
c/o Pyxis Regulatory Consulting Inc.
535 Dock St, Ste 211
Tacoma, WA 98402

Subject: Label Amendment - Registration Review Mitigation for d-Allethrin
Product Name: Synovate Mosquito Repellent
EPA Registration Number: 101128-2
Case Number: 673905
Application Date: October 10, 2025

Dear Maryanne Kellogg:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the d-Allethrin Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

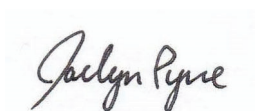
Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide, Fungicide, and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements 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 Agency 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.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. You must

submit one copy of the final printed labeling before you release the 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 12 months from the date of this letter. After 12 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.

If you have any questions about this letter, please contact Carolyn Smith by phone at (202) 566-2273, or via email at smith.carolyn@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Jaclyn Pyne". The signature is written in a cursive, flowing style.

Jaclyn Pyne, Team Leader
Risk Management and Implementation Branch 3
Pesticide Re-Evaluation Division
Office of Pesticide Programs

ENCLOSURE: Stamped label

[Note to reviewer: [Text] in brackets denotes optional text].
[Note to reviewer: {Text} in braces denotes where in the final label text will appear].

Synovate Mosquito Repellent

[Alternate Brand Names: Synovate Mosquito Repellent Device; Synovate Mosquito Repellent Mat]



{Appropriate marketing verbiage from "Optional Marketing Statements" section may be added to the front panel}

Active Ingredient:

d-cis/trans allethrin 21.97%

Other Ingredients 78.03%

Total..... 100.00%

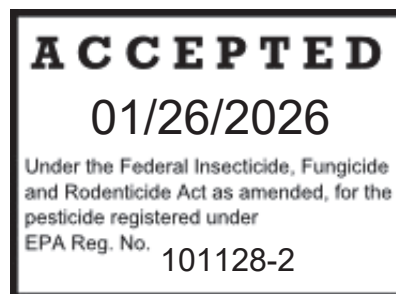
Keep Out of Reach of Children

CAUTION

[See] [inside] [label] [booklet] [for] [additional] [Precautionary Statements][.] [and] [Directions for Use] [including] [Storage and Disposal] [instructions][.]¹

[This package] Contains
Synovate Mosquito Repellent Device

Synovate Mosquito Repellent Mat
Net Weight: 0.046 oz [1.3 g]



EPA Reg. No. 101128-xx EPA Est. No.

Lot Number: _____

Synovate Chemical Inc.
2789 Jackson Avenue
Tracy, CA 95377
925-249-9988

¹ {NOTE TO REVIEWER: The Synovate Mosquito Repellent Device uses an insert. All outer boxes carry all Precautionary Statements, First Aid and Disposal. Inserts also carry all Precautionary Statements, First Aid and Disposal along with the Front Panel and Directions For Use.}

PRECAUTIONARY STATEMENTS
Hazards to Humans & Domestic Animals

CAUTION: Only for use as an insect repellent. Do not use indoors, in tents or any enclosed area. Harmful if inhaled. Avoid breathing vapors.

First Aid

If Inhaled:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.• Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact Infotrac at 1-535-5053 or www.infotrac.net for emergency medical treatment information.	

Environmental Hazards

This product is toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when cleaning equipment or disposing of equipment washwater or rinsate. Drift may be hazardous to aquatic organisms in water adjacent to treated areas.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.
[See insert inside box for usage directions.]

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store unused mats in original box in a cool, dry place inaccessible to children and pets. Store device in original box in a cool, dry place away from sources of heat. **Pesticide Disposal and Container Handling:** Non-refillable container; do not refill or reuse this container. **For used mats:** Do not reuse empty packaging. Place in trash or offer for recycling if available. **For unused mats:** Call your local solid waste agency for disposal instructions. Never place unused mats down any indoor or outdoor drain. **For unwanted device:** Place in trash or offer for recycling if available. Synovate Chemical Inc. products contain recyclable materials and should not be put into the municipal waste stream. Contact your local municipality for recycling directions.

LIMITED WARRANTY

Synovate Chemical Inc. warrants only that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the label, under average use conditions, when used strictly in accordance with the label and subject to the Risks of Using This product as described above. To the extent consistent with applicable law AND AS SET FORTH ABOVE, SYNOVATE CHEMICAL INC. MAKES NO OTHER WARRANTIES, EITHER EXPRESSED OR IMPLIED. No agent or representative of Synovate Chemical Inc. or Seller is authorized to make or create any other express or implied warranty.

LIMITATION OF LIABILITY

To the fullest extent allowed by law, Synovate Chemical Inc., or Seller is not liable for any incidental, consequential, indirect or special damages resulting from the use or handling of this product. The limitation includes, but is not limited to, loss of yield on all or any portion of the treated acreage, increased care, treatment or other expenses required to take the crop to harvest, increased finance charges or altered finance ratings, emotional or mental distress and/or exemplary damages. TO THE FULLEST EXTENT ALLOWED BY LAW, THE EXCLUSIVE REMEDY OF THE BUYER, AND THE EXCLUSIVE MAXIMUM LIABILITY OF SYNOVATE CHEMICAL INC. OR SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT SHALL BE THE RETURN OF THE PURCHASE PRICE OF THIS PRODUCT OR, AT THE ELECTION OF SYNOVATE CHEMICAL INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

PROMPT NOTICE OF CLAIM

To the extent consistent with applicable law allowing such requirements Synovate Chemical Inc. must be provided notice as soon as Buyer has reason to believe it may have a claim, but in no event later than twenty-one days from the date of application, whichever is later, so that an immediate inspection of the affected property and growing crops can be made.

To the extent consistent with applicable law if Buyer does not notify Synovate Chemical Inc. of any claims in such period, it shall be barred from obtaining any remedy.

NO AMENDMENTS

Synovate Chemical Inc. and Seller offer this product, and Buyer accepts it, subject to the foregoing Disclaimer, Risks of Using This product, Limited Warranty and Limitation of Liability, which may not be modified by any oral or written agreement.

{NOTES TO REVIEWER:}

- *{The device specific directions, useful tips, use restrictions and troubleshooting are printed on the insert only. The outer box and separate insert both will carry, "DIRECTIONS FOR USE - It is a violation of Federal law to use this product in a manner inconsistent with its labeling." all precautionary statements and storage and disposal statements.}*

Use Restrictions:

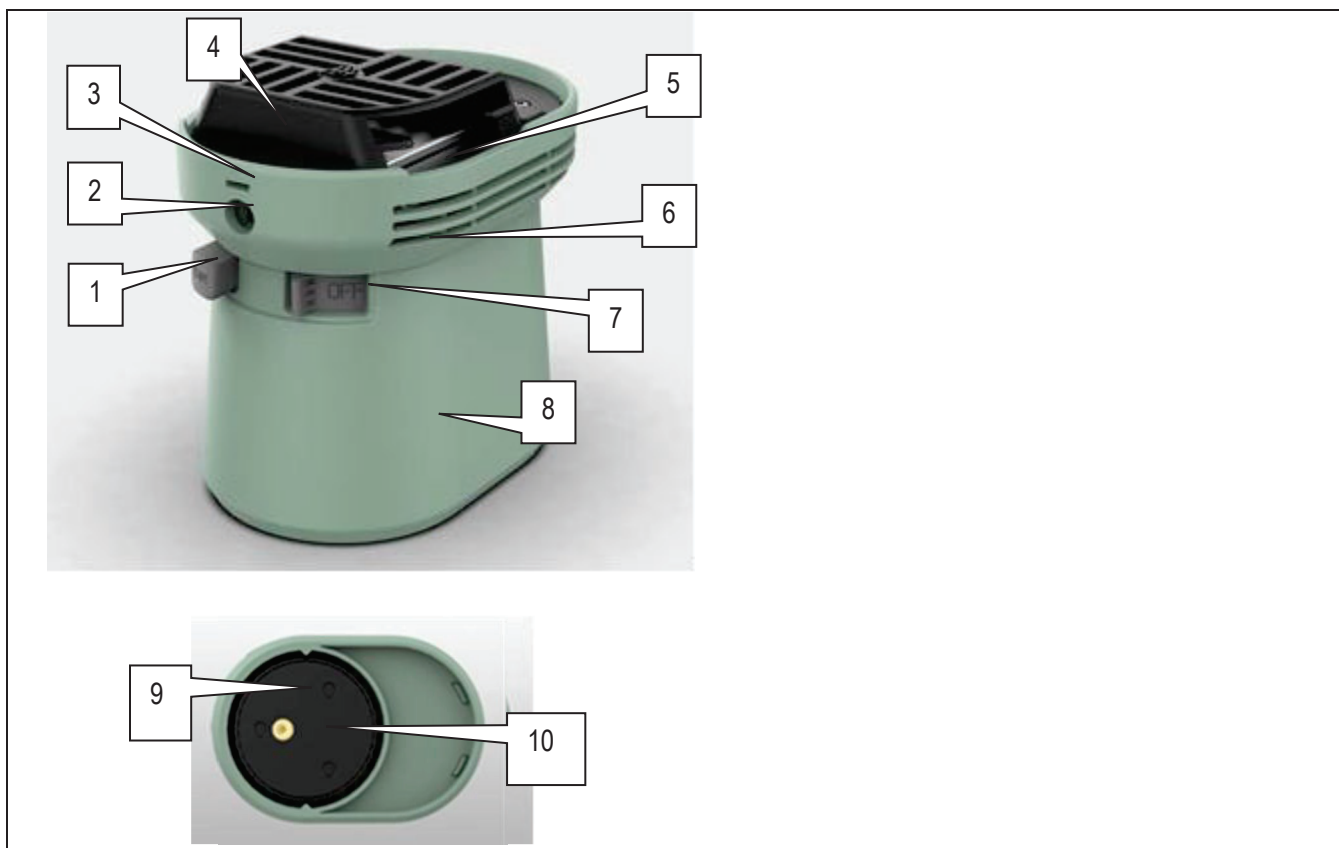
Only for outdoor use as a mosquito repellent. For use outdoors in residential areas: backyards, patios, camping, hiking, or parks. Do not use indoors, in tents, around bodies of water including swimming pools, or in any enclosed area. Cover or remove all exposed food and beverages. Do not leave device unattended. Always operate device on a flat, stable surface with the grill facing upward. Only use Synovate Mosquito Repellent mats in this device. Ensure vents and grill are not covered during use.

In the Box

1. ☒ Synovate Mosquito Repellent Device
2. ☒ Synovate Mosquito Repellent Mat

{Product illustration components}

No.	Name	Note
1	Ignition button	
2	View Window	
3	Hidden button	Use only when replacing the plate
4	Protection Cap	
5	Aluminum plate	
6	Cover	
7	Gas switch	
8	Cover	
9	Gas tank	
10	Inlet sleeve	



Let's get started:

1. Turn the product upside down, fill in gas until the device refuses to take in more gas. Product is compatible with all pressurized, self-sealing, isobutane or butane gas canisters. [Gas sold separately.]



2. Lay the product flat for 5 – 10 seconds and wait for the internal gas to stabilize.



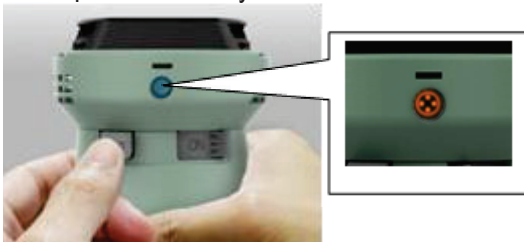
3. Insert the Synovate Mosquito Repellent Mat from the side into the platform.



4. Turn the gas switch to the right to turn on the gas.



5. Press the ignition button, a blue flame can be seen initially, and then it will turn into a red flame. The repellent is ready to use.



6. Turn the gas switch to the left to turn off the gas.



Mat Storage

1. Keep new mats in wrapper until ready to use.

For Best Results:

1. Place in the center of the area you want protected from mosquitoes.
2. Start the device and put in place 15 minutes before using the area.
3. Allow 15 minutes for the full zone to be established.
4. In larger areas, use multiple Synovate Mosquito Repellent Devices spaced 15 feet apart
5. Effectiveness can be impacted by wind [and air movement]. Place upwind on a windy day.
6. Do not expose open Synovate Mosquito Repellent Mat or Device to rain.

Maintenance [storage] [and] [Care]

1. Condensation can build up on and around the grill over time. Clean with a damp cloth if needed. Do not use chemicals or abrasives.
2. Dispose of partially used mats prior to storing for extended periods of time. [See Storage and Disposal Instructions]

Troubleshooting

1. Wind and other conditions may cause the flame to go out. Restart the device if flame is not visible through the view window.
 2. [Altitude above 7,000 ft may prevent device from functioning properly]
 3. If the device won't [turn on][light] or stay [on][lit]:
 - a. Confirm that the device has fuel.
 - b. [Repeat start instructions]
- If you are still bothered by mosquitoes [after 15 minutes], [check that]:
4. [Check that] the device is lit by looking for a small red glow inside the view window.
 5. [Check that] fuel remains in the device.
 6. [Ensure that you are using a fresh mat][Replace used mosquito repellent mat with a new mat.]
 7. Call or email customer service if you are still experiencing issues.

{Synovate Mosquito Repellent device – for reference only }



{Labeling – mat}

Synovate Mosquito Repellent Mat	
Active Ingredient:	
d-cis/trans allethrin	21.97%
Other Ingredients	<u>78.03%</u>
Total	100.00%

Keep Out of Reach of Children

CAUTION

See outer carton for additional First Aid, precautionary statements and Directions for Use.

Net Weight [Wt.]: 0.046 oz [1.3 g]

EPA Reg. No. 101128-xx EPA Est. No.

Manufactured for:

Synovate Chemical Inc.

2789 Jackson Ave.,
Tracy, CA 95377

{Labeling – device}

Synovate Mosquito Repellent Device	
<i>{Labeling for device top}</i>	ATTENTION - HOT SURFACE [Insert mat under grill]
<i>{Labeling for device base}</i>	

Keep Out of Reach of Children

CAUTION

Read ***Directions for Use, First Aid and Precautionary Statements*** on all packaging prior to use.

Only for outdoor use as a mosquito repellent. Do not use indoors, in a tent or any enclosed area. Do not touch the [white] grill while the device is in use. Do not cover while in use. Place on a flat, stable surface. Do not cover repeller during use. Do not expose device to rain.

Use only Synovate Mosquito Repellent Mats

EPA Reg. No. 101128-xx EPA Est. No.

Synovate Chemical Inc.

2789 Jackson Ave.,
Tracy, CA 95377

{Labeling – Shipping Cases }

{Product SKU}-{#}{Case Quantity}

{Product Description}{[Product imagery]}

{Marketing Statements}

Synovate Mosquito Repellent [Device]

Active Ingredient:

d-cis/trans allethrin21.97%

Other Ingredients78.03%

Total100.00%

EPA Reg. No. 101128-xx EPA Est. No.

Synovate Chemical Inc.

2789 Jackson Ave.,

Tracy, CA 95377

{Front Panel AND Insert when applicable}

Synovate Mosquito Repellent Mat

REFILLS

{Appropriate marketing verbiage, and additional graphics and/or symbols from “Optional Marketing Statements” section may be added to the front panel.}

Active Ingredient:

d-cis/trans allethrin.....21.97%

Other Ingredients.....78.03%

Total 100.00%

Keep Out of Reach of Children

CAUTION

See [back] [side] [bottom] [panel] [and insert] for additional First Aid and Precautions⁷

Contains

Five [5] Synovate Mosquito Repellent

Mats

Net Weight: 0.046 oz [1.3 g] each

Total Net Wt: 0.23oz [6.5g]

EPA Reg. No. 101128-xx

EPA Est. No.

Lot Number: _____

[Manufactured for:]

Synovate Chemical Inc.

2789 Jackson Ave.,

Tracy, CA 95377

⁷ {NOTE TO REVIEWER: All outer boxes carry all Precautionary Statements, First Aid and Disposal. When used, inserts also carry all Precautionary Statements, First Aid and Disposal along with the Front Panel and Directions For Use.}

{Side / Bottom Panel AND Insert when applicable}

PRECAUTIONARY STATEMENTS
Hazards to Humans & Domestic Animals

CAUTION: Only for use as an insect repellent. Do not use indoors, in tents or any enclosed area. Harmful if inhaled. Avoid breathing vapors.

First Aid

If Inhaled:	<ul style="list-style-type: none">• Move person to fresh air.• If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible.• Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact Infotrac at 1-800-535-5053 or www.infotrac.net for emergency medical treatment information.	

{Note: The first aid statements' grid format will be used if market label space permits;
otherwise a paragraph format will be used.}

Environmental Hazards

This product is toxic to fish and aquatic invertebrates. Do not apply directly to water. Do not contaminate water when cleaning equipment or disposing of equipment washwater or rinsate. Drift may be hazardous to aquatic organisms in water adjacent to treated areas.

{Side / Bottom Panel AND Insert when applicable}

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. See insert inside box for usage directions.

Use Restrictions:

Only for outdoor use as a mosquito repellent. For use outdoors in residential areas: backyards, patios, camping, hiking, or parks. Do not use indoors, in tents, around bodies of water including swimming pools, or in any enclosed area. Cover or remove all exposed food and beverages. Do not leave device unattended. Always operate device on a flat, stable surface with the grill facing upward. Only use Synovate Mosquito Repellent Mats in Synovate Mosquito Repellent Devices. Ensure vents and grill are not covered during use.

1. Turn the product upside down, fill in gas until the device refuses to take in more gas. Product is compatible with all pressurized, self-sealing, isobutane or butane gas canisters. [Gas sold separately.]



2. Lay the product flat for 5 – 10 seconds and wait for the internal gas to stabilize.



3. Insert the Synovate Mosquito Repellent mat from the side into the platform.

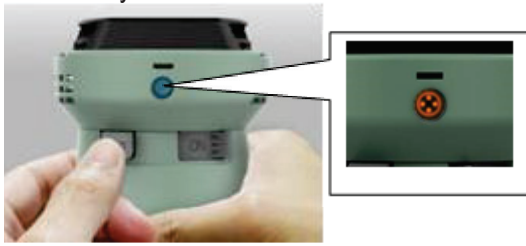


4. Turn the gas switch to the right to turn on the gas.



5. Press the ignition button, a blue flame can be seen initially, and then it will turn into a red flame. The repellent

is ready to use.



6. Turn the gas switch to the left to turn off the gas.



Troubleshooting:

1. If you are still bothered by mosquitoes:
 - a. Change repellent mat. Mats change from blue to white when they need to be replaced.
 - b. Confirm the device is properly running by looking for a small red glow inside the view window.
2. If the Synovate Mosquito Repellent Device won't stay on:
 - a. Confirm that the device has fuel.
 - b. Repeat start instructions.

{Side / Bottom Panel AND Insert when applicable}

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Store unused mats in original box in a cool, dry place inaccessible to children and pets. Store device in original box in a cool, dry place away from sources of heat. **Pesticide Disposal and Container Handling:** Non-refillable container; do not refill or reuse this container. **For used mats:** Do not reuse empty packaging. Place in trash or offer for recycling if available. **For unused mats:** Call your local solid waste agency for disposal instructions. Never place unused mats down any indoor or outdoor drain. **For unwanted device:** Place in trash or offer for recycling if available. Synovate Chemical Inc. products contain recyclable materials and should not be put into the municipal waste stream. Contact your local municipality for recycling directions.

Synovate Chemical Inc. warrants only that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the label, under average use conditions, when used strictly in accordance with the label and subject to the Risks of Using This product as described above. To the extent consistent with applicable law AND AS SET FORTH ABOVE, SYNOVATE CHEMICAL INC. MAKES NO OTHER WARRANTIES, EITHER EXPRESSED OR IMPLIED. No agent or representative of Synovate Chemical Inc. or Seller is authorized to make or create any other express or implied warranty.

LIMITATION OF LIABILITY

To the fullest extent allowed by law, Synovate Chemical Inc., or Seller is not liable for any incidental, consequential, indirect or special damages resulting from the use or handling of this product. The limitation includes, but is not limited to, loss of yield on all or any portion of the treated acreage, increased care, treatment or other expenses required to take the crop to harvest, increased finance charges or altered finance ratings, emotional or mental distress and/or exemplary damages. TO THE FULLEST EXTENT ALLOWED BY LAW, THE EXCLUSIVE REMEDY OF THE BUYER, AND THE EXCLUSIVE MAXIMUM LIABILITY OF SYNOVATE CHEMICAL INC. OR SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT SHALL BE THE RETURN OF THE PURCHASE PRICE OF THIS PRODUCT OR, AT THE ELECTION OF SYNOVATE CHEMICAL INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

PROMPT NOTICE OF CLAIM

To the extent consistent with applicable law allowing such requirements Synovate Chemical Inc. must be provided notice as soon as Buyer has reason to believe it may have a claim, but in no event later than twenty-one days from the date of application, whichever is later, so that an immediate inspection of the affected property and growing crops can be made.

To the extent consistent with applicable law if Buyer does not notify Synovate Chemical Inc. of any claims in such period, it shall be barred from obtaining any remedy.

NO AMENDMENTS

Synovate Chemical Inc. and Seller offer this product, and Buyer accepts it, subject to the foregoing Disclaimer, Risks of Using This product, Limited Warranty and Limitation of Liability, which may not be modified by any oral or written agreement.

{Optional Marketing Statements}

{Repellency Claims}

1. Mosquito repellent
2. An alternate to mosquito spray
3. Provides 15 ft of mosquito protection
4. Synovate Mosquito Repellent provides a 15 ft. zone of mosquito protection
5. Mosquito protection is available on demand
6. No spray needed
7. A mosquito repellent without spray
8. Tough on mosquitoes
9. A different way to fight mosquitoes
10. Provides protection from mosquitoes for four hours.
11. Add [more than one] device[s] to expand the zone of protection
12. System of mosquito protection
13. Provides [Backyard][Porch][Patio] Mosquito Defense

{Education statements}

How it Synovate Mosquito Repellent works:

1. Synovate Mosquito Repellent Mat releases repellent into the air creating a 15 ft zone of mosquito repellent
2. Fuel provides heat which activates the repellent in the blue mat. Once activated, the Synovate Mosquito Repellent Mat forms an invisible repellent against mosquitoes.

{Quick start information}

Quick Start Information:

1. Insert Synovate Mosquito Repellent Mat.
2. Turn the switch to ON.
3. Press the ignition button.
4. The repellent is ready to use when the blue flame turns red.
5. When done using, click the switch to OFF.
6. When the Synovate Mosquito Repellent Mat turns white, it is time to replace it.
7. See product insert provides complete directions for use.
8. See product insert for additional First Aid and Precautions.

{Refill statements*}

1. 5 [Five] Synovate Mosquito Repellent Mats provide 20 hours of mosquito protection.
2. Each Synovate Mosquito Repellent Mat is effective up to 4 hours.
3. Synovate Mosquito Repellent Mat refills are available in packages of five [5] mats.
4. Synovate Mosquito Repellent Mats only.
5. Fuel cartridges are not included.
6. This package includes 5 [five] refill mats {image of refill}.
7. Use only with Synovate Mosquito Repellent Mat.
8. This package contains genuine Synovate Mosquito Repellent Mats.

* All refill statements are calculated as number of mats x 4 hrs = total hours (ex. 5 mats time 4 hrs ea = 20 hrs)

{Non-repellency marketing statements}

1. Does not use candle(s)
2. Device does not have an open flame
3. Lightweight
4. Silent
5. Portable
6. Easy

7. No detectable scent
8. Turn off when not needed
9. Synovate Mosquito Repellent Mat is heat activated
10. Easy to use on patios and backyards.
11. Synovate Mosquito Repellent can be used for outdoor activities including: Camping, Hunting, Basecamp, DIY, Patio, Deck, Parties, Gardening, Outdoor Entertaining, Campsites
12. Enjoy life outside
13. More fun with less mosquitoes
14. Can be used on plastic surfaces
15. Will not damage synthetic materials
16. Can be used around gear and equipment
17. Does not have a citronella smell
18. Does not produce smoke
19. Invisible protection from mosquitos
20. Synovate Mosquito Repellent Mat is heat activated
21. 15' Protection Zone
22. Simple
23. Clean

{Product claims}:

1. Fuel efficient
2. Compatible with all [pressurized] [self-sealing] [isobutane] [butane] [gas] canisters
3. Fuel is sold separately
4. Device is compact
5. Lightweight
6. Portable
7. Weather resistant
8. No Mess
9. See insert for [usage instructions] [troubleshooting].
10. Open for Instructions
11. Provides protection to [Patios], [Outdoor Areas], [Doorways].
12. Place a device every 15' to establish a larger zone of protection;
13. Repels mosquitoes without using a spray
14. Device does not produce smoke
15. Fuel is needed to create heat which activates the Synovate Mosquito Repellent Mat
16. Read this first
17. Versatile
18. Replace mat when it turns white.
19. Check window for red glow.

[EPA Approval Date]