806-30 (08/26/2008 (1/6

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

J. Michael Kelley, Ph.D.
Authorized Representative for Avon Products, Inc.
c/o toXcel
P.O. Box 363
7140 Heritage Village Plaza
Gainesville, VA 20156

AUG 2 6 2008

Dear Dr. Kelley,

Subject: Non-Fast Track Amendments (PRIA)
Product Name: Avon Skin-So-Soft SSS Bug Guard Plus Picaridin Insect Repellent
EPA Reg. No. 806-29
Product Name: Avon Skin-So-Soft SSS Bug Guard Plus Picaridin Insect Repellent Towelettes
EPA Reg. No. 806-30
Product Name: Avon Skin-So-Soft SSS Bug Guard Plus Picaridin Insect Repellent Spray
EPA Reg. No. 806-31
Applications dated April 9, 2008

The label amendments above, submitted in connection with the Federal Insecticide, Rodenticide, and Fungicide Act, are acceptable.

A stamped copy of each label is enclosed for your records. Please submit one copy of each final printed label. If you have any questions, please contact Kevin Sweeney at (703) 305-5063. Thank you for your cooperation in this matter.

Sincerely,

for Richard Gebken
Product Manager 10
Insecticides Branch
Registration Division (7505P)

Enclosure

2/6

FRONT OF CONTAINER:

AVON
SKIN-SO-SOFT
S
S
S
BUG GUARD PLUS
PICARIDIN
INSECT REPELLENT TOWELETTE(S)

ACCEPTED
AUG 26 2008
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide Registered under EPA Reg. No. 806-30

[ALTERNATE BRAND NAME #1:]
AVON
SKIN-SO-SOFT
S
S
S
PICARIDIN
INSECT REPELLENT TOWELETTE(S)

[ALTERNATE BRAND NAME#2:]
AVON
BUG GUARD PLUS
PICARIDIN
INSECT REPELLENT TOWELETTE(S)

KEEP OUT OF REACH OF CHILDREN
CAUTION
See back panel for additional precautionary statements

ACTIVE INGREDIENT:	
Picaridin	10.0%
OTHER INGREDIENTS:	90.0%
TOTAL:	100.0%

1 TOWELETTE
Total Net Weight: 0.386 oz (10.94 g)

[8 TOWELETTES]
[Total Net Weight: 3.09 oz (87.52 g)]

[10 TOWELETTES]
[Total Net Weight: 3.86 oz (109.4 g)]

3/6

[Text within brackets is optional and may appear on the back of container label]

BACK OF CONTAINER:

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. Open package, remove and unfold towelette. Use as many towelettes as necessary to ensure even and liberal coverage before insect exposure. Adults may need to use more than one towelette. Do not apply near eyes and mouth. Apply sparingly around ears. Do not apply under clothing, on cuts, wounds, freshly shaved, excessively sunburned or irritated skin. Use just enough repellent to cover exposed skin. Avoid over application of product. Do not allow children to handle this product. Do not apply directly to children's hands. FOR CONTINUED PROTECTION from deer ticks reapply after 12 hours, and for mosquitoes reapply after 8 hours, and for gnats, no-seeums, sand flies and biting midges reapply after 6 hours. Do not exceed 2 applications per day.

STORAGE: Store in cool, dry place away from heat or flame.
DISPOSAL: **If empty:** Nonrefillable container. Do not reuse or refill this container. 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.

PRECAUTIONARY STATEMENTS: Hazards to Humans. Caution: Harmful if swallowed. Causes moderate eye irritation. Avoid contact with eyes. Wash thoroughly with soap and water after handling, returning indoors, and before eating, drinking, chewing gum, or using tobacco. Wash treated clothing before wearing again. Discontinue use and consult a doctor if irritation or rash occurs.

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 eye. • 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 to by a poison control center or doctor. • Do not give anything to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-FOR-AVON for emergency medical treatment information.	

PHYSICAL HAZARDS - Flammable. Keep away from heat and open flame.

[ALERT: To avoid danger of suffocation, keep this and all other plastic bags away from babies and children. Do not use in cribs, beds, carriages or playpens. The thin film may cling to nose and mouth and prevent breathing.]

To order, see an Avon Representative, or call 1-800-FOR-AVON. www.avon.com
EPA Reg. No. 806-30
EPA Est. No. [052631-NJ-001 AP, 052631-NJ-001, 74058-CA-001 IO, 74058-CA-001, 806-OH-001]
[Boxed letters are first letters of lot number]
AVON PRODUCTS, INC., DISTR.
1251 AVE. OF THE AMERICAS, NY, NY 10020
© AVON 200X [– ALL RIGHTS RESERVED]

Day Lot Code
Exp. Year / Month

4/6

[Note to reviewer: The following statements, including those within brackets, are optional AND may appear on the product label AND / OR in marketing collateral materials AND the use of punctuation marks for each statement is optional]

Contains Vitamin E

With Vitamin E

Vitamin E

Contains Aloe

With Aloe

Aloe

Contains Vitamin E & Aloe

(Contains) Bayrepel®

Bayrepel® is a registered trademark of Lanxess

U.S. Patent No. 6,719,959 and 7,150,878

Gentle Breeze™ Scent

Gentle Breeze™

Pleasantly scented

Easy to apply

Wipe on protection

Convenient [towelette] [wipe] for easy application

Convenient [towelettes] [wipes] for easy application

Portable protection

(Towelettes) (Wipes) will not dry out

Non-oily

Not oily

Non-greasy

Not Greasy

Light feel

Quick drying

Fast drying

Will not harm most plastics or synthetic fabrics

5/6

May damage painted or varnished surfaces, including nail polish

For active [family] lifestyles

All day protection from mosquitoes

All day protection from deer ticks

All day protection from mosquitoes and deer ticks

Suitable for the [entire] [whole] family

Provides the whole family with an effective [broad-spectrum] outdoor insect repellent

Protection for the [entire] [whole] family

Strong protection for the [entire] [whole] family

[Strong] [Dependable] Protection

Effective, dependable protection

Provides strong and dependable [protection] [repellency]

[Repellency –] Avon's exclusive formula [with Picaridin] provides strong and dependable [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

[Repellency -] Patented technology that provides strong and dependable [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Exclusive patented technology

Exclusive patented enhanced duration technology

Exclusive patented time-release technology

Patented time-release technology

Time-release formula

Time-release

Patented controlled-release technology

Controlled-release formula

Controlled-release

Creates an effective barrier of protection to repel [insects] [mosquitoes] [deer ticks] [mosquitoes and deer ticks] [gnats, no-seeums, sand flies and biting midges]

Strong and long-lasting [repellency] [protection] against mosquitoes [for] [up to] 8 hours

Strong and long-lasting [repellency] [protection] against deer ticks [for] [up to] 12 hours

Strong and long-lasting [repellency] [protection] against mosquitoes [for] [up to] 8 hours and deer ticks [for] [up to] 12 hours

6/6

Strong [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Long-lasting [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Strong and long-lasting [repellency] [protection] against deer ticks, mosquitoes, gnats, no-seeums, sand flies and biting midges

Repels gnats, no-seeums, sand flies and biting midges

Repels gnats, no-seeums, sand flies and biting midges up to 6 hours

Repels gnats, no-seeums, sand flies and biting midges for 6 hours

Strong [repellency] [protection] against mosquitoes

Long-lasting [repellency] [protection] against mosquitoes

Prevents mosquitoes from biting [for 8 hours]

Strong [repellency] [protection] against deer ticks

Long-lasting [repellency] [protection] against deer ticks

Strong [repellency] [protection] against mosquitoes and deer ticks

Repels mosquitoes

Repels mosquitoes up to 8 hours

Repels mosquitoes for 8 hours

Repels mosquitoes that may [carry] [transmit] West Nile Virus up to 8 hours

Repels mosquitoes that may [carry] [transmit] West Nile Virus for 8 hours

Repels mosquitoes that may [carry] [transmit] West Nile Virus

Repels deer ticks

Repels deer ticks up to 12 hours

Repels deer ticks for 12 hours

Repels deer ticks that may [carry] [transmit] Lyme Disease up to 12 hours

Repels deer ticks that may [carry] [transmit] Lyme Disease for 12 hours

Repels deer ticks that may [carry] [transmit] Lyme Disease

Made in the USA