



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

January 13, 2022

Micah T. Reynolds
Regulatory Consultant
Tender Corporation
dba Adventure Ready Brands
944 Industrial Park Road
Littleton, New Hampshire 03561

Subject: PRIA Label Amendment – Added efficacy claims, optional marketing language,
and alternate brand names
Product Name: Ben’s Tick & Insect Repellent Wipes
EPA Registration Number: 56575-13
Application Date: 7/23/2021
Decision Number: 577458

Dear Mr. Reynolds:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were previously imposed on this registration. You continue to be subject to existing 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 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 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.

The alternate brand names Ben’s 30% DEET Tick & Insect Repellent Wipes and Ben’s Wipes have been added to the product record.

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

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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.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6. If you have any questions, please contact Kaitlin Saunders by phone at 202-566-2890, or via email at Saunders.Kaitlin@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth Fertich". The signature is cursive and somewhat stylized.

Elizabeth Fertich
Product Manager 4
Invertebrate-Vertebrate Branch 1
Registration Division
Office of Pesticide Programs

Enclosure

{Note to Reviewer: Pages 1 and 2 contain the label text of Outer Multi-Wipe-containing Boxes/packages. Content on pages 1 and 2 will also appear on individually-wrapped wipe packets large enough to bear full labeling (for instance individually wrapped wipes intended for retail sale.)}

[] indicates alternate text

{ } denotes language that does not appear on market label

Ben's® Tick and Insect Repellent Wipes
[Tick and Insect Repellent] [Mosquito & Tick Repellent]
[Tick Repellent] [Mosquito Repellent] [Insect Repellent]

30% DEET Tick & Insect Repellent [circle and bar copy]
{Alternative Brand names}
Ben's 30% DEET Tick & Insect Repellent Wipes
Ben's Wipes

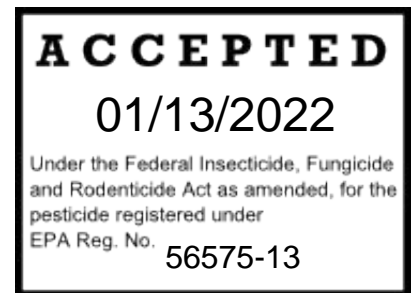
Active Ingredient:

DEET [(CAS No. 134-62-3)]* 30%

Other Ingredients: 70%

Total: 100%

*N,N-diethyl-meta-toluamide



KEEP OUT OF REACH OF CHILDREN
WARNING
[See [back panel] [box] [package] for additional precautionary statements.]

___ Individually Wrapped Wipes

Net [Contents] Weight [Wt.]: ___ fluid oz. each [___ mL each]

Total Net [Contents] Weight: ___ fluid oz. [___ mL] {box only}

[Contains ___ Wipes {box only}] [___ individually wrapped wipes]

[Contains 1 Wipe {pouch only}]

[X by X inches] [X in. x X in.] [X' x X''] [X'' by X''] [X by X cm] [X x X cm]

EPA Est. [56575-NH-1]

EPA Reg. No. 56575-13

[Batch/Lot No.: _]

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals. WARNING: Never use repellents over cuts, wounds, or irritated skin. Causes substantial but temporary eye injury. Do not get in eyes. Do not apply to children’s hands, Do not use on infants. Wash hands 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. Use of product may cause skin reactions in rare cases. If you suspect a reaction to this product, discontinue use, wash treated skin and call your local poison control center. If you go to a doctor, take this repellent product with you.

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.** Tear open sachet near notched end. Remove and unfold wipe (towelette). Repellents should be applied only to exposed skin as directed on this label. Do not use under clothing. Use just enough of this product to cover exposed skin. Heavy application and saturation is unnecessary for effectiveness. If biting insects do not respond to a thin film of repellent, apply a bit more. Do not apply near eyes and mouth, and apply sparingly around ears. Do not allow children to handle this product, and do not apply to children’s hands. When using on children, apply product to your child yourself. Instruct older children in the proper use of this product. Do not apply more than three times per day to children ages twelve (12) and under. Reapply as necessary or after swimming or showering. Apply this product second if used in conjunction with a sunscreen product. After returning indoors, wash treated skin with soap and water or bathe. This is particularly important when repellents are used repeatedly in one day or on consecutive days. Also, wash treated clothing before wearing it again. NOTE: Do not apply on or near acetate, rayon, Spandex, or other synthetic fabrics (other than nylon), furniture plastics (such as eye glasses and watch crystals), leather and painted or varnished surfaces (including automobiles).

FIRST AID

IF IN EYES:	Hold eye open and rinse slowly with water for 15-20 minutes. Remove contact lenses, if present, after the first five minutes, then continue rinsing eye. Call a poison center or doctor for treatment advice.
IF SWALLOWED:	Immediately call a poison control center or doctor 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 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. For more information about this pesticide product (including health concerns, medical emergencies or pesticide incidents) you may call the National Pesticide Information Center at 1-800-858-7378. Note to physician: Probable mucosal damage may contraindicate the use of gastric lavage.	

STORAGE & DISPOSAL

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

Storage: Store this product in a cool, dry (preferably locked) area inaccessible to children or pets and away from heat or open flame. **Disposal:** Nonrefillable container. Do not reuse or refill this container. IF EMPTY: Place in trash or offer 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.

Tender Corp [dba Adventure Ready Brands]
944 Industrial Park Rd
Littleton, NH 03561
[Questions?] [Comments? Call 1-800-258-4696]

[Visit us at: Bens30.com] [UPC code]

{Note to Reviewer: Content on this page 3 represents the labeling content of an individual wipe/towelette packet when the individual packet size cannot contain full labeling content appearing on pages 1 and 2. Full Directions for Use, Precautionary Statements, First Aid, and Storage & Disposal will appear on the outer box/carton/package.}

Ben's® Tick and Insect Repellent Wipes
[Tick and Insect Repellent] [Mosquito & Tick Repellent]
[Tick Repellent] [Mosquito Repellent] [Insect Repellent]

30% DEET Tick & Insect Repellent [circle and bar copy]
{Alternative Brand names}
Ben's 30% DEET Tick & Insect Repellent Wipes
Ben's Wipes

Active Ingredient:

DEET [(CAS No. 134-62-3)]* 30%

Other Ingredients: 70%

Total: 100%

*N,N-diethyl-meta-toluamide

KEEP OUT OF REACH OF CHILDREN
WARNING
[See [back panel] [box] [package] for additional precautionary statements.]

Net [Contents] Weight [Wt.]: ___ fluid oz. each [___ mL] [each]
[Contains 1 Wipe {pouch only}]
[X by X inches] [X in. x X in.] [X' x X''] [X" by X''] [X by X cm] [X x X cm]

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{Optional Marketing Text}

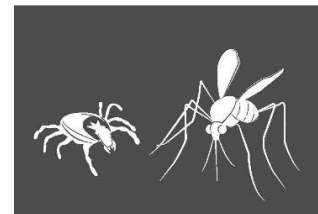
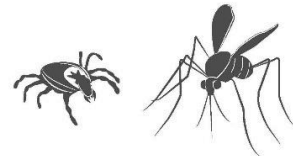
1. Ben's 30% [DEET] [Wipe(s)] [Towelette(s)]
2. Ben's 30 Wilderness Formula [Wipe(s)] [Towelette(s)]
3. Ben's 30% DEET Wilderness Formula [Wipe(s)] [Towelette(s)]
4. Wilderness Formula [Wipe(s)] [Towelette(s)]
5. Ben's Trusted for over 30 years!
6. Carry-on size
7. [Approved] Airplane size
8. [Approved] for Airplane Travel
9. TSA approved travel size
10. TSA travel size
11. TSA approved carry-on size
12. TSA carry-on size
13. Convenient Travel Size
14. Convenient Airplane Travel Size
15. [Approved] Airplane Travel Size
16. Airplane carry-on [size]
17. 30% DEET
18. Tick and Insect Repellent Wipe(s)
19. ___ Individually wrapped wipes [towelettes] *{Note to reviewer: number of wipes to fill in blank space and will be consistent with net content information.}*
20. ___ Pack *{Note to reviewer: number of wipes to fill in blank space and will be consistent with net content information.}*
21. Combo Pack
22. Value Size
23. Family size
24. Easy to Use, Easy to Carry!
25. [Don't Get Bitten – Get Ben's]
26. Repels Mosquitoes that may [carry] [transmit] West Nile Virus
27. Repels Mosquitoes that may [carry] [transmit] Zika Virus
28. Repels Mosquitoes that may [carry] [transmit] Dengue Fever
29. Repels Mosquitoes that may [carry] [transmit] Zika Virus, West Nile Virus, [or] Dengue Fever
30. Repels ticks that may [carry] [transmit] Lyme Disease
31. Mosquito Protection
32. Tick Protection
33. "The choice of Adventure Medical Kits (logo – see subsequent page)" – Dr. Eric Weiss
34. [Up to] Seven [7] hours of Protection
35. [Contains] No Alcohol
36. Alcohol Free
37. Does Not Contain Alcohol
38. Non-oily
39. Protects for 7 hours
40. [Formulated] [Contains] [With] [30%] DEET
41. Non-greasy
42. Non-staining
43. Resists perspiration
44. Not greasy or oily
45. Feels great on you, tough on bugs [too]!
46. Pleasant [feel]
47. Does not feel greasy or oily, won't stain and resists perspiration
48. Repels Mosquitoes [and ticks]
49. [Product Name] provides just the right protection for the entire family against ticks, mosquitoes, and

chiggers while camping, hiking and enjoying all other outdoor activities.

50. [Provides] Protection for the entire family
51. Repels mosquitoes for 7 hours
52. 7 hours of protection [from] [against] [mosquitoes]
53. Effective mosquito protection
54. Travel size [pack]
55. Convenient
56. On the go
57. Easy to use
58. Single [use] wipe [pouch] [towelette]
59. Wipe on protection
60. Repels mosquitoes [for 7 hours] that may [carry] [transmit] [the] West Nile virus.
61. Makes on the go application easy
62. [Ideal for] backpack size
63. Purse size
64. Insect repellent wipe
65. [Personal] pocket size
66. Tick [and] [Mosquito] [Repellent] [Protection]
67. Ideal for the [pocket] [purse] [pack] [backpack] [travel bag] [tackle box]
68. [Pocket] [Travel] [Purse] [Backpack] size
69. Repels mosquitoes that may [carry] [transmit] [Zika virus] [West Nile Virus] [or] [Dengue Fever] and ticks that may [carry] [transmit] [Lyme Disease]
70. Repels ticks that may [carry] [transmit] Lyme Disease
71. [Up to] 7 hours of Protection [against] Mosquitoes
72. [Up to] 7 hours of Protection against mosquitoes that may [carry] [transmit] Zika Virus
73. [Up to] 7 hours of Protection against mosquitoes that may [carry] [transmit] West Nile Virus
74. [Up to] 7 hours of Protection against mosquitoes that may [carry] [transmit] Dengue Fever
75. [Up to] 7 hours of Protection against mosquitoes that may [carry] [transmit] Zika Virus, West Nile Virus, [or] [and] Dengue Fever
76. Proven [results] [effective] against mosquitoes and ticks
77. [Great for] [Ideal for] [backpacking], [backyard barbeques], [hiking], [fishing], [international travel], [camping], [evenings outdoors], [picnicking], [the whole family]
78. [Grab & Go] [Wipe & Go] [tick] [mosquito] [protection]
79. [Original] [outdoorsman] [outdoors] [backyard] [family] [active] [everyday] formula
80. [Effective] [Mosquito] [Tick] [protection]
81. [Protect] your family from [ticks] [and] [mosquitoes]
82. [Trusted] [repellent] protection for the [whole] [entire] family
83. [Dependable] [Effective] protection [from ticks] [against ticks] [from mosquitoes] [against mosquitoes]
84. [Dependable] [Effective] protection [from ticks] [against ticks] [carrying] [that may carry] [that may transmit] Lyme Disease
85. [Dependable] [7 hour] [Effective] protection [from mosquitoes] [against mosquitoes] [carrying] [that may carry] [that may transmit] Zika Virus, West Nile Virus, and Dengue Fever
86. 7 hours worry free protection [from] [against] [mosquitoes]
87. Apply after sunscreen
88. Convenient protection
89. Easy application
90. Family [insect repellent] [bug repellent]
91. Great for the whole family
92. Family friendly
93. Made in [the USA] [America] [New Hampshire]
94. Notice: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions

- 95. Repels ticks that may [carry] [transmit] [Lyme Disease]
- 96. Suitable for the entire family
- 97. Unscented
- 98. Tough [on] [against] [Ticks] [Mosquitoes]
- 99. Family protection [from mosquitoes for 7 hours]
- 100. For comfortable outings with the family
- 101. Use just the right protection for your skin while outdoors, around the home and back yard
- 102. By purchasing [product name] [this product], you'll protect yourself while helping the environment. A portion of sales will be donated to Tender's Environmental Scholarship Program.
- 103. [Value] [Family] Size
- 104. [Dual] [Twin] [Value] [X] [Family] Pack {X represents number of units}
- 105. Insect Repellent [Dual] [Twin] [Value] [X] [Family] Pack {X represents number of units}
- 106. Mosquito Repellent [Dual] [Twin] [Value] [X] [Family] Pack {X represents number of units}
- 107. Tick Repellent [Dual] [Twin] [Value] [X] [Family] Pack {X represents number of units}

{Symbols & Graphics:



{Note to Reviewer: Registrant intends to insert recycling icons/images on the outer box of multi-packed towelettes, as appropriate for the container type based on the guidance below derived from <http://how2recycle.info>. A user will follow the container handling instructions in the Storage & Disposal section and is recommended to offer container for recycling, if available.}

<http://how2recycle.info>

