



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

May 12, 2022

Micah Reynolds
Senior Regulatory Consultant for
Tender Corporation c/o
TSG Consulting
1150 18th St NW, Suite 1000
Washington, DC 20036

Subject: Label Amendment – Adding marketing claims and reorganizing some of the label text.
Product Name: Natrapel 8 Hour Insect Repellent Wipes
EPA Registration Number: 56575-14
Application Date: March 2, 2021
Decision Number: 578027

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.

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.

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Decision No. 578027

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 Jennifer Gaines by phone at (202) 566-2685, or via email at gaines.jennifer@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: Stamped Label

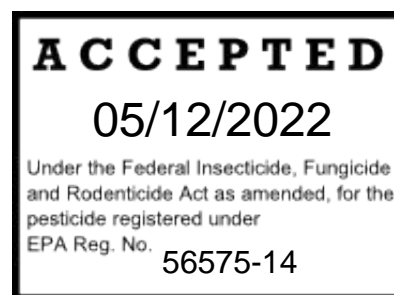
{ Note to Reviewer: Pages 1 and 2 contain the label text of Outer Multi-Wipe-containing Boxes/packages. Content on pages 1 and 2 will also appear on individually-wrapped wipe packets large enough to bear full labeling (for instance individually wrapped wipes intended for retail sale.)

[] indicates alternate text

{ } denotes language that does not appear on market label

<p>Natrapel® 8 Hour Insect Repellent Wipes <i>{Optional marketing call-outs:}</i> [Tick and Insect Repellent] [Mosquito & Tick Repellent] [Tick Repellent] [Mosquito Repellent] [Insect Repellent]</p>
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{Alternative Brand names}
 Natrapel Insect Repellent Wipes
 Ben's® 20 Picaridin Insect Repellent Wipes
 Ben's Tick Repellent Wipes
 Natrapel Wipes
 Ben's Picaridin Wipes



Active Ingredient: Picaridin..... 20%
Other Ingredients: 80%
 Total: 100%

<p>KEEP OUT OF REACH OF CHILDREN CAUTION [See [back panel] [box] [package] for additional precautionary statements.</p>

Net [Contents] [Weight] [Wt.]: [] [fluid] oz. [] mL
 Total Net [Contents] [Weight]: [] fl 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]

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. Stop and read this entire label before use. Tear open wipe at notch. Remove and unfold wipe [towelette]. Apply to all exposed skin. Apply sparingly around ears. Excess amounts or frequent applications are unnecessary. **Do not apply to hands of small children.** Avoid contact with lips, cuts, wounds or irritated skin. Do not apply to excessively sunburned skin. Reapply every eight hours. Do not exceed two applications per day. Do not use under clothing. After returning indoors, wash treated skin with soap and water [and double-check yourself and other family members for ticks.]

PRECAUTIONARY STATEMENTS

CAUTION. Hazards to Humans: Causes moderate eye irritation. Avoid contact with eyes. Wash hands thoroughly with soap and water after handling, returning indoors, and before eating, drinking, chewing gum, using tobacco, or using the toilet.

STORAGE & DISPOSAL

Storage: Store in a cool, dry place out of the reach of children. Keep away from heat, sparks and open flame. **Pesticide Disposal and Container Handling:** 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.

FIRST AID

{Note to reviewer: bulleted First Aid Statements will appear on the commercial label if space allows.}

IF IN EYES:	<ul style="list-style-type: none"> • Hold eye open and rinse gently 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	<ul style="list-style-type: none"> • Call a physician or poison control center 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 1-800-858-7378 for emergency medical information	

PHYSICAL HAZARDS:

Flammable. Do not use or store near heat sources, sparks or open flame. Do not smoke while applying.

EPA Reg. No. 56575-14
EPA Est. No. [56575-NH-1] [074946-NY-1]
[Batch/Lot No.: _____] 02-2270-0

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

[Website] [UPC Code]

{Note to reviewer: optional warranty statement} Notice: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions

{Note to Reviewer: Content on this page 3 represents the labeling content of an individual wipe/towelette packet when the individual packet label 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.}

Natrapel® 8 Hour Insect Repellent Wipes
{Optional marketing call-outs:}
[Tick and Insect Repellent] [Mosquito & Tick Repellent]
[Tick Repellent] [Mosquito Repellent] [Insect Repellent]

{Alternative Brand names}
Natrapel Insect Repellent Wipes
Ben's® 20 Picaridin Insect Repellent Wipes
Ben's Tick Repellent Wipes
Natrapel Wipes
Ben's Picaridin Wipes

Active Ingredient: Picaridin..... 20%
Other Ingredients: 80%
Total: 100%

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

Net [Contents] [Weight] [Wt.]: [] [fluid] oz. [] mL
[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 Reg. No. 56575-14
EPA Est. No. [56575-NH-1] [074946-NY-1]
[Batch/Lot No.:_]

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

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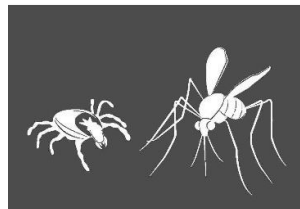
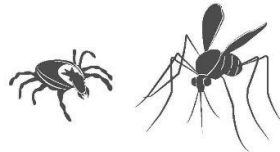
{Optional Marketing Text}

1. Protects for 12 hours against mosquitoes and ticks
2. [Formulated] [Contains] [With] [20%] Picaridin
3. [Light Feel]
4. Feels light and clean
5. Light, clean feel
6. Clean, dry feel
7. Repels Mosquitoes [and ticks] for up to 12 hours
8. Protection for the entire family
9. [Use with confidence on the whole family.] [And your family will want to use it too.] [Not, oily, greasy or sticky.] [It smells great too]
10. Repels mosquitoes [and ticks] for 12 hours
11. 12 hours of protection from mosquitoes [and ticks]
12. Not sticky or greasy
13. No oily residue
14. Won't damage cotton, wool, nylon [acetate, rayon, spandex] or other synthetic materials
15. Won't damage [Plastics] [watch crystals] or other synthetic materials
16. Won't damage [fishing line, gun barrel, plastic lenses] [sporting equipment]
17. Repels mosquitoes and ticks for up to 12 hours & biting flies, deer flies, no-see-ums, chiggers, gnats and fleas for up to 8 hours
18. Long Lasting Protection (up to 12 hours)
19. Reapply every eight [8] hours
20. Effective mosquito protection for up to 12 hours
21. Travel size [pack]
22. Convenient
23. Easy to use
24. Single [use] wipe [pouch] [towelette]
25. Now...protection that feels light and clean
26. Wipe on protection
27. [Product Name] Provides up to 12 hours [of] protection against mosquitoes and ticks. It also provides effective protection against biting flies, deer flies, gnats, no-see-ums, chiggers and fleas for up to 8 hours
28. [Product Name] Provides effective protection against ticks, biting flies, deer flies, gnats no-see-ums, chiggers and fleas for up to 8 hours
29. [Product Name] containing Picaridin is formulated for [fishermen, hunters, and other outdoorsmen] [active lifestyles].
30. [Product Name] Will not damage plastics or other synthetic materials
31. Clean, effective. Finally an insect repellent you won't mind using. Great for everyone in the family!
32. Because [Product Name] is formulated with Picaridin it is perfect for hunters and fishermen plus it will not damage fishing lines or other synthetic materials.
33. Repels mosquitoes for [up to] 12 hours that may [carry] [transmit] [spread] [the] West Nile virus.
34. Package No.
35. Carry-on Size
36. [Airplane] [Airline] Carry-on Size
37. Convenient [airplane] [airline] travel size
38. Makes on the go application easy
39. For active sports
40. Sport formula
41. [Ideal for] backpack size
42. Purse size
43. Insect repellent wipe
44. [Personal] pocket size
45. Gear Safe
46. Safe on gear

47. Will not harm gear [or] [equipment]
48. Does not harm gear [or] [equipment]
49. Fisherman's formula
50. Angler's formula
51. Tick [and] [Mosquito] Repellent
52. Light feel
53. Ideal for the [pocket] [purse] [pack] [beach bag] [backpack] [travel bag] [tackle box] [fly vest]
54. Repels mosquitoes that may [carry] [transmit] [spread] Zika virus [West Nile Virus] [or] [Dengue Fever] [Chikungunya] and ticks that may [carry] [transmit] [spread] Lyme Disease for up to 12 hours
55. Repels mosquitoes that may [carry] [transmit] [spread] Zika virus for up to 12 hours
56. Repels mosquitoes that may [carry] [transmit] [spread] West Nile Virus for up to 12 hours
57. Repels mosquitoes that may [carry] [transmit] [spread] Dengue Fever for up to 12 hours
58. Repels mosquitoes that may [carry] [transmit] [spread] Chikungunya for up to 12 hours
59. Repels ticks that may [carry] [transmit] [spread] Lyme Disease for up to 12 hours
60. Repels ticks that may [carry] [transmit] [spread] Tick Borne Encephalitis for up to 12 hours
61. Repels Biting Flies, Stable flies, black flies, gnats, chiggers and sand flies for up to 8 hours
62. 8 hour protection against [biting flies] [stable flies] [black flies] [gnats] [chiggers] [and] [sand flies]
63. Mosquito protection for up to 12 hours
64. Tick Protection for up to 12 hours
65. Long Lasting, 12 hour protection from Mosquitoes [and] [Ticks]
66. Up to 12 hours of Protection [against] Mosquitoes [and] [Ticks]
67. Up to 12 hours of Protection against mosquitoes that may [carry] [transmit] [spread] Zika Virus
68. Up to 12 hours of Protection against mosquitoes that may [carry] [transmit] [spread] West Nile Virus
69. Up to 12 hours of Protection against mosquitoes that may [carry] [transmit] [spread] Dengue Fever
70. Up to 12 hours of Protection against mosquitoes that may [carry] [transmit] [spread] Zika Virus, West Nile Virus, Dengue Fever, Chikungunya
71. Dye-Free
72. [Effectively] repels [biting flies] [stable flies] [black flies] [gnats] [chiggers] [&] [sand flies] for up to 8 hours
73. [Great for] [Ideal for] [backpacking], [backyard barbeques], [hiking], [fishing], [international travel], [camping], [evenings outdoors], [picnicking], [beaching], [boating], [kayaking], [canoeing], [paddling], [paddle boarding], [on the water activities], [the whole family]
74. [quick] [even] coverage
75. [grab & go] [spray & go] [tick] [mosquito] [defense] [protection]
76. [Light, pleasant scent] [smells good] [refreshing scent] [lightly scented] [a better smelling way to keep bugs away] (*Note to reviewer: only for scented formulas.*)
77. [Original] [outdoorsman] [outdoors] [backyard] [family] [sports] [sportsman] [active] [everyday] formula
78. [Picaridin] [Active ingredient] is based on the natural compound Piperine, which is responsible for the pungency in black pepper
79. [Effective] [Mosquito] [Tick] [defense] [protection]
80. [Protect] [Defend] your family from [ticks] [and] [mosquitoes]
81. [Reliable] [repellent] protection for the [whole] [entire] family for up to 12 hours
82. [Repels] [Deters] listed insects
83. [Reliable] [Dependable] [Effective] protection [from ticks] [against ticks] [from mosquitoes] [against mosquitoes] for up to 12 hours
84. 12 hours worry free protection [from] [against] mosquitoes
85. 12 hours worry free protection [from] [against] ticks
86. All day protection
87. Apply after sunscreen
88. Can be applied to [clothing] [gear]
89. Convenient, no mess, no rub protection

- 90. Easy application
- 91. Family [insect repellent] [bug spray] [bug repellent]
- 92. For comfortable outings with the family. Protects against ticks and mosquitoes for up to 12 hours, and biting flies, stable flies, black flies, gnats, chiggers, and sand flies for up to 8 hours
- 93. For up to 12 hours of protection against mosquitoes and ticks, and up to 8 hours of protection against biting flies, stable flies, black flies, gnats, chiggers, and sand flies
- 94. Great for the whole family
- 95. Effective protection from mosquitoes [and] [ticks]
- 96. Made in [the USA] [America] [New Hampshire]
- 97. No Mess
- 98. Pleasant low odor that evaporates when dry
- 99. Repels [mosquitoes] [ticks] [mosquitoes and ticks] for up to 12 hours and biting flies, yellow flies, no-see-ums, stable flies, black flies, gnats, chiggers, and sand flies for up to 8 hours
- 100. Repels [ticks], [mosquitoes], [chiggers] for up to 12 hours and [black flies], [yellow flies], [gnats], [no-see-ums], [biting flies], [horse flies], [stable flies], [sand flies] for up to 8 hours
- 101. Repels ticks that may [carry] [transmit] [spread] [Rocky Mountain Spotted Fever], [Lyme Disease], [Tick Borne Encephalitis] for up to 12 hours
- 102. Repels ticks that may [carry] [transmit] [spread] Rocky Mountain Spotted Fever for up to 12 hours
- 103. Suitable for the entire family
- 104. The [tick] [mosquito] [black fly] formula
- 105. Repels bugs, not people
- 106. You'll forget you're wearing it, but the bugs won't
- 107. Tough [on] [against] [Ticks] [Mosquitoes]
- 108. Won't damage [gear] [synthetics] [plastics] [fishing equipment] [angling gear] [hiking gear] [clothing] [sunglasses] [cell phones] [cell phone cases] [water bottles] [swimwear] [golf clubs] [golf gloves] [nylon] [rain jackets]
- 109. [Value] [Family] Size
- 110. [Dual] [Twin] [Value] [X] [Family] Pack {X represents number of units}
- 111. Insect Repellent [Dual] [Twin] [Value] [X] [Family] Pack {X represents number of units}
- 112. Mosquito Repellent [Dual] [Twin] [Value] [X] [Family] Pack {X represents number of units}
- Tick Repellent [Dual] [Twin] [Value] [X] [Family] Pack {X represents number of units}


{Symbols & Graphics (Other images of approved target pest/use sites may be used)}



**Adventure[®]
Medical
Kits**

BE SAFE

{Note to Reviewer: Registrant intends to insert recycling icons/images on the outer box of multi-packed towelettes and the plastic outer wrap of a single towelette. A user will follow the container handling instructions in the Storage & Disposal section and is recommended to offer container for recycling, if available. The following images and text are derived from <http://how2recycle.info> and will be modified with the optional language/images as relevant for each container type – paper/cardboard box or plastic wrap.}



Preparing Material for Recycling

Information is provided to ensure the proper steps are taken to effectively recycle materials.

Rinse & Insert Lid	Empty & Replace Cap	Empty Before Recycling	Rinse Before Recycling
Rinse & Replace Lid	Recycle If Clean & Dry	See Website For Cap	Remove Label Before Recycling
Empty & Discard Sprayer	Empty & Reattach Sprayer	Empty & Discard Pump	Empty & Reattach Pump

See Website for Cap/Bottles: Certain caps and small packaging are too small to make it through a recycling facility. Ask your drop-off location if they accept loose caps, or send your plastic caps to Terracycle or Gimme 5. For glass beverage bottles with small, crown shaped metal caps, it's best to collect them in an emptied soup can. Once you have filled the can, squeeze the top closed and toss it in your recycling bin!


{From image file above}: See <http://how2recycle.info> for Cap/Bottles.



How2Recycle

Information and locational instructions let you know if an item can be recycled traditionally or by other means.


Widely Recycled	Limited Recycling <small>* Not recycled in all communities</small>	Not Yet Recycled	Store Drop-Off



Type of Recyclable Material

Lists what type of material the packaging is made from.

PLASTIC	PAPER	METAL
COATED PAPER	GLASS	MULTI-LAYER



Lists Recyclable Parts of Packaging

Information on what parts of the packaging needs to be recycled in this specific way.

BOTTLE	TRAY	INSERT
BOX	BAG	WRAP
CAN	FILM	POUCH

Wrap: This helps you identify which part of the packaging we're referring to.