

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

August 11, 2023

Peter E. Stevenson Regulatory Consultant c/o Tender Corporation 944 Industrial Park Road Littleton, NH 03561

Subject: Notification per PRN 98-10 – Added new ABNs and optional marketing claims to label; added new Alternate #1 CSF Product Name: Natrapel 8 Hour EPA Registration Number: 56575-15 Application Date: 11/18/22 Decision Number: 590121

Dear Mr. Stevenson:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) 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 label submitted with the application has been stamped "Notification" and will be placed in our records.

The alternate brand names "Ben's Gear Formula," "Ben's Hunting Formula," "Ben's Fishing Formula," and "Ben's Outdoor Adventure Formula" 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 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.

Please note that the record for this product currently contains the following CSFs:

- Basic CSF dated 11/18/2022
- Alternate CSF 1 dated 11/18/2022

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If you have any questions, you may contact Robert Mitchell at 202-566-2842 or via email at <u>mitchell.robert@epa.gov</u>.

Sincerely,

Elizad

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

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{Front Panel}

Natrapel 8 hour
[INSECT REPELLENT]
[Tick and Insect Repellent] [Mosquito & Tick Repellent] [Tick Repellent] [Mosquito Repellent]
{Alternative Brand names} Natrapel
Ben's 20 Picaridin
Ben's Tick Repellent
Ben's Gear Formula
Ben's Hunting Formula
Ben's Fishing Formula
Ben's [Outdoor] Adventure Formula

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

Keep Out of Reach of Children CAUTION

[See [back panel] [card] [behind peel back] for additional precautionary statements.]

Net Contents: [__] [fluid] oz. [___] ml [Continuous Spray] [Pump Spray] [Spray]

[] indicates alternate text

{} Denotes Language that does not appear on market labeling {Back Panel, Cards & Peel Backs}

NOTIFICATION

56575-15

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:

08/11/2023

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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.

Read and follow all directions and precautions [on this product label]. [Remove protective cap.] Hold can 4 to 6 inches from skin while spraying, keeping nozzle pointed away from face. Slightly moisten skin or clothing with a slow sweeping motion. Use just enough repellent to cover exposed skin and/or clothing. Do not use under clothing. Do not spray directly on face. Do not apply near eyes and mouth. Spray on hands first, and then apply sparingly to face, neck and around ears, avoiding your eyes. Do not apply over cuts, wounds, or irritated skin, and do not apply to excessively sunburned skin. Do not apply to children's hands. Do not allow children to handle this product. When using on children, apply to your own hands and then put it on the child. Frequent reapplication or saturation is unnecessary. Avoid over-application of this product. Do not exceed more than 2 applications per day. After returning indoors, wash treated skin with soap and water [and double-check yourself and other family members for ticks.] Wash treated clothing before wearing it again. Use of this product may cause skin reactions in rare cases. If you suspect a reaction to this product, discontinue use, wash treated skin and call your Poison Control Center. If you go to a doctor, take this product with you.

STORAGE & DISPOSAL

Pesticide Storage: Store this product in a cool, dry (preferably locked) place, out of reach of children. Keep away from heat, sparks, and open flame.

Container Disposal: Do not puncture or incinerate! **If empty:** Nonrefillable container. Do not reuse or refill this container. 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

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

FIRST AID		
If in eyes	Hold eye open and rinse gently with water for 15-20 minutes Remove contact lenses, if present, after five minutes, and then continue rinsing.	
	Call a poison control center or doctor for treatment advice.	
If swallowed	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 Poison Control Center or doctor. Do not give anything to an unconscious person.	

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Have the product container or label with you when calling or going for treatment. You may also contact 1-800-858-7378 for emergency medical information.

PHYSICAL HAZARDS

{Pump Spray} Flammable. Keep away from heat and open flame. {Bag on Valve} Flammable. Contents under pressure. Do not use or store near heat or open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.
[Batch Lot No.:] TENDER CORPORATION

TENDER CORPORATION [944 Industrial Park Road] Littleton, NH 03561

EPA Reg. No. 56575-15 [EPA Est. 56575-NH-1] [Natrapel.com] [tendercorp.com] [bens30.com]

{Optional Marketing Text}

 This Eco-Spray[®] Can uses a patented mechanical delivery system to create a continuous spray held in any position.

- 2. Continuous Spray
- 3. No Rubbing required
- 4. One Touch Pump
- 5. Easy Application
- 6. No Mess
- 7. Convenient, no mess, no rub protection
- 8. Sprays Upside Down
- 9. Level {for packages with clear indicator of amount remaining}
- 9.10. 10. Running Low {for packages with clear indicator of amount remaining}
- 11. Now with Twist Close Cap!
- 12. Airplane carry-on size
- 13. Maximum carry-on size
- 14. TSA [approved] travel size
- 15. TSA [approved] carry-on size
- 16. Convenient Travel Size
- 17. Convenient Airplane Travel Size

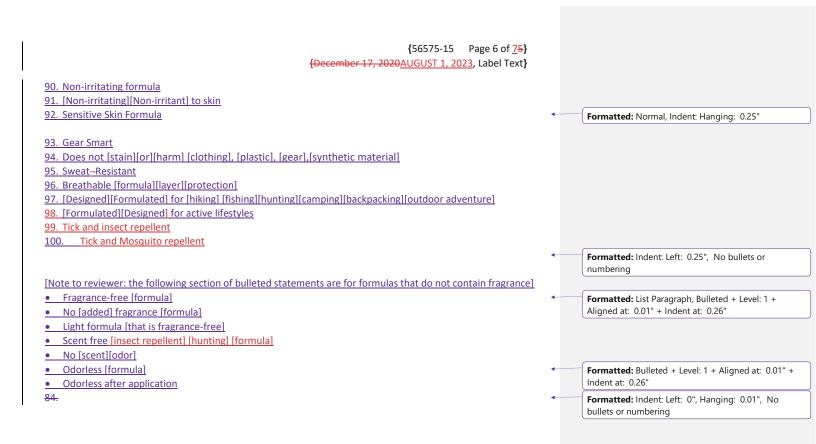
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- 18. Airplane carry-on
- 19. [Approved] [for] Airplane[s] [Travel] [Size]
- 20. Approved Airplane Size
- 21. Airplane Size
- 22. Carry-on Size
- 23. Max carry-on size
- 24. Maximum [Max] Airplane [Travel] Size
- 25. For comfortable outings with the 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
- 26. 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.
- 27. Use with confidence on the whole family
- 28. And your family will want to use it, too
- 29. Not oily, greasy or sticky
- 30. Cool Spray
- 31. Spray [(and<mark>)] [(</mark>'n]) go
- 32. Non-[oily][greasy][sticky]
- 33. Does not damage plastic
- 34. Won't Damage Fishing Lines, Plastics or other Synthetic Materials [Fisherman's Formula]
- 35. [Won't Damage Fishing Lines, Plastics or other Synthetic Materials [Gear Safe]]
- 36. 12 hours worry free protection from Ticks and Mosquitoes
- 37. Pocket Size
- Repels [mosquitoes] [ticks] [mosquitoes and ticks] for up to 12 hours, and biting flies, stable flies, black flies, gnats, chiggers, and sand flies for up to 8 hours.
- 39. [Effectively_-repels] [biting flies] [no see-ums][stable flies] [black flies] [gnats] [chiggers] [&] [sand flies] [for up to 8 Hours.]
- 40. Long-lasting, 12 hour effective protection from [mosquitoes] [and] [ticks]
- 41. Long-Lasting 12 hour effective [mosquito] [and] [tick] Pprotection
- 42. Repels mosquitoes that may [carry][spread][transmit][Zika Virus][West Nile Virus][or][Dengue Fever] and ticks that may [carry][spread][transmit][Lyme Disease] for up to 12 hours
- 43. Repels Mosquitoes that may [carry][spread][transmit] West Nile Virus for up to 12 hours
- 44. Repels Mosquitoes that may [carry][spread][transmit] Zika Virus for up to 12 hours
- 45. Repels Mosquitoes that may [carry][spread][transmit] Dengue Fever for up to 12 hours
- 46. Repels Mosquitoes that may [carry][spread][transmit] Zika Virus, West Nile Virus, [or] Dengue Fever for up to 12 hours
- 47. Repels ticks that may [carry][spread][transmit] Lyme Disease for up to 12 hours
- 48. Repels Biting Flies, Stable flies, black flies, gnats, chiggers and sand flies for up to 8 hours
- 49. 8 hour protection against [biting flies][no see-ums][stable flies][black flies][gnats][chiggers][and][sand flies]
- 50. Mosquito protection for up to 12 hours
- 51. Tick protection for up to 12 hours
- 52. Up to 12 Hours of Protection [against] [Mosquitoes] [and] [ticks]
- 53. Up to 12 Hours of Protection against mosquitoes that may [carry][spread][transmit] Zika Virus
- 54. Up to 12 Hours of Protection against mosquitoes that may [carry][spread][transmit] West Nile Virus
- 55. Up to 12 Hours of Protection against mosquitoes that may [carry][spread][transmit] Dengue Fever

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- 56. Up to 12 Hours of Protection against mosquitoes that may [carry][spread][transmit] Zika Virus, West Nile Virus, [or] Dengue Fever 57. [Picaridin] [the active ingredient] is based on the compound Piperine, which is responsible for the pungency in black pepper. 58. [Reliable] protection for the [whole][entire] family 59. Great for the whole family 60. [Family] protection [from] [ticks][and][mosquitoes] for up to 12 hours. 61. Suitable for the entire family 62. Eco-spray provides consistent coverage and can be sprayed in any direction, so you can reach even the hardest to reach spots 63. [Great for] [Ideal for] [backpacking], [backyard barbecues], [hiking] [fishing][international travel], [camping] [evenings outdoors] [picnicking] [beaching], [boating], [kayaking] [canoeing], [paddling] [paddle boarding] [on the water activities] [the whole family] 64. [Pprotect][defend] your family from [ticks][mosquitoes] 65. [Light, pleasant scent] [smells good] [refreshing scent] [lightly scented][a better smelling way to keep ticks and mosquitoes away] 66. [Ffeels light and clean] [light, clean feel] 67. You'll forget you're wearing it, but the bugs won't 68. [Repels][deters][repels]- [ticks] [mosquitoes] for up to 12 hours 69. [Repels][deters][repels]- [chiggers], [black flies], [gnats], [biting flies], [stable flies], for up to 8 hours 70. 12 Hour, all day protection from [ticks] [and] [mosquitoes] 71. Pleasant low odor that evaporates when dry 72. 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] [gun stocks][fishing line][tackle boxes][wool][plastic sporting goods][backpacks][outerwear][painted surfaces] 73. Can be applied to [clothing] [gear] 74. [Dye-free] 75. [outdoorsman][outdoors][backyard] [family][sport][s][sportsman][active] [hunting][gear smart][everyday] Formula 76. Made in [the USA] [America] [New Hampshire] 77. [Mosquito] [Tick] [protection] for up to 12 hours 78. up to 12 hours of [mosquito] [tick] [protection] 79. Apply after sunscreen
 - 80. [reliable] [dependable] [effective] protection [from ticks] [against ticks] [from mosquitoes] [against mosquitoes] for up to 12 hours
 - 81. The [tick] [mosquito] [black fly] formula
 - 82. [grab & go] [spray & go] [tick] [mosquito] [defense] [protection] for up to 12 hours
 - 83. [tick][mosquito] repelling action for up to 12 hours
 - 84. Holds more repellent than the same size aerosol bottle
 - 85. Sprays [upside down][any direction]
 - 86. [For][great for][use on] adults and kids ages 3 months and up* *when used as directed
 - 87. Can be [used on pregnant women] [used during pregnancy] when used as directed
 - 88. Won't leave you smelling like bug repellent
 - 89. [Light][pleasant][Clean][Fresh][Great] scent [[that] won't leave you smelling like bug repellent]

Formatted: Indent: Hanging: 0.25"



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

