

18 JUL 1994

Ms. Jean Killoren
Wisconsin Pharmacal Company
Division of Badger Pharmacal, Inc.
2977 Highway 60
P.O. Box 198
Jackson, WI 53037

Dear Ms. Killoren:

Subject: Label Revisions
EPA Reg. No. 305-28
EPA Reg. No. 305-30
EPA Reg. No. 305-31
EPA Reg. No. 305-32
EPA Reg. No. 305-39
EPA Reg. No. 305-40
Submission: June 30, 1994

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. One copy of the finished labeling must be submitted prior to releasing the product for shipment.

The Insect Protection Factor is not acceptable. Please remove all IPF (Insect Protection Factor) labeling from each of these products. It is not clear to us that higher concentrations of DEET are necessarily more efficacious. Also, if we were to approve such a factor, "IPF" marketing claims could proliferate and we would be unable to determine what may be an appropriate factor for multiple active ingredients or other active ingredients. We consider these claims to be misbranding as described in 40 CFR 156.10(a)5.

Sincerely,



Marion J. Johnson, Jr.
Acting Product Manager 10
Insecticide & Rodenticide Branch
Registration Division (7505C)

REPEL[®] SPORTSMEN[®]

BUG BLOCK

55 IPF

(Insect Protection Factor)

ACCEPTED
with COMMENTS
in EPA Letter Dated
18 JUL 1994

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, this product is
registered under the name
305-28

Effective,
Long Lasting
Insect Protection

BEST AVAILABLE COPY

REPEL[®] SPORTSMEN[®]

Effective, Long Lasting Insect Protection

REPEL[®]SPORTSMEN[®] BUG BLOCK
REPEL[®] Sportsmen[®] Bug Block provides effective, long lasting protection from mosquitoes, specifically designed for active outdoors men and women.

The IPF (Insect Protection Factor) was developed to remove the appropriate level of insect protection. The IPF number corresponds to the protection that each Repel product provides. A lower IPF is for use when bugs are few, a higher IPF is for use when bugs are really biting.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with the directions on the label. Read all directions before using this product.

Apply over all exposed skin to repel biting flies and mosquitoes. Dispense on palm of hand and rub on. Do not spray directly on EYES AND MOUTH. Do not apply to hands of young children. Do not cover exposed skin and clothing. Do not use under clothing. Avoid reapplication and saturation is unnecessary for effectiveness. Avoid treated skin with soap and water. Wash treated clothing.

WORKS ON CLOTHING TOO: For ticks and chiggers, apply to around openings in outer clothing. Do not apply to synthetic fabrics. Do not damage cotton, wool and nylon. **MAY DAMAGE FURNITURE, PAINTED SURFACES, AND WATCH CRYSTALS.**

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS — CAUTION: Harmful if swallowed. Do not use if you are allergic to any of the ingredients. Do not use if you are reacting to this product, wash treated skin and call your local Poison Control Center. Do not apply to severely sunburned or otherwise damaged skin.

PRACTICAL TREATMENT: If in eyes, flush with plenty of water. If in mouth, spit out and swallow. If swallowed, contact a Poison Control Center.

PHYSICAL & CHEMICAL HAZARDS — FLAMMABLE: Do not use near open flame. **DISPOSAL:** Do not reuse empty container. Wrap container and put in trash.

Another product from Wisconsin Pharrnacal:

Relief from insect
bites and stings.

Sting Eze

Manufactured by
Wisconsin Pharrnacal Company, Inc.
Jackson WI, 53037
MADE IN THE U.S.A.

EPA REG. NO. 305-28 EPA EST. NO. 305-WI-1

FOR USE
 In violation of Federal law to use this product in a manner inconsistent with its labeling.
Read all directions
 before using this product.
 Apply over all exposed skin to repel biting flies, ticks and mosquitoes. Do not spray in enclosed areas. To apply to face and neck, dispense on palm of hand and rub on. Do not spray directly on face. **DO NOT APPLY TO EYES AND MOUTH.** Do not spray to heads of young children. Use just enough repellent to cover exposed skin and clothing. Do not use under clothing. Avoid overexposure. Frequent reapplication and reabsorption is unnecessary for effectiveness. After returning indoors, wash treated skin with soap and water. Wash treated clothing.
WORKS ON CLOTHING TOO: For ticks, chiggers and fleas apply to soles, tops of shoes and around openings in outer clothing. Do not apply to synthetic fabrics other than nylon, wool and rayon. **MAY DAMAGE FURNITURE FINISHES, PLASTICS, PAINTED SURFACES AND WATCH CRYSTALS.**

Manufactured by
 Waccoway Pharmaceutical Co. Inc.
 Jackson, WI 53037
 MADE IN THE U.S.A.

NON-AEROSOL PUMP
REPEL
SPORTSMEN

BUG BLOCK

**55
 IPF**

(Insect Protection Factor)

Effective, Long Lasting Insect Protection

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Additional Precautions on Side Panel.

ACTIVE INGREDIENTS:

N,N-diethyl-male-Limonide

52.25%

Other Inert

2.75%

INERT INGREDIENTS

45.00%

NET CONTENTS 4 FL. OZ.

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS —
CAUTION: Harmful if swallowed.
 Do not apply to eyes and lips.
 Use of this product may cause skin reactions in rare cases. If you suspect that you or your child is reacting to this product, wash treated skin and call your local Poison Control Center. Do not apply to severely sunburned or otherwise damaged skin.
PRACTICAL TREATMENT: If in eyes, flush with plenty of water. If irritation persists, get medical attention. If swallowed, contact a Poison Control Center.
PHYSICAL AND CHEMICAL HAZARDS — FLAMMABLE:
 Do not use near fire or flame.
DISPOSAL: Do not reuse empty container. Wash container and put in trash collection.

EPA REG. NO. 305-29
 EPA EXT. NO. 305-WF-1

UPC

BEST AVAILABLE COPY

ACCEPTED
 with COMMENTS
 In EPA Letter Dated

18 JUL 1994

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, this product is a registered under EPA Reg. No.

313-21

555

IPF Sport Unscented-4 oz. Pump Label v.3