

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<sup>®</sup> FAMILY<sup>®</sup>

## BUG BLOCK

# 35 IPF

(Insect Protection Factor)

**BEST AVAILABLE COPY**

ACCEPTED  
with COMMENTS  
In EPA Letter Dated

18 JUL 1994

Under the Federal Insecticide,  
Fungicide, and Rodenticide Act  
as amended, for the pesticide  
registered under EPA Reg. No.

305-31

Effective, Scented Insect Protection

### CAUTION

KEEP OUT OF REACH OF CHILDREN  
See Precautions on Back Panel

ACTIVE INGREDIENTS:  
N, N-diethyl-meta-toluamide 33.25%  
Other Isomers 1.75%  
INERT INGREDIENTS 65.00%

NET WT. 6.5 OZ.

### REPEL<sup>®</sup> FAMILY<sup>®</sup> BUG BLOCK

Hours of effective protection from mosquitoes, black flies, ticks, gnats, chiggers, no-see-ums, sand flies, deer flies, fleas and other biting insects.

REPEL<sup>®</sup> Family<sup>®</sup> Bug Block, with a soft scent, provides long lasting, non-greasy, effective protection.

The IPF (Insect Protection Factor) was developed to remove the mystery in choosing the appropriate level of insect protection. The IPF number corresponds to the amount of insect protection that each Repel product provides. A lower IPF is appropriate for times 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 its labeling.

Read all directions before using this product.

Hold container 6 to 8 inches from skin or clothing and spray with a slow sweeping motion. Do not spray in enclosed areas. To apply to face, spray palm of hand and spread on face and neck. Do not spray directly on face. **DO NOT APPLY TO EYES AND MOUTH.** Do not apply to hands of young children. Use just enough repellent to cover exposed skin and clothing. Do not use under clothing. Avoid overexposure. Frequent reapplication and saturation is unnecessary for effectiveness. After returning indoors, wash treated skin with soap and water. Wash treated clothing.

**WORKS ON CLOTHING TOO:** Spray shirts, socks, and hats. For ticks and chiggers, spray pants cuffs, socks and around openings in outer clothing. Do not apply to synthetic fabrics other than nylon. Will not damage cotton, wool and nylon. **MAY DAMAGE FURNITURE FINISHES, PLASTICS, PAINTED SURFACES, AND WATCH CRYSTALS.**

### 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 & CHEMICAL HAZARDS — FLAMMABLE:** Contents under pressure. Keep away from heat, sparks and open flames. Do not puncture or incinerate containers. Exposure to temperatures above 130°F may cause bursting.

**DISPOSAL:** Do not reuse empty container. Wrap container and put in trash collection.

U.P.C.

Manufactured for  
Wisconsin Pharmaceutical Company, Inc.  
Jackson, WI 53037  
MADE IN THE U.S.A.

EPA REG. NO. 305-31  
EPA EST. NO. 3657-WI-2