

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)

POCKET-SIZE

REPEL[®]
SPORTSMEN[®]

BEST AVAILABLE COPY

BUG BLOCK

40
IPF

(Insect Protection Factor)

IDEAL FOR:

- Jackets
- Golf Bags
- Tackle Boxes
- Glove Compartments

Effective,
Long Lasting
Insect Protection

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.

305-32

REPEL[®]
SPORTSMEN[®]

Effective, Long Lasting Insect P

REPEL[®] SPORTSMEN[®] BUG BL

Up to 6 hours of effective protection from mosquitoes, b
no-see-ums, sand flies, deer flies, fleas and other biting
Bug Block is non-greasy and resists perspiration.

REPEL[®] Sportsmen[®] Bug Block is developed especially for o
hunters, grillers, bikers, boaters, hikers, joggers, ball players and

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

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner

Read all directions before using this

Hold container 6 to 8 inches from skin or clothing and spray
Do not spray in enclosed areas. To apply to face, spray palm
neck. Do not spray directly on face. DO NOT APPLY TO EYE
hands of young children. Use just enough repellent to cover
not use under clothing. Avoid overexposure. Frequent r
unnecessary for effectiveness. After returning indoors, wa
water. Wash treated clothing.

WORKS ON CLOTHING TOO: Spray shirts, socks, and hat
pan's cuffs, socks and around openings in outer clothing. U
other than nylon. Will not damage cotton, wool and rylot
FINISHES, PLASTICS, PAINTED SURFACES, AND WATCH C

PRECAUTIONARY STATEME

HAZARDS TO HUMANS — CAUTION: Harmful if swallowed. I
of this product may cause skin reactions in rare cases. If you
reacting to this product, wash treated skin and call your loca
apply to severely sunburned or otherwise damaged skin.

PRACTICAL TREATMENT: If in eyes, flush with plenty of water
attention. If swallowed, contact a Poison Control Center.

PHYSICAL & CHEMICAL HAZARDS — FLAMMABLE: Cont
from heat, sparks and open flames. Do not puncture or inc
temperature above 130°F may cause bursting.

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

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

EPA REG. NO. 305-32 EPA EST. NO. 3657-WI-2

REPEL[®] SPORTSMEN[®]

BUG BLOCK

40 IPF

(Insect Protection Factor)

BEST AVAILABLE COPY

Effective, Long Lasting Insect Protection

CAUTION

KEEP OUT OF REACH OF CHILDREN

See Precautions on Back Panel

ACTIVE INGREDIENTS:

N, N-diethyl-meta-toluamide	38%
Other Inertness	2%
INERT INGREDIENTS	60%

NET WT. 6.5 OZ.

REPEL[®] SPORTSMEN[®] BUG BLOCK

Up to 6 hours of effective protection from mosquitoes, black flies, ticks, gnats, chiggers, no-see-ums, sand flies, deer flies, fleas and other biting insects. REPEL[®] Sportsmen[®] Bug Block is non-greasy and resists perspiration.

REPEL[®] Sportsmen[®] Bug Block is developed especially for campers, backpackers, fishermen, hunters, golfers, bikers, boaters, hikers, joggers, ball players and active outdoors men and women.

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: Contains 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 53007

MADE IN THE U.S.A.

EPA REG. NO. 305-32
EPA EST. NO. 3057-WI-2

232965

REPEL[®] SPORTSMEN[®]

BUG BLOCK

**40
IPF**

(Insect Protection Factor)

BEST AVAILABLE COPY

Effective, Long Lasting Insect Protection

CAUTION

KEEP OUT OF REACH OF CHILDREN
See Precautions on Back Panel

ACTIVE INGREDIENTS:

N, N-diethyl-meta-toluamide	38%
Other Isomer:	2%
INERT INGREDIENTS	60%

**ECONOMY SIZE
NET WT. 11 OZ.**

**ECONOMY SIZE
11 OZ. (312 grams)**

REPEL[®] SPORTSMEN[®] BUG BLOCK

Up to 6 hours of effective protection from mosquitoes, black flies, ticks, gnats, chiggers, no-see-ums, sand flies, deer flies, fleas and other biting insects. REPEL[®] Sportsmen[®] Bug Block is non-greasy and resists perspiration.

REPEL[®] Sportsmen[®] Bug Block is developed especially for campers, backpackers, fishermen, hunters, golfers, bikers, boaters, hikers, joggers, ball players and active outdoors men and women.

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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.

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 anything. 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. 305-32
EPA EST. NO. 3657-WI-2

233912

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 is unnecessary for effectiveness. After returning indoors, wash treated skin with soap and water. Wash treated 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 temperature above 130°F may cause bursting.

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

REPEL[®]
SPORTSMEN[®]

BUG BLOCK
(Insect
Protection
Factor) **40
IPF**

Effective, Long Lasting Insect Protection

ACTIVE INGREDIENTS	
N,N-diethyl-methyl-toluamide	38%
Other Insecticides	2%
INERT INGREDIENTS	
	60%

CAUTION
KEEP OUT OF REACH OF CHILDREN
See Precautions on Back Panel

NET WEIGHT 1.1 OZ. MADE IN THE U.S.A.
Mfd. for Wisconsin Pharmacal Co., Inc., Jackson WI, 53007
EPA REG. NO. 305-32 EPA EST. NO. 2467-W-2

BEST AVAILABLE COPY