

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<sup>®</sup>**  
**FAMILY<sup>®</sup>**

**BUG BLOCK**

**27**  
**IPF**

(Insect Protection Factor)

**IDEAL FOR:**

- Purses
- Jackets
- Glove Compartments
- Beach Bags

Effective,  
Scented  
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.

353

**REPEL<sup>®</sup>**  
**FAMILY<sup>®</sup>**

Effective, Scented Insect Protection

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

Repels Mosquitoes, Biting Flies, Chiggers, Ticks and  
Including Fleas on Exposed Skin Surfaces

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

The IPF (Insect Protection Factor) was developed to remove the mystery  
level of insect protection. The IPF number corresponds to the amount of  
Repel product provides. A lower IPF is appropriate for times when bugs  
when bugs are really biting.

**DIRECTIONS FOR USE:** It is a violation of Federal law to use this product  
its labeling. Read all directions before using this product. Hold container  
clothing and spray with a slow sweeping motion. Do not spray in a  
repellent to cover exposed skin and clothing. Do not use under clothing.  
reapplication and saturation is unnecessary for effectiveness.

**FOR EXPOSED SKIN AREAS, TO REPEL FLIES, GNATS AND MOSQUITOES:**  
Do not apply to eyes and mouth. Do not apply to hands of young children.  
face. For treating face, spray in palm of hand, rub palms together and  
cuts, wounds, or irritated skin.

**FOR CLOTHING, TO REPEL TICKS, FLEAS AND CHIGGERS:** Apply to  
cuffs of trousers, tops of socks, shoes, hats and areas of clothing  
weeds or other growth.

After returning indoors, wash treated skin with soap and water. Wash

**PRECAUTIONARY STATEMENT:**

**HAZARDS TO HUMANS**

**CAUTION:** Causes eye irritation. Harmful if swallowed. Do not let children  
been treated. Use of this product may cause skin reactions in rare cases.  
your child is reacting to this product, wash treated skin and call your

**STATEMENT OF PRACTICAL TREATMENT:**

**IF IN EYES:** Flush eyes with plenty of water. Get medical attention if irritation  
**IF SWALLOWED:** Call a physician or Poison Control Center.

**PHYSICAL HAZARDS**

**EXTREMELY FLAMMABLE:** Contents under pressure. Do not use near  
flame. Do not puncture or incinerate container. Exposure to temperature  
bursting. May damage plastics, varnished or painted surfaces. May irritate  
cotton. DO NOT apply to synthetic fabrics.

**STORAGE AND DISPOSAL**

**STORAGE:** Store in original container in cool, locked storage  
area away from heat and open flame.

**DISPOSAL:** Replace cap and discard containers in trash. Do not  
incinerate or puncture. Securely wrap original container in  
several layers of newspaper and discard in trash.

Manufactured for  
Wisconsin Pharmaceutical Company, Inc.  
Jackson WI, 53037

**MADE IN THE U.S.A.**

EPA REG. NO. 305-39 EPA EST. NO. 3657-WI-2

**BEST AVAILABLE COPY**

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

## BUG BLOCK

# 27 IPF

(Insect Protection Factor)

Effective, Scented Insect Protection

### CAUTION

KEEP OUT OF REACH OF CHILDREN

See Precautions on Back Panel

#### ACTIVE INGREDIENTS:

N, N-diethyl-m-toluamide	25.50%
Other Insecters	1.35%
N-octyl bicycloheptane dicarboximide	7.87%
Di-n-propyl hexcinclohexanone	3.84%
<b>INERT INGREDIENTS:</b>	<b>61.84%</b>

NET WT. 6.5 OZ.

**REPEL<sup>®</sup> FAMILY<sup>®</sup> BUG BLOCK**  
Repels Mosquitoes, Biting Flies, Chiggers,  
Ticks and Other Flying Insects,  
Including Fleas on Exposed Skin Surfaces.

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. 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.

**FOR EXPOSED SKIN AREAS, TO REPEL FLIES, GNATS AND MOSQUITOES:** Use as directed above. Do not apply to eyes and mouth. Do not apply to hands of young children. Do not spray directly on face. For treating face, spray in palm of hand, rub palms together and rub on face. Do not apply over cuts, wounds, or irritated skin.

**FOR CLOTHING, TO REPEL TICKS, FLEAS AND CHIGGERS:** Apply along all openings of the clothing, cuffs of trousers, tops of socks, shoes, hats and areas of clothing which may contact the ground, weeds or other growth.

After returning indoors, wash treated skin with soap and water. Wash treated clothing.

#### PRECAUTIONARY STATEMENTS

##### HAZARDS TO HUMANS

**CAUTION:** Causes eye irritation. Harmful if swallowed. Do not let children rub their eyes if hands have been treated. 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.

##### STATEMENT OF PRACTICAL TREATMENT

**IF IN EYES:** Flush eyes with plenty of water. Get medical attention if irritation persists.  
**IF SWALLOWED:** Call a physician or Poison Control Center.

##### PHYSICAL HAZARDS

**EXTREMELY FLAMMABLE:** Contents under pressure. Do not use near fire, heated surfaces, sparks or flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. May damage plastics, varnished or painted surfaces. May be used on Nylon, Orion, wool or cotton. DO NOT apply to synthetic fabrics.

##### STORAGE AND DISPOSAL

**STORAGE:** Store in original container in cool, locked storage area away from heat and open flame.

**DISPOSAL:** Replace cap and discard container in trash. Do not incinerate or puncture. Securely wrap original container in several layers of newspaper and discard in trash.



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

EPA REG. NO. 305-39  
EPA EST. NO. 3657-WI-2

232865

BEST AVAILABLE COPY

**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. 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. **FOR EXPOSED SKIN AREAS, TO REPEL FLEES, GNATS AND MOSQUITOES:** Use as directed above. Do not apply to eyes and mouth. Do not apply to hands of young children. Do not spray directly on face. For treating face, spray in palm of hand, rub palms together and rub on face. Do not apply over cuts, wounds, or irritated skin. After returning indoors, wash treated skin with soap and water. Wash treated clothing.

**PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS - CAUTION:** Causes eye irritation. Harmful if swallowed. Do not let children rub their eyes if hands have been treated. 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.

**STATEMENT OF PRACTICAL TREATMENT - IF IN EYES:** Flush eyes with plenty of water. Get medical attention if irritation persists. **IF SWALLOWED:** Call a physician or Poison Control Center.

**PHYSICAL HAZARDS - EXTREMELY FLAMMABLE:** Contents under pressure. Do not use near fire, heated surfaces, sparks or flames. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting. May damage plastic, varnished or painted surfaces. May be used on Nylon, Orlon, wool or cotton. **DO NOT** apply to synthetic fabrics.

**STORAGE:** Store in original container in cool, locked storage area away from heat and open flame. **DISPOSAL:** Replace cap and discard contents in trash. Do not incinerate or puncture. Securely wrap original container in several layers of newspaper and discard in trash.

**REPEL<sup>®</sup>**  
**FAMILY<sup>®</sup>**

**BUG BLOCK**  
(Insect  
repellent  
Factor)  
**27  
IPF**

Effective, Scented Insect Protection

ACTIVE INGREDIENTS	
N,N-Diethyl-m-toluidide	25.50%
Diethyltoluamide	1.35%
Methylcyclohexanedi-carbonyl-di-	7.67%
Cinnamyl alcohol	3.84%
<b>INERT INGREDIENTS</b>	<b>61.64%</b>

**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 Pharmaceutical Co., Inc., Jackson WI, 53007  
EPA REG. NO. 305-30 EPA EST. NO. 2657-WI-2

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