

PM 10 305-40

10/11

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

**18
IPF**

(Insect Protection Factor)

ACCEPTED
with COMMENTS
in EPA Letter Dated
18 JUL 1994

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the purpose of being
registered under EPA FIFRA
305-40

Effective,
Long Lasting
Insect Protection

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REPEL[®]
SPORTSMEN[®]

Effective, Long Lasting Insect Protection

REPEL[®] SPORTSMEN[®] BUG BLOCK

Repels mosquitoes, chiggers, ticks, deer flies, stable flies, black flies
skin surfaces.

The IPF (Insect Protection Factor) was developed to remove to
appropriate level of insect protection. The IPF number corresponds to
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 label directions. Read all directions before using this product.

Apply over all exposed skin to repel biting flies, ticks and mosquitoes in
enclosed areas. To apply to face, dispense on hands and rub on face.
DO NOT APPLY TO EYES AND MOUTH. Do not apply to hair. Do not use
just enough repellent to cover exposed skin and clothing. Do not use
overexposure. Frequent reapplication and saturation is unnecessary.
Returning indoors, wash treated skin with soap and water. Wash
and chiggers, apply to socks, tops of shoes and around openings.
Do not apply to synthetic fabrics. Will not damage cotton, wool, leather,
FURNITURE FINISHES, PLASTICS, PAINTED SURFACES, AND

PRECAUTIONARY STATEMENT:

HAZARDS TO HUMANS — CAUTION: Harmful if swallowed. Do not use
of this product may cause skin reactions in rare cases. If you suspect
reacting to this product, wash treated skin and call your local Poison
Control Center. Apply over cuts, wounds, or irritated skin.

PRACTICAL TREATMENT: If in eyes, flush with plenty of water. If
swallowed, call a physician or Poison Control Center.

PHYSICAL & CHEMICAL HAZARDS — FLAMMABLE: Do not use near
flame.

STORAGE: Store in a cool, dry area away from heat or open flame.

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

For an effective insect bite relief treatment,
we recommend:

Sting Eze.

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

EPA REG. NO. 305-40 EPA EST. NO. 305-WI-1

**REPEL® SPORTSMEN®
BUG BLOCK**
Repels mosquitoes, chiggers,
ticks, deer flies, stable flies, black
flies, gnats and fleas on exposed
skin surfaces.

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.
Apply over all exposed skin to repel
biting flies, ticks and mosquitoes.
Do not spray in enclosed areas. To
apply to face, dispense on hands
and rub on. 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. For ticks and chiggers,
apply to soles, tops of shoes and
around openings in outer clothing. Do
not apply to synthetic fabric. Will
not damage cotton, wool and nylon. **MAY
DAMAGE FURNITURE FINISHES,
PLASTICS, PAINTED SURFACES
AND WATCH CRYSTALS.**

Manufactured by
Wisconsin Pharmacal Co., Inc.
Jackson, WI 53037
MADE IN THE U.S.A.

NON-AEROSOL PUMP
**REPEL®
SPORTSMEN®**

BUG BLOCK

**18
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-metho-tothamide	18.62%
Other isomers	0.88%
N-ethyl bicyclohept-ene dicarboximide	5.00%
Di-n-propyl isocinchomerone	2.50%
INERT INGREDIENTS	75.00%

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 over cuts, wounds, or
irritated skin.

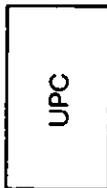
PRACTICAL TREATMENT: If in
eyes, flush with plenty of water. If
irritation persists, get medical
attention. If swallowed, call a
physician or Poison Control
Center.

**PHYSICAL AND CHEMICAL
HAZARDS - FLAMMABLE:** Do
not use or store near heat or open
flame.

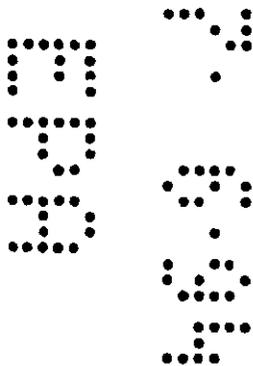
STORAGE: Store in a cool, dry
area away from heat or open
flame.

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

EPA REG. NO. 305-40
EPA EST. NO. 305-WI-1



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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.
Apply over all exposed skin to repel biting flies, ticks and mosquitoes. Do not spray in enclosed areas. To apply in face, dispense on hands and rub on. 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. For hats and chiggers, apply to inside, tops of shoes and around openings in outer clothing. Do not apply to synthetic fabric. Will not damage cotton, wool and nylon. **MAY DAMAGE FURNITURE FINISHES, PLASTICS, PAINTED SURFACES AND WATCH CRYSTALS.**

PRECAUTIONARY STATEMENTS

HAZARD 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 over cuts, wounds, or irritated 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: Do not use or store near heat or open flame.

STORAGE: Store in a cool, dry area away from heat or open flame.

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



Effective, Long Lasting Insect Protection

ACTIVE INGREDIENTS:

N, N-Diethyl-m-toluamide	16.62%
Other Inert	0.00%
N-ethyl bicyclohexane dicarboximide	5.00%
Di-n-propyl methacrylamide	2.50%
INERT INGREDIENTS	75.88%

CAUTION

KEEP OUT OF REACH OF CHILDREN

See Precautions on Back Panel

NET WEIGHT 2 FL. OZ.

Manufactured by

Wisconsin Pharmaceutical Company, Inc., Jackson WI, 53037

EPA REG. NO. 305-40

EPA EST. NO. 305-WI-1

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