

Jean Killoren
WPC Brands, Inc.
1 Repel Road
Jackson, WI 53037

Subject: Bug Stuff Insect Repellent
EPA Registration No. 305-44
Submission dated January 12, 2000
Application dated June 26, 2002
Application dated October 30, 2002

Dear Ms. Killoren:

The proposed amendment to the registration for the product cited above under The Federal Insecticide, Fungicide And Rodenticide Act, as amended revising the label in response to the DEET RED, PR Notices 2001-1 and 2001-6 and the Agency's letter of September 27, 2002 is acceptable subject to the comments listed below:

1) Change the paragraph beginning with, "If you suspect a reaction xx", to read:

If you suspect a reaction to this product:

- * Discontinue use;
- * Take off contaminated clothing;
- * Rinse skin immediately with plenty of water for 15-20 minutes;
- * Call a poison control center or doctor for treatment advice.

2) Add the statement, "Have the product container with you when calling a poison control center or doctor or going for treatment."

3) Add the statement, "For additional information in case of emergency call toll free (insert Telephone Number), to the First Aid block.

4) Move the statements, "Do not apply over cuts, wounds, sunburned or irritated skin. Do not allow children to handle this product.", from the Precautionary Labeling section to the Directions For Use section.

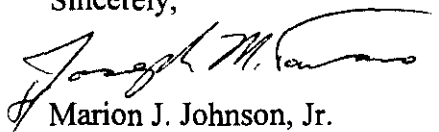
5) Place the storage and disposal statements in a box and add the statement, "PESTICIDE STORAGE; store in a cool, dry place inaccessible to children."

This product is not being re-registered at this time. Product specific efficacy data will be required. Once the efficacy guidelines are in place, you will be notified of the efficacy requirements.

A stamped copy of the amended label is enclosed for your records. Submit two copies of the final label before the product is released for shipment under this revised label.

If you have any questions or comments please contact Joseph Tavano at (703) 305-6411.

Sincerely,



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



Master Label

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Bug Stuff

INSECT REPELLENT *(either in name or stated separately)*

Keep Out of Reach of Children
See back panel for precautions.

ACTIVE INGREDIENTS:

DEET 20.0%

OTHER INGREDIENTS: 80.0%

TOTAL 100.0%

NET WT __ oz (__ g)

Back label

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Read and follow all directions and precautions on this product label.

Apply over all exposed skin to repel biting insects. Use just enough repellent to cover exposed skin. Do not use under clothing. If used on face, spread on hands first then apply sparingly to face and ears. Do not apply near eyes and mouth. Avoid over-application. When using on children, apply to your own hands and then put it on the child. Do not apply to children's hands.

After returning indoors, wash treated skin with soap and water. Wash treated clothing before wearing it again.

- ❖ Do not apply to synthetic fabrics such as acetate, rayon or spandex. Will not damage cotton, wool and nylon. May damage furniture finishes, leather, plastics painted and varnished surfaces including watch crystals, guns, bows and automobiles.

STORAGE AND DISPOSAL: Do not contaminate water, food, or feed by storage and disposal. If empty: Do not reuse this container. Place in trash or offer for recycling if available. If partly filled: Call your local waste agency (or 1-800-CLEANUP) for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS:

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: Do not apply over cuts, wounds, sunburned, or irritated skin. Use of this product may cause skin reactions in rare cases. Do not allow children to handle this product. Wash hands before eating, drinking, chewing gum, or using tobacco.

If you suspect a reaction to this product, discontinue use, wash treated skin, and call your local poison control center. If you go to a doctor take this repellent with you.

WPC Brands, Inc.

Questions or Comments?

Made in the U.S.A.

EPA Reg. No. 305-44

Jackson, WI 53037

Call (800) 558-6614

www.wpcbrands.com

EPA Est. No. 305-W1-1

Optional Marketing Claims

- ❖ 20% DEET
- ❖ Unscented Lotion
- ❖ Outdoor protection (for the entire family) in a (smooth) lotion that is not sticky or greasy.
- ❖ Family Protection
- ❖ Insect Block
- ❖ Unscented mosquito protection
- ❖ Effective protection from mosquitoes, ticks, gnats, chiggers, and biting flies.
- ❖ Repels mosquitoes, ticks, biting flies, gnats, chiggers and fleas.
- ❖ Developed especially for campers, backpackers, fisherman, hunters, golfers, bikers, hikers, joggers, ball players and active outdoor enthusiasts.
- ❖ Sportsmen Formula

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

APR 1 2003

Under the Federal Insecticide,
Fungicide, and Herbicide Act,
as amended, for the pesticide
registered under EPA Reg. No.
305-44

Key

- ❖ Optional text/information may or may not be on label.
(Optional text) – May be left out of text, used in place of preceding text or in conjunction with preceding text.
(Italicized – for informational purposes only.