

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

Subject: Repel 23 Insect Repellent
EPA Registration No. 305-50
Submission dated January 12, 2000
Application dated June 6, 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 First Aid statement for If Swallowed to read:

IF SWALLOWED:

- * Immediately call a poison control center or doctor.
- * Do not induce vomiting unless told to do so by a poison control center or doctor.
- * Do not give **any** liquid to the person.
- * Do not give anything by mouth to an unconscious person.

2) Change the second section of the First Aid block 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.

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

4) The statement, "This product contains petroleum distillates.", must be placed directly under the ingredients statement.

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."

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

7) In the Hazard To Humans And Domestic Animals section, revise the statement. "Wash hands xxx tobacco.", to read, "Wash hands xxxxx using tobacco or using the toilet."

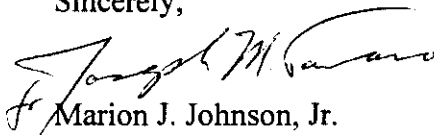
This product is not being re-registered at this time. Product specific efficacy data will be required. Once the efficacy guidelines are in place, you will be notified of the efficacy requirements.

Also, to be eligible for re-registration, the product must be packaged in containers utilizing a concave trigger to help aim the product or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes.

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

Base Name:
Repel 23

INSECT REPELLENT (either in name or stated separately)

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

| | |
|---------------------|--------|
| ACTIVE INGREDIENTS: | |
| DEET | 23.0% |
| OTHER INGREDIENTS: | 77.0% |
| TOTAL | 100.0% |

Net Weight oz (gm)

Back labeling

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.**

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/or clothing. Do not use under clothing. Do not spray directly on face. If used on the face, spray 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.

- ❖ Works on clothing too: Spray shirts, pants, and hats. For ticks, chiggers and fleas apply to tops of socks and around openings of outer clothing.

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

STORAGE AND DISPOSAL: Do not contaminate water, food, or feed by storage and disposal. Do not Puncture or Incinerate! If empty: Place in trash or offer for recycling if available. If partly filled: Call your local solid waste agency or (1-800-CLEANUP) for disposal instructions.

PRECAUTIONARY STATEMENTS:

HAZARD TO HUMANS AND DOMESTIC ANIMALS - CAUTION: Harmful if swallowed. Do not apply over cuts, wounds 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.

**ACCEPTED
with COMMENTS
In EPA Letter Dated:
APR 1 2003**

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
305-50

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| FIRST AID |
| If swallowed: |
| <ul style="list-style-type: none"> • Call a poison control center or doctor immediately for treatment advice. • Have a person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give anything by mouth to an unconscious person. |
| If you suspect a reaction to this product, discontinue use and wash treated skin. |
| Have the product container with you when calling a poison control center or doctor, or going for treatment. |

PHYSICAL AND CHEMICAL HAZARDS: FLAMMABLE - Contents under pressure. Keep away from heat, sparks and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130° F may cause bursting.

- ❖ 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.

Manufactured for: WPC Brands, Inc.
 Jackson, WI 53037 Made in the U.S.A.
 Questions or Comments? Call 1-800-558-6614
 www.wpcbrands.com
 EPA Reg. No. 305-50 EPA Est. No. 3657-WI-2

Optional marketing claims:

- ❖ Repel 23 Insect Block
- ❖ 23% DEET
- ❖ Repels: mosquitoes, ticks, biting flies, gnats, fleas & chiggers
- ❖ Hours of effective ((un)scented) protection from mosquitoes, ticks, black flies, gnats, chiggers, no-see-ums, sand flies, deer flies, fleas, biting flies and other biting insects.
- ❖ The long-lasting, non-greasy formula provides exceptional effective protection.
- ❖ Non greasy and resists perspiration
- ❖ Developed especially for campers, backpackers, fisherman, hunters, golfers, bikers, hikers, joggers, ball players and active outdoor enthusiasts.
- ❖ Effective, long lasting ((un)scented) protection
- ❖ (Un)Scented protection
- ❖ Long Lasting Protection

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| <u>Key</u> |
| ❖ 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 |