	<p align="center"><b>U.S. ENVIRONMENTAL PROTECTION AGENCY</b></p> <p align="center">Office of Pesticide Programs Registration Division (7505P) 1200 Pennsylvania Ave., N.W. Washington, D.C. 20460</p>	<p>EPA Registration No. <b>305-51</b></p>	<p>Date of Issuance: <b>APR 09 2008</b></p>
<p><b>NOTICE OF PESTICIDE:</b> <input type="checkbox"/> Registration <input checked="" type="checkbox"/> Reregistration (under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended)</p>		<p>Term of Issuance: <b>Conditional</b></p> <p>Name of Pesticide Product: <b>Repel 25</b></p>	
<p><b>Name and Address of Registrant (include ZIP Code):</b> <b>United Industries Corp. D/B/A WPC Brands, Inc.</b> <b>P.O. Box 4406</b> <b>Bridgeton, MO 63044</b></p>			
<p><b>Note:</b> Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.</p>			
<p>On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.</p> <p>Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.</p> <p>This action is taken under the authority of section 4(g)(2)(c) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended. Reregistration under this section does not eliminate the need for continual reassessment of pesticides. EPA may require submission of data at any time to maintain the registration of your product.</p> <p>Based on your response to the Reregistration Eligibility Document(s), EPA has reregistered the product listed above provided that the following change is made to the label:</p> <ol style="list-style-type: none"> <li>1. Revise the Directions for Use section, as follows:             <ol style="list-style-type: none"> <li>a. Directly below the FIFRA required statement "It is a violation of Federal law to use this product in a manner inconsistent with its labeling", and on a separate line, Replace all text with following statements: <b>"READ AND FOLLOW ALL DIRECTIONS AND PRECUTIONS ON THIS PRODUCT LABEL.</b></li> </ol> <p>For Outdoor Use Only. Do not spray in enclosed areas. Never use repellents over cuts, wounds, sunburned or irritated skin. Do not apply near eyes and mouth, and apply sparingly around ears. When using sprays, do not spray directly into face; spray on hands first and then apply to face. Do not allow children to handle this product, and do not apply to children's hands. When using on children, apply to your own hands and then put it on the child. Apply only to exposed skin and/or clothing (as directed on the product label). Do not use under clothing. Use just enough repellent to cover exposed</p> </li> </ol>			

skin. Heavy application and saturation is unnecessary for effectiveness; if biting insects do not respond to a thin film of repellent, apply a bit more. After returning indoors, wash treated skin with soap and water or bathe. This is particularly important when repellents are used repeatedly in a day or on consecutive days. Also, wash treated clothing before wearing it again. **Use of this product may cause skin reactions in rare cases. 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 product with you.**

Hold container 6-8 inches from skin or clothing and spray with a slow sweeping motion.

~~Works on~~ For use on outer surfaces of clothing ~~too~~: Spray shirts, pants, and hats. For ticks, chiggers and fleas apply to tops of socks and around opening in outer clothing. 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."

- 2. 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.

- 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. 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 as shown in #1 above.
- 6. 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."
- 7. Revise the Storage and Disposal Section as follows:

**"Storage and Disposal**

**Pesticide Storage:** Store in a cool dry place away from heat or open flame and inaccessible to children. Do not contaminate water, food, or feed by storage and disposal. Do not puncture or incinerate!

**Pesticide Disposal: 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."

- 8. Marketing Claims:

- a. Remove the statement: "Made in the USA" *This is a false and misleading statement, unless WPC Brands, Inc. can demonstrate that all of the ingredients are manufactured in the U.S.A.*
- b. Revise the following marketing claim: **Hours of Effective ((un)scented) protection from mosquitoes, ticks, black flies, gnats, chiggers, no-see-urns, sand flies, deer flies, fleas, and biting flies** ~~and other biting insects.~~  
*The terms "Hours" and "and other biting insects" are vague and misleading.*

- c. Revise the following marketing claim: "~~The long-lasting~~, Non-greasy formula provides exceptional effective protection."  
*The term "The long-lasting" is vague and misleading.*
- d. Revise the following marketing claim: "Effective, ~~long-lasting~~ ((un)scented) protection."  
*The term "long-lasting" is vague and misleading.*

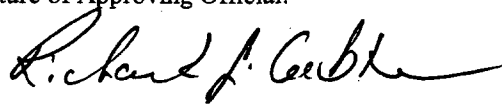
9. Revise the company name and address to:  
 WPC Brands, Inc.  
 PO Box 4406  
 Bridgeton, Missouri 63044

10. To be eligible for reregistration, aerosol and pump spray formulations must be packaged in containers utilizing a concave trigger to help aim product or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes.

11. The Agency is in the process of developing and improving the current Efficacy Assessment Guidelines for repellent products. The Agency intends to defer the determination of any related efficacy data requirements supporting the claims that may appear on this label until these Efficacy Assessment Guidelines are complete. When the guidelines are finalized, the Agency expects to issue a Data Call-In to address the revised guidelines to all registrants with registrations for personal repellent products that have not previously submitted efficacy data sufficiently consistent with the revised guidelines.

You must submit two copies of the final printed label revised in accordance with the comments listed above before the product is released for shipment under this label. If you have any questions, you may contact Carmen Rodia at (703)-306-0327 or [rodia.carmen@epa.gov](mailto:rodia.carmen@epa.gov).

A copy of your label stamped "Accepted with Comments" is enclosed for your records:

Signature of Approving Official: 	Date:  <p style="text-align: center;">APR 09 2008</p>
Richard J. Gebken, Product Manager (10) Registration Division, Insecticide Branch	

**Master Label**

**Base Name:**  
**Repel 25**

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

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

<b>ACTIVE INGREDIENTS:</b>	
DEET	25.0%
<b>OTHER INGREDIENTS:</b>	75.0%
<b>TOTAL</b>	<b>100.0%</b>

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**

*April 9, 2008*  
Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 305-51

**FIRST AID**

**If swallowed:**

- 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:  
Jackson, WI 53037

WPC Brands, Inc.  
Made in the U.S.A.  
Call 1-800-558-6614

Questions or Comments?

www.wpcbrands.com

EPA Reg. No. 305-51

EPA Est. No. 3657-WI-2

Optional marketing claims:

- ❖ Repel 25 Insect Block
- ❖ 25% 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

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.