



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 23, 2016

Michael Sarli
Director of Regulatory Affairs
United Industries Corp.
D/B/A WPC Brands, Inc.
PO Box 4406
Bridgeton, MO 63044

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – Adding optional marketing claims “Repels mosquitoes that may carry the [Chikungunya], [Zika], [Dengue] and [West Nile] virus” and “Repels mosquitoes that may transmit the [Chikungunya], [Zika], [Dengue], and [West Nile] virus”
Product Name: Repel Insect Repellent 30 LE
EPA Registration Number: 305-62
Application Date: March 7, 2016
OPP Decision Number: 514838

Dear Mr. Sarli:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this product for shipment with the new labeling. In accordance with 40 CFR § 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. “To distribute or sell” is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR § 152.3.

Should you wish to add/retain a reference to your company’s website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section

12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the EPA find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Menyon Adams of my team by phone at (703) 347-8496 or via email at adams.menyon@epa.gov.

Sincerely,

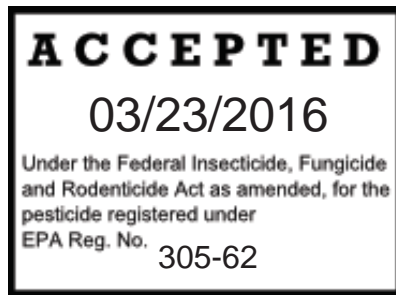
A handwritten signature in black ink, appearing to read "For Andrew C. Bryceland". The signature is stylized and written over a light blue rectangular stamp.

Andrew C. Bryceland, Team Leader
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511P)
Office of Pesticide Programs

Enclosure

REPEL

Insect Repellent 30 LE



KEEP OUT OF REACH OF CHILDREN

WARNING: See back panel for precautions and first aid statements

Active Ingredients:

Oil of Lemon Eucalyptus*.....	30.0%
Other Ingredients:.....	70.0%
TOTAL.....	100.0%

*Approx. 65% p-menthane-3,8-diol

NET 0.5, 1, 2, 3,4, 6, 8, 9 fl oz or other size as appropriate
(metric conversion to be included)

OPTIONAL MARKETING LANGUAGE

[Repel Insect Repellent 30 LE is designed to repel mosquitoes for up to six hours. This unique formula is guaranteed to repel mosquitoes and ticks. You can use Repel Insect Repellent 30 LE with confidence knowing that it will not harm your fishing line, camping gear, watch crystals or tackle box. Apply Repel Insect Repellent 30 LE and get your adventure started.]

You can use Repel Insect Repellent 30 LE with confidence knowing that it will not harm your fishing line, camping gear, watch crystals or tackle box. Apply Repel Insect Repellent 30 LE and get your adventure started.

The active ingredient in Repel Insect Repellent 30 LE is derived from the leaves of the Lemon Eucalyptus tree.

STOP. READ ENTIRE LABEL BEFORE EACH USE.

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.**

To repel insects, apply to exposed skin and clothing. For best results, spread evenly with hand to moisten all exposed skin. Do not spray directly on face. To apply to face, dispense on palm of hand and spread on face and neck. Reapply once as needed. Do not apply more than twice per day.

STORAGE AND DISPOSAL: Store the product in a cool, dry place, out of reach of children. **If empty:** Nonrefillable container. Do not reuse or refill this container. Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING. Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. After returning from outdoors, wash product from all exposed skin. Do not allow children to apply this product to themselves. Do not apply to the hands of children. Do not use on children under the age of three years. May cause skin reactions for some people. Discontinue if irritation or rash appears. Do not apply over cuts, wounds or irritated skin.

First Aid

<p>If in Eyes Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing. Call a poison control center or doctor for treatment advice.</p>
<p>If swallowed Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mouth to an unconscious person.</p>
<p>Have the product container or label with you when calling a Poison Control Center or doctor, or going for treatment. In case of emergency call 1-800-332-5553.</p>

Physical or Chemical Hazards

COMBUSTIBLE. Do not use or store near heat or open flame.

NOTICE: To the extent consistent with applicable law, buyer assumes all responsibility for safety and use not in accordance with directions.

Questions or Comments? Call 1-800-332-5553

Made in the USA for WPC Brands, Inc.
PO Box 4406
Bridgeton, MO 63044

EPA Reg. No. 305-62

Est. No. 9688-MO-1

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OPTIONAL MARKETING CLAIMS

1. Contains Lemon Eucalyptus Oil
2. Active Ingredient extract of Lemon Eucalyptus
3. Active Ingredient Derived from Plant Extracts
4. Gives Mosquitoes and Ticks the Brush-Off
5. Active Ingredient derived from plant extracts
6. Active Ingredient Derived from Lemon Eucalyptus

7. Contains plant extracts [of Lemon Eucalyptus]
8. Repels [annoying] mosquitoes (and ticks)
9. Delivers up to 6 hours of repellency of Mosquitoes
10. Repels up to 6 hours against mosquitoes
11. Repels mosquitoes [for] up to 6 hours
12. Won't harm [your] gear
13. Will not [melt][damage][weaken] your fishing line
14. Will not harm watch crystals, tackle boxes, backpacks, fishing line, tents or bedding.
15. Goes on easy
16. Lemon Eucalyptus scent
17. Cool, refreshing [lemon eucalyptus] scent
18. Fisherman's Formula
19. Botanically-based active ingredient
20. Plant-based active ingredient
21. Effective, Dependable mosquito repellency for up to six hours
22. Unique formula
23. Unique plant-based active ingredient
24. New formula! [to be removed 6 months after first shipment]
25. [Contains][made with] Oil of Lemon Eucalyptus
26. Powered by Citriodiol® Nature's Repellent (logo)
27. Naturally-based active ingredient
28. Active ingredient derived from [the leaves of] the Lemon Eucalyptus tree
29. [By][From][Brought to you by] the makers of Repel®
30. Not Sticky or greasy
31. Repels mosquitoes including those that may transmit West Nile Virus for up to six hours
32. Repels annoying mosquitoes[and ticks]
33. Cool Lemon Eucalyptus scent
34. DEET Free
35. Contains no DEET
36. Repels mosquitoes [including those] that may [transmit] [carry] West Nile Virus [for up to six hours]
37. Protects[s] [ion] against [the] mosquitoes that may carry [Eastern Equine Encephalitis] EEE.
38. Repels mosquitoes that may carry the [Chikungunya], [Zika], [Dengue] and [West Nile] virus
39. Repels mosquitoes that may transmit the [Chikungunya], [Zika], [Dengue] and [West Nile] virus