



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

March 13, 2020

United Industries Corporation
D/B/A WPC Brands, Inc.
c/o Michael G. Sarli
Sr. Director of Regulatory Affairs
P.O. Box 4406
Bridgeton, MO 63044

Subject: Labeling Notification per Pesticide Registration Notice (PRN) 98-10 – Adding Alternate Brand Name
Product Name: Repel Insect Repellent 30 LE-W
EPA Registration Number: 305-64
Application Date: January 28, 2020
OPP Decision Number: 559716

Dear Mr. Sarli:

The U.S. Environmental Protection Agency (EPA) is in receipt of your application for notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Biopesticides and Pollution Prevention Division (BPPD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The labeling submitted with this application has been stamped “Notification” and will be placed in our records. The alternate brand name: “Repel® Plant-Based Lemon Eucalyptus Insect Repellent Wipes” has been added to the product’s records. You must submit one (1) copy of the final printed labeling with the modifications.

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 the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) and is subject to review by the 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.

Page 2 of 2
EPA Reg. No. 305-64
OPP Decision No. 559716

If you have any questions, please contact Gina Burnett of my team by phone at (703) 605-0513 or via email at burnett.gina@epa.gov.

Sincerely,

A handwritten signature in blue ink that reads "Andrew C. Kuyel". The signature is written in a cursive style with a large, sweeping initial 'A'.

Team Leader Name, Team Leader
Branch Name
Biopesticides and Pollution
Prevention Division (7511P)
Office of Pesticide Programs

Enclosure

REPEL

Insect Repellent 30 LE-W

[ABN: *Repel Plant-Based Lemon Eucalyptus Insect Repellent Wipes*]

NOTIFICATION

305-64

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

03/13/2020

Active Ingredients:	
Oil of Lemon Eucalyptus*	30.0%
Other Ingredients:	<u>70.0%</u>
TOTAL	100.0%
*Approx. 65% p-menthane-3,8-diol	

KEEP OUT OF REACH OF CHILDREN

CAUTION: See [side] [back] [panel] [booklet] for precautions and first aid statements

Net Wt: x oz (x g) y – z” x z” Wipes

[Bracketed Text] = Optional language {Bracketed Text} = Note to Reviewer

{OPTIONAL MARKETING LANGUAGE}

[Repel Insect Repellent 30 LE-W is designed to repel mosquitoes for up to six hours. This unique formula is guaranteed to repel mosquitoes. You can use Repel Insect Repellent 30 LE-W 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. Convenient towelette for easy application} You can use Repel Insect Repellent 30 LE-W with confidence knowing that it will not harm your fishing line, camping gear, watch crystals or tackle box. Apply Repel Insect Repellent 30 LE-W and get your adventure started. The active ingredient in Repel Insect Repellent 30 LE-W 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.**

Remove the lid from the container by pulling upward. Remove the protective foil. Lift flap on lid. Pull up the center towelette and thread the corner of towelette through the open flap in lid; **DO NOT** push finger through lid opening. Replace lid on container. Towelettes should be pulled at an angle to dispense one at a time. The lid should be tightly closed on container between uses to keep towelettes from drying out. [Optional directions for a single packet towelette: Tear open foil pack.]

Unfold towelette and wipe evenly over exposed skin. Use just enough repellent to cover exposed skin. Do not use under clothing. When using on face, apply sparingly, avoiding eyes. Do not apply near eyes and mouth. Apply sparingly around ears. Do not apply over cuts, wounds or irritated skin. Do not apply to sunburned skin. Do not apply to children's hands. Do not allow children to handle this product. [Frequent reapplication is unnecessary.] Avoid over-application of this product. After returning indoors, wash treated skin with soap and water. Reapply once as needed. Do not apply more than twice per day.

{Optional Directions for Flexible (Pouch) Packaging}

Tear open package [along the dotted line] beginning at the notch. Gently pull the top towelette out of the pouch. Towelettes should be pulled at an angle to dispense one at a time. Reseal the pouch to prevent the wipes from drying out between uses. Unfold towelette and wipe evenly over exposed skin. Use just enough repellent to cover exposed skin. Do not use under clothing. When using on face, apply sparingly, avoiding eyes. Do not apply near eyes and mouth. Apply sparingly around ears. Do not apply over cuts, wounds or irritated skin. Do not apply to sunburned skin. Do not apply to children's hands. Do not allow children to handle this product. [Frequent reapplication is unnecessary.] Avoid over-application of this product. After returning indoors, wash treated skin with soap and water. Reapply once as needed. Do not apply more than twice per day.

STORAGE AND DISPOSAL: Do not contaminate water, food, feed by storage or 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

CAUTION. Causes moderate eye injury. Avoid contact with eyes or clothing. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. 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

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.

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 1-888-880-1181.

Physical or Chemical Hazards

FLAMMABLE. 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 1-888-880-1181

United Industries D/B/A WPC Brands, Inc.
PO Box 4406
Bridgeton, MO 63044

EPA Reg. No. 305-XX
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Est. No. 9688-MO-1
Batch Code:

{OPTIONAL MARKETING CLAIMS}

1. Gives Mosquitoes the Brush-Off
2. Repels [annoying] mosquitoes
3. Delivers up to 6 hours of repellency of Mosquitoes
4. Repels up to 6 hours against mosquitoes
5. Repels mosquitoes [for] up to 6 hours
6. Won't harm [your] gear
7. Will not [melt][damage][weaken] your fishing line
8. Will not harm watch crystals, tackle boxes, backpacks, fishing line, tents or bedding.
9. Goes on easy
10. Lemon Eucalyptus scent
11. Cool, refreshing [lemon eucalyptus] scent
12. Fisherman's Formula
13. Effective, Dependable mosquito repellency for up to six hours
14. Unique formula
15. New *{to be removed 6 months after first shipment}*
16. [Contains][made with] Oil of Lemon Eucalyptus
17. Powered by Citriodiol® Nature's Repellent (logo)
18. Active ingredient derived from [the leaves of] the Lemon Eucalyptus tree
19. [By][From][Brought to you by] the makers of Repel®
20. Not Sticky or greasy
21. Repels mosquitoes including those that may transmit West Nile Virus for up to six hours
22. Repels annoying mosquitoes
23. Cool Lemon Eucalyptus scent
24. Repels mosquitoes [including those] that may [transmit] [carry] West Nile Virus [for up to six hours]
25. Protects[s] [ion] against [the] mosquitoes that may carry [Eastern Equine Encephalitis] EEE.
26. Repels mosquitoes that may carry the [Chikungunya], [Zika], [Dengue] and [West Nile] virus
27. Repels mosquitoes that may transmit the [Chikungunya], [Zika], [Dengue] and [West Nile] virus
28. Travel [pack][pak][size]
29. [Soft] [Pack][Pak][Size]
30. [Ideal] [package] for [purses][backpacks][tackle boxes][beach bags]
31. Will not dry out
32. Easy to use Towelettes/Wipes
33. Easy to use and/carry protection
34. Mess free/wipe on protection
35. New Packing / New Easy to Use Wipes/Towelettes *{to be removed 6 months after first shipment}*
36. Contains Lemon Eucalyptus Oil
37. Active Ingredient extract of Lemon Eucalyptus
38. Active Ingredient Derived from Plant Extracts
39. Active Ingredient Derived from Lemon Eucalyptus

[Bracketed Text] = Optional language {Bracketed Text} = Note to Reviewer

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40. Contains plant extracts [of Lemon Eucalyptus]
 41. Plant Derived Ingredients
 42. Botanically-based active ingredient
 43. Plant-based active ingredient
 44. Unique plant-based active ingredient
 45. Powered by Citriodiol® [Nature's Repellent] [(logo)]
 46. [Contains] [a] Botanical [Active] Ingredient[s]
 47. [Contains] [a] Botanically-Derived [Active] Ingredient[s]
 48. [Contains] Oil of Lemon Eucalyptus [,] [is] a Botanical [Active Ingredient] [Ingredient] [Product]
 49. [Contains] Oil of Lemon Eucalyptus [,] [is] a Botanically-Derived [Active Ingredient] [Ingredient] [Product]
 50. [Contains] Oil of Lemon Eucalyptus [,] [is] [a] [an] [Active Ingredient] [Ingredient] [Product] derived from plants
 51. [Contains] Oil of Lemon Eucalyptus [,] [is] [a] [an] [Active Ingredient] [Ingredient] [Product] derived from plants
 52. [Contains] Oil of Lemon Eucalyptus derived from [the leaves of] the Lemon Eucalyptus tree