

12/2/2003

DEC 2 2003

Olivia Laird
TENDER CORPORATION
c/o Laird's Regulatory Consultants, Inc.
501 South Lincoln Ave.
Sterling, Virginia 20164-2024

Subject: Ben's 100 Insect Repellent
EPA Registration No. 56575-7
Application dated September 22, 2003

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 accordance with PR Notices 2001-1 and 2001-6 is acceptable subject to the comments listed below:

1) Your supplier of deet is no longer claiming that their product is 100% active. Morflex is now claiming that their product is 98.11% active. Therefore, you must change the ingredients statement on the label for your product to read:

ACTIVE INGREDIENT	
DEET.....	98.11%
OTHER INGREDIENTS.....	1.89%

2) Add a Precautionary Statement to read as follows:

Precautionary Statements

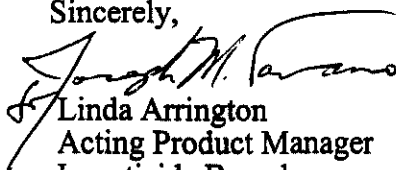
Hazards To Humans And Domestic Animals

Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes.

3) Submit a revised Confidential Statement Of Formula(CSF). The latest CSF for this product is dated May 11, 1991 and must be revised in light of your supplier's new declaration of active for their product.

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

Sincerely,


Linda Arrington
Acting Product Manager
Insecticide Branch
Registration Division(7505C)



Ben's 100 Insect Repellent

Tick and Insect Repellent

Active Ingredient:

*Deet (CAS No. 134-62-3) 100%
*N,N-diethyl-m-toluamide (m-DEET) + Related Isomers
["The choice of Adventure Medical Kits (logo)" -Dr. Eric Weiss]

[Repels Insects That May Carry

West Nile Virus And
Lyme Disease]

[MAX FORMULA]

Up to 10 Hours Protection

Repels:

Mosquitoes, Ticks, Black Flies, Fleas, Biting
Midges, Chiggers, Sand Fleas, Stable Flies

ACCEPTED
with COMMENTS
In EPA Letter Dated:
DEC 2 2003

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
56575-7

Keep Out of Reach of Children

WARNING

DO NOT USE ON INFANTS

Not recommended for use on children under the age 10.

See card for additional precautionary statements.

Net Contents 1.25 fl. Oz. (37 ml) Lotion [Pump]

Tender Corporation
Littleton, NH 03561

Questions? Call 1-888-258-4696 ext.236

EPA Reg. NO 56575-7

EPA Est. 56575-NH-1

{Container Label-Lotion Back Panel}

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 and card

~~Apply a few drops to your palm and wipe on exposed skin areas. Do not apply over cuts wounds or irritated skin. Do not~~
apply near eyes and mouth. Apply sparingly around ears. Do not apply to children's hands. Do not allow children to
handle this product. When using on children, apply to your own hands and then put on the child. Use just enough repellent
to cover exposed skin. Do not use under clothing. Avoid over-application of this product. Wash hands after applying.
After returning indoors, wash treated skin with soap and water. Repeat as needed.

{Container Label-Pump Spray Back Panel}

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 protective cap and spray on all exposed skin areas, keeping nozzle pointed away from face. Do not inhale. Do not apply over cuts, wounds or irritated skin. Do not apply near eyes and mouth. To apply to face, spray on hands and rub on. Apply sparingly around ears. Do not apply to children's hands. Do not allow children to handle this product. When using on children, apply to your own hands and then put it on the child. Use just enough repellent to cover exposed skin. Do not use under clothing. Avoid over-application of this product. After returning indoors, wash treated skin with soap and water. Wash treated clothes before wearing again. Do not spray in enclosed areas. For ticks and chiggers, apply to shoe tops, socks and around openings in clothing. Repeat as needed.

{Container Label - Both Lotion and Pump Spray Back Panel}

Storage and disposal

Storage: Store in a cool dry (preferably locked) storage area in accessible to children and pets and away from heat or open flame.

Disposal: Do not puncture or incinerate. **If empty:** Do not reuse this container. Place in trash or, if available offer for recycling. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

Refer to card for complete Precautionary Statements

{Card Label-Front Panel}

Ben's 100 Insect Repellent

Tick and Insect Repellent

[Child -Resistant Packaging]

[Repels Insects That May Carry
West Nile Virus And
Lyme Disease]

[MAX FORMULA]
Up to 10 Hours Protection

Repels:
**Mosquitoes, Ticks, Black Flies, Fleas, Biting
Midges, Chiggers, Sand Fleas, Stable Flies**

Net Contents 1.25 fl. oz. (37 ml.) Lotion [Pump]

{Card Label- Lotion Back Panel}

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 and card

~~Apply a few drops to your palm and wipe on exposed skin areas. Do not apply over cuts wounds or irritated skin. Do not~~
apply near eyes and mouth. Apply sparingly around ears. Do not apply to children's hands. Do not allow children to handle this product. When using on children, apply to your own hands and then put on the child. Use just enough repellent to cover exposed skin. Do not use under clothing. Avoid over-application of this product. Wash hands after applying. After returning indoors, wash treated skin with soap and water. Repeat as needed

{Card Label- Pump Spray Back}

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 protective cap and spray on all exposed skin areas, keeping nozzle pointed away from face. Do not inhale. Do not apply over cuts, wounds or irritated skin. Do not apply near eyes and mouth. To apply to face, spray on hands and rub on. Apply sparingly around ears. Do not apply to children's hands. Do not allow children to handle this product. When using on children, apply to your own hands and then put it on the child. Use just enough repellent to cover exposed skin. Do not use under clothing. Avoid over-application of this product. After returning indoors, wash treated skin with soap and water. Wash treated clothes before wearing again. Do not spray in enclosed areas. For ticks and chiggers, apply to shoe tops, socks and around openings in clothing. Repeat as needed.

{ Card Label -Both Lotion and Pump Spray Back Panel }

Storage and disposal

Storage: Store in a cool dry (preferably locked) storage area in accessible to children and pets and away from heat or open flame.

Disposal: Do not puncture or incinerate. **If empty:** Do not reuse this container. Place in trash or, if available offer for recycling. **If partly filled:** Call your local solid waste agency or 1-800-CLEANUP for disposal instructions. Never place unused product down any indoor or outdoor drain.

FIRST AID STATEMENT

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 eye. Call a poison control center for treatment advice.
If swallowed	Immediately call a poison control center or doctor 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 the poison control center or doctor. Do not give anything by mouth to an unconscious person.
Have the product container or label with you when calling a poison control center or doctor, or for going for treatment	

{Note: The First Aid statements' grid format will be used if market label space permits; otherwise a paragraph format will be used}

Physical or Chemical Hazards

Keep off synthetics, plastics, furniture and painted surfaces. May damage leather.

EPA Reg.No.56575-7

EPA Est. 56575-NH-1

{Optional Selling Copy- Lotion, Pump Spray}

[Full Strength repellent for maximum protection against ticks and all types of biting insects.]

Use Ben's 100 when the bugs are especially intense or when all-day protection is needed. See our complete line of products for the prevention and treatment of outdoor ailments at www.tendercorp.com. Recyclable Packaging Made Primarily from Recycled Fibers
Please Recycle When Possible

A portion of your purchase goes towards Tender's Environmental Donation Program.

For more information, write Tender Corporation, Attn: Jayne

A Product of Products of

Tender Corporation

P.O. Box 290

Littleton, NH 03561

www.tendercorp.com

Questions? Call 1-888-258-4696 ext. 236

Please send me information about Lyme disease and
valuable coupons on other TENDER products

Name _____

Street _____

City _____

State _____

Zip _____

Clip and mail to: Tender Corporation

P.O. Box 290

Littleton, NH 03561

[] denotes alternate/optional verbiage { } Denotes language that does not appear on marketing labeling