

56575-13

08/05/2008

1/4



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

August 5, 2008

Ms. Olivia D. Laird,
Agent/Consultant for Tender Corporation
c/o Laird's Regulatory Consultants, Inc.
17804 Braemar Place
Leesburg, VA 20175-7046

**Subject: Secondary Re-Review of Revised Labeling
Ben's® Tick & Insect Repellent Wipes, EPA Reg. No. 56575-13
Your Submission Dated July 23, 2008**

Dear Ms. Laird:

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

General Statement:

1. Delete all text throughout the label marked with "strikethrough."

First Aid Statement (table) comment(s):

2. Replace the 2nd sentence starting with "For more information ..." with: **"For more information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call the National Pesticide Information Center at 1-800-858-7378 or 1-800-xxx-xxxx."**¹

Storage and Disposal section comment(s):

3. Replace the existing "**Pesticide Disposal:**" subsection with: "**Disposal:** Nonrefillable container. Do not reuse or refill this container. Offer for recycling, if available."

Tender Corporation should note that 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.

¹ Please note that the "1-800-xxx-xxxx" must be substituted with a valid phone number that is available twenty-four (24) hours per day, seven (7) days per week for answering and responding to any medical emergencies or health concerns as per Pesticide Registration (PR) Notice 2001-1.

FRONT COPY

Ben's® [logo] Tick & Insect Repellent Wipes

30% DEET TICK & INSECT REPELLENT [circle and bar copy]

**Repels insects that may transmit West Nile Virus
Easy to Use, Easy to Carry!**

Active Ingredient:

DEET* 30%

Other Ingredients: ...70%

Total.....100%

***(CAS No. 134-62-3)**

Keep out of reach of children

WARNING: See back panel for additional precautionary statements.

12 Individually Wrapped Wipes

Net Weight: 0.12 fluid oz each

Total Net Weight 1.44 fluid oz

SIDE PANELS

BEN'S [logo] Tick & Insect Repellent Wipes

On right side panel include –

EPA Est. 56575-NH-1

EPA Reg. No. 56575-13

**ACCEPTED
with COMMENTS
In EPA Letter Dated
August 5, 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
56575-13**

Ben's 30 wipes box

BACK COPY

Don't Get Bitten – Get Ben's®

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING

Never use repellents over cuts, wounds or irritated skin. Causes substantial but temporary eye injury. Do not get in eyes. Do not apply to children's hands. Do not use on infants. Wash hands thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. 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 repellent product with you.

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. Tear open sachet near notched end. Remove and unfold wipe (towelette). Repellents should be applied only to exposed skin as directed on this product label. Do not use under clothing. Use just enough of this product to cover exposed 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. Do not apply near eyes and mouth, and apply sparingly around ears. Do not allow children to handle this product, and do not apply to children's hands. When using on children, apply product to your child yourself. Instruct older children in the proper use of this product. Do not apply more than 3 times per day to children ages twelve (12) and under. Reapply as necessary or after swimming or showering. Apply this product second if used in conjunction with a sunscreen product. 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. NOTE: Do not apply on or near acetate, rayon, Spandex or other synthetic fabrics (other than nylon), furniture, plastics (such as eyeglasses and watch crystals), leather and painted or varnished surfaces (including automobiles).

First Aid

If in Eyes:

- Hold eye open and rinse slowly 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 or doctor for treatment advice

If Swallowed:

- Immediately call a poison control center or doctor for treatment advice
- Have person sip a glass of water, if unable 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

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For more information on this pesticide product (including health concerns, medical emergencies or pesticide incidents), you may call the National Pesticide Information Center at 1-800-858-7378.

Note to Physician: Probable mucosal damage may contraindicate the use of gastric lavage.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal. **Pesticide**

Storage: Store this product in a cool and dry (preferably locked) area

inaccessible to children or pets and away from heat or open flame. ~~Pesticide~~

~~**Disposal:** 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. If empty: Do not reuse this container. Place in trash or offer for recycling if available.~~

02-2220-1

Tender Corp [logo]

106 Burndy Rd, Littleton NH 03561

Questions? Call 1-800-258-4696

UPC 044224070852