



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUN 27 2007

Elizabeth Anne Brown, Ph.D.
Technical and Regulatory Analyst
Buzz Off Insect Shield, LLC
814 West Market Street
Greensboro, NC 27401

RE: Labeling Change (Other) per Notice 98-10, Section II 0
EPA Registration Number: 74843-2
Date of Submission: April 4, 2007

Dear Dr. Brown:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below: Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Delete the marketing claims:
 - "Odorless" from the bullets
 - "EPA Registered"
 - "Has no unpleasant smell or feel"

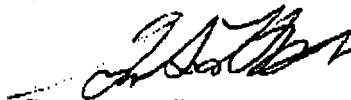
The term odorless is a subjective term depending on who you ask and also an implied safety claim. Likewise the phrase "No unpleasant smell or feel".

The only allowed reference to "registration" is the complete EPA Registration No. Other references such as "EPA registered" implies endorsement of the product by the Agency and not allowed.

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If you have any questions in regard to this letter please feel free to contact me at 703-305-6100.

Sincerely,



George T. LaRocca
Product Manager 13
Insecticide Branch
Registration Division (7505P)

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Hang-tag on outside of garment (removable by consumer)

BUZZ OFF INSECT SHIELD INSECT REPELLENT APPAREL from [clothing brand]

- THIS GARMENT HAS BEEN TREATED WITH **BUZZ OFF INSECT SHIELD PERMETHRIN INSECT REPELLENT**
- REPELS MOSQUITOES, TICKS, ANTS, FLIES, CHIGGERS, AND MIDGES
- DRYCLEANING REMOVES ACTIVE INGREDIENT- DO NOT DRYCLEAN
- REPELLENCY REMAINS EFFECTIVE FOR 70 WASHINGS
- DO NOT RE-TREAT GARMENT WITH OTHER PERMETHRIN INSECT REPELLENT PRODUCTS
- FOR PROTECTION OF EXPOSED SKIN, USE IN CONJUNCTION WITH AN INSECT REPELLENT REGISTERED FOR DIRECT APPLICATION TO SKIN.
- WASH TREATED GARMENTS SEPARATELY FROM OTHER CLOTHING.

EPA Reg No. 74843-2
EPA Establishment No. 74843-NC-XXX

Active Ingredient	
Permethrin	0.52%
Other Ingredients (Garment)	<u>99.48%</u>
	100.00%

Manufactured by Buzz Off Insect Shield, LLC.
Greensboro, NC 27408

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Storage and Disposal

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

Disposal: Discard in trash when clothing is worn out. Do not reuse clothing for other purposes than as a garment.

RETAIN THIS TAG FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS GARMENT. THIS TAG NOT TO BE REMOVED EXCEPT BY CONSUMER.

EPA-ACCEPTED. 12-1-2006 (with 12/6/2006 verbal agreement)
Revisions: 4-5-07 (notification)

**ACCEPTED
with COMMENT
In EPA Letter Dated:**

JUN 27 2007
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
74843-2

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Optional Marketing Statements for hang-tag/outer label

- Repels mosquitoes (including those which may carry West Nile Virus)
 - Repels ticks (including those which may carry Lyme disease)
 - In heavily infested areas, you may prefer to wear long-sleeved shirts and pants to increase protection
 - Neither Buzz Off Insect Shield Apparel nor any other insect protection product can guarantee complete protection from insects or insect bites
 - Does not protect against diseases or reactions from insect bites
 - Bug repellent.
 - No bugs, no bite
 - Whether in the backwoods or the backyard, Buzz Off Insect Shield helps keep you protected
 - Buzz Off Insect Shield is a patent-pending technology for treating apparel that repels mosquitoes, ticks, ants, flies, chiggers and midges
 - By taking advantage of the latest fibers and technology, we've created a comfortable microclimate for your feet that also repels insects
 - All Buzz, No Bite
 - Buzz Off and Get Out [Outside]
 - Enjoy the Outdoors
 - Buzz Off has you covered
 - You can't tell it's there but the bugs can
-
- Built-In Insect Protection
 - Invisible
 - Odorless
 - EPA Registered
 - Invisible, odorless protection
 - Invisible, odorless protection just by putting on your clothes
 - Has no unpleasant smell or feel
 - Durable. Lasts through 70 washes, the expected lifetime of a garment
 - Lasts through 70 washes
 - Convenient
 - Comfortable
 - Effective
 - Easy Care. Normal home laundering is recommended.
 - Used as a heading: Buzz Off Advantages

Buzz Off
Insect Shield
insect repellent
apparel
Do Not Dry Clean
 Repels mosquitoes,
 ticks, ants,
 flies, chiggers
 and midges.
 Repellency
 remains effective
 for 70 washings.
 (fold line)
 Active Ingredient:
 Permethrin
 0.52% w/w
 EPA Reg No.
 74847-2
 EPA Est No.
 74843-NC-xxx
 Dispose of garment
 in trash. Wash
 separately from other
 clothing. Refer to
 packaging for more
 information

EPA Accepted
 12-1-2006 (with 12/6/2006 verbal agreement)
 Revisions: 4-5-2007 (notification)

NOTE: This is the actual size of the label.