



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
ARIEL RIOS BUILDING -1200 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20460

OFFICE OF PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

JAN 06 2009

Tender Corporation
c/o Ms. Amy Plato Roberts
Regulatory Consultant for Tender Corporation
Technology Sciences Group Inc.
1150 18th Street, NW
Suite 1000
Washington, DC 20036

Dear Ms. Roberts,

Subject: Label Amendment and Response to the Conditions of Registration
Natrapel 8 hour Insect Repellent Wipes
EPA Reg. No. 56575-14
Applications dated October 30 and November 25, 2008

The label amendment referred to above, submitted in connection with the Federal Insecticide, Rodenticide, and Fungicide Act, as amended, is acceptable provided you:

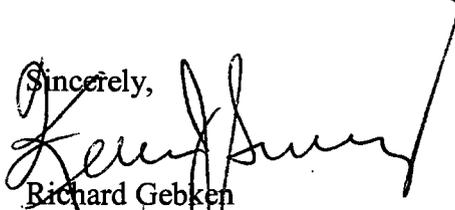
1. Remove the claim: "DEET-FREE (so no unpleasant odor)". This claim is subjective and may be interpreted as an implied safety claim and/or a comparative claim indicating that EPA has concluded that DEET smells unpleasant when compared to picaridin-based products.
2. Remove the claim "Repels mosquitoes (for 8 hours) that may (carry) (transmit) (the) West Nile virus." This claim is not approved on the 'me-too' product and the cited data do not support this claim. Other products mentioned in your correspondence have efficacy data to support the claim.

Thank you for your response to the conditions of registration for the subject product including the updated data matrix. Please note that the parent product is conditionally registered pending the submission, review and acceptance of product specific efficacy data. These data requirements were also listed in your registration notice because these conditions apply to your 'me-too' product. Please contact the registrant of the parent product to regarding the status of

these conditional data. Once the parent product registrant has satisfied the conditions of their registration, an unconditional registration may be issued for your 'me-too' product(s) provided you cite the appropriate studies.

A stamped copy of your label is enclosed for your records. If you have questions, please contact Kevin Sweeney at (703) 305-5063 or sweeney.kevin@epa.gov

Sincerely,



for

Richard Gebken
Product Manager 10
Registration Division (7505P)
Insecticides Branch

Enclosure

Natrapel® 8 Hour Insect Repellent Wipes

{Box and Pouch Front Panel}

Active ingredient: Picaridin 20%
Other ingredients: 80%
Total: 100%

KEEP OUT OF REACH OF CHILDREN

CAUTION

Stop and read this entire label before use. See back panel for additional precautionary statements

Net (Contents) (Weight): 0.092 fl oz each
Total Net (Contents) (Weight): 1.44 fl oz {box only}
(Contains 12 Wipes {box only}) (12 individually wrapped wipes)
(Contains 1 Wipe) {pouch only}

ACCEPTED
with COMMENTS
In EPA Letter Dated
JAN 06 2009
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
56575-14

{Box and Pouch Back Panel}

DIRECTIONS FOR USE: It is a violation of Federal law to use this product in a manner inconsistent with its labeling. **Read All Directions and Precautions on this Product Label Prior to Use.**

Tear open wipe at notch. Remove and unfold wipe (towelette). Apply to all exposed skin. Apply sparingly around ears. Excess amounts or frequent applications are unnecessary. **Do not apply to hands of small children.** Avoid contact with lips, cuts, wounds or irritated skin. Do not apply to excessively sunburned skin. Reapply every eight hours. Do not exceed two applications per day. Do not use under clothing.

PRECAUTIONARY STATEMENTS: Hazards to Humans: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling, returning indoors, and before eating, drinking, chewing gum, or using tobacco.

STORAGE & DISPOSAL: Store in a cool, dry place out of the reach of children. Keep away from heat, sparks and open flame. **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 or 1-800-526-9377 for disposal instructions.

FIRST AID IF IN EYES:

- Hold eye open and rinse gently with water for 15-20 minutes
- Remove contact lenses, if present, after the first five minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice.

FIRST AID IF SWALLOWED:

- Call a physician or poison control center immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by a Poison Control Center or doctor.
- Do not give anything to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-858-7378 for emergency medical information.

PHYSICAL HAZARDS:

Flammable. Do not use or store near heat sources, sparks or open flame. Do not smoke while applying.

EPA Reg. No.56575-14
EPA Est. 56575-NH-1; 074946-NY-001
(Batch/Lot No.: _____)
02-2270-0

Tender Corp (logo)
Littleton NH 03561 (Questions?) (Comments? Call 1-800-258-4696) (Website)
Made In USA

UPC 0 44224 06095 2

{Optional Marketing Text}

1. Protects for 8 hours
2. (Formulated) (Contains) (With) Picaridin
3. (Light feel), strong protection
4. Feels light and clean
5. Light, clean feel
6. Clean, dry feel
7. Repels mosquitoes
8. Protection for the entire family
9. (Use with confidence on the whole family.) (And your family will want to use it too.) (Not, oily, greasy, or sticky.) (It smells great too.)
10. Repels mosquitoes for 8 hours
11. 8 hours protection from mosquitoes
12. Not sticky or greasy
13. No oily residue
14. DEET-Free (so no unpleasant odor)
15. Won't damage cotton, wool, nylon (acetate, rayon, spandex) or other synthetic materials
16. Won't damage (plastics) (watch crystals) or other synthetic materials
17. Won't damage (fishing line, gun barrel, plastic lenses) (sporting equipment)
18. Repels mosquitoes, ticks, (biting flies, deer flies, no-see-ums, chiggers, gnats and fleas) (and other biting insects).
19. Long Lasting Protection
20. Reapply every eight hours
21. Effective mosquito protection
22. Travel size
23. Convenient
24. Easy to use
25. Single (use) wipe (pouch) (towellette)
26. (Now...protection that feels light and clean!)
27. Wipe on protection
28. Natrapel 8 hour provides up to 8 hours (of) protection against mosquitoes. It also provides effective protection against ticks, biting flies, deer flies, gnats, no see-ums, chiggers and fleas.
29. Natrapel 8 hour provides effective protection against ticks, biting flies, deer flies, gnats, no see-ums, chiggers and fleas.
30. Natrapel 8 hour with Picaridin is specially formulated for (fisherman, hunters and other Outdoorsmen) (active lifestyles). (Natrapel 8 hour will not damage plastics or other synthetic materials.)
31. Clean, Effective. Finally an insect repellent you won't mind using. Great for everyone in the family!
32. Because Natrapel 8 hour is formulated with Picaridin it is perfect for hunters and fisherman plus it will not damage fishing lines or other synthetic materials.
33. Repels mosquitoes (for 8 hours) that may (carry) (transmit) (the) West Nile virus (encephalitis) (diseases).