1-31-94

EFFICACY REVIEW

DATE: IN11-18-93 OUT 1-31-94

FILE OR REG. NO. 67200-G

PETITION OR EXP. PERMIT NO.

DATE DIV. RECEIVED November 5, 1993

DATE OF SUBMISSION November 1, 1993

DATE SUBMISSION ACCEPTED

TYPE PRODUCT(S): (I,)D, H, F, N, R, S Repellent

DATA ACCESSION NO(S). None; D196829; S453352; Case# 034509; AC:166

PRODUCT MGR. NO. 10-Mountfort/Tavano

PRODUCT NAME(S) BUG-Me-NOT™ X Insect Repellent Wristband

COMPANY NAME Chase-A-Way, Incorporated

SUBMISSION PURPOSE Provide performance data from laboratory tests conducted according to company devised protocols in support of spatial repellency of insects.

CHEMICAL & FORMULATION N,N-Diethyl-meta-toluamide 9.50%

Other isomers 0.50%

(unspecified net weight, impregnated material)

CONCLUSIONS & RECOMMENDATIONS The data presented in the unaccessioned and untitled volume submitted with the application for the subject product are adequate to demonstrate the concept of spatial repellency against the mosquito Aedes aegypti and the honeybee Apis mellifera when the subject product is worn according to directioms on the label. We will accept the written summaries and photographs in this volume as fulfillment of the requirements of § 95-9(a)(2) and (3) on p. 263 and partial fulfillment of the requirements for the standard of § 95-9(b)(1)(iv) on p. 264 of the Product Performance Guidelines. The additional information on repellency against stable flies and the summary of field use information received in facsimile from Dr. Carl Abraham on repellency against mosquitoes as experienced by individuals wearing the subject product contrasted with those who were not so protected is marginally adequate to support the label claim for many hours of protection since there is no doubt that repellency continued for more than the minimum 2-3 hours specified by the Guidelines for mosquitoes. The unique nature of the formulated product and the fact that no claims of complete protection are made behooves us to interpret Guidelines requirements broadly in this case. Additional specific claims for known vectors such as deer tick would, however, require additional field tests.

RL Vern L. McFarland, IRB