APR 14 2004

Jill C. Geyer S.C. Johnson & Son, Inc. 1525 Howe Street Racine, WI 53403-2236

Subject: Off! Insect Repellent Foam Type EPA Registration No. 4822-51 Application dated November 14,2002 Application dated February 20, 2004 FAX dated April 8, 2004

Dear Ms. Geyer:

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 response to the DEET RED and PR Notices 2001-1 and 2001-6 and making additional labeling changes is acceptable subject to the comments listed below:

- 1) Place the following statement in the First Aid section:
 - **%**For additional information in case of emergency call toll free(Insert phone number).
- 2) Delete all references to the 6 hour repellency duration claim. The data submitted to support these claims has not yet been reviewed. Once the data has been reviewed and if found acceptable, you can then request an amendment.

This product is not being re-registered at this time. Product specific efficacy data will be required. Once the efficacy guidelines are in place, you will be notified of the efficacy requirements.

Also, to meet the requirement of the DEET RED, the product must be packaged in containers utilizing a concave trigger to help aim the product or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes.

A stamped copy of the amended label is enclosed for your records. Submit two copies of the final label before the product is released for shipment under this revised label.

OFF! Insect Repellent Foam Type [primary name of record]

- SC Johnson A Family Company
- INSECT REPELLENT
- Keeps mosquitoes away from you!
- (Provides protection from) (Protects against) (Fights off Repels) (Works on)
 mosquitoes, biting flies, ticks (including ticks that cause Lyme Disease), gnats,
 no-see-ums, chiggers and fleas
- Repels insects
- · Repels bugs, not people
- Non-greasy
- The OFFI repellent you'll want on
- Feels great(!)
- Proven protection against mosquitoes
- Mosquito protection
- Hours of protection from mosquitoes
- (Also) repels deer flies, sand flies, and most other flies, ticks and chiggers
- Repels fleas from treated skin
- · Not greasy, won't stain, resists perspiration
- HOLD UPRIGHT WHEN SPRAYING
- Contains DEET (N,N-Diethyl-meta-toluamide)
- Mosquito protection
- Repels mosquitoes that may carry West Nile Virus
- · Repels mosquitoes that may carry diseases
- Repels mosquitoes that may carry (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Japanese) (Cache Valley) (Venezuelan equine) (Murray Valley) encephalitis
- Repels mosquitoes that may carry (Ross River Fever) (Barmah Forest Disease)
 (Dengue Fever) (Yellow Fever) (Rift Valley Fever)
- Repels ticks that may carry (Lyme disease) (Rocky Mountain Spotted Fever) (Tick Paralysis) (Ehrlichiosis) (European Tick Borne Encephalitis) (Powassan Encephalitis)
- Repels black flies that may carry Onchocerciasis
- Up to 6 hours of mosquito protection
- (OFF!) (products) also available in (aerosol) (spritz) (towelette) (and great fragrances too!)
- Keeps bugs OFF!

ACTIVE INGREDIENT:

KEEP OUT OF REACH OF CHILDREN

WARNING

See additional Precautions on Back Panel

ACCEPTED with COMMENTS In EPA Leater Flured:

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Carrier to the second of the s

Net Wt. 1 - 12 oz.

HOLD UPRIGHT WHEN SPRAYING

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS - WARNING: Causes substantial but temporary eye injury. Harmful if swallowed. Do not get in eyes. Use of this product may cause skin reactions in rare cases. Wash treated clothing before wearing it again. Wash thoroughly with soap and water after handling.

[Note to reviewer: Boxed format or bullets may be used in First aid section if label space permits]

FIRST AID

Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

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 or doctor for treatment advice.

If swallowed: Call poison control center or doctor 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 by mouth to an unconscious person.

Skin: If you or your child react to this product, discontinue use, take off contaminated clothing, wash treated skin and call a poison control center or doctor for treatment advice.

PHYSICAL & CHEMICAL HAZARDS - FLAMMABLE: Contents under pressure. Do not use near heat, sparks or open flame. Do not puncture or incinerate containers. Exposure to temperature above 120°F may cause bursting. Keep treated surfaces away from fire or flame until dry.

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.

Shake before using. Hold spout next to palm of hand, press valve button and release puff of foam about size of a quarter. Rub hands together; spread evenly with hand to moisten all exposed skin and thin clothing, reapplying as needed to cover all exposed areas. Do not apply over cuts, wounds, irritated or sunburned skin. Do not spray in enclosed areas. Use just enough repellent to cover exposed skin and/or clothing. Avoid over-application of this product. Frequent reapplication and saturation are unnecessary. Do not allow children to handle this product. After returning indoors, wash treated skin with soap and water. FOR MAXIMUM PROTECTION, spread evenly with hands to moisten all exposed skin.

TO APPLY TO FACE: **Spray palm of hand** first and then apply sparingly and avoid eyes. Do not spray directly onto face. Do not apply near eyes and mouth. Apply sparingly around ears. Do not apply to children's hands. When using on children, apply to your own hands and then put it on the child.

WORKS ON CLOTHING TOO: Do not *use* under clothing. Spray shirts, pants, socks, and hats. For ticks and chiggers also spray cuffs, socks and around other openings in outer clothing. Will not damage cotton, wool or nylon. DO NOT APPLY ON OR NEAR: ACETATE, RAYON, SPANDEX OR OTHER SYNTHETICS (OTHER THAN NYLON), FURNITURE, PLASTICS, WATCH CRYSTALS, LEATHER AND PAINTED OR VARNISHED SURFACES INCLUDING AUTOMOBILES.

STORAGE: Store away from heat or flame in an area inaccessible to children.

DISPOSAL: Do not puncture or incinerate!

If empty: This container may be recycled in the few but growing number of communities where aerosol can recycling is available. Before offering for recycling, empty the container by using the product according to the label. If recycling is not available, place in trash.

If partially filled: Call your local solid waste agency or 1-800-529-3394 for disposal instructions.



(Note to reviewer: The STEEL recycle symbol might be used on final printed label if space allows.)

(Contains no CFCs or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols (or corresponding graphic below).)



Questions? Comments? Call 800-558-5252 or write Helen Johnson. © 2004 S.C. Johnson & Son, Inc. Racine, WI 53403-2236 U.S.A. All Rights Reserved

EPA Reg. No. 4822-51

EPA Est. No. 4822-XX

The Confidential Statements Of Formula dated February 19, 2004 for the basic formula and alternate formula33432A are acceptable and have been placed into the file for this product.

Before the alternate formulas 34453A and 34454A can be considered, the following information on the inert ingredient, TAKASAGO RL-2862, must be submitted:

* Complete composition with chemical names, CAS Reg No. and percentages of each component.

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

Sincerely,

Richard Gebken

Acting Product Manager 10

Insecticide Branch

Registration Division (7505C)