

FEB 24 2004

Jean M. Fugate
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, Wisconsin 53403-5011

Subject: Revised Label and CSFs For:
OFF! Insect Repellent Formula V
EPA Registration No. 4822-167
Application dated April 13, 2000
Application dated November 15, 2002
Application dated July 15, 2003
Application dated December 4, 2003

Dear Ms Fugate:

The proposed amendments to the registration of the product cited above under The Federal Insecticide, Fungicide, and Rodenticide Act, as amended, revising the label in response to the DEET RED and adding optional label language and repellency claims and revising the Confidential Statements Of Formula (CSFs) are acceptable subject to the comments listed below:

1) Delete all references to the 8 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.

2) It appears now that there is no formula (basic or alternate) that does not contain a fragrance. Therefore the word, Unscented must be deleted from the product name.

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 be eligible for re-registration, 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.

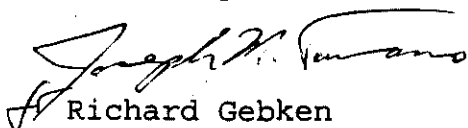
A stamped copy of the revised label is enclosed for your

records. Submit two copies of the revised finished label before the product is released for shipment under this amended label.

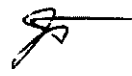
The CSFs dated December 4, 2003 are acceptable and have been made a part of the file for this product.

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)



OFF! INSECT REPELLENT FORMULA V [master name]
 OFF! Deep Woods Insect Repellent V [alternate brand name, 4-18-97]
 Deep Woods OFF! Insect Repellent V [alternate brand name, 6-21-91]

- Unscented
- Fragrance Free
- **(Refreshing) (Fresh) (Pine) (Outdoor) scent**
- **A fresh scent your whole family will enjoy**
- LONG LASTING PROTECTION from mosquitoes, ticks (including ticks that cause Lyme disease), biting flies, gnats and chiggers
- Keeps bugs off!®
- **(OFF!) Family Pack**
- Always carry [product name]
- **(Travel) (Sample) size**
- Contains DEET (N,N-Diethyl-meta-toluamide)
- Proven protection against mosquitoes
- Mosquito protection (for up to 8 hours)
- Repels mosquitoes (for up to 8 hours)
- x% (MORE) (FREE)
- (Bonus) (Value) Size
- x (oz) (ounces) at the (same) x (oz) (ounce) price
- x (oz) (ounces) for the (same) price of x (oz) (ounces)
 (Note to reviewer: In claims above x is used to represent any number between 1 and 100)
- 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 (for up to 8 hours)
- Repels mosquitoes that may carry (Ross River Fever) (Barmah Forest Disease) (Dengue Fever) (Yellow Fever) (Rift Valley Fever) (for up to 8 hours)
- 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
- (Enjoy) up to 8 hours of protection from (mosquitoes). Also protects against (works on) (repels) (ticks (including ticks that cause Lyme disease)) (biting flies) (stable flies) (black flies) (sand flies) (deer flies) (chiggers) (fleas) (gnats) (no-see-ums)
- (Protects against) (Fights off) (Repels) (Works on) (mosquitoes) (ticks (including ticks that cause Lyme disease)) (biting flies) (stable flies) (black flies) (sand flies) (deer flies) (chiggers) (fleas) (gnats) (no-see-ums)
- Lasts for up to 8 hours against mosquitoes
- Stay protected for up to 8 hours (from mosquitoes that may carry West Nile Virus) (from mosquitoes that may carry disease(s))
- Maximum protection (keeps working) (for) up to 8 hours against mosquitoes
- (Proven) (Effective) Protection (you can count on for up to 8 hours) (from mosquitoes that may carry West Nile Virus) (from mosquitoes that may carry disease(s)).
- (Delivers) (Powerful) protection (keeps working) for up to 8 hours against mosquitoes
- Proven shield for up to 8 hours against mosquitoes (against mosquitoes that may carry (West Nile Virus) (disease(s))).
- Fights off (mosquitoes) (mosquitoes that may carry West Nile Virus) for up to 8 hours

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- Up to 8 hours of proven protection from mosquitoes (that may carry West Nile Virus)
- Effective protection up to 8 hours from mosquitoes (that may carry West Nile Virus) (that may carry disease(s))
- Enjoy the (outdoors, the great outdoors, backyard, outside, park, woods/forest) with up to 8 hours of protection against mosquitoes
- SPRAYS UPSIDE DOWN TOO!
- Provides long lasting protection from mosquitoes, ticks (including ticks that cause Lyme disease) and biting flies: stable flies, black flies, sand flies, and deer flies.
- Also repels chiggers, fleas, gnats, no-see-ums from treated skin and clothing.
- OFF! Insect Repellent Formula V gives effective protection and is not greasy, won't stain and resists perspiration.
- **(OFF!) (Deep Woods) (products) also available in a (pump) (towelette)**

ACTIVE INGREDIENT:

DEET 25%

INERT INGREDIENTS:.....75%

KEEP OUT OF REACH OF CHILDREN

CAUTION

See Additional Precautions on Back Panel

NET WT.

OZ.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS - CAUTION: Causes moderate eye irritation. Harmful if swallowed. Avoid contact with 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 a 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 suspect a reaction 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. Keep away from heat, sparks, and open flame. Do not puncture or incinerate container. Exposure to temperatures above 120° F. may cause bursting. Do not expose treated surfaces near 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.**

Hold container 6 to 8 inches from skin or clothing and spray with a slow sweeping motion. 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 © 2003 S. C. Johnson & Son, Inc., Racine, WI 53403-2236 U.S.A. All Rights Reserved