

OCT 23 2003

Jean M. Fugate
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236

Subject: Off! Towelette Insect Repellent
EPA Registration No. 4822-258
Application dated April 13, 2000
Application dated June 27, 2002
Application dated August 13, 2003

Dear Ms. Fugate:

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 is acceptable subject to the comments listed below:

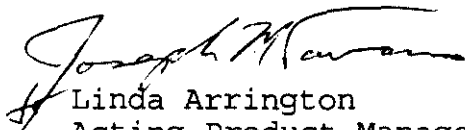
This product is not being re-registered at this time. Product specific efficacy data will be required. Once the efficacy guidelines are in place, you will be notified of the efficacy requirements.

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.

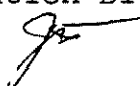
The Confidential Statements Of Formula dated August 13, 2003 for the basic and alternate formulas are acceptable and have been placed into the file for this product.

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

Sincerely,



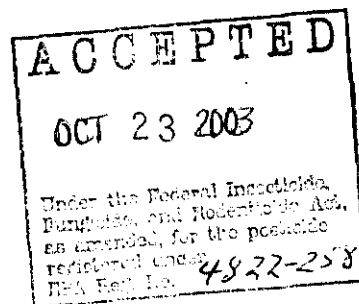
Linda Arrington
Acting Product Manager 10
Insecticide Branch
Registration Division (7505C)



OFF! TOWELETTE INSECT REPELLENT

[Note to reviewer: the following label is for individual towelette wrappers and/or outer containers]

ACTIVE INGREDIENT: .
DEET 25%
OTHER INGREDIENTS..... 75%



Keep Out of Reach of Children

WARNING

See additional precautions on (side) (back) panel

NET WT: X OZ.

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 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 - Do not use near heat or open flame. 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.**

Open package, remove and unfold towelette. For maximum protection moisten all exposed skin evenly and completely. Do not apply over cuts, wounds, irritated or sunburned skin. Do not apply near eyes and mouth. Apply sparingly around ears. Use just enough repellent to cover exposed skin and/or clothing. Avoid over-application of this product. Frequent reapplication is unnecessary. Do not apply to children's hands. Do not allow children to handle this product. After returning indoors, wash treated skin with soap and water. Do not use under 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, leather, watch crystals and painted or varnished surfaces including automobiles.

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

[The following is for individually-wrapped towelettes]

DISPOSAL: Before disposing, empty package by using the product according to the label. Do not reuse towelette or wrapper. Place used towelette and wrapper in trash.

[The following is for outer containers containing individually-wrapped towelettes]

DISPOSAL: *Before disposing, empty package using the product according to the label. Do not reuse towelette or wrapper. Place used towelette and wrapper in trash. Place outer container in trash or offer for recycling if available.*

[The following is for outer containers containing towelettes that are not individually-wrapped]

DISPOSAL: *Before disposing, empty package using the product according to the label. Do not reuse towelette. Place used towelette in trash. For unused towelettes: Call your local solid waste agency or 1-800-529-3394 for disposal instructions. Place outer container in trash or offer for recycling if available.*

Questions? Comments? Call 800-558-5252 or write Helen Johnson. © 2003 S. C. Johnson & Son, Inc.
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(Made in Canada)

PA Reg. No. 4822-258

EPA Est. No. XX-XX-X

[The following is optional language. Note: parenthesis indicate optional text.]

- LONG LASTING PROTECTION from (Mosquitoes) (Ticks) (Biting Flies) (Gnats) (Chiggers) (Fleas)
- S.C. Johnson A Family Company
- X Individual towelette packet(s)
- **X individually wrapped towelettes**
- Easy to apply to face and neck
- **Even application**
- **Easy application**
- **Easy to reapply**
- (New) Pleasant scent
- **Unscented**
- **Fragrance Free**
- Handy to carry with you
- **On the go protection**
- Provides (long) lasting protection from (mosquitoes) (biting flies) (gnats) (sand flies) (no-see-ums) (deer flies) (stable flies) (black flies).
- **Enjoy protection from (mosquitoes) (biting flies) (gnats) (sand flies) (no-see-ums) (deer flies) (stable flies) (black flies) (ticks) (chiggers) (fleas).**
- **And because it's from the makers of OFF! it's especially formulated to effectively repel (mosquitoes) (biting flies) (gnats) (sand flies) (no-see-ums) (deer flies) (stable flies) (black flies) (ticks) (chiggers) (fleas).**
- **Also repels (ticks) (chiggers) (fleas) from treated skin.**
- **(Proven) (effective) protection (you can count on) (from mosquitoes that may carry (West Nile Virus) (disease(s))**
- **(Delivers) (Powerful) protection (against mosquitoes)**
- **(Keeps working) (Proven Shield) against mosquitoes (that may carry (West Nile Virus) (disease(s)).**
- **Fights off mosquitoes (that may carry West Nile Virus)**
- **Contains DEET (N,N-Diethyl-meta-toluamide)**
- **Mosquito protection**
- **Repels mosquitoes (that may carry West Nile Virus)**
- **Repels mosquitoes that may carry diseases**
- **Won't get in your eyes like sprays can**
- **Non-aerosol**
- **Pre-moistened repellent towelettes**

- *Repels bugs, not people*
- *Easy on arms, tough on bugs*
- *Easy on your skin*
- *Wipe OFF!*
- *Unwrap it*
- *Won't dry out*
- *Match your protection to the occasion*
- *Fast and friendly*
- *Skin friendly*
- *Wipe it on, toss it out*
- *Small package*
- *OFF! to go*
- *Always fresh*
- *Keeps Bugs OFF!*
- *Always Carry (Product Name)*
- *Singles*
(It is individually wrapped so it won't dry out) (and) (it fits anywhere)
For use at home or on the go!
- *Carry one everywhere*
- *Quick protection*
- *Protect and Go*
- *Protection on the Go*
- *(Product name) convenient to toss in your (Car) (Desk) (Purse) (Bag) (Briefcase) (Gym Bag) (Beach Bag) (Back Pack) (Wallet)*
- *Enjoy the (outdoors) (great outdoors) (backyard) (outside) (park) (woods) (forest) (with protection against mosquitoes)*
- *(Product name) gives effective protection and is not greasy, won't stain and resists perspiration*