

AUG 9 2005

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

Subject: 8 Hour claim against mosquitoes
Off! Towelette Insect Repellent
EPA Registration No. 4822-258
Application dated February 22, 2005
Letter dated February 22, 2005

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 by adding an 8 Hour claim against mosquitoes is acceptable subject to the comments listed below:

- 1) The following claims are acceptable:
 - a. General "up to 8 hour repellency" claim against mosquitoes.
 - b. Claims against "mosquitoes that may transmit/carry/vector West Nile Virus."
- 2) Refer to recommendation 2 in the enclosed Efficacy Review for modifications and deletions that must be made to the proposed label for this product.

A stamped copy of the draft label is enclosed. This label supercedes all previously accepted labels. Submit two copies of the finished corrected label.

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

Sincerely,



Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505C)



OFF!® TOWELETTE INSECT REPELLENT [primary name of record]
 OFF! Deep Woods Insect Repellent Towelettes [alternate brand name]
 Deep Woods OFF! for Sportsmen Insect Repellent Towelettes [alternate brand name]
 OFF! Deep Woods Sportsmen Insect Repellent Towelettes [alternate brand name]

[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.

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**
 AUG 9 2005
 Under the Federal Insecticide,
 Fungicide, and Rodenticide Act,
 as amended, for the pesticide
 registered under EPA Reg. No.
4822-258

[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.

[Note to reviewer: If any "hours of duration" claims are used on the marketed product label, the following statement will be included: "Some may need more than one towelette for adequate coverage."]

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)

EPA 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
- (For) easy application 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 **(for up to 8 hours)**
- **Repels mosquitoes (for up to 8 hours)**

- 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
- Moist and fresh, anytime, anywhere!
- Trial sample (included)
- (OFF!) (#) (count) Pack
- (#) towelette packets
- (OFF!) (Deep Woods) (Mosquito) (Towelette) (Repellent) Pack
- (OFF!) (Summer) (Value) (Bonus) (Family) (Camping) (Sporting) (Gardening) (Convenient) (All Activity) (All Activities) Pack
- OFF! (repellent) has you covered
- (Packaged) for resale (and personal use)
- UPC on each packet
- Open for (individual units) (individually wrapped towelettes) (individual packets)
- Resalable
- OFF! (mosquito) (bug) repellents (to use) at (home) (country clubs) (and) (farms).
- OFF! (mosquito) (bug) repellents (ideal) (for use by) (contractors) (vending machine operators)
- OFF! mosquito repellents for resale in (convenience stores) (retail stores) (vending machines)
- (Great) (Ideal) for camping
- OFF! (Deep Woods) Mosquito (Protection) (Center)
- (The) OFF! (Deep Woods) Center of West Nile Virus (Prevention) (Protection)
- OFF! (Deep Woods) West Nile Virus (Prevention) (Protection) Center
- OFF! (Deep Woods) Protection Against Mosquitoes
- OFF! (Deep Woods) Repellents for Long Lasting Protection Center
- OFF! (Deep Woods) The right protection for your family

- (No matter where you are,) (you) (you've) gotta get your OFF! on!
- *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)*
- *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*
- *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*