OCT 1 1991

Ms. Martine Albritton S.C. Johnson & Son, Inc. 1525 Howe Street Racine, WI 53403

Dear Ms. Albritton:

Subject: Application for Revised Labeling

Off! Lotion Formula II EPA Reg. No. 4822-362 9/13/9/ Librussia

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Five copies of the finished labeling must be submitted prior to releasing the product for shipment.

Delete the label addendum --"ACTIVE INGREDIENTS. . . 7.5%"-- since it may evoke misleading comparisons of products containing the statement to those without.

Even though the term "DEET" has been accurately deleted from the active ingredient declaration, we are encouraging its depiction in other parts of the label.

Sincerely,

Richard F. Mountfort Product Manager (10) Insecticide-Rodenticide Branch Registration Division (H7505C)

S. C. JOHNSON WAX

NEW INSECT REPELLENT

OFF! LOTION FORMULA II
INSECT SCREEN
PROVIDES
PROTECTION FROM
MOSQUITOES, BITING FLIES, TICKS
GNATS, NO-SEE-UMS AND FLEAS
REPELS INSECTS

LIGHT, PLEASANT SCENT CLEAN FRESH SCENT

NON-GREASY -- LEAVES YOUR SKIN FEELING SMOOTH AND NATURAL

> MOISTURIZER WITH ALOE VERA

WARNING: KEEP OUT OF REACH OF CHILDREN ACCEPTED
With Letter Dated

N EPA Letter Dated

OCT 1 1591

OCT 1 1591

Under the Federal Inserticide Act

Under the Federal Rodenticide Act

Fungicide, and Rodenticide Pessicide

Fungicide, and roder EPA Pess. No.

18415181826 Under

18415181826 Under

SEE ADDITIONAL PRECUATIONS ON BACK LABEL

| ACTIVE INGREDIENTS | |
|-----------------------------------|----------|
| N,N-DIETHYL-META-TOLUAMIDE 7.125% | |
| OTHER ISOMERS | |
| INERT INGREDIENTS | <u>%</u> |

NET WT. 1 OZ. - 12 OZ.

(OFF INSECT SCREEN LOTION)

INSECT SCREEN LOTION
WITH
ALOE VERA

OFF! INSECT REPELLENT IS A PLEASANT SMELLING LOTION.
SPECIALLY FORMULATED TO REPEL MOSQUITOES, BITING FLIES,
TICKS. GNATS. NO-SEE-UMS AND FLEAS FOR UP TO TWO HOURS.

OFF! INSECT REPELLENT ALSO MOISTURIZES YOUR SKIN. IT CONTAINS ALOE VERA TO LEAVE SKIN FEELING SMOOTH AND NATURAL NEVER STICKY OR GREASY. KEEPING INSECTS AWAY NEVER FELT SO GOOD.

DIRECTIONS FOR USE

IT IS A VIOLATION OF FEDERAL LAW TO USE THIS PRODUCT IN A MANNER INCONSISTENT WITH ITS LABELING.

FOR BEST RESULTS, SPREAD EVENLY AND COMPLETELY OVER ALL EXPOSED SKIN. APPLY TO HAND FOR APPLICATION TO FACE AND NECK. REPEAT APPLICATION AS NECESSARY. TO APPLY TO CLOTHING PUT A SMALL AMOUNT IN PALM OF HAND, RUB PALMS TOGETHER, AND WIPE ON CLOTHING. WILL NOT DAMAGE COTTON, WOOL OR NYLON. DO NOT APPLY ON OR NEAR: ACETATE, RAYON, SPANDEX, DYNEL FABRICS OR OTHER SYNTHETICS OTHER THAN NYLON. MAY DAMAGE FURNITURE FINISHES, PLASTICS, LEATHER, WATCH CRYSTALS AND PAINTED OR VARNISHED SURFACES INCLUDING AUTOMOBILES.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS - WARNING: HARMFUL IF SWALLOWED. MAY CAUSE EYE INJURY. AVOID CONTACT WITH EYES AND LIPS. USE SPARINGLY ON SMALL CHILDREN. DO NOT ALLOW CHILDREN TO RUB EYES IF HANDS HAVE BEEN TREATED. DO NOT ALLOW USE BY SMALL CHILDREN WITHOUT CLOSE ADULT SUPERVISION. DO NOT APPLY TO EXCESSIVELY SUNBURNED OR DAMAGED SKIN. MAY CAUSE SKIN REACTION IN RARE CASES.

STATEMENT OF PRACTICAL TREATMENT

IF IN EYES - FLUSH WITH PLENTY OF WATER. IF IRRITATION PERSISTS, GET MEDICAL TREATMENT. IF SWALLOWED - CALL A PHYSICIAN OR POISON CONTROL CENTER. GET MEDICAL ATTENTION.

STORAGE

STORE AWAY FROM HEAT OR FLAME IN AN AREA INACCESSIBLE TO CHILDREN.

DISPOSAL

DO NOT REUSE EMPTY CONTAINER. WRAP CONTAINER AND PUT IN TRASH.

CONTENTS: DEIONIZED WATER, DEET, DISTEARYLDIMONIUM CHLORIDE, PETROLATUM USP, GLYCERIN USP, ISOPROPYL PALMITATE, CETYLALCOHOL, ALOE, DIMETHICONE, TITANIUM DIOXIDE USP, METHYL PARABEN, PROPYL PARABEN, SODIUM CHLORIDE, FRAGRANCE, FD&C BLUE #1, D&C YELLOW #10.

QUESTIONS? COMMENTS? CALL TOLL-FREE 1-800-558-5252 WEEKDAYS, 9-5 EASTERN TIME OR WRITE CAROL HANSEN.

C 1990 S. C. JOHNSON & SON, INC. RACINE, WI 53403 U.S.A. ALL RIGHTS RESERVED.

OFF! IS S. C. JOHNSON & SON, INC'S TRADEMARK FOR INSECT REPELLENT.

EPA REG. NO. 4822-362 EPA EST. NO. 4822-WI-1