

FEB 24 2004

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

Subject: Revised Label and CSFs For:  
Unscented OFF! Insect Repellent  
EPA Registration No. 4822-380  
Application dated December 19, 2001  
Application dated November 20, 2002  
Application dated December 4, 2003  
Application dated January 20, 2004

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 revising the Confidential Statements Of Formula (CSFs) are acceptable subject to the comment listed below:

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 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.

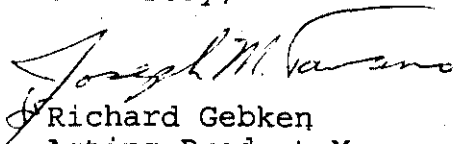
A stamped copy of the revised label is enclosed for your records. Submit two copies of the revised finished label before

the product is released for shipment under this amended label.

The CSFs dated December 4, 2003 and January 19, 2004 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)



Unscented OFF! Insect Repellent [master name]  
 OFF! Insect Repellent II [alternate brand name, 8/15/94]

- SC Johnson A Family Company
- EFFECTIVE PROTECTION from Mosquitoes, Gnats, No-See-Ums, Biting Flies, Ticks (*including ticks that cause Lyme disease*), Chiggers and Fleas
- Repels mosquitoes, gnats, ticks, biting flies, chiggers & fleas
- Long-lasting protection from mosquitoes, ticks, biting flies, gnats, and chiggers
- FRAGRANCE FREE
- UNSCENTED
- NON-GREASY
- Summer Splash
- Outdoor Fresh
- Tropical Fresh
- Fresh Scent
- New (and improved) (fragrance name) scent (!)
- New (and improved) (fragrance name) fragrance (!)
- Scratch'n'sniff
- Scratch here (to smell fragrance name)
- Refreshing(ly) light scent (of fragrance name) (!)
- Refreshingly light scent your whole family will enjoy
- **(OFF!) Family Pack**
- **Always carry (product name)**
- **(Travel) (Sample) size**
- Try the new scent(s) from OFF! Skintastic repellent(s)
- Clean, fresh scent (of fragrance name)
- (Fresh) (new) scent (!)
- A clean, fresh scent your whole family will enjoy
- Visit [www.mosquitoes.com](http://www.mosquitoes.com) for more information
- Keeps bugs OFF!
- New (consumer) preferred fragrance (or scent)
- Best smelling (product name) ever
- Repels bug(s), not people
- New light, refreshing scent repels bugs, not people
- (Fragrance Name) (Product name) won't leave you smelling like a bug repellent
- (Introducing) the bug repellent that doesn't smell like bug repellent
- A better-smelling way to Keep Bugs OFF!
- Keeping bugs OFF! never smelled (so great) (so good) (better)(!)
- Feels great (!)
- Feels good on. Now smells even better (!)
- The OFF! repellent you'll want on
- Contains DEET (N,N-Diethyl-meta-toluamide)
- Proven protection against mosquitoes
- Mosquito protection
- Up to 6 hours of Mosquito Protection
- Repels mosquitoes that may carry West Nile Virus (for up to 6 hours)
- Repels mosquitoes that may carry diseases (for up to 6 hours)

**ACCEPTED**  
**with COMMENTS**  
**In EPA Letter Dated:**

FEB 24 1994

Under the Federal Insecticide,  
 Fungicide, and Rodenticide Act,  
 as amended, this pesticide  
 registered under EPA Reg. No.  
4822-383

- Repels mosquitoes that may carry (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Japanese) (Cache Valley) (Venezuelan equine) (Murray Valley) encephalitis (for up to 6 hours)
- Repels mosquitoes that may carry (Ross River Fever) (Barmah Forest Disease) (Dengue Fever)(Yellow Fever) (Rift Valley Fever) (for up to 6 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 6 hours of protection from mosquitoes. Also protects against (ticks) (biting flies) (stable flies) (black flies) (sand flies) (deer flies) (chiggers) (fleas) (gnats) (no-see-ums)
- (Protects against) (Repels) (Works on) (mosquitoes) (mosquitoes that may carry West Nile Virus) (ticks) (biting flies) (stable flies) (black flies) (sand flies) (deer flies) (chiggers) (fleas) (gnats) (no-see-ums)
- Lasts for up to 6 hours against mosquitoes
- Stay protected for up to 6 hours from mosquitoes (that may carry West Nile Virus) (that may carry disease(s))
- Maximum protection (keeps working) (for) up to 6 hours
- (Proven) (Effective) Protection (you can count on for up to 6 hours from mosquitoes) (that may carry West Nile Virus) (that may carry disease(s)).
- ((Delivers) (Powerful) protection) (keeps working) against mosquitoes for up to 6 hours
- Proven shield for up to 6 hours against mosquitoes
- (Fights off) (Protects against) (repels) (mosquitoes (that may carry West Nile Virus)) (ticks) (biting flies) (stable flies) (black flies) (sand flies) (deer flies) (chiggers) (fleas) (gnats) (no-see-ums)
- Up to 6 hours of proven (effective) protection from mosquitoes (that may carry West Nile Virus)
- (Effective) (Proven) protection up to 6 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 6 hours of protection against mosquitoes
- HOLD UPRIGHT WHEN SPRAYING (SPRAYS UPSIDE DOWN TOO!)
- Provides hours of effective protection from mosquitoes, gnats, and biting flies (deer flies, sand flies, stable flies, and black flies).
- Also repels ticks, chiggers and fleas from treated skin and clothing.
- OFF!<sup>®</sup> is not greasy, won't stain and resists perspiration.

**ACTIVE INGREDIENT:**

DEET..... 15%

INERT INGREDIENTS:..... 85%

**KEEP OUT OF REACH OF CHILDREN**

**WARNING**

See additional Precautions on Back Panel

Net Wt. 1 - 12 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:** Contents under pressure. Do not use near heat, sparks or open flame. Do not puncture or incinerate container. Exposure to temperatures 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.**

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 optional graphic below])



Questions? Comments? Call 800-558-5252 or write Helen Johnson. ©2003 S.C. Johnson & Son, Inc. Racine, WI 53403-2236 USA. All Rights Reserved

EPA REG. NO. 4822-380

EPA EST. NO. 4822-XX