

MAY 19 2003

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

Subject: Unscented Off! Skintastic Insect Repellent
EPA Registration No. 4822-396
Application dated April 13, 2000
Application dated December 17, 2002
Application dated April 15, 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 and PR Notices 2001-1 and 2001-6 is acceptable subject to the comments listed below:

1) Under First Aid change the section for skin to read:

If you suspect a reaction to this product:

- * Discontinue use;
- * Take off contaminated clothing;
- * Rinse skin immediately with plenty of water for 15-20 minutes;
- * Call a poison control center or doctor for treatment advice.

2) Change the Precautionary Statements to read:

⌘ Causes substantial but temporary eye injury. Do not get in eyes. Prolonged or frequently repeated skin contact may cause allergic reaction in some individuals. Use of this product may cause skin reactions in rare cases. Wash treated clothing before wearing it again. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.⌘.

3) Add the following Note To Physician:

⌘ Note To Physician: Probable mucosal damage may contraindicate the use of gastric lavage.⌘.

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.

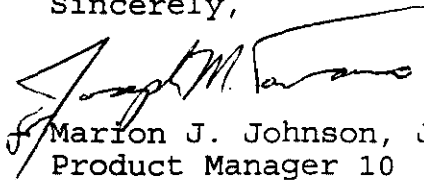
Also, to meet the requirement of the DEET RED, the product must be packaged in containers utilizing a concave trigger to help aim the product or other comparable mechanism that will ensure that the product will not be inadvertently sprayed in the eyes.

A stamped copy of the 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.

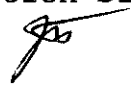
The Confidential Statements Of Formula dated April 15, 2003 are acceptable and have been placed into the file for this product.

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

Sincerely,



Marion J. Johnson, Jr.
Product Manager 10
Insecticide Branch
Registration Division (7505C)



Unscented OFF! Skintastic Spray Insect Repellent

MAY 19 2003
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
4822-37C

- SC Johnson A Family Company
- Low DEET Formula
- The Right Amount of Protection from Mosquitoes, Biting Flies, Gnats, Chiggers and Fleas
- With Aloe Vera
- Non-Greasy
- Unscented
- New
- Get the OFF! mosquito protection that is right for you and your family
- Protect your family with Unscented OFF! Skintastic Spray Insect Repellent
- Specially formulated to feel and smell better on your skin
- Provides Protection from Mosquitoes, Biting Flies, Gnats, No-see-ums, Chiggers and Fleas
- (Great for) (activities such as) (playing in the yard), (barbecuing), (playing and relaxing outdoors), (or) (relaxing on the deck)
- Tropical Fresh
- Fresh Scent
- Contains (with) Deet (N, N, Diethyl-meta-toluamide)
- Contains (with) Deet (N, N, Diethyl-meta-toluamide) Mosquito Protection
- xx% (MORE) (FREE)
- Bonus (Value) (Size) (Pack)
- xx oz (ounces) at the (same) 6 oz (ounce) price
- xx oz (ounces) for the (same) price of 6 oz (ounce)
- Twin-Pack
- Buy one get one Free (!)
- For Family
- OFF! Family Pack
- (Place) (Carry) (Have) (Unscented OFF! Skintastic Spray Insect Repellent)(one): (everywhere) (in your) (purse) (glove compartment) (glove box) (golf bag) (tennis bag) (tackle box) (tent) (book bag) (backpack) (fanny pack) (beach bag) (boat) (summer cabin) (first-aid kit)
- For use at (;) (home) (or) (on the go) (on a picnic) (picnicking) (camping) (at sporting events) (boating) (fishing) (hiking) (while) (gardening) (playing) (outside)
- Keep(s) Bugs OFF!®
- Take Along (OFF! repellent) (Unscented OFF! Skintastic Spray Insect Repellent) (!)
- On the go (OFF! repellent) (Unscented OFF! Skintastic Spray Insect Repellent) (!)
- 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
- 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 for more information
- Introducing (a) new scent(s) from OFF! Skintastic repellent(s), (so you can enjoy the outdoors)
- 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) (Unscented OFF! Skintastic Spray Insect Repellent) 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
- Keeping insects away never felt better
- From the #1 brand of insect repellents
- From (the makers of) OFF!, the #1 brand of insect repellents
- From America's #1 brand of insect repellents
- (From the) (America's) #1 trusted brand of insect repellents
- OFF!: 40+ years of experience in Mosquito Protection
- Families have trusted the OFF! protection for more than 40 years
- Repels mosquitoes that may carry (West Nile Virus) (diseases)
- HOLD UPRIGHT WHEN SPRAYING (SPRAYS UPSIDE DOWN TOO)
- OFF! Skintastic Family Insect Repellent is specially formulated with a lower level of active repellent ingredients to feel and smell better on your skin.
- Effectively repels mosquitoes, biting flies, deer flies, no-see-ums, gnats, chiggers and fleas from treated skin and clothing.
- It is effective, dependable protection that does not feel greasy or oily.
- It won't stain and resists perspiration.
- OFF! Skintastic Family Insect Repellent has a fresh, clean fragrance that won't leave you smelling like a bug repellent.
- Contents: ethyl alcohol, DEET, hydrocarbon propellant, fragrance, aloe vera

ACTIVE INGREDIENT:

DEET..... 7%

INERT INGREDIENTS.....93%

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 moderate but temporary eye injury. Do not get in eyes or on lips. Wash thoroughly with soap and water after handling. Do not apply over cuts, wounds, irritated skin, or sunburned skin. Use sparingly on small children. Do not allow children to handle this product. Use of this product may cause skin reactions in rare cases.

(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.

Skin: If you or your child react to this product, wash treated skin and call a poison control center or doctor for treatment advice.

PHYSICAL & CHEMICAL HAZARDS – Extremely flammable: Contents under pressure. Keep away from fire, sparks, and heated surfaces. Do not puncture or incinerate container. Exposure to temperature above 120°F may cause bursting. Keep treated surfaces away from fire, sparks, 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 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. 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 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. Wash treated clothing before wearing again.

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.

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