

AUG 9 2005

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

Subject: 8 Hour claim against mosquitoes
Unscented Deep Woods Off! Insect Repellent II
EPA Registration No. 4822-399
Application dated February 22, 2005
Letter dated February 22, 2005

Dear Ms. Geyer:

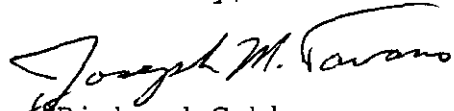
The proposed amendment to the registration for the product cited above under The Federal Insecticide, Fungicide And Rodenticide Act, as amended revising the label by adding an 8 Hour claim against mosquitoes is acceptable subject to the comments listed below:

- 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)



Unscented Deep Woods OFF! Insect Repellent II [primary name of record]
 OFF! Deep Woods Insect Repellent VII [alternate brand name, 6/2/03]
 Deep Woods OFF! for Sportsmen Insect Repellent VIII [alternate brand name, 7/2/03]
 OFF! Deep Woods Sportsmen Insect Repellent III [alternate brand name, 10/07/04]
 OFF! Active Insect Repellent IV [alternate brand name, 12/16/04]

- SC Johnson A Family Company
- Protection from Mosquitoes, Ticks, Biting Flies, Gnats, Chiggers and Fleas
- New
- Unscented
- Fragrance Free
- Tropical Fresh
- Fresh scent
- Get the OFF! mosquito protection that is right fo you and you
- OFF! Family Pack
- 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
- (Place) (Carry) (Have) (product name)(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)
- Camping
- Fishing
- Hunting
- Boating
- Hiking
- Picnic
- Gardening
- Taking a walk
- Keep(s) Bugs OFF!®
- LONG LASTING PROTECTION from mosquitoes, ticks (including ticks that cause Lyme disease), biting flies, gnats and chiggers
- 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)
- 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**)

**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.
4822-399

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- 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
- Provides hours of effective protection from mosquitoes and biting flies: deer flies, sand flies, stable flies, black flies.
- Repels gnats and biting flies: deer flies, sand flies, stable flies, black flies.
- Also repels ticks, chiggers, and fleas from treated skin and clothing.
- (Product name) is not greasy, won't stain, resists perspiration.
- **Mosquito protection (for up to 8 hours)**
- **Repels mosquitoes (for up to 8 hours)**
- **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**
- HOLD UPRIGHT WHEN SPRAYING
- Sweat-Resistant
- Sweat-Resistance
- With resistance to sweat
- Designed for people on the go
- Take-Along
- (Perfect to) take-along with you

[Note to reviewer: Bulleted statements and text within parenthesis are optional]

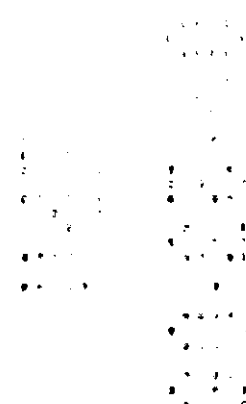
ACTIVE INGREDIENT:

DEET 25.00%
INERT INGREDIENTS ...75.00%

KEEP OUT OF REACH OF CHILDREN
WARNING

See additional precautions on back label

NET WT. 3.5 to 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. 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.

For additional information in case of emergency call toll free 800-558-5252.

PHYSICAL & CHEMICAL HAZARDS - Combustible: Do not use or store 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.** Hold container 4 to 6 inches from skin or clothing and spray. 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 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: Before disposing, empty the container by using the product according to the label. Do not reuse this container. Place in trash or offer for recycling if available.

If partially filled: Call your local solid waste agency or 1-800-529-3394 for disposal instructions.

Never place unused product down any indoor or outdoor drain.

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Questions? Comments? Call 800-558-5252 or Write Helen Johnson ©2004 S.C. Johnson & Son, Inc. Racine, WI 53403-2236 U.S.A. All Rights Reserved

EPA Reg. No. 4822-399

EPA Est. No. 4822-WI-1