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Systems Integration Group, Inc.

PM

03

4822-469

5/19/99

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MAY 19 1999

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

Dear Mr. Wallace:

Subject: Product Name: Repellent LMO  
EPA Registration Number 4822-469  
Your amendment dated: December 22, 1998

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable subject to the comments listed below. Five copies of the final finished label must be submitted.

- o Delete all statements in reference to Citronella Candles, since this reference could be construed as comparative claim. Refer to 40 CFR 156.10 (a)(5) for further guidance.
- o You must make sure that the label does not contain the terms "caution" "warning" or "danger" except as the respective signal word for that label. Consider alternative wording such as "notice" or "attention" instead, so that there is no conflict with EPA required signal word..

A stamped copy of the proposed label is enclosed for your records. Please contact Ms. Pat Quarles at (703) 305-6876.

Sincerely,



Marion Johnson  
Product Manager 10  
Insecticide Branch  
Registration Division 7505

2714

(text appearing in parentheses is optional)

## Repellent LMO

### ACTIVE INGREDIENT

d-cis/trans allethrin ..... 21.97%

INERT INGREDIENTS..... 78.03%

KEEP OUT OF REACH OF CHILDREN

### CAUTION

(SEE (BACK) (SIDE) PANEL (INSERT) FOR ADDITIONAL PRECAUTIONARY STATEMENTS)

or

(FOR DETAILED DIRECTIONS FOR USE AND SAFETY INFORMATION, SEE INSERT  
(INSTRUCTION SHEET) INSIDE (CARTON) (BOX).)

(STARTER PACKAGE) (CONTAINS) (CONTENTS):

1 Reusable Device

(1) (2) (3) (4) (5) (6) (Fuel Cartridge(s)) (Candle(s))

(1) (2) (3) (4) (5) (6) Insect Repellent Pad(s) (Mat(s))

Net Weight: \_\_\_\_ oz. (\_\_\_\_g) each

Total Net Weight: \_\_\_\_ oz. (\_\_\_\_g)

(REFILL(S))

(REFILL PACKAGE) (CONTAINS) (CONTENTS):

(1) (2) (3) (4) (5) (6) (Fuel Cartridge(s)) (Candle(s))

(1) (2) (3) (4) (5) (6) Insect Repellent Pad(s) (Mat(s))

Net Weight: \_\_\_\_ oz. (\_\_\_\_g) each

Total Net Weight: \_\_\_\_ oz. (\_\_\_\_g)

ACCEPTED  
with COMMENTS  
In EPA Letter Dated  
MAY 19 1999

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the purpose of registered under EPA Reg. No. 4822-469

(New!)

(Area Repellent)

((Continuous) (Comforting) (Soothing) (Peaceful) protection (from mosquitoes) (bugs) (outdoor flying insects) (biting flies))

(Enjoy (the outdoors) (your backyard) (again))

((Enjoy the) Soothing glow)

(Create the perfect ambiance)

(Light up your (deck) (patio) (night))

((Great) (Ideal) (Perfect) for (parties) (gatherings) (entertaining))

(Create a relaxing ambiance)

(Set the mood)

(The (light) (ambiance) (atmosphere) of (a) (citronella) (candle) (tiki torch), the (strength) (power) (effectiveness) (protection) (of) (a) (an) (OFF!®) (mosquito coil) (all in one) (together in one product).)

(Add (light) (ambiance) (atmosphere) to your evening outside. Subtract the bugs.)

(Create a Virtually Bug-Free Zone™)

(Keep Bugs OFF!®, while you light up your night)

((An) (The) OFF!®, you don't put on™)

(Light up your night, while you keep bugs OFF!®)

(A decorative way to keep (bugs) (mosquitoes) (outdoor flying insects) OFF!® the guest list)

(Repellent LMO, (It is) the reason why bugs hide the matches!)

(Ambiance and (efficacy) (effectiveness) (an effective repellent) in one product)

(Citronella Candles are great for protecting your (backyard) (deck) (patio) (outdoor area) from (bugs) (mosquitoes) (outdoor flying insects). Now OFF!®, the expert at keeping bugs away, has (developed) (created) a product that repels (bugs) (mosquitoes) (outdoor flying insects) further than candles, but still (lets you) (enjoy) (create) (a) (an) (wonderful) (pleasant) (nice) (atmosphere) (that) (you) (your family) (and) (you) (your friends) (will love) (enjoy) (but the bugs) (will hate) (won't).)

(Create (a) (an) (wonderful) (pleasant) (nice) (atmosphere) (that) (you) (your family) (and) (you) (your friends) (will love) (enjoy) (but the bugs) (will hate) (won't).)

(When it comes to repelling (bugs) (mosquitoes) (outdoor flying insects), there is (are) OFF!® (repellents) and then there is everybody else.)

(New OFF!® (Repellent LMO) (area repellent) creates a (wonderful) (nice) (festive) (enjoyable) (pleasant) (atmosphere) (ambiance) like citronella candles and tiki torches, but protects further than a candle or torch.)

(Give your evening outside a special touch while making sure the bugs won't touch you.)

(OFF!® (repellent) protection that glows)

(Its portable design also makes it great for camping.)

(New OFF!® (Repellent LMO) (area repellent), doesn't have an exposed flame so you don't have to worry about (your kids) (children) (getting burned) (burning their fingers) (putting their hands where they shouldn't).)

(New OFF!® (Repellent LMO) (area repellent) has a special safety feature so if it is accidentally tipped over, the flame is automatically extinguished.)

(The flame (inside) extinguishes (automatically) (immediately) if it is tipped over.)

((OFF!® Repellent LMO) (The device) is specially designed so it can not tip over easily.)

(It is (a product) (device) (something) you can feel good about using around your (family) (kids) (children) (and friends).)

((Mosquitoes) (bugs) (outdoor flying insects) (biting flies) can spoil just about any outdoor activity (whether you are entertaining guests at a barbecue or just working in your backyard).)

((When used with Repellent LMO pads,) (Repellent LMO) (efficiently) repels (reduces the annoyance of) (mosquitoes)(outdoor flying insects) (bugs) ((and) biting flies) in an area as large as (15 feet in diameter) (an average-size deck or patio) (15 feet by 15 feet) (175 square feet) (225 square feet) (a deck or patio) (for hours).)

(Repellent LMO is also portable to allow you to take it anywhere you expect annoying (mosquitoes) (outdoor flying insects) (bugs)((and) biting flies) to be a problem.)

(Repellent LMO pleasantly protects your outdoor area from (mosquitoes) (outdoor flying insects) (bugs)((and) biting flies) in an area as large as (15 feet in diameter) (an average-size deck or patio) (15 feet by 15 feet) (175 square feet) (225 square feet) (a deck or patio) (for hours).

<REPELLENT LMO – Amended label to EPA 12/98>

Repellent LMO provides a bug free outdoor area as large as (15 feet in diameter) (an average-size deck or patio) (15 feet by 15 feet) (175 square feet) (225 square feet) (a deck or patio) (from mosquitoes) (biting flies) (outdoor flying insects) (for hours).)

((Provides) (Odor-free) (Unscented) (Scented) (Pleasantly scented) (Convenient) (Portable) (Silent) (Continuous) (No-mess) (Worry-free) (Effective) protection (for up to 4 hours).)

((Provides) (Odor-free) (Unscented) (Scented) (Pleasantly scented) (Convenient) (Portable) (Silent) (Continuous) (No-mess) (Worry-free) (Effective) protection from (mosquitoes) (outdoor flying insects) (bugs) (biting flies).)

((Provides) (Odor-free) (Unscented) (Scented) (Pleasantly scented) (Convenient) (Portable) (Silent) (Continuous) (No-mess) (Worry-free) (Effective) protection you can take anywhere outdoors.)

((Provides) (Odor-free) (Unscented) (Scented) (Pleasantly scented) (Convenient) (Portable) (Silent) (Continuous) (No-mess) (Worry-free) (Effective) protection you don't (have to) put on.)

(A revolutionary device that protects (you) (and) (your) (family) (guests) (and) (friends) from (mosquitoes) (outdoor flying insects) (bugs) (biting flies).)

(A device that (pleasantly protects your outdoor area from (mosquitoes) (outdoor flying insects) (bugs) (biting flies)) (provides protection from mosquitoes (outdoor flying insects) (bugs) (biting flies)).)

(An outdoor product for use in backyards, patios, decks, and other recreational areas)

(But now the makers of OFF!®, the experts at keeping (mosquitoes) (bugs) (outdoor flying insects) (biting flies) away, has developed a whole new way to give you effective protection. In fact, it's an OFF!® product you don't put on.)

(Made from a (tough) (sturdy) (durable) (material) (that can be) (easily) (wiped off) (cleaned))

(Just use (the device) once and throw away.)

(Throw away (the device) when pad and candle are (exhausted) (used up).)

(Don't forget to pick up (Repellent LMO) (fuel) (cartridges) (candles) (and) (pads) (refills).)

(Make sure you have enough (Repellent LMO) to (properly) protect (your outdoor area) (backyard) (deck) (patio). Just see the (chart) (graphic) (below) to figure out how many you need.)

(Weather-resistant)

(Sturdy)

(Durable)

(Worry-free)

(No-mess)

(Safe (and effective) when used as directed)

(Continuous)

(Convenient)

(Easy to use)

(Effective)

(Enjoy the outdoors again (With the OFF!® you don't put on) (without wearing an insect repellent).)

(It's a portable device so you can take it anywhere; it's (odor-free) and silent so you can use it (in comfort) (comfortably); and it (pleasantly) (protects) (repels) (your outdoor area from) (mosquitoes) (outdoor flying insects) (bugs)((and) biting flies) (in) (an area as large as) (15 feet in diameter) (an average size deck or patio) (15 feet by 15 feet) (175 square feet) (225 square feet) (a deck or patio) for up to 4 hours so you can enjoy the outdoors again (without the presence of (mosquitoes) (outdoor flying insects) (bugs) (biting flies)) (without getting eaten alive by the bugs).)

(Its design (is attractive) (and) (adds the ambiance of a visible flame) (adds the ambiance of a glowing flame) (adds a glowing ambiance) (adds a wonderful atmosphere) (adds ambiance) so you will be comfortable using it when you entertain guests, yet functional so it is effective and easy to use.)

(Its (attractive) (stylish) (modern) (classic) design will fit any outdoor décor. (Repellent LMO) gives off (a warm glow) (a beautiful ambiance) (a beautiful glow) (a beautiful light) that will (create) (add) atmosphere (to) (for) (your evening outside) (outdoor activity) (time outside) (party).)

((Repellent LMO) is (perfect) (just right) for (holiday parties) (outdoor get-togethers) (dinners with the family).)

(Just place them in (and) (or) around the area you want to protect.)

(Take your backyard back from the bugs.)

(Make outdoor evenings enjoyable again.)

(New (Repellent LMO) is a (small) device that (pleasantly) (protects) (repels) (mosquitoes) (outdoor flying insects) (bugs)((and) biting flies) (from your outdoor area) (from) (an area as large as) (15 feet

in diameter) (an average size deck or patio) (15 feet by 15 feet) (175 square feet) (225 square feet) (a deck or patio) for up to 4 hours. It works by silently and continuously releasing an (odor-free) (unscented) (scented) (pleasantly scented) repellent that keeps (mosquitoes) (bugs) (outdoor flying insects) (biting flies) away from your outdoor area for up to 4 hours.)

(Now the experts at keeping (mosquitoes) (bugs) (outdoor flying insects) (biting flies) off people have developed a revolutionary new way to repel (mosquitoes) (bugs) (outdoor flying insects) (biting flies) (for any outdoor occasion) (without wearing a bug repellent) (that you don't have to put on) -- Introducing (the OFF!® you don't put on) - New Repellent LMO.)

(Odor-free)

(One (OFF!®) (Repellent LMO) (Fuel) (cartridge) (candle) lasts (4) (6-8) (8) (8-10) (9) (9-10) (10) (10-11) (11) (10-12) (12) (up to 4) (up to 24) hours.)

(One Repellent LMO pad lasts (2) (2-3) (3) (3-4) (2-4) (4) (up to 4) hours.)

(Plus it's portable. So you can take it anywhere (mosquitoes) ((and) biting flies) are expected to be a problem.)

(Portable)

(Long lasting device)

(Easy to clean)

(Easy to store from season to season)

(Provides up to 4 hours of (Odor-free) (pleasant smelling) (unscented) (scented) (pleasantly scented) (Convenient) (Portable) (Silent) (Continuous) (Effective) protection from mosquitoes (outdoor flying insects) (bugs) (biting flies).)

(Revolutionary)

(Security from (mosquitoes) (outdoor flying insects) (bugs) (biting flies).)

(Security system against (mosquitoes) (outdoor flying insects) (bugs) (biting flies).)

(Silent)

(Simple)

(Simply insert the (fuel) (cartridge) (candle) (in base) and repellent pad (into top of device). Light the wick. It silently and continuously releases (a) (an) (odorless) (odor-free) (pleasant smelling) (unscented) (scented) (pleasantly scented) repellent that (pleasantly) protects (your outdoor area



<REPELLENT LMO – Amended label to EPA 12/98>

from) (mosquitoes) (outdoor flying insects) (bugs)((and) biting flies) (in) (an area as large as) (15 feet in diameter) (an average size deck or patio) (15 feet by 15 feet) (175 square feet) (225 square feet) (a deck or patio) (for up to 4 hours).)

(Take back (reclaim) your (backyard) (patio) (deck) from (mosquitoes) (outdoor flying insects) (bugs) (biting flies).)

(The (odor-free) (convenient) (portable) (silent) (continuous) (effective) way to keep your area bug-free.)

(The OFF!® (repellent) you don't put on!™)

(Unobtrusive)

**[(Usage Tips) (Helpful Hints)]**

(For best results,)

(Allow (a few) (5) (10) (10-15) (15) (15-30) (30) minutes for product to take effect.) (Start) (turn on) the (product) (Repellent LMO) (OFF!® Repellent LMO) (outdoors) (at least) (5) (10) (10-15) (15) (15-30) (30) minutes before your activity (and place it in your outdoor area) (so it has time to begin working.)

(Use the Repellent LMO) (when air is calm) (in still air) (in areas) (The device works well in outdoor areas) (where there is minimal (light) (mild) (breeze)) (such as decks, porches, patios, yards).)

(Wind will carry (disperse) (distribute) the repellent away from the device.)

(Use one Repellent LMO (in) (small areas) (an area as large as) (10x10) (11x11) (12x12) 13'x13') (14'x14') (15' by 15') (15 feet in diameter) (an average size deck or patio) (175 square feet) (225 square feet) (a deck or patio) (for every 175 square feet) (for every 225 square feet) (of space).)

(Use two Repellent LMO (or more) (in) (larger areas) (areas larger than) (15 feet in diameter) (an average size deck or patio) (15 feet by 15 feet) (175 square feet) (225 square feet) (a deck or patio) (for every 175 square feet) (for every 225 square feet) (of space).)

(Extreme) wind, heat, humidity may effect the performance of the Repellent LMO.

Device and pad effectiveness may be diminished if exposed to rain.

(If your unit fails to light, it may be out of fuel.)

(Check (the) fuel level by holding the cartridge horizontally and looking at the clear end.)

(Check (the) fuel gauge on the (back of the device) (bottom.)

(You can see (the) amount of fuel in (the) cartridge. Replace (the) (candle if it has (been exhausted) (burned out)) (cartridge if it is empty).)

(When (the) candle (burns out) (is exhausted) (the) pad is (used up) (exhausted).)

(Pad (mat) turns (white) (pale blue) (beige) (brown) when active ingredient has been exhausted) (used up).)

## **DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

### **[BASIC INSTRUCTIONS]**

Place (the) (device) (unit) (Repellent LMO) on a flat, stable area (near to where you want to enjoy the outdoors) (without the constant annoyance from (mosquitoes) (bugs) (flying, biting bugs) (insects).

(Open) (Remove) (Slide) device (top).

(Snap) (Place) (Screw) (fuel canister) (candle) into base.

Remove one (Repellent LMO) (repellent) pad from its (the) (package) (wrapper) (cover). Place it (in the device top) (in the top of the unit) (in the (pad) holder) (in the device top's slot).

Light the (fuel wick) (candle).

Reinstall device top (being careful to (turn) (twist) top until it (snaps) (clicks) in place) (it snaps into place).

Do not move the device when it is lit (working) (functioning).

When (you are) finished using (the) (device) (unit) (Repellent LMO), carefully remove top and blow out flame.

### **TO CHANGE PAD:**

Extinguish flame.

Allow (the) (Repellent LMO) (device) (unit) to cool completely.

(Open) (Remove) (Slide) device (top).

(Open up device.)

Pull (the) used pad out and slide (in) (a) fresh pad (in). (Wrap (the) used pad in paper and place (it) in (the) trash.)

IMPORTANT: Remove remains of exhausted (used up) candle before inserting a new refill candle.

Light the wick.

Reinstall device top (being careful to (turn) (twist) top until it (snaps) (clicks) in place) (it snaps into place).

STORAGE: Store unused pads in (original packaging) (the device storage area) (and in) (an area inaccessible to children and pets) (and keep in locked area). (After allowing to cool,) Store (device) (unit) (Repellent LMO) and (with its partially used pads) in a cool, dry place inaccessible to children and pets.

DISPOSAL: Securely wrap (exhausted) (used up) pad in newspaper and place in trash. After allowing to cool, securely wrap empty fuel cartridge in newspaper and place in trash.

**[NOTE TO REVIEWER: THE DIRECTIONS FOR USE WILL VARY DEPENDING ON THE SPECIFIC DESIGN OF THE DELIVERY SYSTEM. THE FOLLOWING ALTERNATE DIRECTIONS MAY BE ADDED TO (OR COULD REPLACE PORTIONS OF) THE BASIC INSTRUCTIONS TO ACCOMMODATE POTENTIAL CONFIGURATIONS OF THE DEVICE.]**

(Fold) (unfold) (assemble) (build) device as shown in picture.

(Remove protective rain cap.)

(Remove (base) (fuel (candle) compartment) cover to expose (fuel) (candle) compartment in base of unit.)

(Remove child resistant cap from fuel source.)

(Reinstall (base) (fuel (candle) compartment) cover.)

(Place candle on flat surface (near to where you want to enjoy the outdoors).)

(Place the device top on a flat surface covering the candle.)

(Close device.)

(When (you are) finished using (the) (device) (unit) (Repellent LMO), simply blow through the side (vents) to extinguish the flame.)

(When (you are) finished using (the) (device) (unit) (name) simply close (air) vents.)

(When surfaces are cool to the touch snap protective rain cap over the vented top to prevent rain water from getting into the device or wetting the (repellent) (pad) (mat).)

(Discard and replace pad when it turns (white) (pale blue) (beige) (brown).)

((Attach) (Secure) (the device) (the unit) (OFF!® Repellent LMO) to the (optional) pole and (place) (install)(put) the pole into the ground.)

((You can) Collapse (fold) (disassemble) (the device) (the unit) (OFF!® Repellent LMO) when not in use (for storage) (for use away from home) (for transportation).)

(Make sure to extinguish the flame before collapsing (folding) (disassembling) the device (the unit).)

(Do not (walk with) (the device) (the unit) (OFF!® Repellent LMO) (lit) (functioning) (working).)

((OFF!® Repellent LMO) (This device) (is) not for use when walking.)

(Do not hang (device) (the unit) (OFF!® Repellent LMO) higher than (4) (5) (6) (8) feet above the ground.)

(Before cleaning, make sure to extinguish the flame and let (the device) (the unit) (top) (OFF!® Repellent LMO) cool.)

(Before cleaning, remove pad (and candle) (and fuel source) (first).)

(Wash with a wet cloth only.)

(Wash with water and light duty detergent.)

(Wipe with a dry (paper) towel.)

**[NOTE TO REVIEWER: DIRECTIONS/INSTRUCTIONS MAY CONTAIN SUBTITLED PICTURES TO AID CONSUMER UNDERSTANDING]**

**PRECAUTIONARY STATEMENTS**

**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

CAUTION. Harmful if inhaled. Avoid breathing vapors. Keep out of reach of children. For outdoor use as an insect repellent only. Do not use indoors, in a tent or enclosed area. Do not touch the (vented top) (device) (unit) while (the unit) (it) is in use. The (vented top) (device) (unit) is hot while in use. Do not insert (use) anything other than Repellent LMO (pads) (mats) (and candles) in the (device) (unit).

#### FIRST AID

If inhaled: Move victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get medical attention.

#### ENVIRONMENTAL HAZARDS

This pesticide is highly toxic to fish. Do not apply directly to water. Drift from treated areas may be hazardous to organisms in adjacent aquatic sites.

#### PHYSICAL AND CHEMICAL HAZARDS

Place on flat, stable surfaces. Do not cover with any material while in use. Clean with a damp cloth only when the device is cool and inactive.

(Keep candle wick trimmed to 1/2 inch or less at all times. Keep candle free of matches or foreign matter that may present fire hazard.)

Do not insert anything other than Repellent LMO pads into the top. Do not allow pad to come into contact with other substances. S.C. Johnson & Son, Inc. will not be held responsible for damage, injury or poor performance caused by use of other fuel cartridges (candles) or repellent pads.

EPA Reg. No. 4822-469

EPA Est. No. 4822-WI-1

Patents Pending

QUESTIONS? COMMENTS? Call 800-558-5252 or write Helen Johnson. ©(1998)(1999)(2000) S.C. Johnson & Son, Inc., Racine, WI 53403-2236 USA. All Rights Reserved.

#### [REPELLENT PAD POUCH]

## Repellent LMO

#### ACTIVE INGREDIENT

d-cis/trans allethrin.....21.97%

INERT INGREDIENTS..... 78.03%

KEEP OUT OF REACH OF CHILDREN

#### CAUTION

(SEE (OUTER CARTON) (INSERT) FOR ADDITIONAL PRECAUTIONARY STATEMENT(S))

(FOR DETAILED DIRECTIONS FOR USE AND SAFETY INFORMATION, SEE INSERT (INSTRUCTION SHEET) INSIDE (CARTON) (BOX).)

Net Contents: \_\_\_\_ (pads)(mats)

Net Weight: \_\_\_\_ oz. (\_\_\_\_g) each

Total Net weight: \_\_\_\_ oz. (\_\_\_\_g)

EPA Reg. No. 4822-469

EPA Est. No. 4822-WI-1

QUESTIONS? COMMENTS? Call 800-558-5252 or write Helen Johnson. ©(1998)(1999)(2000) S.C. Johnson & Son, Inc., Racine, WI 53403-2236 USA.

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**[DEVICE LABEL]**

**CAUTION - HOT SURFACE**

Keep out of reach of children.

For outdoor use as an insect repellent only. Do not use indoors, in a tent or enclosed area. Do not touch the device top while the unit is in use. Device top is hot while in use.

Place on flat, stable surfaces.

Do not cover with any material while in use.

(Device contains flammable fuel. Do not use near fire or flame.)

Read Directions for Use and precautionary statements on the (insert) (instruction sheet) and outer package carefully.

Fuel cartridges (candles) other than (OFF!® Repellent LMO) will not work in this device. S.C. Johnson & Son, Inc. will not be held responsible for damage, injury or poor performance caused by use of other fuel cartridges or repellent pads (mats).

Manufactured for S.C. Johnson & Son, Inc. Racine, WI 53403-2236, Patents Pending

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<REPELLENT LMO - Amended label to EPA 12/98>

[FUEL CARTRIDGE (if applicable)]

DANGER:

(Name) (oil) (lamp) (cartridge) (canister) Harmful or fatal if swallowed. Combustible. Contains petroleum hydrocarbons. Do not take internally. If swallowed do not induce vomiting. Call a physician immediately. Remove wick cover with a coin or screwdriver. WARNING: Replace wick cover when not in use to prevent accidental ingestion of liquid by a child. Do not adjust wick height. KEEP OUT OF REACH OF CHILDREN. NEVER LEAVE A LIGHTER (DEVICE) (NAME) UNATTENDED. Do not store near heat or open flame. Do not use near flammable surfaces or items. Do not use in potpourri pots or any other container where there is inadequate ventilation above the flame. As with all open flame products, use with extreme care and at your own risk.

FOR OUTDOOR USE ONLY.

HARMFUL IF SWALLOWED.