

JUL 8 2004

Kelly K. Rahn
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, Wisconsin 53403-2236

Subject: Snake II
EPA Registration No. 4822-501
Application dated November 4, 2003

Dear Ms. Rahn:

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 additional marketing claims is acceptable subject to the comments listed below:

1) Delete the following claims from the list of marketing claims:

#1 repellent brand in America.
No other repellent brand is more trusted.
America's (#1 repellent brand) (choice).
Mom's favorite repellent brand.
Moms choose OFF!.
The most trusted repellent brand.
No other repellent brand is more trusted.
Consumer tested and preferred for long lasting protection.
(Not) (Doesn't use) citronella.
Zero DEET.
Citronella candles protect a (distance) (radius) (of) up to 1 foot.

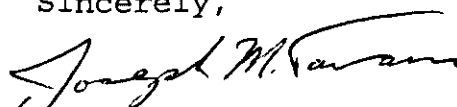
2) Delete the word, ~~Extra~~, for all the claims in which it appears.

A stamped copy of the draft label is enclosed for your records.

Submit two copies of the amended final label before this product is released for shipment under this revised label.

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

Sincerely,



Richard Gebken
Acting Product Manager 10
Insecticide Branch
Registration Division (7505C)



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**ACCEPTED
with COMMENTS
In EPA Letter Dated:
JUL 8 2001**

SNAKE II

FRONT PANEL
S.C. Johnson (Wax)
(A Family Company)

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
4522-501**

(REFILLS)

Outdoor Fresh Scent
(Country) Fresh Scent

Spring Fresh Scent
Vanilla Breezes Scent

Each coil lasts (up to) (2) (2-3) (3) (4) (5) (6) (7) (8) (9) (5-7) hours Long lasting

- (Glow) (Works) pleasantly for (up to) (2) (2-3) (3) (4) (5) (6) (7) (8) (9) (5-7) hours
- Light, flat, small - easy to pack and use outdoors

FOR OUTDOOR USE ONLY

ACTIVE INGREDIENT:

d/l-allethrolone d-trans chrysanthemate 00.15%

INERT INGREDIENTS: 99.85%

Contents: (contains) (1) (refillable) (reusable) (pot) (1) (stand);
(2)(metal)(stands); (2) (3) (4) (5) (6) (7) (8) (9) (10) (coils)

Net Wt. .** oz. (** g) each
Total Net Wt. *.** ounces (oz) (** g)

KEEP OUT OF REACH OF CHILDREN

CAUTION

(Before use read and follow all directions.) or
(See additional precautionary statements and complete use directions on (back) (side) (bottom) (top) (panel).)

(Keeps a 6' (10') x 10' area free from mosquitoes (for up to) (2) (3) (4) (5) (6) (7) (8) (9) hours).
(Effective wide-area protection).
(Creates a virtually bug-free zone!)
(Light Snake II before event to initiate its)(Patented wide end (coil) design).
(Pleasant, effective protection for your patio or deck (yard)).

Brand America trusts
#1 repellent brand in America
No other repellent brand is more trusted
America's (#1 repellent brand) (choice)
Mom's favorite repellent brand
Moms choose OFF!
Heat activated (mosquito) (repellent) (system) (technology)(protection)
Satisfaction guaranteed
Guaranteed (or your money back)
The most trusted repellent brand

No other repellent brand is more trusted
 Consumer tested and preferred for long lasting protection
 (Repels) (mosquitoes) (Keeps bugs off) without anything on
 Effective (mosquito) (protection) (repellent) you don't have to put on
 Tested in the worst areas – just think what it can do for your backyard
 Tested in the most extreme mosquito conditions
 Trusted protection for over 40 years
 (Trusted) (mosquito) (repellency) (protection) (for your family)
 Protection barrier
 Perimeter of (repellency) (protection)
 Great (repellency) (protection) no mess
 Great for (BBQs) (picnics)
 The OFF! That you don't put on
 Proven protection from mosquitoes
 Trusted (mosquito) protection for (everyone in) your family
 (Mosquito) protection for all occasions
 Easy to use
 Just light it and relax
 No scent
 Affordable mosquito (repellency) (protection)
 (Not) (Doesn't use) citronella
 Protect (your family) (the ones you love) (against) (from) mosquitoes
 Invisible shield
 Zero DEET
 OFF! The experts in repelling insects
 Researched
 Use with confidence
 OFF! (brand) relied on for generations
 No zapping
 No sprays or lotions
 Decorative
 Get ready for the summer
 (Camping) (family) (mosquito) (repellency) (protection) kit
 OFF! For every occasion
 Don't have to wash off
 Buy one, get one free
 Free (refills) (with purchase!)
 (Value) (Bonus) Pack
 Portable (mosquito) (protection) (repellency)
 No unpleasant scent
 (Mosquito) (repellency) (protection) that lasts all evening
 Each (coil) (refill)(lasts) (repels) (mosquitoes) up to 4 (extra) hours
 (Declare your yard a) virtually mosquito-free zone
 Citronella candles protect a (distance) (radius) (of) up to 1 foot
 OFF! Coils (protect) (repel) (mosquitoes) up to 10 X 10 ft. (area)
 Contains d/l-allethrolone d-trans chrysanthemate
 (Protects) (repels) (mosquitoes) (from) and average sized patio
 (Gets rid of) (repels) (blocks) (mosquitoes) (from)(in) a 10 X 10 foot area
 (Provides) 10 X 10 foot area (of) (mosquito) (protection) (repellency) (free from mosquitoes)
 Won't damage clothing

Free your family from (annoying) mosquitoes
Does not attract (mosquitoes) (bugs)
(Protects) (repels) mosquitoes (from)(in) an area (up to) (10' X 10') (100 sq. ft.)
(Repels) (Shields against) (Protects against) mosquitoes which may carry (diseases such as)
(West Nile Virus) (Malaria) (Yellow fever) (Encephalitis)
No chemicals or sprays on your skin
Repels mosquitoes before they get you
OFF! (has) (is) a complete line of mosquito (repelling) protection (for every situation)
Mosquito protection kit
Border of protection
(Repels) (Shields against) (protects against) (annoying) mosquitoes (while you enjoy the outdoors)
(Repels) (Shields against) (protects against) mosquitoes up to (a total of) (4), (8), (12), (16), (20), (24) (extra) hours (each) (coil) (refill) (!)
(Repels) (Shields against) (protects against) (annoying) mosquitoes (for hours) (in your outdoor living space) Virtually Mosquito Free for (up to) (a total of) (4), (8), (12), (16), (20), (24) (extra) hours of (effective) (virtually mosquito-free) (mosquito) (repellency) (protection) (Effective) (proven) (mosquito) (protection) (shield) (repellency) (for) (up to) (a total of) (4), (8), (12), (16), (20), (24) (extra) hours (each) (coil) (refill) (!)
(Works up to) (lasts) (lasting) (fights off) (protects) (against) (repels) (mosquitoes) (for) (up to) (a total of) (4), (8), (12), (16), (20), (24) (extra) hours (each) (coil) (refill) (!)
(Up to) (a total of) (4), (8), (12), (16), (20), (24) (extra) hours of (outdoor) (backyard) (outside) (great outdoors) (campsite) (protection) (repellency) (from mosquitoes)
(Up to) (a total of) (4), (8), (12), (16), (20), (24) (extra) hours of (proven) protection (in the outdoors, the great outdoors, backyard, outside, at the park, in the woods)
(Up to) (a total of) (4), (8), (12), (16), (20), (24) (extra) hours of (repellency) (repelling) (mosquitoes)
Enjoy (the) (outdoors) (great outdoors) (backyard) (outside) (park) (woods) (forest) with (up to) (a total of) (4), (8), (12), (16), (20), (24) (extra) hours of (repellency) (protection)

BACK PANEL

SNAKE II

(REFILLS)

(ENJOY YOUR PICNIC, PATIO AND BACKYARD FUN WITH SNAKE II. HELPS TO REPEL MOSQUITOES IN SEMI-CONFINED AREAS SUCH AS PORCHES, PATIOS, AND OTHER AREAS WHERE THERE IS LITTLE MOVEMENT OF AIR.)

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS & DOMESTIC ANIMALS
 CAUTION: Avoid prolonged inhalation or contact with skin. Avoid contact with eyes or clothing. Do not touch lit end of coil. Do not use indoors. Wash hands after use and before eating or smoking. Cover any exposed food to avoid contamination. Do not place in direct contact with flammable objects, materials or surfaces.

(Note to reviewer: Boxed format or bullets may be used in First aid section if label space permits)

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FIRST AID

Call a poison control center or doctor for treatment advice. Have the product container or label with you when calling a poison control center or doctor, or going for treatment.

If inhaled: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible.

If on skin or clothing: Take off contaminated clothing. Immediately rinse skin with plenty of water for 15-20 minutes.

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.

PHYSICAL OR CHEMICAL HAZARDS: Use with caution to avoid fire hazard.

ENVIRONMENTAL HAZARDS: This product is toxic to fish. Do not apply directly to water. Drift from treated areas may be hazardous to organisms in adjacent aquatic sites. Do not contaminate water when disposing of equipment washwaters.

DIRECTIONS FOR USE

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

1. Remove coils from (pouch) (all wrapping materials) (container) (box) (envelope).
2. (Loosen outer rings until end moves freely.)
(Grasp each COMMA shaped portion in the center between thumb and forefinger of each hand.)
(Separate the two COMMA shaped portions by gently pressing them in opposite direction 1/4 inch apart.)
3. Align coil with mounting (detail) (stand) (device) (tray). Insert (press) (mount) snap the slot of the coil onto (into) the metal stand in the base of the pot.
4. Light outer end of coil until glowing, then BLOW OUT ANY FLAME.
5. Restore lid (slide tray and into unit) (align lid to base) (snap lid to base) and place unit (pot) (device) (coil) 6-10 (8-10) feet apart around area to be protected. Each coil lasts (up to) (2) (3) (4) (5) (6) (7) (8) (9) (2-3) (5-7) hours.
6. If shorter period of use is desired, carefully lift coil out of pot and extinguish (snuffing into the pot) (by pressing the glowing end inside the pot). The unused portion can then be relit when needed.
7. (Save the pot for use with SNAKE II refills.) (When repellent coil is completely (exhausted) (used), save the pot for future use with SNAKE II refills.)

NOTE: Graphic depictions may appear on final printed labeling to enhance user understanding of Directions for Use.

For Best Results: Use only SNAKE II mosquito coil refills. Place the SNAKE II mosquito coil outdoors in semi-confined areas such as porches, patios, yards and similar areas where there is

minimal breeze. Duration and results are affected by airflow and breeze. Do not use in wind. Use one pot (coil) for each 60 (6 ft. x 10 ft.) to 100 (10 ft. x 10 ft.) square foot area.

STORAGE: Store in a dry place (preferably locked) inaccessible to children and pets and away from sources of heat or ignition. Used pots, if kept for further use, must be stored out of reach of children and pets.

DISPOSAL: Before disposing, empty container by using the product according to the label. Used coils: Place ashes in trash. Coil pouch: Do not re-use empty pouch. Place in trash. Unused coils: Call your local solid waste agency or 1-800-529-3394 for disposal instructions. Never place unused product down any indoor or outdoor drain.

Question? Comments? Call 800-558-5252 or write Helen Johnson.
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EPA Reg. No. 4822-501
EPA Est. No. 63376-MYS-1 (A) or 70999-WI-1 (B) or 70999-WI-2 (C)
Lot number suffix (A), (B) or (C) indicates appropriate establishment number

US Patent number 5,657,574 and patent pending

Coils made in Malaysia Pots made in China

COIL LABEL (unit labeling)

SNAKE II

(REFILLS)

FOR BEST RESULTS - USE ONLY SNAKE II MOSQUITO COIL REFILLS

- Outdoor Fresh Scent
- Spring Fresh Scent
- (Country) Fresh Scent
- Vanilla Breezes Scent

KEEP OUT OF REACH OF CHILDREN

CAUTION

See additional precautionary statements and complete use directions on (back) (side) (bottom) (top) (panel) (outer carton).

ACTIVE INGREDIENT:

d/l-allethrolone d-trans chrysanthemate	00.15%
INERT INGREDIENTS:	99.85%

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Net Wt. .** oz. (** g) each
Total Net Wt. *.** ounces (oz) (** g)

INSTRUCTIONS:

- Remove coils from (pouch) (all wrapping materials) (container) (box) (envelope). (Separate prior to use.)
- Insert the slot of the coil onto (into) the (top of) metal stand in the base of the pot.
- Light outer end of coil (with a match) until glowing, then **BLOW OUT ANY FLAME.**
- Place units 6-10 (8-10) feet apart around area to be protected. Each coil lasts (up to) (2) (3) (4) (5) (6) (7) (8) (9) (2-3) (5-7) hours.
- Save the pot for use with SNAKE II refills.
- If shorter periods of use are desired, carefully lift coil out of pot and extinguish by pressing the glowing end inside the pot. The unused portion can then be relit when needed.

STORAGE: Store in a dry place (preferably locked) inaccessible to children and pets and away from sources of heat or ignition. Used pots, if kept for further use, must be stored out of reach of children and pets.

DISPOSAL: Before disposing, empty container by using the product according to the label. Used coils: Place ashes in trash. Coil pouch: Do not re-use empty pouch. Place in trash. Unused coils: Call your local solid waste agency or 1-800-529-3394 for disposal instructions. Never place unused product down any indoor or outdoor drain.

Question? Comments? Call 800-558-5252 or write Helen Johnson.

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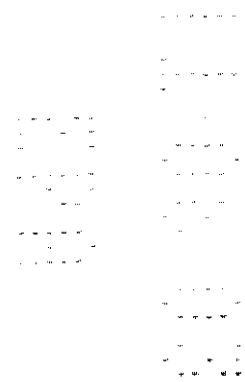
EPA Reg. No. 4822-501

EPA Est. No. 63376-MYS-1 (A) or 70999-WI-1 (B) or 70999-WI-2 (C)

Lot number suffix (A) or (B) indicates appropriate establishment number

US Patent number 5,657,574 and patent pending

Coils made in Malaysia



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POT LABEL

SNAKE I

Outdoor Fresh Scent
(Country) Fresh Scent

Spring Fresh Scent
Vanilla Breezes

(Keeps a 6' (10') x 10' area free from mosquitoes (for up to (2) (3) (4) (5) (6) (7) (8) (9) hours).
(Effective wide-area protection).
(Creates a virtually bug-free zone!)
(Pleasant, effective protection for your patio or deck (yard)).

STORAGE: Store in a dry place (preferably locked) inaccessible to children and pets and away from sources of heat or ignition. Used pots, if kept for further use, must be stored out of reach of children and pets.

DISPOSAL: Before disposing, empty container by using the product according to the label. Used coils: Place ashes in trash. Coil pouch: Do not re-use empty pouch. Place in trash. Unused coils: Call your local solid waste agency or **1-800-529-3394** for disposal instructions. Never place unused product down any indoor or outdoor drain.

(TO REDUCE ANNOYANCE FROM MOSQUITOES, USE ONE OR MORE (COILS) (UNITS) (POTS). FOR OUTDOOR USE (AS AN INSECT REPELLENT) ONLY. PLACE COILS AT LEAST 6-10 FEET (8-10 FEET) APART. DO NOT USE INDOORS, OR IN ENCLOSED AREAS. PLACE ON A FLAT HEAT-RESISTANT SURFACE AWAY FROM

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ANYTHING FLAMMABLE AND OUT OF REACH OF CHILDREN OR PETS. KEEP COIL FREE OF MATCHES OR OTHER FOREIGN MATTER. DO NOT USE COIL TO LIGHT OTHER ITEMS. DO NOT USE WATER TO EXTINGUISH COIL - SMOTHER LIT COIL BY CAREFULLY LIFTING COIL OUT OF POT AND EXTINGUISH THE GLOWING END BY (SNUFFING INTO THE POT) (BY PRESSING THE GLOWING END INSIDE THE POT). NEVER LEAVE A BURNING COIL UNATTENDED. COILS OTHER THAN [INSERT PRODUCT NAME] WILL NOT WORK IN THIS DEVICE. S. C. JOHNSON & SON WILL NOT BE HELD RESPONSIBLE FOR DAMAGE, INJURY OR POOR PERFORMANCE CAUSED BY USE OF OTHER MOSQUITO COIL REFILLS.

IMPORTANT NOTE: TO REDUCE FIRE HAZARD AND TO AVOID OVERHEATING OF THE POT SURFACE - ALWAYS BLOW OUT FLAME AFTER LIGHTING COIL!

Question? Comments? Call 800-558-5252 or write Helen Johnson.

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Pot made in China