

4822-501

11/8/2012

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 8, 2012

Ms. Rachel M. Callies
Registration Specialist
S.C. Johnson & Son, Inc.
1525 Howe Street
Racine, WI 53403-2236

**Subject: Amended Labeling; New Combinations of Existing Optional Marketing Statements & Revisions to Directions for Use to Address Potential Packaging-Related Changes
SNAKE II, EPA Reg. No. 4822-501
Your Submission Dated September 12, 2012**

Dear Ms. Callies:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable with the following label revision provision(s):

Net Weight/Contents Statement section comment(s), page 1 of 7:

1. Net weight or contents for multi-pack products must be stated on a pesticide label in accordance with section (2)(q)(2)(C)(iii) of FIFRA and 40 CFR §156.10(a)(1)(iii). EPA interpretation of the statutory and regulatory requirements is that the label must state the total weight for the entire contents as sold and distributed. In addition, the label may indicate the net weight and quantity of individual units within the carton. For example, "Net Weight 6.25 lbs. (20 - 5oz. packets)." For additional information regarding the "Net Weight/Contents" statement, please refer to Chapter 17 of the Agency's Label Review Manual under "Miscellaneous" at <http://www.epa.gov/oppfead1/labeling/lrm/chap-17.htm>. As such, you must revise the "Net Contents" statement to read as follows:

"[For individually packaged coils:

Net Weight: __ oz. (__ g)]

[For multi-packs containing a number of individually packaged coil refills:

*Net Weight: _X*_ oz. (_XX**_ g) XXX*** - __ oz. coil refills (_XXXX****_ g coil refills)*

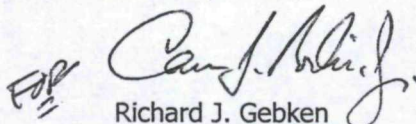
Contains __ [number] (REFILLS)]'

- *The net weight of the entire multi-pack must be displayed in ounces.
- ** The net weight of the entire multi-pack in grams is optional.
- *** The total count of the multi-pack must be displayed
- **** The fluid ounces of each container within the multi-pack must be identified.

Should you wish to add/retain a reference to the company's website on your label, please be aware that the website becomes labeling under FIFRA and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under section 12(a)(1)(E) of FIFRA. 40 CFR §156.10(a)(5) lists examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not be substantially differ from those claims approved through the registration process. Therefore, should the Agency find, or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA-approved registration, the website will be referred to EPA's Office of Enforcement and Compliance Assurance (OECA). As an alternative, you may refer consumers to the company's phone number or e-mail address.

A copy of your label stamped "Accepted with Comments" is enclosed for your records. Please submit two (2) copies of the final printed labeling, incorporating the above changes, before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with section 6(e) of FIFRA. Your release for shipment of the product bearing amended labeling constitutes accepting of these conditions. If you have any questions about this label review, please contact Mr. Carmen J. Rodia, Jr. at (703) 306-0327 or via e-mail at Rodia.Carmen@epa.gov.

Sincerely Yours,



Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosure:
004822-00501 D470221

Label stamped "Accepted with Comments," dated November 8, 2012

SNAKE II [Master Name]
OFF! Mosquito Coil III [Alternate Brand Name]

ACTIVE INGREDIENT
d/l-allethrolone d-trans chrysanthemate00.15%
OTHER INGREDIENTS 99.85%
TOTAL.....100.00%

ACCEPTED
With COMMENTS
In EPA Letter Date:
November 8, 2012
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:
4822-501

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).

Contains (Contents):

(x)(refillable)(reuseable)(**durable**)(**case**)(**holder**)(**starter unit**)(pot)
(x)(metal)(stands) (**coil**) (**tray**) (holder)
(2)(3)(4)(5)(6)(7)(8)(9)(10)(coils)

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

(X [number]) (REFILLS)
FOR OUTDOOR USE ONLY

PRECAUTIONARY STATEMENTS: HAZARDS TO HUMANS AND DOMESTIC ANIMALS
CAUTION: **Harmful if absorbed through skin. Avoid contact with skin, eyes or clothing. Harmful if inhaled. Avoid breathing vapor or dust. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.**

General Precautions and Restrictions:
Do not touch lit end of coil. Do not use indoors. Cover any exposed food to avoid contamination. Do not place in direct contact with flammable objects, materials or surfaces.

[Boxed format or bullets may be used in First aid section if label space permits.]

FIRST AID

IF ON SKIN OR CLOTHING: 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.
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. Call a poison control center or doctor for further treatment advice.
Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-558-5252 for emergency medical treatment information.

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

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. Do not contaminate water when disposing of equipment washwaters.

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DIRECTION FOR USE

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

((Twist to) open (metal) (tin) (plastic) container.)

Remove coils from (pouch) (all wrapping materials) (container) (box) (envelope).

(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 directions ¼ inch apart.)

(Select (a) (coil) tray and (bend) (position) (metal) (plastic) (pin) (tab) (holder) (stand)(coil support) (to upright (vertical) position))

Align (***repellent***) coil with (mounting) (***spring) (pin) (tab) (holder)***) (detail) (stand) (device) (tray) (***spring) (metal) (plastic) (pin) (coil support)***). Insert (press) (mount)(snap) the slot of the coil onto (into) the (spring) (metal) (plastic) (pin) (coil support) (metal stand (in the base of the pot.))

Light outer end of coil until glowing (***it glows***), then BLOW OUT ANY FLAME.

(Restore lid) (slide tray into unit)(align lid to base)(snap lid to base) (and) place (unit)(pot)(device)(coil)(***trays***)(s) 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.

If shorter period of use is desired, carefully lift (***remove***) coil (out of pot) (***from***)(***the***) (***spring) (metal) (plastic) (pin) (tab) (holder) (stand) (coil support)***) and extinguish (snuffing into the pot)(by pressing the glowing end inside the pot (***against the (coil) tray***)). The unused portion can (then) be (***stored within the (metal) (tin) (plastic) container and***) relit when needed.

(Save the pot (tray) (holder) (***metal) (tin) (plastic) (container) (and) (trays)***) (stand) for use with Snake II refills.) (When repellent coil is completely (exhausted) (used), save the pot (tray) (holder) (stand) (metal) (tin) (plastic) (container) (and trays) for future use with Snake II refills.)

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 AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in a dry place (preferably locked) inaccessible to children and pets and away from sources of heat or ignition. Used pots (trays) (stands) (holders) (***spring(s); (metal) (plastic) (pin) (containers)***), if kept for further use, must be stored out of reach of children and pets.

PESTICIDE 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 or offer for recycling if available. Pot (tray)(stand)(holder)(***pin)(spring)(coil support)***): Do not reuse or refill except as described in the directions for use. Unused coils: Call your local solid waste agency or 1-800-529-3394 for disposal instructions. Never place any unused product down any indoor or outdoor drain.

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EPA Reg. No. 4822-501
EPA Est. No. XXXX-XX (...) Lot number suffix (...) indicates appropriate establishment number.
(US Patent(s) xxxxxxxx)
(Patent Pending)

Question? Comments? Call 800-558-5252 or write Helen Johnson.
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Racine, WI 53403-2236 U.S.A.
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(www.[website].com)

(Coils made in [country])
(Pot (Tray) (Stand) (Holder) made in [country])

[COIL LABELING (pouch)]

SNAKE II
(REFILLS)

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%
OTHER INGREDIENTS	99.85%
TOTAL.....	100.00%

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

**[NOTE TO REVIEWER: INSTRUCTIONS ON THE POUCH ARE OPTIONAL TO ALLOW FOR
MINIMUM LABELING IF NEEDED]**

[Pouch Instructions Option A:]

(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.)

[Pouch Instructions Option B:]

(INSTRUCTIONS:

(Remove coils from (pouch) (all wrapping materials) (container) (box) (envelope).

(Select (a) (coil) tray and (bend) (position) (metal) (plastic) (pin) (tab) (holder) (stand)(coil support) (to upright (vertical) position))

Align (repellent) coil with (mounting) (spring) (pin) (tab) (holder) (detail) (stand) (device) (tray) (spring) (metal) (plastic) (pin) (coil support). Insert (press) (mount)(snap) the slot of the coil onto (into) the (spring) (metal) (plastic) (pin) (coil support) (metal stand (in the base of the pot.))

Light outer end of coil until glowing (it glows), then BLOW OUT ANY FLAME.

(Restore lid) (slide tray into unit)(align lid to base)(snap lid to base) (and) place (unit)(pot)(device)(coil)(trays)(s) 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.

If shorter period of use is desired, carefully lift (remove) coil (out of pot) (from)(the) (spring) (metal) (plastic) (pin) (tab) (holder) (stand) (coil support) and extinguish (snuffing into the pot)(by pressing the glowing end inside the pot (against the (coil) tray)). The unused portion can (then) be (stored within the (metal) (tin) (plastic) container and) relit when needed.))

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in a dry place (preferably locked) inaccessible to children and pets and away from sources of heat or ignition. Used pots (trays) (stands) (holders) (spring(s)) (metal) (plastic) (pin) (containers), if kept for further use, must be stored out of reach of children and pets.

PESTICIDE 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 or offer for recycling if available. Unused coils: Call your local solid waste agency or 1-800-529-3394 for disposal instructions. Never place any 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. XXXX-XXX ((...) Lot number suffix (...) indicates appropriate establishment number.)
(US Patent(s) xxxxxxx)
(Patent Pending)

(Coils made in [country])
(Pot (Tray) (Stand)(Holder)made in [country])

[Optional Bottom Sticker for Pot/Tray/Container/Holder]

Snake II

STORAGE AND DISPOSAL

4822-501
Snake II

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Store in a dry place (preferably locked) inaccessible to children and pets and away from sources of heat or ignition. Used pots (trays) (stands) (holders) **(spring(s)) (metal) (plastic) (pin) (containers)**, if kept for further use, must be stored out of reach of children and pets.

PESTICIDE 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 or offer for recycling if available. Pot (tray)(stand)(holder)**(pin)(spring)(coil support)**: Do not reuse or refill except as described in the directions for use. Unused coils: Call your local solid waste agency or 1-800-529-3394 for disposal instructions. Never place any 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 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 **(removing)** coil (out of pot **(from)(the) (spring) (metal) (plastic) (pin) (tab) (holder) (stand) (coil support)** and extinguish the glowing end (by) (snuffing in the pot.) (pressing the glowing end inside the pot **(against the (coil) tray)**). Never leave a burning coil unattended. Coils other than Snake II 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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(Coils made in [country])
(Pot (Tray) (Stand) (Holder) **(container)** made in [country])

[Optional Marketing Statement for all label options:]

- Outdoor Fresh Scent
- Spring Fresh Scent
- (Country) 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
 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 (coverage)
 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)(campsite)(campground)
 Brand America trusts
 Heat activated (mosquito)(repellent)(system)(technology)(protection)
 Satisfaction guaranteed
 Guaranteed (or your money back)

(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 (campsite)(campground)
 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 (BBQ's)(picnics)(parties)(gatherings)(camping) (**backpacking**)
 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)
 Protect (your family)(the ones you love)(against)(from) mosquitoes
 Invisible shield
 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) (**backpacking**) (family)(mosquito)(repellency)(protection) (coverage) kit
 OFF! For every occasion
 Don't have to wash off
 Buy one, get one free
 Free (refills)(with purchase!)
Refills available
 (Value)(Bonus) Pack
 Portable (mosquito)(protection)(repellency)(up to 4 hours per coil)(up to 10 X 10 ft.)
 (Up to 4 hours per coil)(Up to 10 X 10 ft.) protection
 No unpleasant scent
 (Mosquito)(repellency)(protection) that lasts all evening
 Each (coil)(refill)(lasts)(repels)(mosquitoes) up to 4 hours
 (Declare your yard (camp)(campsite)(campground) a) virtually mosquito-free zone
 OFF! Coils (protect)(repel)(mosquitoes) up to a 10X10 ft. (area)
 Contains d/l-allethrolone d-trans chrysanthemate
 (Protects)(repels)(mosquitoes)(from) an averaged sized patio
 (Gets rid of)(repels)(blocks)(mosquitoes)(from)(in) a 10X10 foot area
 (Provides) 10X10 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) (that) 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) hours
 (each)(coil)(refill)(!)
 (Repels)(Shields against)(Protects against)(annoying) mosquitoes (for hours) (in your (outdoor living space)
 (camp)(campsite)) (campground)
 (Virtually Mosquito Free for) (up to)(a total of)(4), (8), (12), (16), (20), (24) 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)
 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) hours (each)(coil)(refill)(!)
 (Up to)(a total of) (4),(8),(12),(16),(20),(24) hours of (outdoor)(backyard)(outside) (**backpacking**) (great
 outdoors)(campsite) (campground) (protection)(repellency)(from mosquitoes)
 (Up to)(a total of) (4),(8),(12),(16),(20),(24) hours of (proven) protection (in the outdoors) (in the great
 outdoors) (in your back yard) (outside) (at the park) (in the woods) (for your camp (campsite))(**while
 backpacking**)
 (Up to)(a total of) (4),(8),(12),(16),(20),(24) hours of (repellency)(repelling) (mosquitoes)
 Enjoy (the)(outdoors)(great outdoors)(backyard)(outside)(park)(woods) (camping)(**backpacking**) (forest)
 (your camp_(campsite)(campground)) with (up to)(a total of) (4),(8),(12),(16),(20),(24) hours of
 (repellency)(protection)

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.

Tabletop
 Patio & Deck
 Backyard
 Convenient

Backpacking

Camp (Campsite)(campground)
 Zone Coverage
 Camp(site)(ground) & Dock
 (Wide) (Broad)Area Coverage
 (Wide) (Broad) Area Protection
 S.C. Johnson (Wax)
 A Family Company ([logo])
 Since 1886

Fisk Johnson [signature]
 For best results (-) use only [Snake II Refills]

- Works with [Snake II]**
- Compatible with [Snake II]**
- Fits [Snake II]**
- Contains [number] coils
- Portable (Campsite) (Mosquito) Coils**
- Durable (case)(holder)(starter unit)**
- Reusable (case)(holder)(starter unit)**
- Refillable (case)(holder)(starter unit)**
- Water-resistant (case)(holder)(starter unit)**
- Crush-resistant (case)(holder)(starter unit)**
- Protective (case)(holder)(starter unit)**

[Text describing OFF! line segmentation to be used with or without graphics]

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Try out complete line of OFF!® Outdoor products.
(Personal repellants) (Table top) (Patio & Deck) (Backyard) (Camp) (Campsite) (Campground)
((Campsite) Pretreat) (Citronella Candle) ((Wide)(Broad) Area (Zone) Coverage)
Look for products in each of these categories to meet your outdoor needs.

[OR]

***For the most complete protection, choose products for:
(you)(your gear)(your tent)(your world)(your area)(your campsite)***

[OR]

***For you, for your gear (tent), for your area (world) (campsite)
[to be used in conjunction with graphics to describe alternate segmentation available]***