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MAR 2 | 2005

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

Subject: KBR 3023 ALL FAMILY INSECT REPELLENT AEROSOL SPRAY EPA Registration No. 4822-537 Application dated December 7, 2004 Letter dated February 7, 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 and adding alternate formulas is acceptable subject to the comments listed below:

- 1) Delete the optional labeling, "(Repels) (Shields against) (Protects against) (mosquitoes) that may carry (West Nile Virus) (Yellow fever) (Encephalitis)". Data must be submitted or referenced to support these claims.
- 2) Delete the statement "including ticks that cause Lyme Disease", wherever it appears. Data must be submitted or referenced to support this claim.
 - 3) Delete the claim, "Dye-free".

The Confidential Statements Of Formula(CSFs) dated December 7, 2004 for the basic formulation and alternate formulations are acceptable and have been made a part of the file for this product.

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

Sincerely,

Richard Gebken

Product Manager 10 Insecticide Branch

Registration Division (7505C)

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KBR 3023 ALL-FAMILY INSECT REPELLENT AEROSOL SPRAY OFF! Skintastic IX Insect Repellent [alternate brand name, 6/25/04] OFF! Active I Insect Repellent [alternate brand name, 6/25/04]

[Note to reviewer: the following section of bulleted statements and any text in parenthesis are optional language]

- (Contains Picaridin) (Contains KBR) (new generation insect repellent)
- Effective protection from mosquitoes, ticks, biting flies and fleas
- Repels insects for up to 6 hours
- Use with confidence on the whole family. It feels good on the skin, not oily, greasy, or sticky. It smells great too.
- [Repel(s)] (Shields against) (Protects against) (annoying) (Mosquitoes) (insects) up to 6 hours
- (Effective) (Proven) (mosquito) (protection) (shield) (repellency) up to 6 hours
- (Repels) (Shields against) (Protects against) mosquitoes that may carry (West Nile Virus) (Yellow fever) (Encephalitis)
- Long lasting protection from mosquitoes, black flies, sand flies, stable flies, gnats, no-seeums, ticks (including ticks that cause Lyme Disease), and fleas
- Provides hours of effective protection from mosquitoes, black flies, sand flies, stable flies, gnats, no-see-ums, ticks (including ticks that cause Lyme Disease), and fleas
- Gives effective protection against mosquitoes, black flies, sand flies, stable flies, gnats, nosee-ums, ticks (including ticks that cause Lyme Disease), and fleas
- Repels mosquitoes, black flies, sand flies, stable flies, gnats, no-see-ums, ticks (including ticks that cause Lyme Disease), and fleas
- Repels flies (too!)(for up to 6 hours)
- Works great on biting flies
- (Proven mosquito) (Provides long lasting) (Dependable) (Invisible) (Discreet) protection
- Keeps bugs OFF!
- (Light) (gentle) (mild) (smooth) (Non-Greasy) Formula
- Always carry (product name)
- Sprays at any angle
- (Light pleasant) (Clean fresh) (great) scent
- (It's) pleasant smelling
- Has a fresh, clean fragrance that won't leave you smelling like bug repellent
- Specially formulated to feel and smell better on your skin
- · Keeping insects away never felt so good
- Leaves skin feeling (smooth and natural) (great)
- (Doesn't feel like you have it on) (Your friends won't know you have it on) (You won't know you have it on)
- Leaves a pleasant feeling on skin
- Feels comfortable
- (Ultra) (Clean) feel
- Dye-free
- For playing and relaxing outdoors
- Won't stain
- For yardwork and camping
- Protection for people on the go
- Protection that fits your lifestyle
- (Family) (Skincare) formula

ACCEPTED
with COMMENTS
IN EPA Letter Detect:

MAR 2.1 2005
Under the Federal Insecticide,
Franciside, and Redesticide Act,
franciside, and Redesticide Act,
as unreaded, for the pesticide
as unreaded, for the pesticide
as unreaded RPA Reg. No.
registered under RPA Reg. No.
4822-537

- Suitable for the whole family
- Gentle on your skin
- (Contents:) Denatured alcohol, water, Picaridin, hydrocarbon propellant, (aminomethylpropanol), (sodium benzoate), (fragrance)
- (Sports) (Active) formula
- No fragrance
- Fragrance-free

KEEP OUT OF REACH OF CHILDREN **CAUTION**

ACTIVE INGREDIENT:

OTHER INGREDIENTS:.....90%

NET CONTENTS: 1-12 ounces (28-340 grams)

PRECAUTIONARY STATEMENTS

Hazards to Humans - CAUTION: Causes moderate eye irritation. Avoid contact with eyes. 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.

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

Flammable: Contents under pressure. Do not use near heat, sparks or open flame. Do not puncture or incinerate container. Exposure to temperatures above 120° F may cause bursting. 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 6 to 8 inches from skin or clothing and spray with a slow sweeping motion. 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. Reapply every 5-6 hours. Frequent reapplication and saturation are unnecessary. Do not apply more than three times per day. On young children, do not apply more than twice in a day.

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 also spray cuffs, socks and around other openings in outer clothing. Will not damage fabrics, plastics, watch crystals, and painted or varnished surfaces.

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. ©2004 S.C. Johnson & Son, Inc. Racine, WI 53403-2236 USA. All Rights Reserved

EPA Reg. No. 4822-537

EPA Est. No. 4822-XX