



11/30/2009

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Ms. Jean Fugate
S. C. Johnson & Son, Inc.
1525 Howe St.
Racine, WI 53403

NOV 30 2009

Subject: Amendment to revise the labeling of Norm I.
Product Name: Norm I
Registration No.: 4822-542
Date of Submission: 28 August 2009

Dear Ms. Fugate;

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) §3(c)(7)(A)(ii), is acceptable provided that you:

1. Provide two copies of the final printed labeling. These must be submitted prior to releasing the product for shipment.
2. Remove the claims "New", "Introducing", or "A new kind of" as they pertain to the product generally; these claims may be used for a period of 6 months from the date of first distribution for claims associated with the Fan Unit.
3. Remove or modify the claims associated with the "Fan Unit Delivery Device Claims", as follows:
 - ~~4. Improved (New) (Design) (Shape) (Look) (Size)~~
 - ~~5. New and Improved (Design) (Shape) (Look) (Size)~~
 - ~~6. Advanced (New) (Design) (Shape) (Look) (Size)~~
 - ~~7. Innovative (New) (Design) (Shape) (Look) (Size)~~
 - ~~8. Enhanced (New) (Design) (Shape) (Look) (Size)~~
 - ~~9. Better (New) (Design) (Shape) (Look) (Size)~~
 - ~~16. (More) Versatile (Design) (Shape) (Look) (Size)~~
 - ~~20. Smarter Design~~
 - 28. Same protection, (~~better~~ new design) (smaller design) (compact design)
4. Remove or modify the claims associated with "Marketing Claims", as follows:
 - 1. (Multi-pack) (twin) (Bonus) (Value) (Variety) (Backyard) (~~Barbeque~~) (Pack)

2009

Should you wish to add/retain a reference to the company's website, including www.OFFProtects.com, on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act 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 FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list 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 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 the EPA's Office of Enforcement and Compliance Assurance.

As an alternative, you may refer consumers to the company's phone number or e:mail address.

If these conditions are not met, the registration will be subject to cancellation in accordance with FIFRA §6 and/or may be found to be misbranded and referred to OECA for enforcement. Your release for shipment of the product constitutes acceptance of these conditions

A stamped copy is enclosed for your records. If you have any questions, you may contact Mark E. Suarez, at (703) 305-0120.

Sincerely,



for

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

Enclosure
AgencyLetterheadTemplate.doc
Stamped Label

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EPA Master Name: NORM 1

- Alternate brand name: OFF!® Clip-On™ Mosquito Repellent [1/21/08]
- Alternate brand name: OFF!® Clip-On™ Mosquito Repellent Deepwoods Sportsmen [1/21/08]
- Alternate brand name: OFF!® Clip-On™ Mosquito Repellent Refill(s) [1/21/08]
- Alternate brand name: OFF!® Clip-On [6/4/07]
- Alternate brand name: OFF!® Repellent Fan [6/4/07]

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

NOV 30 2009

**Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
4822-542**

GENERAL CLAIMS:

Repels mosquitoes

1. (Portable) Protection
2. (Provides protection (from mosquitoes) for up to 12 hours
3. Protection for (outdoor occasions)
4. Tested in the Everglades
5. (Protection) (repellency) no mess
6. Repels (Mosquitoes), (not people)
8. As you move (from place to place), [Product Name] rebuilds its protection in a few minutes
9. In just a few minutes, [Product Name] creates personal protection from mosquitoes.
10. Environmental factors such as wind may affect the area of protection
11. Head-to-Toe Protection (for) up to (6), (7), (8), (9), (10), (11), (12) Hours

Longevity Claims:

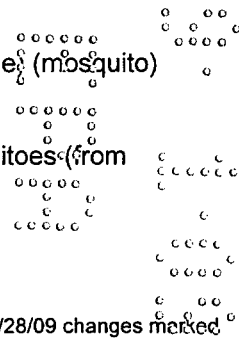
1. (Each refill) (Provides) (Enjoy) (Protection) (from mosquitoes) (For) Up To (6), (7), (8), (9), (10), (11), (12) (Hour)(s) (of) (odorless) protection) (from Mosquitoes).

Refill Claims:

1. (Replace)(Each) (refill) (provides) (effective) (personal)(space) (protection) (lasts) up to (after) (6), (7), (8), (9), (10), (11), (12) hours (of head to toe) (protection) (per refill) (or) (xx) hours after opening) (or) (when blue [insert color] indicator is gone). (Use (each refill) within (2 weeks) (14 days) of opening.)
2. Replace refill and battery(ies) (at the same time) after (6), (7), (8), (9), (10), (11), (12) hours
3. Sample inside
4. Free refills
5. Added refills inside
6. (Do not) (Don't) forget (to purchase) (product name) (your) refills
7. Works with (product name) (repellent) (fan) (device) (unit)
8. For best results, we recommend that the refill be used within (#) (weeks) (months) of opening
9. Refills available
10. (Multiple-use) (reusable) refills (up to 12 hours)
11. Use each refill multiple times (up to 12 hours)
12. Remainder of (6), (7), (8), (9), (10), (11), (12) hour refill can be used at a future time.
13. (Extra) (Second) (Free) refill (included)
14. Replace the refill when the green use up indicator is gone.

"Technology" Claims:

1. (Patented) (Laboratory) (Field) (Tested) (fan-aided) (innovative)Technology
2. New
3. (Fan) (circulated) (powered) (repellent) (outdoor protection)
4. (Fan) (activated) repellent (pad)
5. (The) (Quiet) (Built-in) fan (inside) (disperses) (circulates) (a new kind of) (the) (mosquito) (repellent) (all around you).
6. Scientifically engineered.
7. (Vents) (air exits) out the bottom of the (unit) (product name) to repel mosquitoes-(from) where they (hunt) (approach).



“Convenience/Portability” Claims:

1. Portable (Small) (design)
2. (Comfort) (Convenience) (and) (Portability) compared to OFF!® (Insect Repellents) (skin applied repellents)
3. Easy to use
4. Portable protection
5. (Take) (the) (Portable) (Outdoor) Protection (with you) (that goes with you) (that stays with you) (that) (allows) (lets) (you) (to) (enjoy) (the outdoors) (your outdoor) (activities) (events) (fun).
6. (Easy to use) (Convenient) (No liquid) (refills)
7. Created for your (outdoor) (active) lifestyle
8. Protection (for people on the go) (that fits your) (outdoor) (active) lifestyle
9. (Place) (Carry) (Have) (take) unused (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)
10. Outdoor Usage (Occasions) (Locations)
(For use) (in) (Enjoy) (Product Name's) (protection) (when you're) (camping), (fishing), (hunting), (boating), (in) (the) (backyard), (on the Go), (at sporting events), (watching sports), (while) (gardening), (playing) (outside), (entertaining), (relaxing on/in), (patio or deck), (the backyard), (away-from-home) (activities) (events), (at) (the Beach), (at) (the park), (outside)

“No Skin Application” Claims:

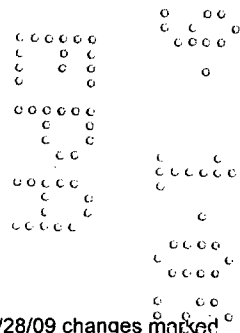
1. No skin application
2. Portable Protection You Don't Have To (put on), (spray on), (rub on)
3. (Introducing) (The) OFF!® (Personal Protection) (Repellent) you (do not) (don't) (need to) (put) (spray) on)
4. Nothing to apply
5. (Not messy) (no spray) (no mess)
6. Mosquito protection you don't (put on your skin) (spray on).
7. (Enjoy) (personal) (mosquito) protection (without a spray.)

Usage Claims:

1. (Clip-on)TM (Insect) (Mosquito) Repellent
2. (Specially designed to) Clip(s) onto (your) (belt), (pants), (shorts) (waistband) (purse) (or) (sit(s) on a flat surface).
3. Device may also be placed on a table, (bench) (or other suitable surface) away from food and sources of heat, ignition or moisture.
4. Battery(ies) (not) included
5. (Just) Clip It (On) (to your belt) (to your bag) (or set it next to you)
- ~~6. (Ergonomic) (comfortable) (light) (portable) design~~
- ~~76.~~ For outdoor use only.
- ~~87.~~ Do not use indoors
- ~~98.~~ Battery operated
- ~~109.~~ Does not (require) (use) heat (to operate)
- ~~110.~~ Refillable (replaceable disk)
- ~~121.~~ Don't spray it on. Clip it on.
- ~~132.~~ Clip it on...or set it next to you.

Fan Unit (Delivery Device) Claims:

1. (Ergonomic) (comfortable) (light) (portable) design
2. (Now)(More) Ergonomic
3. New (Design) (Shape) (Look) (Size)
4. Improved (New) (Design) (Shape) (Look) (Size)
5. New and Improved (Design) (Shape) (Look) (Size)
6. Advanced (New) (Design) (Shape) (Look) (Size)
7. Innovative (New) (Design) (Shape) (Look) (Size)



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- 8. Enhanced (New) (Design) (Shape) (Look) (Size)
- 9. Better (New) (Design) (Shape) (Look) (Size)
- 10. (Now) (New) Smaller (New) (Design) (Shape) (Look) (Size)
- 11. Sleek (New) (Design) (Shape) (Look) (Size)
- 12. Modernized (Design) (Shape) (Look) (Size)
- 13. (More) Modern (Design) (Shape) (Look) (Size)
- 14. (More) Contemporary (Design) (Shape) (Look) (Size)
- 15. (More) Compact (Design) (Shape) (Look) (Size)
- 16. (More) Versatile (Design) (Shape) (Look) (Size)
- 17. Same (OFF! Clip-On) Protection
- 18. Smaller Size, Same (OFF! Clip-On) Protection
- 19. Now In A Mini
- 20. Smarter Design
- 21. XX% Smaller
- 22. XX% Lighter
- 23. Mini (Clip on) (Design) (Shape) (Look) (Size)
- 24. Nano (Clip on) (Design) (Shape) (Look) (Size)
- 25. Gen II (Clip on) (Design) (Shape) (Look) (Size)
- 26. (Now with) (a) rotating clip
- 27. (Now with) (a) pivoting clip
- 28. Same protection, (better design) (smaller design) (compact design)
- 29. Uses same refill as (OFF! Clip-On) (product name).
- 30. Uses (OFF! Clip On) (product name) refill

Disease carrying mosquito claims:

- 1. (Repel(s)) (Protect(s) Against) Mosquitoes That May (Carry) (Vector) (Transmit) (West Nile Virus), (St. Louis) (Eastern equine) (Western equine) (LaCrosse) (Cache Valley) (or) (Venezuelan) (equine encephalitis)

Marketing Claims:

- 1. (Multi-pack) (twin) (Bonus) (Value) (Variety) (Backyard) (Barbeque) (Pack)
- 2. Buy one get one free
- 3. Money back (guaranteed) (guarantee)
- 4. Odorless
- 5. Unscented
- 6. Get the OFF!@ mosquito protection that is right for you.
- 7. (Contains) (with) (Metofluthrin) (S1264)
- 8. Visit www.OFFprotects.com for more information
- 9. Keep(s) Bugs OFF! @
- 10. Up to 12 hours of protection from mosquitoes
- 11. Learn more about the (new) (Product Name) at www.OFFProtects.com™
- 12. (Look inside) (for) usage tips and savings (inside)
- 13. Save (\$) on any (Product Name) (refill)

RETAIL CONTAINER LABELING: STARTER KIT AND REFILL KIT

[PRODUCT NAME]

CAUTION:

(KEEP OUT OF REACH OF CHILDREN)

(Do not allow children or pets to (handle) (play with) the unit.)

See additional (precautions) (and instructions) on back.

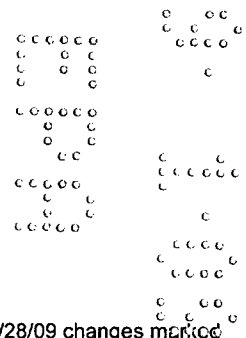
Do not use indoors or in enclosed spaces.

ACTIVE INGREDIENT:

Metofluthrin31.2%

OTHER INGREDIENTS..... 68.8%

Total.....100.0%



6009

NET WT. (XXX) (OZ) (Grams)

(Starter Kit) (Contains) 1 [Product Name] (mosquito) (repellent) (fan) (device) (unit), (1) (2) (mosquito) (repellent) Refill(s) (Discs) (Disks) (Cartridges), and (Number) (Type) batteries (Refill) Contains (1) (2) (3) [Product Name] (mosquito) (repellent) refill(s) (discs) (disks) (cartridges)

Net Weight XX oz. (each)

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

CAUTION: Harmful if swallowed, inhaled, or absorbed through the skin. Avoid contact with skin, eyes or clothing. Avoid breathing vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Remove and wash contaminated clothing before reuse.

Store away from food, beverages and pet food. Do not use indoors or in enclosed spaces. Do not touch (device) (unit) with metal instruments or wet hands. Do not allow materials of any kind to cover the unit while it is in use. Replace refill only when unit is off.

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

FIRST AID Call a poison control center or doctor immediately for treatment advice.

If Swallowed: Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything to an unconscious person.

If on Skin: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.

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

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

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

Hand Wash Logo:

Be sure to wash hands after handling.

ENVIRONMENTAL HAZARDS

Do not apply to water.

PHYSICAL & CHEMICAL HAZARDS – Do not pry open or probe into (device) (unit) with any instrument or tool. Use only with (Number) (Type) battery (ies). Do not cover the (device) (unit) when in use or place it near sources of heat or ignition. Do not store near heat or open flame. Do not put battery(ies) in fire or mutilate. Battery(ies) may burst or release toxic materials.

[Optional Supplemental (additional) Directions:]

1. Insert repellent disk. (Do not touch treated (refill) (pad) (cloth).)
2. Turn unit "On."
3. Clip unit onto waistband or place on table next to you.
4. Turn "Off" when finished. Remainder of 12 hour refill can be used at a future time. See inside for (complete) usage directions.

[Clarifying text for pictograms:]

~~1. Pull and remove (color) tab~~

21. Remove foil seal (Do not touch treated (refill) (pad) (cloth).)

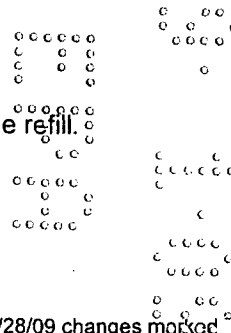
32. Insert (color) [insert color] side down. Front cover latch.

43. When (color) [insert color] use-up indicator dries up, it's time to replace the refill.

4. Battery door (under clip)

5. "On/Off" Switch (& Symbol)

~~6. Front cover latch.~~



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.

Batteries are included. [For Starter Instructions only]

To prepare (device) (unit) (To insert repellent (refill) (disk)):

- 1. For initial use only: Turn over (device) (unit) and remove (color) tab from (the) battery door to activate the (Number) (Type) batteries.
- 2 1. Remove one mosquito repellent (refill) (disk) from its packaging and remove (the) peel-off (foil) (seal) to start the (color) **[insert color]** use-up indicator. Do not touch treated (refill) (pad) (cloth) (when inserting or removing the) (refill) (disk).
- 32. Open (the) front cover **latch** and insert (refill) (disk) into (the) unit with (the) (color) **[insert color]** side down, then snap the front cover latch closed. Wash hands (thoroughly) (and) (immediately) after handling the (refill) (disk).

To operate unit:

- 43 Slide the ON/OFF switch (all the way) to "ON" (fan symbol) (● **solid dot**) (until the fan turns on).
- 54. Clip the unit to your belt, pants/short(s) waistband, purse or any other convenient location (next to you). (**Rotate if desired.**)
- 65. When finished using the (product) (name) (unit), slide the ON/OFF switch to ("OFF") (off symbol) ("O").

Useful tips:

- **(Unit includes a rotating clip for desired comfort.)**
- ~~You can also place the unit next to you on a table, bench or other suitable (hard) surface (away from food and sources of heat, ignition or moisture.) (When placing unit on a surface, lay the unit on its clip to allow open circulation of repellent.)~~
- Within (a few) minutes, (the) (new) [Product Name] (fan) (device) (unit) (creates) (provides) (head-to-toe) (personal) protection from mosquitoes for up to (6), (7), (8), (9), (10), (11), (12) hours. If you move, allow a few minutes for the [Product Name] (fan) (device) (unit) to rebuild (an) (the) (its) (head-to-toe) (**personal**) (protection.)
- **You can also place the unit next to you on a table, bench or other suitable (hard) surface (away from food and sources of heat, ignition or moisture.) (When placing unit on a surface, lay the unit on its clip to allow open circulation of repellent.)**
- To prolong the refill's life between uses, close the unit by sliding the switch to the ("Off") ("Off" symbol) ("O") position. Store [Product Name] (the) (unit) (device) (in) (the) ("OFF") (off symbol) (position) in a cool, dry place – never in a hot car, glove compartment, or trunk.
- Replace the refill when the (color) **[insert color]** use-up indicator (is gone) (**dries up**). (Repeat steps # and #.) For best results, replace refill (within) (#) (weeks) (days) (after) (of) opening or after 12 hours total use. Only (Product Name) refill(s) (disks) (**provided**) should be used in the (Product Name) (unit) (device).
- When you no longer feel air blowing from the bottom of the unit, replace (with) (Number) (Type) batteries.

STORAGE AND DISPOSAL

STORAGE: Store **in a cool, dry place** away from heat or flame in an area inaccessible to children.

DISPOSAL: "Non-refillable disk. Before disposing, fully use up the refill disk according to the label. Do not refill or reuse the disk. If Empty: Place the refill disk in the trash or offer for recycling, if available." If refill remains partially unused: Call your local solid waste agency or 1-800-523-3394 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
Sold By ©(YEAR) S.C. Johnson & Son, Inc. Racine, WI 53403-2236 U.S.A. All Rights Reserved
U. S. Patent D553233 (pat. Pending)
EPA Reg. No. 4822-542
EPA Est. No. 70999-WI-1 (A), 70999-WI-2 (B). Lot number suffix (A) or (B) indicates appropriate establishment number.

(Refill) (Made in (country of origin))
(Device) (Made in (country of origin))

FAN UNIT (Delivery Device) and REFILL POUCH:

[Product Name]

CAUTION

(KEEP OUT OF REACH OF CHILDREN)

(Do not allow children or pets to (handle) (play with) the unit.)

Do not use indoors or in enclosed spaces.

Do not touch (treated) (refill) (pad) (cloth). Wash hands after handling (the) (refill) (disk).

See additional precautions (and instructions) on (refill) (package)(ing) (container) (box).

ACTIVE INGREDIENT:

Metofluthrin31.2%

OTHER INGREDIENTS..... 68.8%

Total.....100.0%

NET WT. (XXX) (OZ) (Grams)

[Clarifying text for pictograms, if used:]

1. Remove foil seal (Do not touch treated (refill) (pad) (cloth).)
2. Insert [insert color] side down. Front cover latch.
3. When [insert color] use-up indicator dries up, it's time to replace the refill.
4. Battery door (under clip)
5. "On/Off" Switch (& Symbol)

[Note: Full Directions for Use to be used if space allows]

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.

To prepare (device) (unit) (To insert repellent (refill) (disk)):

1. Remove one mosquito repellent (refill) (disk) from its packaging and remove (the) peel-off (foil) (seal) to start the [insert color] use-up indicator. Do not touch treated (refill) (pad) (cloth) (when inserting or removing the) (refill) (disk).
2. Open (the) front cover latch and insert (refill) (disk) into (the) unit with (the) (color) [insert color] side down, then snap the front cover latch closed. Wash hands (thoroughly) (and) (immediately) after handling the (refill) (disk).

To operate unit:

3. Slide the ON/OFF switch (all the way) to "(ON)" (fan symbol) (● solid dot) (until the fan turns on).
4. Clip the unit to your belt, pants/short(s) waistband, purse or any other convenient location (next to you). (Rotate if desired.)
5. When finished using the (product) (name) (unit), slide the ON/OFF switch to ("OFF") (off symbol) ("O").

