

4822-542

6/2/2014

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

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JUN 02 2014

Jean M. Fugate
S.C. Johnson & Son, Inc.
1525 Howe St.
Racine WI 53403-2236

Subject: Notification to Add Packaging Specific Marketing Claims
Product Name: NORM 1
EPA Registration Number: 4822-542
Submission Date: May 12, 2014
Decision Number: 491662

Dear Ms. Fugate:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated May 12, 2014 for the product 4822-542. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10.

If you have any questions, please call me directly at 703-305-6701 or Carlyn Petrella of my staff at 703-347-0439.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Gebken".

Richard Gebken
Product Manager / Team Leader (10)
Insecticide Branch
Registration Division (7505P)
Office of Pesticide Programs

United States Environmental Protection Agency Washington, DC 20460	<input type="checkbox"/> Registration <input type="checkbox"/> Amendment <input checked="" type="checkbox"/> Other	OPP Identifier Number <div style="text-align: right; font-size: 1.5em;">2/13</div>
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Application for Pesticide - Section I

1. Company/Product Number S.C. Johnson & Son, Inc. / 4822-542	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) S.C. Johnson & Son, Inc. / NORM 1	PM# Team 10	
5. Name and Address of Application (Include ZIP Code) S. C. Johnson & Son, Inc. 1525 Howe St. Racine, WI 53403-2236 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. Product Name	

Section II

<input type="checkbox"/> Amendment – Explain below. <input type="checkbox"/> Resubmission in response to Agency letter dated <input checked="" type="checkbox"/> Notification – Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated <input type="checkbox"/> "Me Too" Application. <input type="checkbox"/> Other - Explain below.
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Explanation: Use additional page(s) if necessary. (For Section I and Section II.)
Notification of minor label changes per PR Notice 98-10.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms or PR Notice 98-10 and 40CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section III

1. Material This Product Will Be Packaged In:					
Child-Resistant Packaging <input type="checkbox"/> Yes * <input checked="" type="checkbox"/> No <i>*Certification must be submitted</i>	Unit Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If "Yes" Unit Packaging wgt. 0.0016 – 0.0192 oz	No. Per container 1-12	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" Package wgt.	No. Per container	2. Type of Container <input type="checkbox"/> Metal <input checked="" type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input checked="" type="checkbox"/> Other (Foil pouch)
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container	4. Size(s) Retail Container 0.0016 – 0.0192 oz.		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product		
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input checked="" type="checkbox"/> Other <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled					

Section IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Jean M. Fugate	Title Lead, Regulatory Affairs Registration	Telephone No. (Include Area Code) (262) 260-2871
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Lead, Regulatory Affairs Registration	
4. Typed Name Jean M. Fugate	5. Date 12 May 2014	

12 May 2014

Mr. Richard Gebken
 Product Manager 10
 Document Processing Desk
 Registration Division
 Office of Pesticide Programs (7504P)
 U.S. Environmental Protection Agency
 Room S-4900, One Potomac Yard
 2777 South Crystal Drive
 Arlington, VA 22202-4501

Via courier

**Re: Notification of minor label changes per PR Notice 98-10
 NORM 1, EPA Reg. No. 4822-542**

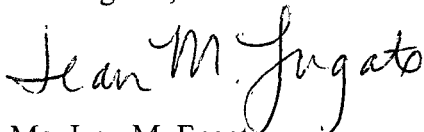
Dear Mr. Gebken:

S.C. Johnson & Son, Inc. (SCJ) would like to notify the Agency of minor changes to the subject product. First, we wish to have options to describe the contents of a retail package by including our product branding or "refillable" as descriptors. We also wish to include a "remove before use" statement for a fan unit sticker that may be used to carry marketing statements. We have also added "OFF!" and corrected grammar/phrasing in one of the optional marketing statements. Lastly, we have deleted one marketing statement that appears to be redundant.

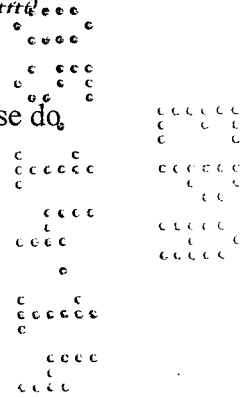
We believe that no PRIA fee is due. Attached for your review please find a completed application form and one copy of the label. Added text is marked in *bold blue italics and highlighted in yellow*, deleted text has been ~~struck and marked in bold red italics and highlighted in yellow.~~

Thank you for your assistance with this action. Should you have any questions please do not hesitate to contact me.

Best regards,



Ms. Jean M. Fugate
 Lead, Regulatory Affairs Registration
 Phone: (262) 260-2871
 Fax: (262) 260-4716
 Email: jmfugate@scj.com



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[Information in brackets is notes to Reviewer]
(Information in parentheses is optional language)

(Underlined parenthesis sections indicate optional language where a choice(s) of the underlined options will be included on the label and cannot be excluded)

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]

RETAIL CONTAINER LABELING: STARTER KIT AND REFILL KIT

[PRODUCT NAME]

NOTIFICATION
06/02/2014

ACTIVE INGREDIENT:

Metofluthrin31.2%
 OTHER INGREDIENTS..... 68.8%
 Total.....100.0%

Do not allow children to handle the unit. Keep out of reach of pets.

CAUTION:

See additional (precautions) (and instructions) on (back) (side) (panel(s))(outermost package).
Do not use indoors or in enclosed spaces.

[For refill kits packaged using a see-through blister where the refill pouch front panel is fully visible, all precautionary language above will appear as well as some additional precautionary statements about proper refill handling found on the refill pouch label. See precautions in "REFILL POUCH" section for this lengthier precautionary language option.]

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

(Starter Kit) (Contains) 1 (Refillable) ([Product Name branding or sub-branding]) (mosquito) (repellent) (fan) unit [insert #] (mosquito) (repellent) Refill(s), and [insert #] [insert type] batteries
 (Refill) Contains [insert #] ([Product Name branding or sub-branding]) (mosquito) (repellent) refill(s) and [insert #] [insert type] batteries
 Net Weight XX oz. (each)

[Optional referral statement for small packages.]
(See inside for usage instructions)

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.)

To prepare unit:

1. Remove one mosquito repellent refill from its packaging (by holding the tab). Do not touch treated (refill) cloth when inserting or removing the refill.

[Information in brackets is notes to Reviewer]
(Information in parentheses is optional language)

(Underlined parenthesis sections indicate optional language where a choice(s) of the underlined options will be included on the label and cannot be excluded)

2. (Hold tab.) (Slide) (insert) refill into (the) unit ([insert color]) ([insert pattern/descriptor])(side up) (side down). Wash hands thoroughly and immediately after handling the refill.
3. Lock refill in place by (twisting) (turning) the (top)(front) (clockwise) until refill slot is completely closed to [insert "off" symbol].

To operate unit:

4. (Twist) (Turn) on the unit by (again) (further) (twisting)(turning) the (top) (front) (clockwise) (all the way) to [insert "on" symbol] (until the fan turns on).
5. Clip the unit to your belt, pants/short(s) waistband, purse or (hang on) (place in) any other convenient location next to you. (Rotate if desired.)
6. ([insert color]) (use up)(LED) light will turn on to indicate when there are (approximately) [insert #] hours of refill and battery (life) remaining. When you no longer feel air blowing from the unit and the ([insert color]) (use up) (indicator)(LED) light turns off, insert new refill and new ([insert # and type]) batteries.
7. When finished using the unit, (twist) (turn) the (top) (front) (counterclockwise) to [insert "off" symbol].

Useful tips:

- (Unit includes a rotating clip for desired comfort.)
- Within (a few) minutes, (the) 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 unit to (rebuild) (reform) (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.)
- Store ([Product Name]) (the) unit (in) (the) ("OFF") (off symbol) (position) in a cool, dry place – never in a hot car, glove compartment, or trunk.
- Each refill lasts up to (6), (7), (8), (9), (10), (11) (12) hours. (Use within [insert #] days of opening.) (Refills expire after [insert #] days of opening.) Replace refill [insert number] days after opening or after 12 hours of use, whichever comes first. Only ([Product Name]) refill(s) (provided) should be used in the ([Product Name]) unit.
- Replace (with)) (Fan unit designed to use) ([insert # and type]) batteries.

(Batteries are included.)

[Optional Supplemental (additional) Directions:]

1. Insert repellent disk. (Do not touch treated (refill) (cloth).)
2. (Turn) (Twist) unit "On."
3. Clip unit onto waistband or place on table next to you.
4. (Turn) (Twist) "Off" when finished. Remainder of (6), (7), (8), (9), (10), (11) (12) hour refill can be used at a future time.

[Information in brackets is notes to Reviewer]
(Information in parentheses is optional language)

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(Underlined parenthesis sections indicate optional language where a choice(s) of the underlined options will be included on the label and cannot be excluded)

See inside for (complete) usage directions.

[Optional clarifying text for pictograms, if used:]

1. (Hold tab). (Slide) (insert) refill into unit ([insert color]) ([insert pattern/descriptor])(side up) (side down).) Do not touch treated refill cloth.
2. (Twist) (turn) the (top) (front) (clockwise) until fan (goes) (turns) ON.
3. [Insert color] = (The refill and batteries are low.) (Change refill and batteries soon.) (Change soon.)
4. Battery door (under clip)
5. "On/Off" Switch (& Symbol)

STORAGE AND DISPOSAL

STORAGE: Store in a cool, dry place away from heat or flame in an area inaccessible to children.
DISPOSAL: Non-refillable refill. Before disposing, fully use up the refill according to the label. Do not refill or reuse the refill. If Empty: Place the refill in the trash or offer for recycling if available. If refill remains partially unused: Call your local solid waste agency or 1-800-529-3394 for disposal instructions. Never place unused product down any indoor or outdoor drain.

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

CAUTION: Harmful if swallowed, inhaled, or absorbed through the skin. Avoid contacting skin, eyes or clothing with treated refill cloth. 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.

[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: If treated refill cloth touches skin or clothing 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.

[insert Hand Wash Logo]

Be sure to wash hands after handling.

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[Information in brackets is notes to Reviewer]
(Information in parentheses is optional language)

(Underlined parenthesis sections indicate optional language where a choice(s) of the underlined options will be included on the label and cannot be excluded)

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) batter(y)(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 batter(y)(ies) in fire or mutilate. Batter(y)(ies) may burst or release toxic materials.

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))

REFILL POUCH:

[Product Name]

ACTIVE INGREDIENT:

Metofluthrin31.2%
OTHER INGREDIENTS..... 68.8%
Total.....100.0%

Do not allow children to handle the unit. Keep out of reach of pets.

CAUTION

Do not touch treated cloth. Wash hands after handling (the) (refill).
See additional precautions (and instructions) on (outermost) (refill) (package)(ing) (container) (box).

Do not use indoors or in enclosed spaces.

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

[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 unit:

[Information in brackets is notes to Reviewer]
(Information in parentheses is optional language)

(Underlined parenthesis sections indicate optional language where a choice(s) of the underlined options will be included on the label and cannot be excluded)

1. Remove one mosquito repellent refill from its packaging (by holding the tab). Do not touch treated (refill) cloth when inserting or removing the refill.
2. (Hold tab.) (Slide) (insert) refill into (the) unit ([insert color]) ([insert pattern/descriptor])(side up) (side down). Wash hands thoroughly and immediately-after handling the refill.
3. Lock refill in place by (twisting) (turning) the (top)(front) (clockwise) until refill slot is completely closed to [insert "off" symbol].

To operate unit:

4. (Twist) (Turn) on the unit by (again) (further) (twisting)(turning) the (top) (front) (clockwise) (all the way) to [insert "on" symbol] (until the fan turns on).
5. Clip the unit to your belt, pants/short(s) waistband, purse or (hang on) (place in) any other convenient location next to you. (Rotate if desired.)
6. ([Insert color]) (use up)(LED) light will turn on to indicate when there are (approximately) [insert #] hours of refill and battery (life) remaining. When you no longer feel air blowing from the unit and the ([insert color]) (use up) (indicator)(LED) light turns off, insert new refill and new ([insert # and type]) batteries.
7. When finished using the unit, (twist) (turn) the (top) (front) (counterclockwise) to [insert "off" symbol].

[Optional-Supplemental (additional) Directions:]

1. Insert repellent disk. (Do not touch treated (refill) (cloth).)
2. (Turn) (Twist) unit "On."
3. Clip unit onto waistband or place on table next to you.
4. (Turn) (Twist) "Off" when finished. Remainder of (6), (7), (8), (9), (10), (11) (12) hour refill can be used at a future time.

See inside for (complete) usage directions.

[Optional clarifying text for pictograms, if used:]

1. (Hold tab). (Slide) (insert) refill into unit ([insert color]) ([insert pattern/descriptor])(side up) (side down). Do not touch treated (refill) cloth.
2. (Twist) (turn) the (top) (front) (clockwise) until fan (goes) (turns) ON.
3. [Insert color] = (The refill and batteries are low.) (Change refill and batteries soon.) (Change soon.)
4. Battery door (under clip)
5. "On/Off" Switch (& Symbol)

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) (Made in (country of origin)).

EPA Reg. No. 4822-542

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[Information in brackets is notes to Reviewer]
(Information in parentheses is optional language)

(Underlined parenthesis sections indicate optional language where a choice(s) of the underlined options will be included on the label and cannot be excluded)

EPA Est. No. 70999-WI-1 (A), 70999-WI-2 (B). Lot number suffix (A) or (B) indicates appropriate establishment number.

FAN UNIT (Delivery Device):

[Product Name]

ACTIVE INGREDIENT:

Metofluthrin31.2%

OTHER INGREDIENTS..... 68.8%

Do not allow children to handle the unit. Keep out of reach of pets.

(CAUTION)

Do not use indoors or in enclosed spaces.

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

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.

(Made in (country of origin))

Model No.: [Insert #]

EPA Reg. No. 4822-542

[Optional Marketing Statements]

General Claims:

1. Repels mosquitoes
2. Portable Protection
3. Provides protection (from mosquitoes) for up to 12 hours
4. Protection for outdoor occasions
5. Tested in the Everglades
6. (Protection) (repellency) no mess
7. 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
12. SC Johnson A Family Company
13. A Family Company Since 1886. Fisk Johnson
14. Remove before use [Optional labeling for a sticker applied to the fan unit]
15. OFF!

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).

(Underlined parenthesis sections indicate optional language where a choice(s) of the underlined options will be included on the label and cannot be excluded)

Refill Claims:

1. (Replace) (Each) (refill) (provides) (personal space) (protection) (lasts) up to (after) (6), (7), (8), (9), (10), (11), (12) hours (of head to toe) (protection) (per refill) (*). (*) (Use each refill) within ([insert #] weeks) ([insert #] days) of opening.)
2. (Replace) (Each) (refill) (provides) (personal space) (protection) (lasts) up to (after) (6), (7), (8), (9), (10), (11), (12) hours (of head to toe) (protection) (per refill) (*). (*) (Refill expires after ([insert #] weeks) ([insert #] days).)
3. Replace refill and battery(ies) (at the same time) after (6), (7), (8), (9), (10), (11), (12) hours
4. Sample inside
5. Free refills
6. Added refills inside
7. (Do not) (Don't) forget (to purchase) (product name) (your) refills
8. Works with (product name) (repellent) (fan) (device) (unit)
9. Refill(s) fit all Clip-On™ (product name) fan devices
10. (Contains) [insert quantity] refills (+). (+) Refill(s) fit all Clip-On™ (product name) fan devices.
11. For best results, we recommend that the refill be used within (#) (weeks) (months) of Opening
12. Refills available
13. (Multiple-use) (reusable) refills (up to 12 hours)
14. Use each refill multiple times (up to 12 hours)
15. Remainder of (6), (7), (8), (9), (10), (11), (12) hour refill can be used at a future time.
16. (Extra) (Second) (Free) refill (included)
17. Replace the refill and batteries (when)(after) you no longer feel air blowing from the unit (and the ([insert color]) (x hour) (use up) (indicator)(LED) light turns off)
18. (Refill) works in all Clip-on (models) (units)
19. (Refill) can be used in all Clip-on (models) (units)

Technology Claims:

1. (Patented) (Laboratory) (Field) (Tested) (fan-aided) (innovative) Technology
2. (Fan) (circulated) (powered) (repellent) (outdoor protection)
3. (Fan) (activated) repellent
4. (The) (Quiet) (Built-in) fan (inside) (disperses) (circulates) (the) (mosquito) (repellent) (all around you).
5. Scientifically engineered.
6. (Vents) (air exits) (360°) out (of) the (unit) (product name) to repel mosquitoes (from where they) (hunt) (approach).
7. (Fan)(design) provides 360° air flow
8. (Now with) (a) (an) ([insert color]) (X hour) (refill and battery) (use up)(indicator)(LED) light
9. ([Insert color]) (X hour) (refill and battery) (use up) (indicator)(LED) light
10. ([Insert color]) (LED) light indicates (approximately) [insert number] hours of refill and battery left:
11. ([Insert color]) (X hour) (refill and battery) (use up)(indicator) (LED) light technology
12. (Now with) (a) (an) ([insert color]) (X hour) (refill and battery) (use up)(indicator)(LED) light technology

[Information in brackets is notes to Reviewer]
(Information in parentheses is optional language)

(Underlined parenthesis sections indicate optional language where a choice(s) of the underlined options will be included on the label and cannot be excluded)

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. (Bring) (Carry) (Clip) (Attach) (take) (take along) (unused) (product name)(one): (everywhere) (in) (your) (purse) (car) (golf bag) (tennis bag) (tackle box) (backpack) (fanny pack) (beach bag) (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).
11. (Easy to use) (Convenient)(360°)(rotating) clip.
12. Add (convenience)(portability)(comfort) (style) to your (spring)(summer)
13. Versatile clip
14. Versatile clip- rotates
15. Versatile clip- rotates (so) (you can) (Clip-it) (hang it) (place it)
16. Versatile clip- (so) (you can) (Clip-it) (hang it) (place it)
17. (Have) (Take) (Bring) (Carry) (product name) (one) (along): (ready) (in) (to) (for) (your) (tent) (boat) (summer cabin)

"No Skin Application" Claims:

1. No skin application
2. Portable Protection You Don't Have To (put on), (spray on), (rub on)
3. (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)™ (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.

[Information in brackets is notes to Reviewer]
(Information in parentheses is optional language)

(Underlined parenthesis sections indicate optional language where a choice(s) of the underlined options will be included on the label and cannot be excluded)

- 4. Batter(y)(ies) (not) included
- 5. (Just) Clip It (On) (to your belt) (to your bag) (or set it next to you) (or hang it next to you)
- 6. For outdoor use only.
- 7. Do not use indoors
- 8. Battery operated
- 9. Does not (require) (use) heat (to operate)
- 10. Refillable (replaceable disk)
- 11. Don't spray it on. Clip it on.
- 12. Clip it on...or set it next to you.
- 13. Clip it on...or hang it next to you.

Fan Unit (Delivery Device) Claims:

- 1. (Ergonomic) (comfortable) (light) (portable) design
- 2. (More) Ergonomic
- 3. (Design) (Shape) (Look) (vent design)
- 4. Sleek (Design) (Shape) (Look)
- 5. Modernized (Design) (Shape) (Look) (vent design)
- 6. (More) Modern (Design) (Shape) (Look) (vent design)
- 7. (More) Contemporary (Design) (Shape) (Look) (vent design)
- 8. Same (OFF! Clip-On) Protection
- 9. Gen-III-(Clip on) (Design) (Shape) (Look)
- 10. (with) (a) rotating clip
- 11. (with) (a) pivoting clip
- 12. Same protection, (updated design) (compact design)
- 13. Uses same refill as (OFF! Clip-On) ([insert product name])
- 14. Uses (OFF! Clip On) (product name) refill
- 15. Limited Edition Designs
- 16. Designs only available at [insert retailer name]
- 17. Clip it On – in colors!
- 18. look for [insert year first launched]
- 19. Add (portable) (convenient) style to your summer
- 20. more vents

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
- 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.

[Information in brackets is notes to Reviewer]
(Information in parentheses is optional language)

(Underlined parenthesis sections indicate optional language where a choice(s) of the underlined options will be included on the label and cannot be excluded)

- 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)
- 14. (Twin) (Bonus) (Value) (Variety) (Backyard) Pack
- 15. Mosquito Protection in Two Easy Steps
 - 1. Twist top to open, fully insert refill
 - 2. Twist closed to activate fan

[Insert color] Light = Change refill & batteries soon

[The two steps, if used, will always carry a referral to the complete usage instructions. Optional graphics may accompany the two steps, example graphics shown below.]

