

4822-564

11/6/2012

1/9



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

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

November 6, 2012

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

Subject: Amended Labeling; Addition of New Optional Marketing Statements & Addressing of Potential Packaging-Related Changes to Directions for Use Geneva-P, EPA Reg. No. 4822-564 Your Submission Dated August 8, 2012

Dear Ms. Fugate:

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):

General Comment(s):

- 1. Delete all text throughout the subject label that are marked with "strikethrough."

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

- 2. 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 sprayers:

Net Weight (NET WT.) ((Net) Contents): __ fluid oz.]

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

Net Weight: _X*_ fl. oz. (_XX** _ mL) XXX - _ fl. oz. (_XXXX***** _ mL containers)***

Contains [_ (holder(s)) (unit(s)) (cartridge system(s)) (carabiner(s)) (case(s)) (carabiner case(s)) (cartridge sprayer(s)) (personal repellent(s)) (spray(s)) __ oz. Total)]'

***The net weight of the entire multipack must be displayed in fluid ounces.**

**** The net weight in ml 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.**

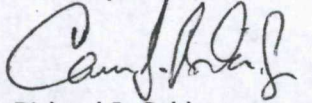
Optional Marketing Claims section comment(s), page 6 – 7 of 7:

- 3. You must delete the newly added optional marketing statements that have been marked with "strikethrough." The Agency is not really sure how the addition of these added optional marketing statements relate to a DEET repellent product that is typically applied to skin or clothing. In addition, there are no added graphics for us to review and/or consider.

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: Label stamped "Accepted with Comments," dated November 6, 2012
 004822-00564 D468622

3/9

Geneva-P [EPA base file name]

OFF! Deep Woods Sportsmen Insect Repellent VI [alternate brand name, 4-1-11]

**KEEP OUT OF REACH OF CHILDREN
WARNING**

See Additional Precautions on Back Panel

ACTIVE INGREDIENT:

Picaridin..... 20%

OTHER INGREDIENTS:..... 80%

**KEEP OUT OF REACH OF CHILDREN
WARNING**

See Additional Precautions on Back Panel

NET CONTENTS: ~~XXX~~

(Net Wt.) ((Net) Contents) X oz

(Contains)

*(X Refillable (holder(s)) (unit(s)) (cartridge system(s)) ((case(s)) (carabiner case(s))
(cartridge sprayer(s)) (personal repellent(s)) (spray(s)))*

(X (Repellent) refill(s))

PRECAUTIONARY STATEMENTS

Hazards to Humans – WARNING: Causes substantial but temporary eye injury. Do not get in eyes. Use of this product may cause reactions in rare cases. Wash thoroughly with soap and water after handling. Remove and wash contaminated clothing before reuse.

[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.

PHYSICAL & CHEMICAL HAZARDS: FLAMMABLE: Contents under pressure. Keep away from heat, sparks, and open flame. Do not puncture or incinerate container. Exposure to temperatures above 130°F may cause bursting.

DIRECTIONS FOR USE

ACCEPTED
With COMMENTS
In EPA Letter Dated:
November 6, 2012
Under the Federal Insecticide, Fungicide
and Rodenticide Act, As amended, for the
pesticide Registered under EPA Reg. No:
4822-564

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.

[Note to reviewer: Table A shows options for terms used to identify an aerosol can holder in the optional directions that follow]

(Table A)

Options for aerosol can holder terms
<ul style="list-style-type: none"> • Holder • Unit • Cartridge system • Carabiner • Case • Carabiner case • Cartridge sprayer

((Product name) (OFF!) (insert holder term from Table A) Set-Up)

[Optional holder set up - Option 1]

To prepare (product name) (OFF!) (insert holder term from Table A) (To insert repellent (refill)):

1. Remove one mosquito repellent (refill) from its packaging (and remove (the) (dust) cap).
2. (Squeeze) (pinch) (buttons) (tabs) (and) (twist) (to) remove (detach) (separate) (the) top of (insert holder term from Table A)
3. (Insert) (place) (refill) into (the) (bottom of) (insert holder term from Table A)
4. (Reattach) (snap) the (top of) (insert holder term from Table A) to the (bottom of) (insert holder term from Table A)
5. Clip the (insert holder term from Table A) to your belt, pants/short(s) waistband, backpack, gear, or store in any other convenient location.

[OR]

[Optional holder set up - Option 2]

Remove dust cap from (aerosol) (can) (bottle) (refill). (Press buttons) (pinch buttons) (squeeze) (twist) (rotate) (to) Remove the (base) (bottom) from the top and insert (aerosol/can/bottle) refill into the (base) (bottom). Reattach the top to the (base) (bottom).

[Optional section for holder use]

To (access) (use) repellent:

- 1 (Squeeze) (pinch) (buttons) (tabs) (and) (twist) (to) remove the bottom of (insert holder term from Table A) from the (top of the) (insert holder term from Table A)
- 2 Spray repellent as (indicated) (directed)
- 3 After applying repellent, (reattach) (snap) the bottom of the (insert holder term from Table A) to the top of the (insert holder term from Table A)

[Optional clarifying text for pictograms for holder directions, if used:]

1. Remove (refill).

2. *(Twist to) (Separate) (Remove) the top of (insert holder term from Table A) from the bottom of (insert holder term from Table A).*
3. *Insert refill into the bottom of (insert holder term from Table A).*
4. *(Reattach) (snap) the top (insert holder term from Table A) to the bottom of (insert holder term from Table A)*
5. *Attach to a convenient location (on you or your gear).*
6. *To use, (twist to) remove the bottom of (insert holder term from Table A) from the top of (insert holder term from Table A)*
7. *Spray repellent.*

(To Apply Spray) (To Apply Repellent) (When Applying Repellent)

(Shake well before each use.) ((Squeeze tabs and) pull cap to remove.) Hold container 6 to 8 inches from skin 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. Do not use under clothing. Avoid over-application of this product. For continued insect protection, reapply as effectiveness diminishes, but not to exceed 2 applications per day. Frequent reapplication and saturation are unnecessary. Apply sparingly around ears. When using on children, apply to your own hands and then put it on the child. Do not apply to children's hands. 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.

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

DISPOSAL: Before disposing, empty the container by using the product according to the label. Do not reuse this container. Place in trash or offer for recycling if available. If partially filled: Call your local solid waste agency or 1-800-529-3394 for disposal instructions. Never place unused product down any indoor or outdoor drain.



[Note to reviewer: The STEEL recycle symbol might be used on final printed label of steel can if space allows.]

(Aluminum can, please recycle)

[Note to reviewer: The aluminum recycle symbol might be used on final printed label of aluminum can if space allows.]

(Contains no CFCs or other ozone depleting substances. Federal regulations prohibit CFC propellants in aerosols [or corresponding graphic below].)



Questions? Comments? Call 800-558-5252 or write Helen Johnson. Sold by: ©2008 S.C. Johnson & Son, Inc. Racine, WI 53403-2236 USA. All Rights Reserved

EPA Reg. No. 4822-564

EPA Est. No. XXX-X-X

[For small size aerosol cans with a peel-out label, a referral statement will be utilized]

***[Language on optional holder]
Read the label inside before use.***

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

- NEW
- (now) with Picaridin
- (now) contains Picaridin
- SC Johnson A Family Company
- A family company since 1886. Fisk Johnson
- **20% Picaridin**
- Repels (annoying) mosquitoes (that may carry West Nile Virus) (for (up to) 8 hours)
- Protects against (annoying) mosquitoes (that may carry West Nile Virus) (for (up to) 8 hours)
- (Proven) (long-lasting) protection from (annoying) mosquitoes (that may carry West Nile Virus) (for (up to) 8 hours)
- Repels ticks
- Repels ticks (including ticks that cause Lyme Disease)
- TICKS-OFF®
- Repels Biting Flies
- Repels chiggers
- Keeps bugs OFF!
- BUG-OFF™
- Non-Greasy (formula)
- Sports formula
- Active formula
- Outdoorsmen formula
- It feels good on the skin, not oily, greasy, or sticky.
- Keeping insects away never felt so good
- 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
- Clean feel
- Dye-free
- For playing and relaxing outdoors
- Won't stain
- Always carry [*insert product brand name*]
- Long lasting (protection)
- Long lasting on-the-go protection
- For people on-the-go (protection)
- Protection that fits your lifestyle
- Specially formulated for (hunters,) (hunting,) (fishermen,) (fishing,) (hikers,) (hiking,) (campers) (camping) (and) (other outdoorsmen) (other outdoor activities)
- (It) won't damage (gear) (fishing lines,) (gun stocks,) (tackle boxes) (or) (other synthetic materials) (other plastic sporting equipment)
- **Won't Harm Gear** * [*will qualify with at least one of the following material choices*] * (fabrics) (cotton) (wool) (nylon) (acetate) (rayon) (spandex) (other synthetic fabrics) (plastics) (watch crystals) (plastic lenses) (vinyl) (or) (painted surfaces)
- **Gear Smart** * [*will qualify with at least one of the following material choices*] * (fabrics) (cotton) (wool) (nylon) (acetate) (rayon) (spandex) (other synthetic fabrics) (plastics) (watch crystals) (plastic lenses) (vinyl) (or) (painted surfaces)
- Won't damage (fabrics) (cotton) (wool) (nylon) (acetate) (rayon) (spandex) (other synthetic fabrics) (plastics) (watch crystals) (plastic lenses) (vinyl) (or) (painted surfaces)
- Sprays at any angle
- **(For) you**
- **For (more) active outdoor adventures**
- **For (hiking) (fishing) (hunting) (camping) (backpacking)**
- **(Secure) snap-on cap (attaches to caribiner)**
- **Portable (protection)**
- **Light & compact**

[Note to reviewer: the following section of bulleted statements are for formulas containing fragrance]

- It smells great too.
- Won't leave you smelling like bug repellent
- (Light) (pleasant) (Clean) (Fresh) (Great) scent ((that) won't leave you smelling like bug repellent)
- (Light) (pleasant) (Clean) (Fresh) (Great) fragrance ((that) won't leave you smelling like bug repellent)
- (It's) pleasant smelling
- Specially formulated to feel and smell better on your skin

[Note to reviewer: the following section of bulleted statements are for formulas that do not contain fragrance]

- No fragrance (formula)
- Fragrance-free (formula)
- No-odor (formula)
- Odorless (formula)

[Optional marketing statements for refillable holder system]

- *(Multiple) (OFF!) Refills available*
- *Attaches securely to gear*
- *(Accessible) (Refillable) (~~Reloadable~~) (Personal) (Mosquito) (Portable) Spray*
- *(Accessible) (Refillable) (~~Reloadable~~) (Portable) Personal repellent*

Table B [Note to reviewer: information in Table B is to be used for insertion in the statements that follow]

Holder Descriptor	Options for aerosol can holder terms
<ul style="list-style-type: none"> • Rugged adventure • Crush-resistant • Leak-Resistant • Water-Resistant • Durable • Accessible • Refillable • Reloadable • Personal • Portable • Light • Compact • Aluminum 	<ul style="list-style-type: none"> • Holder • Unit • Cartridge system • Carabiner • Case • Carabiner case • Cartridge sprayer

- *[Insert holder descriptor(s) from Table B] [insert holder term from Table B]*
- *Always carry your (OFF!) [Insert holder descriptor(s) from Table B] [insert holder term from Table B]*
- *Works with (name of starter kit) (OFF!) [Insert holder descriptor(s) from Table B] [insert holder term from Table B]*
- *Compatible with (name of starter kit) (OFF!) [Insert holder descriptor(s) from Table B] [insert holder term from Table B]*
- *Fits (name of starter kit) (OFF!) [Insert holder descriptor(s) from Table B] [insert holder term from Table B]*
- *(Refill(s)) ~~reload(s)~~ in [insert holder term from Table B]*
- *Refill in [insert holder term from Table B]*

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

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

~~[Text to be used in conjunction with graphics to describe alternate OFF! segmentation available]~~

~~• For you, for your (gear) (tent), for your (area) (world) (campsite)~~