17702-

10-29-2009



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

> OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

OCT 2 9 2009

Mr. Walter G. Talarek Product Registration W, Neudorff GrnbH KG 1008 Riva Ridge Drive Great Falls, VA 22066-1620

SUBJECT: Application for Pesticide Notification (PRN 98-10 and 2002-X) Request General Label Changes EPA Reg. No. 67702-1 Application Dated September 9, 2009

Dear Registrant:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 and 2002-X dated 09/09/09 for the above product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and 2002_X and finds that the action(s) requested fall within the scope of PRN 98-10 and 2002-X. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-305-6249 or Owen F. Beeder of my staff at 703-308-8899.

Sincerely,

Linda Arrington Notifications & Minor Formulations Team Leader Registration Division (7505P) Office of Pesticide Programs

Please read instructions on I	reverse before compl	٦ form.	Form App	roved C No 1	2070-0060	Rrint-Form
€EPA	Environmenta	Inited States I Protection Age Ington, DC 20460		Régistr Amend × Other	ation	OPP Identifier Number
· · · · · · · · · · · · · · · · · · ·		Application for	Pesticide - Sec	tion I	•	
1. Company/Product Number 67702-1			2. EPA Product Manager 3. Proposed Classification			
4. Company/Product (Name) NEU1140F RTU Copper Soap			PM# 22		- ×	None Restricted
W. Neudorff GmbH KG c/o Walter G. Talarek PC Great Falls, VA 22066-16	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					
	·	Se	ction - II			······
Amendment - Explain below. Resubmission in response to Agency letter dated			Final printed labels in response to Agency letter dated "Me Too" Application. NOTIFICATION			
Notification - Explain	below.		Other - Ex	plain below.	00	CT 2 9 2009
1. Material This Product Wil Child-Resistant Packaging	Be Packaged in: Unit Packaging		r Soluble Packaging	2. Type o	of Container	
Yes*	Yes		Yes		Metal Plantin	
► Certification must	No If "Yes" Unit Packaging wgt.	No. per if "Yo container Pack	No es" No. per age wgt containe		Glass Paper Other (S	pecify)
3. Location of Net Contents	Information	4. Size(s) Retail Cont	ainer	5. Location of Lu	abel Directio	ons
Label C	Container			On Lab		panying product
5. Manner in Which Label is	Affixed to Product	Lithograph Paper glued Stenciled	Oth	BT		
		Sec	tion - IV		***************************************	
1. Contact Point (Complete	items directly below i		ividual to be contacted	, if necessary, to p	T	
Name Title Walter G. Talarek Aut			norized Agent		Telephon 703-759	e No. (Include Area Code) -4837
	y knowingly false or r	Certification this form and all attac nisleading statement m				6. Date Application Received [°] ູ(Sູ່ເຊັສກped)
2. Signature Avalante 3. 1 Au					0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	о
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WHO	lorek		ized Agent		0 0 00 00 00 00 00 00 00 00 00 00 00 00	ο ο ο ΄ οιις
2. Signature MMA 4. Typed Name Walter G. Talarek	lovek	Author 5. Date	ized Agent		0 0 00 00000	ους ΄

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Сору

LAW OFFICES OF WALTER G. TALAREK, P.C.

1008 RIVA RIDGE DRIVE GREAT FALLS, VA 22066-1620

PHONE: 703-759-4837 FAX: 703-759-5548 E-MAIL: wtalarek@verizon.net

September 9, 2009

DELIVERED BY COURIER

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Linda Arrington, Team Leader Notifications and Minor Formulations Team Registration Division c/o Document Processing Desk (NOTIF) Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency Room S-4900, One Potomac Yard 2777 S, Crystal Drive Arlington, VA 22202

Re: NEU1140F RTU Copper Soap EPA Reg. No. 67702-1 Notification

Dear Ms. Arrington:

Please find enclosed W. Neudorff GmbH KG's (Neudorff's) application for a notification for the registration for NEU1140F RTU Copper Soap, EPA Reg. No. 67702-1. In essence, this notification replaces the current optional claim regarding a qualifying symbol and a disclaimer for the Ecosense brand name with the following claim: "[when the Scotts Company uses the brand name Ecosense when selling or distributing this product, it must place a qualifying symbol after the brand name and, in close proximity to the brand name, place the statement 'economically sensible alternative pest control']". The Ecosense brand name belongs to the Scotts Company, which is a supplemental distributor of this product.

The Scotts Company has discussed the above revision in the context of revising labels for herbicidal products with Mr. Dan Kenney, Branch Chief, Herbicide Branch, Registration Division. Neudorff also will apply to make the above revision to the labels of its other products that are distributed by the Scotts Company and that are handled by the Registration Division.

Two (2) copies of the revised label are enclosed. One (1) of the copies has the revision being made by this notification highlighted in yellow.

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This notification is consistent with PR Notices 98-10 and 2002-X and and EPA's regulations at 40 CFR 152.46 and 156.10, and no other changes have been made to the labeling or the confidential statement of formula of 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 of PR Notices 98-10 and 2002-X and 40 CFR 152.46 and 156.10, 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.

If you have any questions about this notification, please feel free to call me.

Sincerely yours,

Walter G. Talarek Authorized Agent

Enclosure – Application for Notification

Cc: Dan Kenney, RD, EPA

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NEU1140F RTU COPPER SOAP

Liquid Copper Fungicide Ready-To-Use

Active Ingredient:

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Copper Octanoate (Copper Soap)	0.08%
Other Ingredients	<u> </u>
Total	100.00%

0.017%.

metallic copper equivalent

EPA REG. NO. 67702-1 Net Contents:

EPA EST. 67702-DEU-1

NOTIFICATION

KEEP OUT OF REACH OF CHILDREN

OCT 2 9 2009

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CAUTION

FIRST AID				
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.			
IF ON SKIN OR	8			
CLOTHING	-Rinse skin immediately with plenty of water for 15-20			
	minutes.			
	-Call a poison control center or doctor for treatment advice.			
IF SWALLOWED	-Call a poison control center or doctor immediately for			
	treatment advice.			
•	-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 by mouth to an unconscious person.			
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.			
	-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.				

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS: Caution: "Harmful if swallowed, absorbed through skin or inhaled. Wash thoroughly with soap and

water after handling. Avoid contact with skin, eyes or clothing. Avoid breathing spray mist. Remove contaminated clothing and wash clothing before reuse.

ENVIRONMENTAL HAZARDS: This product is toxic to fish and aquatic organisms and may contaminate water through runoff. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

STORAGE AND DISPOSAL

Pesticide Storage

Store this product in its original container and keep in a secure storage area out of reach of children and domestic animals. Store in a secure place, away from open fire or flame. Keep container closed and reseal after use. Product may be damaged by freezing. Do not store product below 40°F (4°C). If spilled, use absorbent materials and dispose of in an approved manner.

Pesticide Disposal and Container Handling

Nonrefillable container. Do not reuse or refill this container.

If empty: Place in trash or offer for recycling if available.

If partly filled: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

BATCH CODE:

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 applicable directions and precautions on this label before using.

Application Directions

[The registrant may use either of the following application directions paragraphs, either:

"Using the provided hand-pump sprayer, spray all plant surfaces (top and bottom of leaves) thoroughly with NEU1140F RTU COPPER SOAP. One quart will treat 10 square yards (1.0 L will treat 10 m²)."

OR

"Spray all plant surfaces (top and bottom of leaves) thoroughly with NEU1140F。 RTU COPPER SOAP. 22 fluid ounces will treat 7 square yards." دَنْ الْعَادَةُ اللَّهُ عَلَيْهُ الْعَادَةُ الْعَا

Begin treatment 2 weeks before disease normally appears or when disease first appears, and repeat at 7 to 10 day intervals for as long as needed a Re-apply after rain.

LELLE

6 0000 To control **powdery mildews**, begin treatment 2 weeks before disease normally appears. Alternatively, begin treatment when disease first appears, and repeat at 7 to 10 day intervals for as long as needed. Spray every 7 days when the amount of disease is increasing rapidly. If possible, time applications so that 12 hours of dry weather follow application. On plants that are very susceptible to powdery mildew, such as home-greenhouse-grown cucumber, it is best to spray the plants twice a week during the first 2 weeks after emergence, and weekly thereafter. On outdoor plants, re-apply after rain.

To control downy mildews, leaf and fruit spots, blights, and rust, begin treatment 2 weeks before disease normally appears or when weather forecasts predict a long period of wet weather. Alternatively, begin treatment when disease first appears, and repeat at 7 to 10 day intervals for as long as needed. Spray all plant parts thoroughly. Re-apply following heavy rain. Apply every 7 days when the amount of disease is increasing rapidly. Sprays every 5 to 7 days should be used for preventing late blight on potatoes and tomatoes. If possible, time applications so that at least 12 hours of dry weather follows application.

To prevent fruit rots, spray NEU1140F RTU COPPER SOAP thoroughly onto flowers and fruit. Apply at the start of flowering and continue every 7 to 10 days until harvest. Fungicidal sprays are especially warranted when weather forecasts predict a long period of wet weather. Re-apply after rain.

GRAPES

Note: Do not mix NEU1140F RTU COPPER SOAP with lime. Certain Vinifera and French Hybrid varieties may be sensitive to copper sprays resulting in Before spraying these varieties, consult your State marginal leaf burn. Experiment Station or make test sprays.

Downy mildew, Black rot, Phomopsis Cane and Leaf Spot, Powdery mildew Spray all plant surfaces thoroughly with NEU1140F RTU COPPER SOAP. For best control begin treatment when new growth reaches 1/2 inch and repeat at 7 to 14 day intervals throughout the growing season.

Gray mold (Fruit rot)

Spray all plant surfaces thoroughly with NEU1140F RTU COPPER SOAP. For best control begin treatment at the end of bloom and repeat at 7 to 14 day intervals.

PEACHES

Peach leaf curl

Spray all plant surfaces thoroughly with NEU1140F RTU COPPER SOAP. Care be used to control peach leaf curl. Apply as a dormant spray in late fall during a 0 00 period of dry weather. င္ပင္ပ

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ORNAMENTAL PLANTS Spray all plant surfaces thoroughly with NEU1140F RTU COPPER SOAP. Begin treatment when new growth emerges and repeat every 7 to 10 days for as long as needed to control disease.

African violet - Bacterial leaf spot and blight, Botrytis blight, Leaf spot, Powdery mildew Aluminum plant - Bacterial leaf spot and blight, Anthracnose, Leaf spot, Rhizoctonia blight Aralia - Anthracnose, Bacterial leaf spot and blight, Leaf spot Areca palm - Leaf spot Bird's nest fern - Bacterial leaf spot and blight Boston fern - Bacterial leaf spot and blight, Botrytis blight, Rhizoctonia blight Bromeliad - Anthracnose, Bacterial leaf spot and blight Cactus - Leaf spot Caladium - Bacterial leaf spot and blight, Rhizoctonia blight Chinese evergreen - Anthracnose. Bacterial leaf spot and blight. Leaf spot. Rhizoctonia blight. Soft rot Corn plant - Bacterial leaf spot and blight, Botrytis blight, Leaf spot Croton - Anthracnose, Bacterial leaf spot and blight Devils ivy - Bacterial leaf spot and blight, Rhizoctonia blight Dieffenbachia - Bacterial leaf spot and blight, Leaf spot, Rhizoctonia blight Dracaena - Bacterial leaf spot and blight, Botrytis blight, Leaf spot Dwarf Schefflera - Bacterial leaf spot and blight, Leaf spot Earthstar - Anthracnose English ivy - Anthracnose, Bacterial leaf spot and blight, Botrytis blight, Leaf spot, Rhizoctonia blight Euphorbia - Rhizoctonia blight Fishtail palm - Bacterial leaf spot and blight. Leaf spot Grape ivy - Anthracnose, Botrytis blight, Downy mildew, Powdery mildew, Rhizoctonia blight India-rubber tree - Leaf spot, Botrytis blight Japanese fatsia - Bacterial leaf spot and blight, Leaf spot, Rhizoctonia blight Ladyfinger palm - Leaf spot Lipstick vine - Botrytis blight, Leaf spot Nephthytis - Bacterial leaf spot and blight, Leaf spot, Rhizoctonia blight Nerve plant - Rhizoctonia blight Norfolk Island pine - Colletotrichum needle blight Oyster plant - Leaf spot Peperomia - Leaf spot, Rhizoctonia blight Philodendron - Anthracnose, Botrytis blight, Leaf spot Pothos - Bacterial leaf spot and blight, Rhizoctonia blight Praver plant - Leaf spot Rattlesnake plant - Bacterial leaf spot and blight, Leaf spot Schefflera - Anthracnose, Bacterial leaf spot and blight, Leaf spot, Rhizoctonia blight Sedum - Leaf spot Snake plant - Bacterial leaf spot and blight, Leaf spot Spathe flower - Leaf spot, Rhizoctonia blight Staghorn fern - Bacterial leaf spot and blight, Rhizoctonia blight Swiss cheese plant - Bacterial leaf spot and blight, Anthracnose, Rhizoctonia blight, Soft rot Tailflower - Anthracnose, Bacterial leaf spot and blight, Leaf spot, Rhizoctonia blight, Soft rot Ti plant - Anthracnose, Leaf spot 0 00 0 0 0 0 0 0 0 0 0 0 Urn plant - Anthracnose, Bacterial leaf spot and blight 000000 ι 0 0 Various palms - Leaf spot Wax plant - Botrytis blight, Leaf spot, Rhizoctonia blight 000000 Weeping fig - Leaf spot 0000 000 000 00 Yucca - Leaf spot Zebra plant - Botrytis blight, Leaf spot, Rhizoctonia blight ιςιυς ι ι υστιςι

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NEU1140F RTU COPPER SOAP may cause some copper toxicity on some plant species. Before spraying a specific plant species, consult your State Experiment Station or make a test spray.

ROSES

Blackspot, Downy mildew, Gray mold, Leafspots, Powdery mildew, Rust Spray all plant surfaces thoroughly with NEU1140F RTU COPPER SOAP. Begin treatment when new spring growth emerges and repeat every 7 to 10 days for as long as needed to control disease. NEU1140F RTU COPPER SOAP may cause some copper toxicity on some roses. Copper toxicity appears as purple spots.

Optional wording that may or may not appear on the label:

For Organic Production

For Organic Gardening

- For Roses, Fruits & Vegetables
- For Ornamentals, Fruits & Vegetables
- Controls Powdery Mildew, Black Spot & Rust!
- Copper Soap Fungicide
- Manufactured under a license of Neudorff.
- For flowers, fruits and vegetables
- Use to control a wide range of listed plant diseases.
- Powdery mildew
- Rusts •
- Black spot •
- Leaf & fruit spot
- Downy mildew
- Fruit rot
- Late blight

- For Use in Homes, Home Gardens and Home Greenhouses.

- For household use only

-Roses & Ornamentals: Controls gray mold, black spot, rust, powdery and downy mildew.

-Fruit trees: Controls peach leaf curl, fruit rot, scab, blight, leaf and fruit spot -Vegetables: Controls powdery mildew, downy mildew, leaf spot, early and late blight.

-Use as a dormant spray for peach leaf curl.

-Controls peach leaf curl.

-Controls powdery mildew

-Use for early and late blight on tomatoes (and potatoes).

د د د د د د د د د د د -Controls listed plant diseases using low concentrations of copper. -For a wide range of listed plant diseases: powdery mildew, rusts, blackspot, leaf 000000 & fruit spot, downy mildew, fruit rot, late blight. 0 0 0 0 0 0

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-Dormant and growing season liquid copper fungicide.

- Ready-to-Use

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LCLUE

- OMRI Listed

OMRI

- Listed by the Organic Materials Review Institute (OMRI) for use in organic production of food and fiber
- Listed by the Organic Materials Review Institute (OMRI) for use in organic production
- Made with Cueva[™] Fungicide Ready-to-Use, a trademark of W. Neudorff GmbH KG
- Contains Cueva[™] Fungicide Ready-to-Use, a trademark of W. Neudorff GmbH KG
- Cueva[™] Fungicide Ready-to-Use is a trademark of W. Neudorff GmbH KG
- www.neudorff.com



- NEU1140F RTU COPPER SOAP decomposes to form soluble copper, and fatty acid, both of which can be used by microbes and plants.
- Fixed copper is one of the oldest fungicides and bactericides, used to control a wide range of plant diseases. NEU1140F RTU COPPER SOAP is a patented, fixed copper fungicide, made by combining a soluble copper fertilizer with a fatty acid. The copper and the fatty acid combine to form a copper salt of the fatty acid, known technically as a true soap. The copper soap fungicide controls many common diseases using low concentrations of copper. The net result is an excellent vegetable, fruit and ornamental fungicide. NEU1140F RTU COPPER SOAP is suited for use in domestic circumstances, both indoors and outdoors.

A wide range of bacteria and fungi attack plants, however, they generally only cause a few types of diseases. When using NEU1140F RTU COPPER SOAP, it is important to identify the type of disease in order to use the best method of disease control.

- Powdery mildews tend to occur on the upper leaf surfaces, as though a white powder was sprinkled onto the plant. Powdery mildews can form a dense, white, cottony mass, making the whole leaf appear white. They are also commonly found on stems. Powdery mildews rarely kill plants. Most fungal diseases require water to infect plants. Powdery mildews are unique in that they do not require water for infection. Hence, under home greenhouse conditions, powdery mildews can become severe. Shade and dense plantings also promote powdery mildew.
- Downy mildews tend to occur on the lower leaf surfaces. Downy mildews are much finer than powdery mildews, and appear as fine white cotton, similar to duck down. Downy mildews can rapidly kill plant leaves during wet, cool weather, but are inhibited by hot dry weather. White rust is caused by fungi related to the downy mildews and occurs

as small white blisters, full of white powder, that appear on plant leaves. The white powder is rust spores.

- Leaf and fruit spots are small brown or black spots on the leaf or fruit. They commonly occur on many of the plants grown around the home and in the garden. These spots can be caused by a range of fungi and bacteria. Leaf and fruit spots are commonly caused by fungi belonging to the following genera: Alternaria, Cercospora, Colletotrichum, Cylindrosporium, Gloeosporium, Glomerella, Gnomonia, Marssonia, Mycosphaerella (Didymella), Phomopsis, Phyllosticta, Septoria, and Sphaceloma. Spots on leaves and fruit can expand and grow together. Leaf spot pathogens require water to infect plants. During wet weather, spots can develop into a blight, rapidly, killing leaves, flowers and stems.
- **Rusts** are small orange blisters that appear on plant leaves, that are full of orange powder. The orange powder is rust spores. Towards the end of the season, black spores are often produced.
- **Fruit rots** appear as soft, rotten areas on the fruit. Often the causal fungus can be seen growing and producing spores on the surface of the rotting area. Rots are often caused by fungi belonging to the following genera: Aspergillus, Botrytis, Monilinia, Mucor, Penicillium, Rhizopus and Sclerotinia.

-NEU1140F RTU COPPER SOAP controls diseases of a wide range of plants listed on this label, including many vegetables, fruit and ornamentals. As with most fungicides, NEU1140F RTU COPPER SOAP acts to protect plants from infection. Therefore, it is important to have NEU1140F RTU COPPER SOAP on the leaf, flower or fruit before the pathogen is able to cause an infection.

-Powdery mildews commonly occur on the following plants: bean, beet, broccoli, brussel sprouts, cauliflower, cabbage, cantaloupe, chard, chicory, chive, cucumber, currant, endive, gooseberry, hop, kale, kohlrabi, lettuce, lilac, pea, pumpkin, rose, rutabaga, spinach, squash, strawberry, turnip, and zucchini.

-Downy mildews commonly occur on the following plants: bean, beet, broccoli, brussel sprouts, cauliflower, cabbage, cantaloupe, chard, chicory, chive, corn, cucumber, endive, garlic, hop, kale, kohlrabi, leek, lettuce, onion, pea, pumpkin, rutabaga, shallot, spinach, squash, sunflower, tobacco, turnip, and zucchini

-White rusts commonly occur on the following plants: broccoli, brussel sprouts, cauliflower, cabbage, chard, kale, kohlrabi, spinach, sunflower, and turnip,

-Leaf and fruit spots commonly occur on:

QUINCE: Anthracnose, Cedar Apple Rust, Coryneum Blight, Flyspeck, Quince Rust, Scab, Sooty Blotch

BEAN, PEA: Anthracnose, Ascochyta leaf and pod spot, Bacterial blights (halo, common and brown spot)

BEET, CHARD, SPINACH: Cercospora leaf spot 000000 CARROTS: Alternaria leaf blight, Bacterial leaf blight, Cercospora leaf blight с CELERY AND CELERIAC: Bacterial leaf spot, Cercospora (early) blights Septoria ° ° ° (late) blight *د*ر ر

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CORN: Southern leaf blight, Cercospora leaf spot

CABBAGE AND RELATED PLANTS: Alternaria blight, Bacterial leaf spot CUCUMBERS, CANTALOUPE, SQUASH, PUMPKIN, ZUCCHINI: Alt

- CUCUMBERS, CANTALOUPE, SQUASH, PUMPKIN, ZUCCHINI: Alternaria blight, scab, Angular leaf spot, Anthracnose, Scab, Ulocladium leaf spot
- CURRANT AND GOOSEBERRY: Anthracnose, Phyllosticta and Septoria leaf spots
- GINSENG: Alternaria blight, Botrytis blight, Phytophthora mildew

HOP: Anthracnose, Cercospora leaf spot

LETTUCE, CHICORY, ENDIVE: Septoria leaf spot

ONION, GARLIC, LEEK, SHALLOT, CHIVES: Botrytis leaf blight, Neck rot and Bacterial soft rot

PARSLEY: Leaf scorch, Leaf spot

STRAWBERRY: Angular leaf spot, Leaf scorch, Mycosphaerella leaf spot, Phomopsis leaf blight, Septoria leaf spots

TOMATO, POTATO, EGGPLANT, PEPPER: Anthracnose, Bacterial speck, Bacterial spot, Cercospora leaf spot, Early blight, Gray mold, Late blight, Leaf mold, Septoria leaf spot

-Rusts are commonly found on roses and currants.

-Fruit rots commonly occur on strawberries, raspberries, and other fruit. -NEU1140F RTU Copper Soap may cause some copper toxicity on some plant species. On roses, copper toxicity appears as purple spots. DO NOT mix NEU1140F RTU COPPER SOAP with lime. Certain apple and Vinifera and French Hybrid grape varieties may be sensitive to copper sprays.

- Cultural Method to Assist in Reducing Plant Disease Several common sense techniques can also be used to reduce plant disease. These include:
- Inspect the plants often for signs of disease or insect pests. Take appropriate measures when warranted.
- Promote healthy plant growth, but do not over fertilize.
- Do not grow the same types of plants in the same location in successive years.
- Control weed species around the garden that are related to the plant species that you are growing. Weeds are a source of plant pathogens.
- Space plants to ensure good airflow and drying after rain. Also, water plants in the morning to minimize the time that the plants are wet. Wet leaves, flowers and fruit promote infections by plant pathogens.
- Prune plants during dry weather to reduce wound infections.
- At the end of the growing season remove and compost all garden refuse. Garden refuse can act as a source of plant pathogens.

[when The Scotts Company uses the brand name Ecosense when selling or distributing this product, it must place a qualifying symbol after the brand name and, in close proximity to the brand name place the statement economically sensible alternative pest control]

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- TM [for use by Bonide Products Inc., a licensed distributor of NEU1140F RTU Copper Soap. [when Bonide Products uses the brand name Garden Naturals when selling or distributing this product, it must place an asterisk after the brand name and, in close proximity to the brand name, place the statement 'not intended to imply environmental safety either alone or compared to other products']

The registrant may use one of these optional statements, either: "NOTICE TO BUYER

> To the extent consistent with applicable law, seller warrants that this product conforms to the chemical description on this label and is reasonably fit for purposes stated on this label only when used in accordance with directions under normal use conditions. This warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to seller. To the extent consistent with applicable law, buyer assumes all risk of any such use. To the extent consistent with applicable law, seller makes no other warranties, either expressed or implied.

OR

We guarantee your satisfaction or your money back.

Or

Unconditionally guaranteed by W. Neudorff GmbH KG. If for any reason you are not satisfied with this product, send proof of purchase to the address shown and we will gladly refund your purchase price."

The registrant will use one of these statements, either:

Manufactured under a license of "W. Neudorff GmbH KG, Germany".

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OR

Sold under a license of "W. Neudorff GmbH KG, Germany".

Registrant: W. Neudorff GmbH KG, Postfach 1209, An der Mühle 3, 2 D-31860 Emmerthal, Germany

US Patent Number: 5,246,716