

PM-14

Reg # 66190-1

176

SEP 22 1995

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Plant Pro-Tec, Inc.
24389 Racoon Way
Oak Run, CA 96069

Attention: Dr. Gerald Waters

Subject: Plant Pro-Tec (Garlic) Units
EPA Reg. No. 66190-1
Your letter of May 8, 1995

The labeling referred to above, ~~submitted~~ in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, is acceptable provided that you:

1. The proposed revised directions for use are acceptable for the bag of 25 units, subject to the comments below.
 - a. In the first sentence of the "USE RESTRICTIONS", change "Cervis" to "Cervus".
 - b. In the third sentence under "HOW TO APPLY PRO-TEC (Garlic) UNITS", change "two foot" to "two-foot".
2. On the front panel of the proposed revised label for the bag of 25 units, change "DEVICES EMIT GARLIC ODOR FOR 6-8 MONTHS" to

"PLANT PRO-TEC UNITS EMIT GARLIC ODOR FOR 6-8 MONTHS".

This change is needed because the term "device" applies to a special class of products, regulated under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), to which your product does not belong. The PLANT PRO-TEC (Garlic) UNIT is a pesticide, not a device.

3. The labels for the shipping box and the bag of 250 units are not acceptable as proposed, but would be acceptable if their claims and "DIRECTIONS FOR USE" conformed to those for the bag of 25 units.

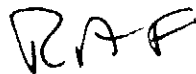
Because the two types of units are claimed to have different stimulus intensities and different durations of effectiveness, we consider them to be distinct products that would have to be registered separately. If you are replacing an older product with a newer one, we may be able to come to some sort of transitional agreement, but if you intend to produce both types of units indefinitely, you must obtain two separate registrations.

- 4. The probe activator is mentioned and illustrated on the label and would become the only method directed for activating units once amended labels are accepted and placed into commerce. To have a product that is fit for use, provide at least one of these tools in all packages of PLANT PRO-TEC (Garlic) UNITS designated for sale or distribution to product users.
- 5. On your ingredient statement, you need to change "Chili Peppers" to "Capsaicin and Related Capsaicinoids", to conform with the latest nomenclature for this active. In order to determine amount of Capsaicin and Related Capsaicinoids, you will have to analyze your product. If you need a laboratory to do such testing, let us know. You can also add an asterisk (*) to the active, which could be explained directly below the ingredient statement as "*derived from Chilli Peppers".

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). Your release for shipment of the product bearing the amended labeling constitutes acceptance of these conditions.

A stamped copy of the labeling is enclosed for your records.

Sincerely yours,



Robert A. Forrest
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H7504C)

- Enclosure: 1. Stamped label
- 2. A-79 Enclosure

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396

ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 22 1995



Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 66190-1

PLANT PRO-TEC (Garlic) UNITS

Discourages deer, elk and rabbits from browsing trees, shrubs and flowers.

Active Ingredients	By Wt.
Oil of Garlic	10.0%
Chili Pepper	3.0%
Inert Ingredients	87.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION

EPA Registration No. 66190-1
EPA Establishment No. 66190-CA-01

DISCOURAGES BROWSE DAMAGE BY EMITTING STRONG GARLIC ODOR

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store only in the original container in a cool, dry place inaccessible to children and pets. Store Plant Pro-Tec (Garlic) Units out of direct sunlight, preferably at temperatures from 30°F to 90°F. Unit bodies will photo degrade in 24 months or more depending on amount of sunshine.

DISPOSAL: Securely wrap used or unused units in newspaper and discard in trash.

DIRECTIONS FOR USE

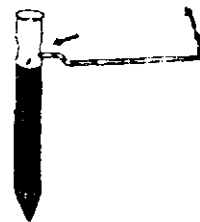
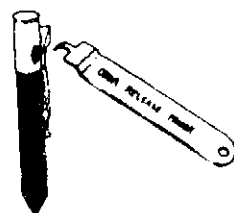
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may be used to discourage deer (*Odocoileus* species), elk (*Cervus* species), and rabbits (*Sylvilagus* species) from browsing trees, shrubs and flowers. Unit must be activated to emit repellent scent. The effective radius of each unit is about two feet.

HOW TO ACTIVATE PLANT PRO-TEC (Garlic) UNITS: To release the repellent garlic odor, use the probe-type tool to puncture the barrier (see diagram). The blue body/white top model emits a strong garlic odor for 6 to 8 months; the white body/blue top model emits a moderate garlic odor for 12 months.

HOW TO APPLY PLANT PRO-TEC (Garlic) UNITS: Pressing the top of the clip opens the bottom making it possible to attach units one-handed. Clip units on leaves, needles, or branches (up to 1/2 inch in diameter) of plants or fence wire. Plants larger than the two foot effective radius may require more than one unit. If placed on a fence, the spacing between units should be about four feet.

If plants are very small or spindly, insert activated units into the soil next to the plant.



U.S. Patent No. 5,083,708

PLANT PRO-TEC, Inc.
P.O. Box 902
Palo Cedro, CA 96073
Phone - (916) 547-5450 - Fax



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496



PLANT PRO-TEC (Garlic) UNITS

Discourages deer, elk and rabbits from browsing trees, shrubs and flowers.

Active Ingredients	By Wt.
Oil of Garlic	10.0%
Chili Pepper	3.0%
Inert Ingredients	87.0%

KEEP OUT OF REACH OF CHILDREN
CAUTION

EPA Registration No. 66190-1
EPA Establishment No. 66190-CA-01

Net Contents:
250 units, 0.14 oz. per unit

DISCOURAGES BROWSE DAMAGE BY EMITTING STRONG GARLIC ODOR

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store only in the original container in a cool, dry place inaccessible to children and pets. Store Plant Pro-Tec (Garlic) Units out of direct sunlight, preferably at temperatures from 30°F to 90°F. Unit bodies will photo degrade in 24 months or more depending on amount of sunshine.

DISPOSAL: Securely wrap used or unused units in newspaper and discard in trash.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

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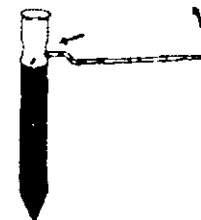
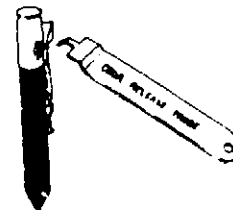
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C FRONT

596



PLANT PRO-TEC (Garlic) UNITS

Discourages deer, elk and rabbits from browsing trees, shrubs and flowers.

<u>Active Ingredients</u>	<u>By Wt.</u>
Oil of Garlic	10.0%
Chili Pepper	3.0%
<u>Inert Ingredients</u>	87.0%

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Registration No. 66190-1
EPA Establishment No. 66190-CA-01

Net Contents:

25 units, 0.14 oz. per unit; 1 Garlic Odor Release Probe

DEVICES EMIT GARLIC ODOR FOR 6-8 MONTHS

PLANT PRO-TEC, Inc.

P.O. Box 902

Palo Cedro, CA 96073

Phone - (916) 547-5450 - Fax

C BACK

696



STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store only in the original container in a cool, dry place inaccessible to children and pets. Store Plant Pro-Tec (Garlic) Units out of direct sunlight, preferably at temperatures from 30°F to 90°F. Unit bodies will photo degrade in 24 months or more depending on amount of sunshine.

DISPOSAL: Securely wrap used or unused units in newspaper and discard in trash.

DIRECTIONS FOR USE

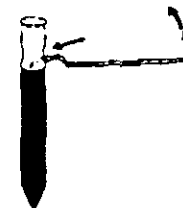
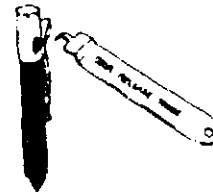
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USE RESTRICTIONS: This product may be used to discourage deer (*Odocoileus* species), elk (*Cervus* species), and rabbits (*Sylvilagus* species) from browsing trees, shrubs and flowers. Unit must be activated to emit repellent scent. The effective radius of each unit is about two feet.

HOW TO ACTIVATE PLANT PRO-TEC (Garlic) UNITS: To release the repellent garlic odor, use the probe-type tool to puncture the barrier (see diagram). The unit emits strong repelling garlic odor for six to eight months.

HOW TO APPLY PLANT PRO-TEC (Garlic) UNITS: Pressing the top of the clip opens the bottom making it possible to attach units one-handed. Clip units on leaves, needles, or branches (up to 1/2 inch in diameter) of plants or fence wire. Plants larger than the two foot effective radius may require more than one unit. If placed on a fence, the spacing between units should be about four feet.

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