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SEP 18 1996

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

Attention: Dr. Gerald Waters

Subject: Plant Pro-Tec (Garlic) Units
EPA Registration No. 66190-1
Your letter of June 19, 1996

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:

A. make the following changes and submit one (1) copy to us before you ship your product:

1. The proposed revised "DIRECTIONS FOR USE" for the "25 unit bag label" are acceptable, subject to the comments below.
 - a. When labels are printed, make sure that the major heading "DIRECTIONS FOR USE" appears in larger and more conspicuous type than its subheadings "USE RESTRICTIONS:", "HOW TO ACTIVATE PRO-TEC (Garlic) UNITS:", and "HOW TO APPLY PRO-TEC (Garlic) UNITS:". It also would help if the main heading "DIRECTIONS FOR USE" were centered rather than left-justified in the label panel. Note that the organization of the "DIRECTIONS FOR USE" was acceptable on the labeling what we accepted with comments on September 22, 1995.
 - b. In the last sentence of the "USE RESTRICTIONS", change "two-feet" to "two feet". On the labeling discussed in our letter of September 22, 1995, hyphenation was needed due to the combining of "two" and "foot" to make the adjective "two-foot". No hyphenation is needed when "feet" is modified by "two" and used as a predicate nominative (referring to the sentence's subject "radius"). Note that the comment in our letter of September 22, 1995, pertained to a sentence which no longer appears on this product's label.
 - c. Change "Organic" to "Food Grade Ingredients".

- 2. The proposed revised "DIRECTIONS FOR USE" for the "Box label" are acceptable, subject to the same comments as are made above for the bag label and the additional comment which appears below.
 - a. In the third sentence under "HOW TO APPLY PRO-TEC (Garlic) UNITS", change "plant/and/or on" to "plant and/or on" (i.e., delete the first slash).
- 3. The user sheets and other items that you provided regarding the effectiveness of the product were interesting and somewhat informative, but are not considered to be acceptable substitutes for formal efficacy studies.

If the accounts presented in the testimonial forms which you submitted are accurate, it appears to us that the most common use strategy claimed to have been effective was the clipping of at least one unit to or immediately beside each plant that was to be protected. There was some dissatisfaction with users' efforts to create odor barriers or boundaries around stands of plants that were to be protected.

- 5. Your two promotional sheets entitled

"Features of
Plant Pro-Tec (Garlic) Units"

and your sheet entitled

"PLANT PRO-TEC (Garlic) Units"

include a number of claims and statements which are not supported by data with which we are familiar. Note that our regulations prohibit the making of "false or misleading" statements in any material considered to be labeling (accompanying the product at any time). Note also that making such statements about the product in virtually any context is prohibited by the Federal Trade Act. Therefore, we suggest that you examine these promotional sheets carefully and adjust or delete any statements which you cannot support with information that you have in your possession. For example, it seems to us that what we know and might expect regarding the role of chili pepper in your units is described more accurately on the sheet which illustrates the green-body/white-top unit than on the sheet which describes the blue-and-white units. If you know for certain that your plastic units photodegrade in a year or two, the claims to this effect that you are making would seem to us to be appropriate.

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If it actually takes 5-10 years or more for the units to photodegrade, your claims would seem to be misleading.

B. within one (1) year of receipt of this letter, you

1. submit the following data in the proper format, as found in PR Notice 86-5:
 - a. an analytical, HPLC method (Guideline No. 151B-16) that analyzes for the active ingredients in the "Oleoresin Capsicum" used in your formulation and
 - b. the analytical data (151B-13) for the amount of "Capsaicin and Related Capsaicinoids" in your product, using the HPLC method.

2. revise your ingredient statement as follows:

Active Ingredients	
Oil of Garlic	10.0%
Capsaicin and Related Capsaicinoids*	[?]%
Inert Ingredients	
	[?]%
Total	100.00%

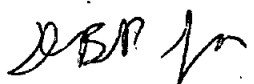
*Derived from Hot Chili Peppers

3. submit a revised Confidential Statement of Formula (CSF), showing nominal concentration, upper, and lower certified limits for "Capsaicin and Related Capsaicinoids".

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,



Karen Whitby
Product Manager (14)
Insecticide-Rodenticide Branch
Registration Division (H7504C)

- Enclosures: 1. Stamped Label
2. A-79 Enclosure

Box label

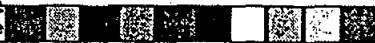
ACCEPTED
with COMMENTS
in EPA Letter Dated

SEP 18 1996

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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%
Capsicum Oleoresin*	3.0%
Inert Ingredients	87.0%

*Derived from Chili Pepper

KEEP OUT OF REACH OF CHILDREN

CAUTION

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

UNITS EMIT GARLIC ODOR FOR 6 TO 8 MONTHS

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 or pets. Store Plant Pro-Tec (Garlic) UNITS out of direct sunlight, preferably at temperatures from 30°F to 90°F. Under these storage conditions, shelf life of unactivated UNITS should be one or more years.

DIRECTIONS FOR USE

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

USE RESTRICTIONS

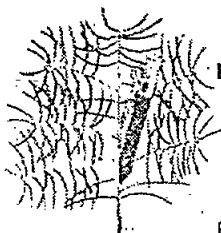
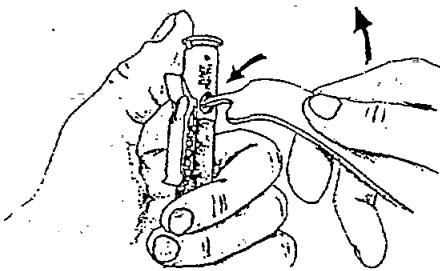
This product may be used to discourage deer (*Odocoileus* species), elk (*Cervus* species), and rabbits (*Sylvilagus* species) from browsing trees, shrubs and flowers. UNIT must be activated to emit repellent scent. The effective radius of each UNIT is about two-feet.

HOW TO ACTIVATE PRO-TEC (Garlic) UNITS

To release the repelling garlic odor, use the probe-type tool to puncture the barrier (see diagram). The UNIT will smell strongest under warm, sunny exposure.

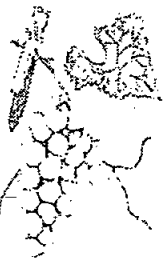
HOW TO APPLY PRO-TEC (Garlic) UNITS

Follow above instructions to puncture the barrier which releases the repelling garlic odor. UNITS should be clipped to individual plants, placed in soil adjacent to a plant, and/or clipped to fences around areas. For creating a barrier/perimeter, place UNITS about four feet apart, closer if necessary. The number of UNITS to use on a plant depends on how much the animal likes the plant/and/or on the animal's browsing habits. For example, a rose bush may require 3-4 UNITS. Generally fewer UNITS will be needed to prevent damage than to stop it. Keep some units in reserve in case the garlic odor needs to be intensified. Under very wet conditions, it may be necessary to clip the UNITS on upside down to keep water from getting in and blocking the garlic odor from escaping.

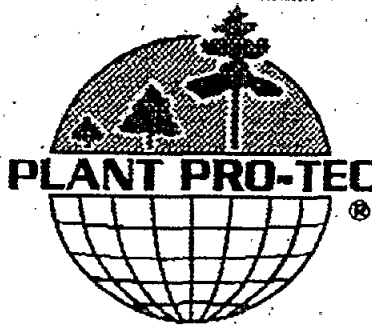


For more information or assistance
call 1-800-572-0055.

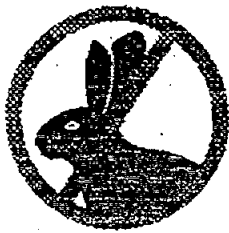
PLANT PRO-TEC, INC.
P.O. Box 902
Palo Cedro, CA 96073 USA
PHONE — (916) 547-5450 — FAX
1-800-572-0055



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PLANT PRO-TEC (Garlic) UNITS



Active Ingredients	By Wt.
Oil of Garlic	10.0%
Capsicum oleoresin*	3.0%
<u>Inert Ingredients</u>	<u>87.0%</u>



*Derived from chilli peppers

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

Net Contents: 25 UNITS, 0.14 oz. per UNIT, 1 Garlic Odor Release Probe
EPA Registration No. 66190-1 EPA Establishment No. 66190-CA-01

**DISCOURAGES DEER, ELK AND RABBITS FROM
BROWSING TREES, SHRUBS AND FLOWERS**

CREATE BOUNDARIES

PROTECT INDIVIDUAL PLANTS

HOME USE
NO RESTRICTIONS
in EPA Letter Dated

SEP 18 1996

Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, this pesticide
registered under EPA Reg. No.

66190-1

FORMULATION 100% ORGANIC

PLASTIC BODY PHOTO DEGRADES

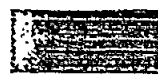
PLANT PRO-TEC, Inc

P.O. Box 902, Palo Cedro, CA 96073 Phone/Fax (916) 547 5450

1-800-572-0055

UNITS EMIT GARLIC ODOR FOR 6-8 MONTHS

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ure.



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PLANT PRO-TEC (Garlic) UNITS

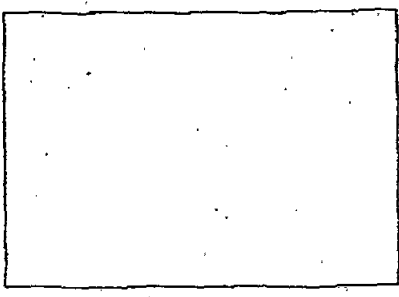
**DISCO
BRO**

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 or pets. Store Plant Pro-Tec (Garlic) UNITS out of direct sunlight, preferably at temperatures from 30°F to 90°F. Under these storage conditions, shelf life of unactivated UNITS should be one or more years.



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.

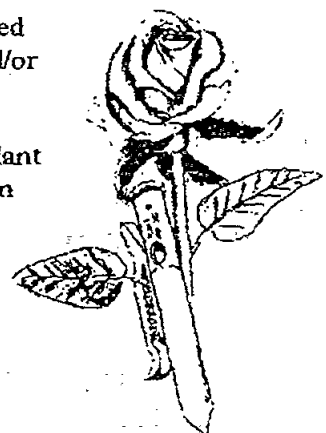


HOW TO ACTIVATE PRO-TEC (Garlic) UNITS:

To release the repelling garlic odor, use the probe-type tool to puncture the barrier (see diagram). The UNIT will smell strongest under warm, sunny exposure.

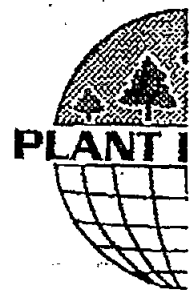
HOW TO APPLY PRO-TEC (Garlic) UNITS:

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For more information or assistance call 1-800-572-0055.

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



Net
EPA

PROTECT

P.O. I

UNITS

250 Unit Bag label

727

ACCEPTED
COMMENTS
in EPA Letter Dated

SEP 18 1996



Under the Federal Insecticide, Fungicide, and Rodenticide Act is amended, for the pesticide registered under EPA Reg. No.



66190-1

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Inert Ingredients	87.0%

*Derived from Chili Pepper

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA Registration No. 66190-1 EPA Establishment No. 66190-CA-01
Net Contents: 250 Plant Pro-Tec (Garlic) Units, 0.14 oz. per UNIT,
1 Odor Release Probe

UNITS EMIT GARLIC ODOR FOR 6 TO 8 MONTHS

STORAGE AND DISPOSAL

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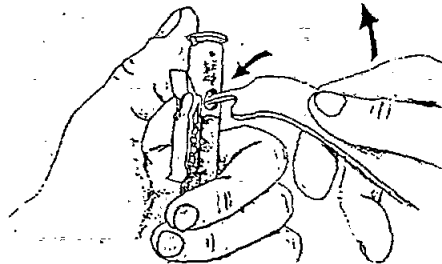
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