

67702-1

10/27/2003

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

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

W. Neudorff GmbH KG  
% Walter G. Talarek  
1008 Riva Ridge Drive  
Great Falls, VA 22066

OCT 27 2003

Subject: NEU1140F RTU Copper Soap  
EPA Reg. No. 67702-1  
Amendment dated August 5, 2003

Dear Mr. Talarek:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act as amended is acceptable provided the following change is made:

Delete the OMRI logo from the list of optional wording. The PR Notice on organic labeling states that an organic label statement should be in a font size comparable to that of other type and not highlighted by size, color, contrast or placement. The OMRI logo appears to be of larger size and in bold print so it stands out from the rest of the label which is contradictory to the intent of the PR Notice.

One copy of the label stamped "Accepted with comments" is enclosed for your records. Please submit one copy of the final printed label that incorporates the required change before the product is released for shipment.

If you have any questions, please contact Robert Westin by phone at (703) 305-5721 or via email at [westin.robert@epa.gov](mailto:westin.robert@epa.gov).

Sincerely,

A handwritten signature, likely of Cynthia Giles-Parker, consisting of stylized initials and a surname.

Cynthia Giles-Parker  
Product Manager (22)  
Fungicide Branch  
Registration Division (7505C)

Enclosure

2 7 10

# NEU1140F RTU COPPER SOAP

## Liquid Copper Fungicide Ready-To-Use

### Active Ingredient:

Copper Octanoate (Copper Soap) 0.08%

Inert Ingredients 99.92%

**Total** 100.00%

metallic copper equivalent 0.017%.

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EPA EST. 67702-WG-1

Net Contents:

**KEEP OUT OF REACH OF CHILDREN**

### 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 CLOTHING	-Take off contaminated 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. Do not apply directly to water. Do not contaminate water when disposing of equipment washwaters.

## **STORAGE AND DISPOSAL**

### **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.

### **Disposal**

**If empty:** Do not reuse this container. Place in trash or offer for recycling if available.

**If partly filled:** Call your local solid waste agency or 1-800-CLEAN-UP for disposal instructions. Never place unused product down any indoor or outdoor drain.

## **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 thoroughly with NEU1140F RTU COPPER SOAP. One quart will treat 10 square yards (1.0 L will treat 10 m<sup>2</sup>)

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 potato and related plants. 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.

OR

Spray all plant surfaces thoroughly with NEU1140F RTU COPPER SOAP. 22 fluid ounces will treat 7 square yards.

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. 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 marginal leaf burn. Before spraying these varieties, consult your State 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 ½ 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.

### ORNAMENTAL PLANTS

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  
 Prayer 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  
 Um plant - Anthracnose, Bacterial leaf spot and blight  
 Various palms - Leaf spot  
 Wax plant - Botrytis blight, Leaf spot, Rhizoctonia blight  
 Weeping fig - Leaf spot  
 Yucca - Leaf spot  
 Zebra plant - Botrytis blight, Leaf spot, Rhizoctonia blight

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.

## ROSE AND ORNAMENTAL SHRUBS

**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 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 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
- OMRI Listed



- 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™, a trademark of W. Neudorff GmbH KG
- Contains Cueva™, a trademark of W. Neudorff GmbH KG
- Cueva™ is a trademark of W. Neudorff GmbH KG
- [www.neudorff.de](http://www.neudorff.de)



- 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 naturally-occurring 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, down as low as 90 ppm. 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*, *Marssonina*, *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, 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, zucchini and many other plant species.

-**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, zucchini and many other plant species.

-**White rusts** commonly occur on the following plants: broccoli, brussel sprouts, cauliflower, cabbage, chard, kale, kohlrabi, spinach, sunflower, turnip, and many other plant species.

-**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

CARROTS: Alternaria leaf blight, Bacterial leaf blight, Cercospora leaf blight

CELERY AND CELERIAC: Bacterial leaf spot, Cercospora (early) blight, Septoria (late) blight

CORN: Southern leaf blight, Cercospora leaf spot

CABBAGE AND RELATED PLANTS: Alternaria blight, Bacterial leaf spot

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, currants and many other types of plants.



-**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."

The registrant may use one of these optional statements, either:

**"NOTICE TO BUYER**

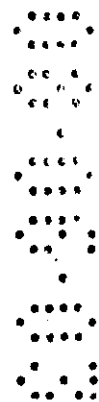
Seller warrants that this product conforms to the chemical description on this label and is reasonably fit for purposes stated on this label only when used in accordance with directions under normal use conditions. This warranty does not extend to use of this product contrary to label directions, or under abnormal use conditions, or under conditions not reasonably foreseeable to seller. Buyer assumes all risk of any such use. 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".

OR

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

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

US Patent Number: 5,246,716

**ACCEPTED  
with COMMENTS  
In EPA Letter Dated:**

OCT 27 2003

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

67702-1

