



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

February 27, 2017

Walter Talarek  
Agent for W. Neudorff GmbH KG  
c/o Law Offices of Walter Talarek, PC  
1008 Riva Ridge Drive  
Great Falls, VA 22066

Subject: Notification per PRN 98-10: Page 6: Adds two optional statements referring user to back panel and booklet for additional Precautionary Statements and Directions For Use  
Product Name: NEU1140F RTU Copper Soap  
EPA Registration Number: 67702-1  
Application Date: January 25, 2017  
Decision Number: 525502

Dear Mr. Talarek:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action requested falls within the scope of PRN 98-10.

The label submitted with the application has been stamped "Notification" and will be placed in our records. Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act 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 FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list 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 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 the EPA's Office of Enforcement and Compliance.

If you have any questions, please contact Tony Kish by phone at 703 308-9443, or via email at [kish.tony@epa.gov](mailto:kish.tony@epa.gov); or Craig Reeves by phone at 703 347-0486, or via email at [reeves.craig@epa.gov](mailto:reeves.craig@epa.gov)

Sincerely,

A handwritten signature in black ink that reads "Tony Kish".

Tony Kish, Product Manager 22 Fungicide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

# NEU1140F RTU COPPER SOAP

Flowable Liquid Copper Fungicide

## NOTIFICATION

67702-1

The applicant has certified that no changes, other than those reported to the Agency have been made to the labeling. The Agency acknowledges this notification by letter dated:

02/27/2017

(ABN: HydroWorxx Disease Control Ready-to-Use)

(ABN: HydroCraft Disease Control Ready-to-Use)

(ABN: HydroPower Disease Control Ready-to-Use)

### Active Ingredient:

Copper Octanoate (Copper Soap) 0.08%

Other Ingredients 99.92%

**Total** 100.00%

metallic copper equivalent 0.017%.

EPA REG. NO. 67702-1

EPA EST.

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 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 m<sup>2</sup>).”

OR

“Spray all plant surfaces (top and bottom of leaves) 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.

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 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.

## **PEACHES**

### **Peach leaf curl**

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

**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  
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  
Urn 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.

## 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 (and other diseases)
- Controls listed plant diseases: powdery mildew, rusts, black spot, leaf & fruit spots, downy mildew, fruit rot, late blight, peach leaf curl
- Use for early and late blight on tomatoes (and potatoes).
- Controls listed plant diseases using low concentrations of copper.
- For a wide range of listed plant diseases: powdery mildew, rusts, blackspot, leaf & fruit spot, downy mildew, fruit rot, late blight.
- Diseases controlled: powdery mildew, rust, black spot, fruit rot [and] other listed diseases.
- Dormant and growing season liquid copper fungicide.
- Protects buds and flowers
- (For) hydroponic gardening
- For hydroponic growing



- Ready-to-Use
- Designed for GardenPro (Independent) Retailers
- [Insert brand name] & your environment: Your home and yard are places for family and pets to enjoy. That's why [brand name] products are designed with care to provide effective solutions to problems inside and outside your home.
- [telephone icon] Questions, Comments (Medical Information) Call X-XXX-XXX-XXXX (insert company website) [computer icon]
- (Can be) use(d) up to day of harvest
- Decomposes to form soluble copper and fatty acid, [both of which can be used by microbes and plants]
- Made by combining soluble copper with a naturally occurring fatty acid
- www.neudorff.com
- Questions, comments (or medical information) X-XXX-XXX-XXXX
- © 20XX Licensed (insert company name). World rights reserved.
- Manufactured. Distributed by: (insert company name)
- Made in/Produced in: \_\_\_\_\_(from US and imported products/parts)
- See back (booklet) label for additional first aid
- See (back)(booklet)(panel) for (additional precautionary statements) (and) (directions for use)
- See booklet for directions for use and additional precautions
- This container is made with a minimum X% recycled material
- 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™ 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](http://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*, *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 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

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

CURRENT 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']



- <sup>TM</sup> [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 any or none 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."

OR

[The] (insert company name) Guarantee: If for any reason you are not satisfied with this product, mail us proof of purchase to obtain a full refund of 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