



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

October 31, 2024

Mark Mongiovi
Regulatory Regional Lead, US
UPL NA Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

Subject: Label Amendment - Registration Review Mitigation for Ethephon
Product Name: Pluck Cotton Boll Opener
EPA Registration Number: 70506-460
Application Date: February 3, 2020
Decision Number: 559338
Case Number: 477344

Dear Mark Mongiovi:

The Agency, in accordance with the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, has completed reviewing all the information submitted with your application to support the Registration Review of the above referenced product in connection with the Ethephon Interim Decision, and has concluded that your submission is acceptable. The label referred to above, submitted in connection with registration under FIFRA, as amended, is acceptable.

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 Assurance.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling and must be used at your next label printing. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 12 months from the date of this letter. After 12 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

If you have any questions about this letter, please contact Caleb Carr by phone at (202) 566-0636, or via email at carr.caleb@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Linda Arrington".

Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

ENCLOSURE: Stamped label

PLUCK COTTON BOLL OPENER

FOR COMMERCIAL USE OR AGRICULTURAL USE ONLY
NOT FOR RESIDENTIAL USE

ACTIVE INGREDIENT:

Ethephon (2-Chloroethyl) phosphonic acid*	55.4%
INERT INGREDIENTS:	44.6%
TOTAL	100.0%

*This product contains 6 pounds ethephon per gallon.

KEEP OUT OF REACH OF CHILDREN

DANGER

PELIGRO

Si Usted no entiende la etiqueta, busque a alguien para que se la explique a Usted en detalle. (If you do not understand this label, find someone to explain it to you in detail.)

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 do so by a poison control center or doctor.

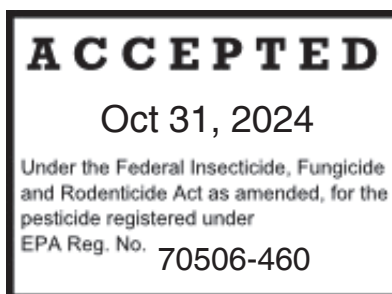
- Do not give anything by mouth to an unconscious person.

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.
EMERGENCY TELEPHONE NUMBERS: Have the product container or label with you when calling a poison control center or doctor or going for treatment.
FOR 24-HOUR EMERGENCY MEDICAL ASSISTANCE CALL: 1-866-303-6952
FOR CHEMICAL EMERGENCY: Spill, leak, fire, exposure, or accident call CHEMTREC 1-800-424-9300

See elsewhere on label for additional precautionary statements

EPA Reg. No. 70506-460
AD 012601

EPA Est. No. 51036-GA-1



Manufactured For:
UPL NA Inc.
PO Box 12219
Research Triangle Park, NC 27709

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PRECAUTIONARY STATEMENTS

DANGER

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CORROSIVE. Causes irreversible eye damage and skin burns. Harmful if swallowed or absorbed through skin. Avoid breathing spray mist. Do not get in eyes, on skin or on clothing. Keep away from domestic animals.

PERSONAL PROTECTIVE EQUIPMENT

Some materials that are chemical-resistant to this product are listed below.

Applicators and other handlers must wear:

1. Coveralls over long-sleeved shirt and long pants.
2. Chemical-resistant gloves made of Nitrile Rubber \geq 14 mils, Butyl Rubber \geq 14 mils, Neo-prene Rubber \geq 14 mils, or Barrier Laminate.
3. Chemical-resistant footwear plus socks.
4. Protective eyewear.
5. Chemical-resistant headgear for overhead exposure.
6. Chemical-resistant apron when mixing or loading or cleaning equipment.

Discard clothing and other absorbent materials that have been drenched or heavily contaminated with this product's concentrate. Do not reuse them. Follow manufacturer's instructions for cleaning and maintaining PPE. If no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

When handlers use closed systems, enclosed cabs, or aircraft in a manner that meets the requirements listed in the Worker Protection Standard (WPS) for agricultural pesticides 40 CFR 170.240.(d)(4-6), the handler PPE requirements may be reduced or modified as specified in the WPS.

USER SAFETY RECOMMENDATIONS

Users should:

1. Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
2. Remove clothing immediately if pesticide gets inside. Then wash body thoroughly and put on clean clothing.
3. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment wash waters.

NON-TARGET ORGANISM ADVISORY: This product is toxic to plants and may adversely impact the forage and habitat of non-target organisms, including pollinators, in areas adjacent to the treated site. Protect the forage and habitat of non-target organisms by following label directions intended to minimize spray drift.

USE PRECAUTIONS

Do not plant another crop within 30 days after treatment.

Mix only the amount of spray you expect to use each day. Do not allow mixed solution to stand overnight.

Avoid spray drift to nearby crops as this product will cause modifications in plant growth. Plant injury or reduced yields will result.

DIRECTIONS FOR USE

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

GENERAL PRECAUTIONS AND RESTRICTIONS

Do not contaminate water used for irrigation or domestic purposes.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirements specific to your State or Tribe, consult the agency responsible for pesticide regulation.

MANDATORY SPRAY DRIFT MANAGEMENT

Aerial Applications:

- Do not release spray at a height greater than 10 feet above the vegetative canopy, unless a greater application height is necessary for pilot safety.
- For all applications, applicators are required to use a fine to medium or coarser droplet size (ANSI/ASABE S641 May2018 (R2022)).
- The boom length must not exceed 65% of the wingspan for airplanes or 75% of the rotor blade diameter for helicopters.
- Applicators must use $\frac{1}{2}$ swath displacement upwind at the downwind edge of the field.
- Nozzles must be oriented so the spray is directed toward the back of the aircraft.
- Do not apply when wind speeds exceed 10 miles per hour at the application site.
- Do not apply during temperature inversions.

Ground Boom Applications:

- Apply with the nozzle height recommended by the manufacturer, but no more than 3 feet above the ground or crop canopy.
- For all applications, applicators are required to use a fine to medium or coarser droplet size (ANSI/ASAE S572.3 FEB2020).
- Do not apply when wind speeds exceed 10 miles per hour at the application site.
- Do not apply during temperature inversions.

Boom-less Ground Applications:

- Setting nozzles at the lowest effective height will help to reduce the potential for spray drift.

SPRAY DRIFT ADVISORIES

THE APPLICATOR IS RESPONSIBLE FOR AVOIDING OFF-SITE SPRAY DRIFT.
BE AWARE OF NEARBY NON-TARGET SITES AND ENVIRONMENTAL CONDITIONS.

IMPORTANCE OF DROPLET SIZE

An effective way to reduce spray drift is to apply large droplets. Use the largest droplets that provide target pest control. While applying larger droplets will reduce spray drift, the potential for drift will be greater if applications are made improperly or under unfavorable environmental conditions.

Controlling Droplet Size – Ground Boom

- Volume – Increasing the spray volume so that larger droplets are produced will reduce spray drift. Use the highest practical spray volume for the application. If a greater spray volume is needed,

consider using a nozzle with a higher flow rate.

- Pressure - Use the lowest spray pressure recommended for the nozzle to produce the target spray volume and droplet size.
- Spray Nozzle - Use a spray nozzle that is designed for the intended application. Consider using nozzles designed to reduce drift.

Controlling Droplet Size - Aircraft

- Adjust Nozzles - Follow nozzle manufacturers recommendations for setting up nozzles. Generally, to reduce fine droplets, nozzles should be oriented parallel with the airflow in flight.

BOOM HEIGHT - Ground Boom

For ground equipment, the boom should remain level with the crop and have minimal bounce.

RELEASE HEIGHT - Aircraft

Higher release heights increase the potential for spray drift.

SHIELDED SPRAYERS

Shielding the boom or individual nozzles can reduce spray drift. Consider using shielded sprayers. Verify that the shields are not interfering with the uniform deposition of the spray on the target area.

TEMPERATURE AND HUMIDITY

When making applications in hot and dry conditions, use larger droplets to reduce effects of evaporation.

TEMPERATURE INVERSIONS

Drift potential is high during a temperature inversion. Temperature inversions are characterized by increasing temperature with altitude are common on nights with limited cloud cover and light to no wind. The presence of an inversion can be indicated by ground fog or by the movement of smoke from a ground source or an aircraft smoke generator. Smoke that layers and moves laterally in a concentrated cloud (under low wind conditions) indicates an inversion, while smoke that moves upward and rapidly dissipates indicates good vertical air mixing. Avoid applications during temperature inversions.

WIND

Drift potential generally increases with wind speed. AVOID APPLICATIONS DURING GUSTY WIND CONDITIONS.

Applicators need to be familiar with local wind patterns and terrain that could affect spray drift.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the

Worker Protection Standard, 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses, and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification, and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personal protective equipment, notification to workers, and restricted-entry intervals. The requirements in this box only apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted-entry interval (REI) of 48 hours.

The REI increases to 72 hours in outdoor areas where average rainfall is less than 25 inches a year.

PPE required for early entry to treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated such as plants, soil, or water, is:

1. Coveralls over short-sleeved shirt and short pants.
2. Chemical-resistant gloves made of Nitrile Rubber \geq 14 mils, Butyl Rubber \geq 14 mils, Neo-prene Rubber \geq 14 mils, or Barrier Laminate.
3. Chemical-resistant footwear plus socks.
4. Protective eyewear.
5. Chemical-resistant headgear for overhead exposure.

Notify workers of the application by warning them orally and by posting warning signs at entrances to treated areas.

Do not apply PLUCK COTTON BOLL OPENER through any type of irrigation system.

AVOIDING SPRAY DRIFT AT THE APPLICATION SITE IS THE RESPONSIBILITY OF THE APPLICATOR.

The interaction of many equipment-and-weather-related factors determine the potential for spray drift. The applicator is responsible for considering all these factors when making decisions.

Where states have more stringent regulations, they should be observed.

STORAGE AND DISPOSAL

STORAGE

Do not contaminate water, food or feed by storage or disposal.
If container is broken or contents have spilled, follow all precautions

indicated above and clean up immediately. Before cleaning up, put on full length trousers, long sleeved shirt, protective gloves, and goggles or face shield. Soak up spill with absorbent media such as sand, earth or other suitable material and dispose of waste at an approved waste disposal facility.

PESTICIDE DISPOSAL

Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency or the Hazardous Waste representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL

Nonrefillable container. Do not reuse or refill this container. Triple rinse container (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into application equipment or mix tank and drain for 10 seconds after the flow begins to drip. Fill the container $\frac{1}{4}$ full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Offer for recycling, if available, or reconditioning, or puncture and dispose of in a sanitary landfill, or by incineration or if allowed by state and local authorities, by burning. If container is burned, stay out of smoke.

GENERAL INFORMATION

COTTON

A foliar spray of PLUCK COTTON BOLL OPENER will accelerate opening of mature unopened cotton bolls and enhance defoliation which can result in earlier harvest with an increased recoverable yield. PLUCK COTTON BOLL OPENER treatment allows increased efficiency from a once-over harvest.

TOBACCO (FLUE-CURED)

A foliar spray of PLUCK COTTON BOLL OPENER promotes early, uniform "yellowing" of mature tobacco. PLUCK COTTON BOLL OPENER reduces curing time, allowing more efficient use of curing barn space, and increased control over harvest schedules.

SPRAY PREPARATION

Add $\frac{1}{2}$ to $\frac{3}{4}$ of the required amount of water to the spray tank. Start agitation. Add the required amount of PLUCK COTTON BOLL OPENER, and the remaining amount of water. Prepare only as much spray solution as can be used on the day of mixing. Do not allow spray solution to stand overnight. Do not spill the concentrated product on spray equipment, or any airplane parts.

ANY SPILLS SHOULD BE RINSED IMMEDIATELY WITH PLENTY OF WATER.

Use of a nurse tank is highly recommended for avoiding possible spills of concentrated formulation on spray equipment or any airplane parts.

TANK MIXTURES WITH DEFOLIANTS AND INSECTICIDES

Follow all applicable use precautions and rate per acre recommendations on labels of products applied as tank mixtures or in sequence with PLUCK COTTON BOLL OPENER. In some cases slight reduction in boll opening response has been observed when tank mixes with defoliants were used.

Good agitation in the spray tank is essential and a tank mixture should not be allowed to stand without agitation for more than 5 to 10 minutes.

Read and observe all appropriate label use directions and precautions for the defoliants and insecticides used.

DO NOT MIX WITH DESICCANTS IF COTTON IS TO BE SPINDLE HARVESTED.

DO NOT TANK MIX PLUCK COTTON BOLL OPENER WITH DEFOLIANTS CONTAINING SODIUM CHLORATE BECAUSE THIS RESULTS IN THE FORMATION OF HYPOCHLOROUS ACIDS WHICH UPON HEATING EMIT TOXIC CHLORINE FUMES.

EQUIPMENT CLEANING

Because of the acidic nature of this product, prolonged exposure to spray deposits will damage acrylic plastics, certain paints, and metals.

Rinse thoroughly with a detergent and water all exposed acrylic plastic-type materials (e.g., aircraft windshields), and painted surfaces within an hour after exposure to spray deposits.

At the end of each day, rinse thoroughly with a detergent and water all the metal parts of the aircraft and the associated spray equipment exposed to the spray deposits.

COTTON

USE	EXPECTED CONDITIONS	PLUCK COTTON BOLL OPENER RATE		ONE GALLON PLUCK COTTON BOLL OPENER TREATS	SPRAY VOLUME		APPLICATION TIMING
		PINT/A	LBS AI	ACRES	GROUND	AIR**	
PLUCK COTTON BOLL OPENER*	Hot and dry 80°F or higher	1 1/3	1.0	6	15 - 50	2 - 5	Apply when the number of mature unopened bolls is sufficient to produce the desired crop. See below for test of boll maturity. Treatment uniformly opens bolls 7 to 14 days earlier.
	Dry and 75 F to 80 F	2	1.5	4			
	Cool but above 65 F or Rank cotton	2 2/3	2	3			
PLUCK COTTON BOLL OPENER + FOLEX Defoliant Tank Mix	High soil moisture or High fertility level or Rank cotton	1/3	.25	24	15 - 50	5 - 10	Apply 4 to 7 days prior to PLUCK COTTON BOLL OPENER boll opening application. To be used as a sequential treatment with, not in place of PLUCK COTTON BOLL OPENER boll opening treatment.
PLUCK COTTON BOLL OPENER + DROPP Defoliant Tank Mix	High soil moisture or High fertility level or Rank cotton	1/3	.25	24	10 - 50	3 - 10	Apply 4 to 7 days prior to PLUCK COTTON BOLL OPENER boll opening application. To be used as a sequential treatment with, not in place of PLUCK COTTON BOLL OPENER boll opening treatment.
Pre-	Hot, dry,	2/3	.5	12	15-50	2-5	Apply 4 to 7 days

USE	EXPECTED CONDITIONS	PLUCK COTTON BOLL OPENER RATE		ONE GALLON PLUCK COTTON BOLL OPENER TREATS	SPRAY VOLUME		APPLICATION TIMING
		PINT/A	LBS AI	ACRES	GROUND	AIR**	
Conditioner for Defoliation	above 80 F						prior to defoliant. Enhances top crop defoliation reducing deterioration of bottom crop and allows for earlier harvest.
	Cool, above 65°F or Rank cotton	1 1/3	1.0	6			

***Pretreatment With Defoliants Prior to PLUCK COTTON BOLL OPENER Treatment**

If the cotton is overly rank or laying down in the middles and good spray coverage of the bolls with PLUCK COTTON BOLL OPENER is difficult, a pretreatment with defoliants will be useful to improve boll coverage with PLUCK COTTON BOLL OPENER. Use dosage rates of PLUCK COTTON BOLL OPENER recommended for boll opening. Read and observe all appropriate label use directions and precautions for the defoliant used.

****NOTE:** For California and Arizona use a volume of no less than 5 gallons per acre for aerial applications.

Boll Maturity

A boll is mature when it is too hard to be dented when squeezed between thumb and fingers, too hard to be sliced with a sharp knife, and when the seed coat becomes light brown in color.

Use Limitations

- Do not exceed a maximum of 2.0 lb. ai/A for combined uses of PLUCK COTTON BOLL OPENER per acre per year.
- **Boll Opening:** Do not tank mix PLUCK COTTON BOLL OPENER with a desiccant if the cotton is to be spindle harvested.
- **Pre-Condition for Defoliation:** Do not tank mix PLUCK COTTON BOLL OPENER with desiccants unless plant desiccation is required. Do not use a defoliant before there is sufficient mature unopened bolls to produce the desired yield (see General Information section on how to test for boll maturity).

When to Harvest: Do not harvest cotton sooner than 7 days after a treatment with PLUCK COTTON BOLL OPENER. Observe the treated crop and harvest when optimum boll opening has been reached. Too early harvest might reduce the full advantage of the treatment and too late a harvest may result in reduced quality and loss of lint which will drop from the plant.

TOBACCO

(Flue-Cured Only)

CROP SITUATION	PLUCK COTTON BOLL OPENER PINTS/ACRE	SPRAY VOLUME GALLONS/ACRE	SPECIFIC DIRECTIONS
Directed Spray Application	1 1/3	50-60	Use drop nozzles. Choose TG or OC spray tips designed to apply 50-60 gpa at 35-40 psi and at tractor speed of 2-3 mph. Use 2 nozzles per row; one on each side of the row dropped low enough to direct the spray to the leaves to be ripened and harvested. Thorough spray coverage is essential. With a directed spray, be sure to harvest all leaves with 20% or more yellowing.
Over-The-Top Application	1 1/3-2 2/3	40-60	<p>Treat only when leaves remaining on the stalk are mature. To ensure remaining leaves are mature, test spray several tobacco plants as described under the section "Application Timing." Use the lower rate in a normally mature crop when experience indicates that minimum ripening inducement is required. Use the higher rate when the crop is heavy and has a tendency to be more rank or when temperatures are lower than normal. Always test spray to determine if the tobacco is mature enough to respond to treatment with PLUCK COTTON BOLL OPENER.</p> <p>Apply over-the-top PLUCK COTTON BOLL OPENER spray as a fine mist using three nozzles (one nozzle tip over the center of the plant, and one on each side) so all leaves are covered thoroughly, similar to the application pattern of systemic sucker control agents. Use a spray pressure of 40 to 60 psi.</p>

USE LIMITATIONS

- Do not apply PLUCK COTTON BOLL OPENER to immature leaves as this can result in unsatisfactory coloring, weight loss and reduced leaf quality.
- Do not allow the crop to over ripen in the field after using PLUCK COTTON BOLL OPENER, since this may cause some reduction in yield and quality.
- Do not treat before anticipated major storm which could prevent harvest and result in crop loss.
- Do not apply PLUCK COTTON BOLL OPENER if rain is expected within 4 hours.

* Do not harvest tobacco treated with PLUCK COTTON BOLL OPENER sooner than 24 days after last application.

APPLICATION TIMING

Successful results with PLUCK COTTON BOLL OPENER call for treatment when leaves are mature, not overly rank green when sprayed. To easily determine the proper treatment timing and the number of leaves per stalk ready for harvest, test spray several plants in more than one location in each field and observe the response. Mature leaves will begin to yellow in 24 to 72 hours. Test leaves that fail to yellow in 72 hours are not mature and are not ready for PLUCK COTTON BOLL OPENER treatment. Wait a few days to permit further natural maturing, then make another test spray or "maturity" check.

When you have confirmed the number of leaves per plant that will color, you can determine the number of acres to treat in order to fill the barn.

Prepare your test spray by mixing one teaspoon of PLUCK COTTON BOLL OPENER in 1 quart of water. Spray each test plant with about 1 oz of this mixture, covering all leaves with a fine mist. PLUCK COTTON BOLL OPENER will not color immature sprayed leaves.

WHEN TO HARVEST

All mature, sprayed leaves will begin to color within 24 to 72 hours after PLUCK COTTON BOLL OPENER application. The yellowing process is weather dependent; cool weather will delay, while hot, sunny weather can speed up the process. Harvest treated tobacco when leaves have reached the desired color intensity.

Do not allow tobacco to become over ripe before starting harvest. Leaf drop can occur when tobacco is over ripe and left on the stalk. If a number of the bottom leaves have yellowed at the time of treatment, they should be harvested prior to spraying with PLUCK COTTON BOLL OPENER.

With an over-the-top application, harvesting can commence 24 hours after PLUCK COTTON BOLL OPENER application depending on weather conditions or to avoid over ripe tobacco. Tobacco harvested 24 hours after treatment will require more time in the coloring phase of the curing process.

CURING PLUCK COTTON BOLL OPENER TREATED TOBACCO

Curing procedures are as much an art as a science and each cure must be judged on the basis of tobacco condition, interval between treatment and harvest, weather and type of curing facility before prescription temperature and ventilation schedules can be established. To obtain maximum quality, care must be taken to observe and control

the curing process closely, especially during the late "coloring" and early "drying" stages of the leaf.

PLUCK COTTON BOLL OPENER treated tobacco will have started the coloring process when harvested, reducing the time required in the coloring phase of curing. Treated tobacco should be dried faster. If tobacco leaves are green or contain some green when harvested, it may be necessary to color them for a few hours. If the leaves are completely yellow, temperature and ventilation must be adjusted in a manner to dry the tobacco as fast as possible without scalding. Once the leaf is dried (3/4 dry), you should follow normal procedures for curing. Since PLUCK COTTON BOLL OPENER treated leaves cure faster, treated and untreated leaves should not be cured together in the same barn.

Warranty and Disclaimer Statement

The directions for use of this product are believed to be adequate and must be followed carefully. However, it is impossible to eliminate all risks associated with the use of this product. Such risks may arise from weather conditions, soil factors, off-target movement, unconventional farming techniques, the presence of other materials, the manner of use or application, or other unknown factors, all of which are beyond the control of UPL NA Inc. ("UPL"), and can cause crop injury, injury to non-target crops or plants, ineffectiveness of the product, or other unintended consequences. To the extent consistent with applicable law, all such risks shall be assumed by the user or buyer.

UPL warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks described above, when used in accordance with the Directions for Use under normal conditions. This warranty does not extend to the use of this product contrary to label instructions or under conditions not reasonably foreseeable to UPL, and is subject to the inherent risks described above.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, UPL DISCLAIMS ALL OTHER WARRANTIES, EXPRESS OR IMPLIED, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, UPL, MANUFACTURER, AND SELLER DISCLAIM AND SHALL NOT BE LIABLE FOR ANY SPECIAL, INCIDENTAL, INDIRECT, OR CONSEQUENTIAL DAMAGES RESULTING FROM THE USE, HANDLING, APPLICATION, STORAGE, OR DISPOSAL OF THIS PRODUCT OR FOR DAMAGES IN THE NATURE OF PENALTIES, AND THE USER AND BUYER WAIVE ANY RIGHT THAT THEY MAY HAVE TO SUCH DAMAGES. NO AGENT, REPRESENTATIVE OR EMPLOYEE OF UPL IS AUTHORIZED TO MAKE ANY WARRANTY, GUARANTEE OR REPRESENTATION BEYOND THOSE CONTAINED HEREIN OR TO MODIFY THE WARRANTIES CONTAINED HEREIN. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE TOTAL LIABILITY OF UPL, MANUFACTURER, AND SELLER, SHALL BE LIMITED TO THE PURCHASE PRICE PAID, OR AT UPL'S ELECTION, THE REPLACEMENT OF THE PRODUCT.