



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

October 10, 2025

Karen Murphy
Regulatory Manager
Axion Ag Products, LLC
1880 Fall River Drive, Suite 100
Loveland, CO 80538

Subject: Label Amendment - Registration Review Mitigation for Copper Compounds
Product Name: BRITZ COPPER SULFUR 15-25 DUST
EPA Registration Number: 89167-112
Case Number: 473907
Application Dates: October 17, 2022

Dear Karen Murphy:

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 Copper Compounds 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 black ink, appearing to read "Julie R. Javier". The signature is fluid and cursive, with the first name "Julie" being the most prominent.

Julie Javier, Team Leader
Risk Mitigation and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

ENCLOSURE: Stamped label

BRITZ COPPER SULFUR 15-25 DUST

(ABN: PHT Copper Sulfur 15-25 Dust)

ACTIVE INGREDIENTS:		(% by weight)
Copper Oxychloride (CAS#1332-65-6)	18.69%
Basic Copper Sulfate (CAS#1344-73-6)	6.90%
Sulfur	25.00%
OTHER INGREDIENTS:		49.41%
TOTAL		100.0%
Copper Expressed as Metallic 15%.		

KEEP OUT OF REACH OF CHILDREN WARNING- AVISO

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

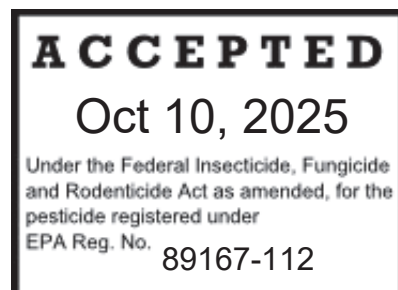
FIRST AID	
IF IN EYES	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
IF ON SKIN OR CLOTHING	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
IF SWALLOWED	<ul style="list-style-type: none"> • 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.
IF INHALED	<ul style="list-style-type: none"> • 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.
HOTLINE NUMBER	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact CHEMTREC day or night, at 1-800-424-9300 for emergency medical treatment.	

See side panel for additional precautionary statements.

For Chemical Emergency:
Spill, Leak, Fire, Exposure, or Accident,
Call CHEMTREC Day or Night
Within USA and Canada: 1-800-424-9300

EPA Reg. No.: 89167-112
EPA Est. No.:
Net Weight : _____ lb (_____ kg)

Manufactured For:
AXION AG PRODUCTS, LLC
1880 FALL RIVER DRIVE, SUITE 100
LOVELAND, CO 80538



03172020RD120624

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

WARNING: Causes substantial but temporary eye injury. Harmful if absorbed through skin. **DO NOT** get in eyes or on clothing. Avoid contact with skin.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

Mixers, loaders, applicators and other handlers must wear the following:

- long-sleeved shirt and long pants,
- waterproof gloves
- shoes plus socks and
- protective eyewear (goggles or faceshield).

USERS SAFETY REQUIREMENTS

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/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry.

Discard clothing and other absorbent material that have been drenched or heavily contaminated with the product's concentrate. **DO NOT** reuse them.

ENGINEERING CONTROLS STATEMENTS

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. Pilots must use an enclosed cab that meets the definition listed in the WPS for agricultural pesticides [40 CFR 170.305]

IMPORTANT: When reduced PPE is worn because a closed system is being used, handlers must be provided all PPE specified above for "applicators and other handlers" and have such PPE immediately available for use in an emergency, such as a spill or equipment break-down.

USER SAFETY RECOMMENDATIONS

USERS SHOULD:

- Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet.
- Remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- 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

This pesticide is toxic to fish and aquatic invertebrates and may contaminate water through runoff. This product has a potential for runoff for several months or more after application. Poorly draining soils and soils with shallow water tables are more prone to produce runoff that contains this product. Drift and runoff may be hazardous to aquatic organisms in waters adjacent to treated areas.

DO NOT apply directly to water, 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 water or rinsate.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. **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 State or Tribal agency responsible for pesticide regulation.

RESTRICTIONS

Pilots must use an enclosed cab that meets the definition listed in the WPS for agricultural pesticides [40 CFR 170.305]

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 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 (PPE) and restricted-entry interval. 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.

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, including plants, soil or water, is:

- Coveralls over long-sleeved shirt and long pants,
- Waterproof gloves
- chemical resistant footwear plus socks,
- chemical-resistant headgear if overhead exposure,
- protective eyewear and
- chemical-resistant apron when mixing, loading, cleaning equipment or spills or otherwise exposed to the concentrate.

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

MANDATORY SPRAY DRIFT MANAGEMENT

Aerial Applications

- **DO NOT** release at a height greater than 10 feet above the vegetative canopy or water, unless a greater application height is necessary for pilot safety.
- **DO NOT** apply when wind speed exceeds 15 mph at the application site. If the windspeed is greater than 10 mph, the boom length must be 65% or less of the wingspan for fixed wing aircraft and 75% or less of the rotor diameter for helicopters. Otherwise, the boom length must be 75% or less of the wingspan for fixed-wing aircraft and 90% or less of the rotor diameter for helicopters.
- Applicators must use ½ swath displacement upwind at the downwind edge of the application area.
- **DO NOT** apply during temperature inversions.

Ground Boom Applications

- Apply with the release height recommended by the manufacturer, but no more than 4 feet above the ground or crop canopy.
- **DO NOT** apply when wind speeds exceed 15 mph at the application site.
- **DO NOT** apply during temperature inversions.

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

Use the lowest boom height that is compatible with the spray nozzles that will provide uniform coverage. 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. When applying aerially to crops, do not release spray at a height greater than 10 ft. above the crop canopy, unless a greater application height is necessary for pilot safety.

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 and 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.

RESISTANCE MANAGEMENT

For resistance management this product contains a Group M1 fungicide/bactericide. Any insect population may contain individuals naturally resistant to this product and other Group M1 fungicide/bactericide. The resistant individuals may dominate the insect population if this group of insecticides are used repeatedly in the same fields. Appropriate resistance-management strategies should be followed.

To delay insecticide resistance, take the following steps:

- Rotate the use of this product or other Group M1 fungicide/bactericide within a growing season, or among growing seasons, with different groups that control the same pathogens.
- Use tank mixtures with fungicide/bactericide from a different group that are equally effective on the target pest when such use is permitted. Use at least the minimum application rate as labeled by the manufacturer.
- Adopt an integrated disease management program for fungicide/bactericide use that includes scouting, uses historical information related to pesticide use, and crop rotation, and which considers host plant resistance, impact of environmental conditions on disease development, disease thresholds, as well as cultural, biological and other chemical control practices.
- Where possible, make use of predictive disease models to effectively time fungicide/bactericide applications. Note that using predictive models alone is not sufficient to manage resistance.
- Monitor treated fungal/bacterial populations for resistance development.
- Contact your local extension specialist or certified crop advisors for any additional pesticide resistance management and/or IPM recommendations for the specific crops and pathogens.
- For further information or to report suspected resistance, contact AXION AG PRODUCTS at 844-425-8488. You can also contact your pesticide distributor or university extension specialist to report resistance.

PRECAUTION: Applications of material containing sulfur should not be made just prior to or during periods of high summer temperatures. Concord and other labrusca type grapes may be injured by sulfur. Consult your local agricultural Extension Service or Fieldman for additional information consistent with directions on this label. Apply directed amount when air is calm, using ground equipment, aircraft, or hand duster.

DO NOT MIX OR DILUTE WITH OTHER PRODUCTS. THOROUGH COVERAGE ESSENTIAL WHEN USING BRITZ COPPER SULFUR 15-25 DUST

APPLICATION RATE

GRAPES: Powdery mildew, Bunch Rots - Use 20 lb (3 lb metallic copper) per acre. Apply when berries start to touch and thereafter as needed. **BRITZ Copper Sulfur 15-25 Dust** must be applied before the disease appears.

Restrictions:

- **DO NOT** apply more than 20 lb/A (3 lb metallic copper) in a single application.
- **DO NOT** apply more than 133.3 lb/A (20 lb metallic copper) of **BRITZ Copper Sulfur 15-25 Dust** per year.
- Minimum Retreatment Interval (RTI) = 3 days.

STORAGE AND DISPOSAL

PESTICIDE STORAGE: Keep out of reach of children and animals. Store in original container only. Store in a cool, dry place and avoid excess heat. **DO NOT** contaminate other pesticides, fertilizers, water, food, or feed by storage or disposal.

IN CASE OF SPILL: Avoid contact, isolate area and keep out animals and unprotected persons. Confine spills. Call **CHEMTREC 1-800-424-9300**.

TO CONFINE SPILL: If dry material, cover to prevent dispersal. Place damaged package in a holding container. Identify contents.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Nonrefillable container. **DO NOT** reuse or refill this container. Offer for recycling, if available. Completely empty bag into application equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or, if allowed by State and local authorities, by burning. If burned, stay out of smoke.

FOR MINOR SPILLS, LEAKS, ETC.: Follow all precautions indicated on this label and clean up immediately. Take special care to avoid contamination of equipment and facilities during cleanup procedures and disposal of waste. In the event of a major spill, fire or emergency, call **CHEMTREC** at **1-800-424-9300** day or night.

CONDITIONS OF SALE AND WARRANTY

CONDITIONS OF SALE: 1. To the extent consistent with applicable law, BRITZ-SIMPLOT GROWER SOLUTIONS LLC warrants that this material conforms to the chemical description on the label and is reasonably fit for use as directed hereon. BRITZ-SIMPLOT GROWER SOLUTIONS LLC neither makes, nor authorizes any agent or representative to make, any other warranty of FITNESS or of MERCHANTABILITY, guarantee or representation, expressed or implied, concerning this material.

2. To the extent consistent with applicable law, critical and unforeseeable factors beyond the control of BRITZ-SIMPLOT GROWER SOLUTIONS LLC prevent it from eliminating all risk in connection with the use of chemicals. Such risks include, but are not limited to, damage to plants, and crops to which the material is applied, lack of complete control, and damage caused by drift to other plants or crops. Such risks occur even though the product is reasonably fit for the uses stated hereon and even though label directions are followed. Buyer and user acknowledge and assume all risks and liability (except those assumed by BRITZ-SIMPLOT GROWER SOLUTIONS LLC under 1 above) resulting from handling, storage, and use of this material.