

To Whom It May Concern:

This business consists of 32 acres planted in mango, lychee and other tropical fruit trees and a nursery in which we produce these plants. My wife has been described as a "world-class" plant propagator due to her innovations in grafting, etc.

We have been involved in some part of this business since 1972

One of our difficulties is that of finding a pesticide labeled for our trees and, of course, one that we can recommend to our customers as they often request.

In May of 2003, we were made aware of a product, (Biodegradeable Soap).

a salesman for the company, showed us pictures of a mango tree that he had washed with the product. We were impressed with the results. He furnished us a sample and we set in motion a test of the product.

I started at a ratio of 100:1, (1 qt. to 25 gallons of water). The first thing I noticed was that the spray-rig I was using was cleansed of the "caked-on" residue of 12 years of usage. Gun, pump, hoses, tank and screens were all cleaned. They looked like new.

The first trees targeted were several mango trees literally covered in scale, fungi, etc. They were all washed at 100:1 on a Sunday in May, 2003. They were washed at 400:1 on the following Sunday.

On the following Wednesday, I examined these trees and noted that most of the scale I was targeting was dead but still clinging to the trees. The following Sunday, I increased the pressure on my rig and observed that the scale literally "rained" from the trees.

Since some organic products have warnings against applying their products on certain plants, we deliberately placed plants of these types in "harms way" Up to this time, we have encountered no toxic reaction on any plants that we have exposed to this product.

We believe that 100:1 is stronger than our needs require so we have established the 'base-line' of 200:1 initial application and move to 400:1 after initial application. If control of the pest involved does not meet ones needs, try 150:1 or 100:1 and then move to 300:1 or 400:1 as a "maintainace" wash for 3 to 5 washings at an interval of 5 to 7 days.

We observe the following:

1. Pests controlled/eliminated:

- a. Mealy Bugs
- b. Soft green scale.
- c. Torpedo scale.
- d. False oleander scale.
- e. Mites- red and 2 spotted.
- f. Anthracnose.
- g. Powdery mildew.
- i.. Alternaria.

2. Plants involved:

- a. Gardenia.
- b. Roses.
- c. Crown of Thorns.
- d. Jamaican poinsettia.
- e. Orchids.

These are the "pets" of my wife and are not grown for resale. We are attaching a list of the plants that are grown in our nursery for resale.

After several washings, our plants were greener, fuller and growth rates in some cases were spectacular. For example, in October of 2003, most of our persimmons were shedding their leaves, preparing for dormancy. The plants getting the overspray from some mangos we were washing put on new leaves- clean and dark green and began to grow. Later with the cold weather they did lose their leaves and go dormant for the winter. But in a very brief time, they outgrew the other persimmons 200-300%. Roses put on stems 22 to 29 inches long with large unblemished flowers and leaves..

We feel certain that each crop will need a base-line established for control of the target problem of the plant type involved.

We are aware of rates as low as 1000:1 and as high as 5:1 with partial control for low rates and no toxic reactions on the high rates. We do not apply the soap in the heat of the day. We prefer late afternoon.

Additionally, we use this product to wash pots & trays, greenhouses, seeds, budwood, rootstocks, knives, clippers, etc.

In the case of seed and planting trays, etc., we have experienced little, if any, damp off of seedlings since we started cleaning the greenhouse and seedlings with a 400:1 mixture of the product.

We normally expect a certain percentage of plant loss due to pythium, rizoctonia, phytophthora, etc. Now the seed trays are so full they look like turf.

Since the grafting process is a "surgical" procedure we are very sensitive to clean working conditions. We now wash hands, tools, budwood, rootstocks, etc with this product. Percentage of successful grafts remains very high.

In conclusion, we still consider the testing of this product to be a "work in progress" at our facility.

	1 Gal.	2-3 Gal.	5-7 Gal.	10 Gal.	25 Gal.	45 Gal.	65 Gal.	95 Gal.
Allspice		15.00	30.00	60.00	150.00			
Ambarella		16.00	30.00	60.00				
Anise		15.00	30.00	60.00				
Apples		15.00	30.00					
Atemoya		25.00	45.00	75.00	150.00	250.00	350.00	500.00
Avocado		20.00	40.00	75.00	150.00	250.00	350.00	500.00
Barbados Cherry		15.00	30.00	65.00				
Bayleaf		16.00	35.00	65.00	150.00			
Bayrum		20.00	40.00	75.00	150.00			
Black Sapote		20.00	40.00	75.00	150.00			
Cacao		20.00	40.00	65.00	150.00			
Cherry of the Rio Grande		15.00	30.00	65.00	150.00			
Caimito		20.00	40.00	75.00	150.00			
Canistel		20.00	40.00	75.00	150.00			
Carambola		20.00	40.00	75.00	150.00			
Cashew		20.00	40.00	75.00	150.00			
Cinnamon		20.00	40.00	75.00	150.00			
Custard Apple		25.00	45.00	75.00	150.00			
Fig		15.00	30.00	75.00				
Grapes		12.00						
Grumichama		15.00	30.00	65.00	150.00			
Guava		20.00	35.00	75.00				
Ilama		25.00	45.00	75.00	150.00			
Jaboticaba		20.00	40.00	85.00	250.00	450.00	800.00	
Jack Fruit		20.00	40.00	75.00	150.00	250.00	500.00	
Jujube		25.00	45.00					
Longan		20.00	40.00	75.00	150.00	250.00	500.00	
Loquat		20.00	40.00	75.00	150.00			
Lychee - Standard		20.00	40.00	75.00	150.00	250.00	500.00	
Lychee - Special		25.00	50.00	85.00	175.00	275.00	550.00	
Macadamia Nut		20.00	40.00	75.00	150.00			
Malabar Chestnut		15.00	30.00	65.00				
Malay Apple		20.00	40.00	75.00	150.00			
Mamey Sapote		25.00	45.00	75.00	150.00	250.00	500.00	
Mango		25.00	45.00	75.00	150.00	250.00	500.00	
Miracle Fruit	10.00	20.00	40.00					
Monstera Deliciosa		20.00						
Mulberry		15.00	30.00	65.00				
Muntingia		12.00	25.00					
Nectarine		15.00	30.00					
Otaheite Gooseberry		15.00	30.00					
Passion Fruit		12.00	25.00					
Peach		15.00	30.00					
Pear		15.00	30.00					
Persimmon		18.00	35.00					
Pitomba		15.00	30.00					
Plum		15.00	30.00					
Pomegranite		15.00	30.00	65.00	150.00			
Rose Apple		15.00	30.00	65.00	150.00			
Sapodilla		30.00	50.00	80.00	200.00	350.00		
Sour Sop		20.00	40.00	75.00	150.00			
Sugar Apple		15.00	30.00	75.00	150.00			
Surinam Cherry		10.00	25.00					
Tamarind		15.00	30.00	65.00	150.00			
Vanilla Orchid	10.00							
Wax Jambu		15.00	30.00		150.00			
White Sapote		20.00	40.00	75.00	150.00			