



April 13, 2007

Re: The Scotts Miracle-Gro Company Environmental Stewardship Program

Dear Florida Environmental Stakeholder,

The Scotts Miracle-Gro Company (SMG) has the largest and most comprehensive consumer based, do-it-yourself focused Lawn and Garden Research and Development (R&D) program in the world. Established in 1941, SMG R&D covers the disciplines of agronomy, horticulture, entomology, plant breeding, formulation, process development, packaging, and applicator development with state of the art facilities. The lawn and garden products we produce are some of the most tested and well-understood consumer products. We have three field stations strategically located over the United States, which are representative of the climates that our products are sold. Scotts has operated a research field station in the state of Florida since 1968 (located just outside of Orlando in Apopka). This facility conducts research specific to the needs of Florida and other southern lawns.

The focal point of SMG R&D efforts has always been on continuous product improvement and innovation. SMG strives to optimize products for a) consumer performance (meet consumer needs and expectations), b) economics, and c) environmental factors (gain healthy benefits of turf: reduced run-off and soil erosion, while reducing off-target application and impact). As such, today's Florida products are significantly different than those of 30 or more years ago. For example, nitrogen rates have been reduced by up to 25% versus similar products from the 1960s and early 70s, and phosphorus application rates have been reduced in excess of 70%, based on test results of optimization efforts using new technology and delivery methods.

SMG consumer research and market share data (when considering all 50 states) shows roughly half of all households apply lawn fertilizers and of those that do treat their lawn, 84% of the behavior is one or two applications a year. The data shows less than four percent of homeowners apply four applications per year. Florida sales data confirms Florida as typical of national usage data. Generally, university best management practices for turf grass are based on highly managed turf (golf courses, sports fields and lawn care serviced home lawns) that receive multiple nutrient applications throughout the year. This means that typical Florida homeowners using fertilizer are applying nitrogen and phosphorus at application rates that are well below (50 to 70% below) best management practices as stated by universities. The high nutrient management terms do not apply to the typical homeowner who only applies fertilizer one or two times per year.

If Florida homeowner best management practices are based on university high nutrient management assumptions (three to five applications per year), the resulting mismatch will lead to homeowner dissatisfaction and may actually encourage off-label actions (homeowner directed higher application rates). This a non-virtuous cycle and one we strive to avoid. SMG has an objective of encouraging homeowners to follow label directions to get the best results, instilling a virtuous cycle that supports further product improvements and innovations based on the best available science. We strive to incorporate good

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environmental stewardship principles in product design and effectively communicate use instructions and appropriate consumer behavior. Any recommended action that is not clear and actionable by homeowners is not sustainable.

SMG wants to partner on implementing enhancements and on communications that will make a difference in our communities and promote good environmental stewardship. It is imperative to identify those actions that will yield positive results and be actionable/sustainable by homeowners (support the virtuous product use cycle). These could include:

- a) Eliminating the use of non-turf analysis products (the 12-12-12 and 10-10-10 products commonly identified as all purpose lawn and garden but almost exclusively used on lawns. They deliver more phosphorus than all other do it yourself products combined (excluding Starter type products for newly seeded/sodded lawns). Research has defined optimal nutrient levels for turf establishment and maintenance to deliver the benefits (reduced run-off and soil erosion) of a healthy lawn and this should be the basis for product recommendations.
- b) Off-target application to hard surfaces is the primary means of nutrient flow under typical homeowner circumstances (supported by field research) and should be addressed on the product label and through the use of application devices. Consumer communication must be clear, consistent and actionable.
- c) Help consumers pick the correct product for their need and apply at the correct time of year. Following the directions is a key component of the communication.

SMG is a resource and willing partner for information, recommendations, and follow-up action. We are committed to providing products that meet consumer needs, provide optimal environmental benefit, and minimize off-target impacts. We embrace continuous improvement but require flexibility in product formulation to develop the best design for consumers. Effective communication with consumers and stakeholders is an important part of our stewardship agenda. Please contact us to develop a partnership that promotes good environmental stewardship.

Sincerely,

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Environmental Stewardship Message On Every Bag Of Scotts Lawn Products

A horizontal banner with a yellow top bar and a light blue background. On the left, the text "Scotts & Your Environment" is written in green, with two green chevrons pointing right. In the center is a green tree with a white oval containing the word "Scotts" in green. On the right, there are three sections of text in green and black.

Scotts & Your Environment >>



We care.
Scotts products are designed with care to grow thicker, greener lawns.

Because green is good.
A healthy lawn cleans the air, produces oxygen and prevents runoff and soil erosion.

You can make a difference.
Help keep our water resources clean. Apply this product only to your lawn, and sweep up any product that lands in the driveway, sidewalk or street back on to your lawn.