

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

September 22, 2022

Ms. Mandy Slack Sr. Analyst, Regulatory Affairs The Scotts Company d/b/a The Ortho Group P.O. Box 190 Marysville, Ohio 43040

Subject: Non-PRIA (Pesticide Registration Improvement Act) Labeling Amendment – Adding

directions for new mini flexi packaging and associated claims; updating warranty

statement; adding graphics Product Name: GC 2762

EPA Registration Number: 239-2777 EPA Application Date: 07/14/2022 Action Case Number: 00379016

Dear Ms. Slack:

The amended labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), as amended, is acceptable.

This approval does not affect any terms or conditions that were previously imposed on this registration. You continue to be subject to existing terms or conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one (1) copy of the final printed labeling before you release this 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 18 months from the date of this letter. After 18 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.

Should you wish to add/retain a reference to your company's website on your label, then please be aware that the website becomes labeling under FIFRA and is subject to review by the U.S. Environmental Protection Agency (EPA). If the website is false or misleading, the product will be considered to be misbranded and sale or distribution of the product is unlawful under FIFRA section 12(a)(1)(E). 40 CFR § 156.10(a)(5) lists examples of statements the 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 EPA find or if it is brought to our attention that a website contains statements or claims substantially differing from statements or claims made in connection with obtaining a FIFRA section 3 registration, the website will be referred to the EPA's Office of Enforcement and Compliance Assurance.

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Your release for shipment of this product constitutes acceptance of these terms. If these terms are not complied with, this registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions, please contact Nina Naimy via email at naimy.nina@epa.gov.

Sincerely,

James Parker, Team Leader Biochemical Pesticides Branch Biopesticides and Pollution Prevention Division (7511M) Office of Pesticide Programs

Enclosure

**Bold, italicized text is information for the reader and is not part of the label.** [Bracketed information is optional text]. Text separated by / denotes and/or options.

ACCEPTED

Sep 22, 2022

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 239-2777

GC 2762

#### **Alternate Brand Name:**

Ortho GroundClear Year Long Vegetation Killer<sub>2</sub>

#### **ACTIVE INGREDIENTS:**

Imazapyr, isopropylamine salt	0.47%
Pelargonic Acid	5.00%
OTHER INGREDIENTS:	94.53%
TOTAL:	100.00%

## THIS PRODUCT CONTAINS:

0.033 lb imazapyr acid equivalent per gallon or 0.38% 0.417 lb pelargonic acid per gallon

## KEEP OUT OF REACH OF CHILDREN

## **WARNING**

See [back] [side] [other] [panel] [booklet] for additional precautionary statements.

**NET CONTENTS**: 8 fl oz / 236 mL / 16 fl oz (1 PT) 473 mL /[ 32 fl oz (1 QT) / 946 mL] / [1 gal / (3.79 L)] / [2 gal (7.57 L)]

When sold as a multi-dose pack unit: 2 x 12 fl oz pouch/container [applicator name] 24 fl oz (710 mL) / pouch/container [applicator name]

When sold as a kit: 12 fl oz (355 mL) pouch/container [applicator name &/+ 1 Refillable Bottle/container [brand name] / pouch/container [applicator name] &/+ 1 Refillable bottle/container[brand name]

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## PRECAUTIONARY STATEMENTS

#### HAZARDS TO HUMANS & DOMESTIC ANIMALS

**WARNING:** Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Wear goggles. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove and wash contaminated clothing before reuse.

## **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 first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-877-465-5161 for emergency medical treatment information.

#### **ENVIRONMENTAL HAZARDS:**

This product is toxic to plants. Drift and run-off may be hazardous to plants in water adjacent to treated areas. To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow pesticide off the treatment area. Rinsing application equipment over the treated area will help to avoid run off to water bodies or drainage systems.

#### **DIRECTIONS FOR USE:**

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

#### Restrictions

- DO NOT apply this product in a way that will contact any person, pet, either directly or through drift.
- Keep people and pets out of the area during application.
- **DO NOT** use on lawns, on or around fruits, vegetables, flowers, shrubs, trees, or over the root zone of shrubs or trees.
- **DO NOT** apply over their root systems. For shrubs and trees, **DO NOT** apply closer than twice the distance from the trunk to the drip line as roots may be within this area.
- **DO NOT** apply to slopes as movement on soil surface may damage desirable plants down the slope.
- DO NOT apply next to fence if desirable plants are growing on the other side or if future planting is intended.
- **DO NOT** use before planting lawns, fruits, vegetables, flowers, or other plants because GC 2762/this/the product remains active in soil for up to one year.
- The maximum single application rate is 24 fl oz per 300 sq ft (0.9 lb imazapyr acid equivalent and 12.1 lb pelargonic acid per acre per application).
- The maximum number of applications is limited to 1 per year (0.9 lb imazapyr acid equivalent and 12.1 lb pelargonic acid per acre per year).
- The maximum yearly application rate is 24 fl oz per 300 sq ft (0.9 lb imazapyr acid equivalent and 12.1 lb pelargonic acid per acre per application).





## HOW IT WORKS/PRODUCT INFORMATION

• GC 2762/this/the product kills existing vegetation [weeds/[grass(es)]/[and/and all/&]/[vegetation] and prevents/[blocks][controls]/[stops] regrowth for up to 1 year.

#### WHERE TO APPLY/USE:

- Apply GC 2762/this/the product only where no vegetation is desired for at least a year.
- Use on driveways, sidewalks, fence lines, paver patios, walkways, gravel areas, rock and desert landscapes, under decks, parking areas, and along fences and curbs.

## Note to PM: the following is alternative text to the previous bullet point.

• [Use where no plant growth is wanted for at least a year on driveways, sidewalks, fence lines, paver patios, walkways, gravel areas, parking areas, and other hardscapes.]

#### **HOW MUCH TO USE/APPLY:**

 Add 24 fl oz of product per 1 gallon of water to treat up to 300 sq ft (or 0.9 lb imazapyr ae/acre, and 12.1 lb pelargonic acid/acre).

#### WHEN TO APPLY/USE:

- Water the day before application if soil is dry.
- Apply to bare ground or when weeds are [present] [actively growing].
- If weeds are taller than 6 inches, mow or cut down [weeds] and remove debris before treatment.
- For best results, apply [on a sunny day] with/when temperatures are above 60°F.
- To prevent the growth of listed weeds [under patios/ asphalt driveways/ tennis courts/play areas/ and parking areas], apply before laying surfacing materials.
- Apply only to areas where no vegetation growth is wanted for up to 1 year.
- In heavy clay soil, plant growth may be prevented for more than one year.
- In areas of heavy rainfall, applications every 6 to 8 months may be necessary.
- If weeds re-grow in treated areas, it is advised that these weeds be spot treated with NNS 79766 Note to PM: EPA Reg. No. 91161-1 is an RTU that contains ammonium nonanoate.

#### **HOW TO USE:**

#### Tank Sprayer

[Applicator (Device)(Applicator Name) Directions/Instructions]

- Add 24 fl oz of product per 1 gallon of water. This rate will apply 0.9 lb imazapyr ae/acre, and 12.1 lb pelargonic acid per acre.
- Apply to places where vegetation is not desired; do not attempt to treat more than 300 sq ft.
- Allow to soak into ground, avoiding runoff to nearby desirable plants.

#### Important:

To prevent sprayer from clogging, always clean after use, as directed.

Bold, italicized text is information for the reader and is not part of the label. [Bracketed information is optional text]. Text separated by / denotes and/or options.

## STORAGE AND DISPOSAL

**PESTICIDE STORAGE:** Store product in original container in a safe place. Protect from freezing. **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 disposal agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

## **End of the Concentrate Section**

## Dose Pack and Dose Pack + Applicator (Kit)

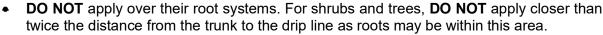
Note to PM: the text below will appear in a pullout accordion label or an insert/booklet label.

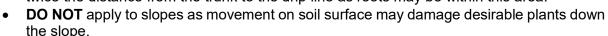
#### DIRECTIONS FOR USE

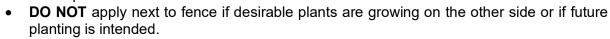
It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

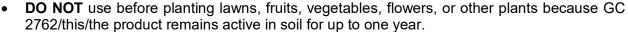
#### Restrictions

- DO NOT apply this product in a way that will contact any person, pet, either directly or through drift.
- Keep people and pets out of the area during application.
- **DO NOT** use on lawns, on or around fruits, vegetables, flowers, shrubs, trees, or over the root zone of shrubs or trees.









- The maximum single application rate is 24 fl oz per 300 sq ft (0.9 lb imazapyr acid equivalent and 12.1 lb pelargonic acid per acre per application).
- The maximum number of applications is limited to 1 per year (0.9 lb imazapyr acid equivalent and 12.1 lb pelargonic acid per acre per year).
- The maximum yearly application rate is 24 fl oz per 300 sq ft (0.9 lb imazapyr acid equivalent and 12.1 lb pelargonic acid per acre per application).

#### HOW IT WORKS/PRODUCT INFORMATION

GC 2762/this/the product kills existing vegetation [weeds/[grass(es)]/[and/and all/&]/[vegetation] and prevents/[blocks][controls]/[stops] regrowth for up to 1 year.

## WHERE TO APPLY/USE:

- Apply GC 2762/this/the product only where no vegetation is desired for at least a year.
- Use on driveways, sidewalks, fence lines, paver patios, walkways, gravel areas, rock and desert landscapes, under decks, parking areas, and along fences and curbs.

## Note to PM: the following is alternative text to the previous bullet point.

• [Use where no plant growth is wanted for at least a year on driveways, sidewalks, fence lines, paver patios, walkways, gravel areas, parking areas, and other hardscapes.]

#### **HOW MUCH TO USE/APPLY:**

• Add 24 fl oz of product per 1 gallon of water to treat up to 300 sq ft (or 0.9 lb imazapyr ae/acre, and 12.1 lb pelargonic acid/acre).

## WHEN TO APPLY/USE:

- Water the day before application if soil is dry.
- Apply to bare ground or when weeds are [present] [actively growing].
- If weeds are taller than 6 inches, mow or cut down [weeds] and remove debris before treatment.





- For best results, apply [on a sunny day] with/when temperatures are above 60°F.
- To prevent the growth of listed weeds [under patios/ asphalt driveways/ tennis courts/play areas/ and parking areas], apply before laying surfacing materials.
- Apply only to areas where no vegetation growth is wanted for up to 1 year.
- In heavy clay soil, plant growth may be prevented for more than one year.
- In areas of heavy rainfall, applications every 6 to 8 months may be necessary.
- If weeds re-grow in treated areas, it is advised that these weeds be spot treated with NNS 79766 Note to PM: EPA Reg. No. 91161-1 is an RTU that contains ammonium nonanoate.

## HOW TO MIX /HOW TO DILUTE/ HOW TO USE:

# Alternate Mixing Instructions for Single-Dose Packaging [Single-Dose Pouch] – ½ gallon dilution

- 1. Unscrew cap from concentrate package/bottle/container/pouch and empty entire concentrate package/bottle/container/pouch into a [reusable] [Ortho] bottle/container [applicator name] or tank sprayer.
- 2. Fill bottle/container [brand name] or tank sprayer with [52 (fl oz)] of water.
- 3. Securely screw cap or top onto bottle/container [brand name] or tank sprayer.
- **4.** No shaking or agitation is required.
- **5.** Spray weeds [and/or] [weed prone area] using [chosen applicator/bottle/container [brand name]]. One half/½ gallon covers up to 150 sq ft.

[Follow all recommendations on the applicator used to apply this product.]

#### OR

## [Two, Single-Dose Pouch] – 1 gallon dilution

- 1. Unscrew cap from two concentrate packages/bottles/containers/pouches and empty both concentrate packages/bottles/containers/pouches into a [reusable] [Ortho] bottle/container [applicator name] or tank sprayer.
- 2. Fill bottle/container [brand name] or tank sprayer with [6.5 pints] [(104 fl oz)] of water.
- 3. Securely screw cap or top onto bottle/container [brand name] or tank sprayer.
- **4.** No shaking or agitation is required.
- **5.** Spray weeds [and/or] [weed prone area] [using chosen applicator/bottle/container [brand name]]. One/1 gallon covers up to 300 sq ft.

[Follow all recommendations on the applicator used to apply this product.]

#### STORAGE AND /& DISPOSAL

**PESTICIDE STORAGE:** Store product in original container in a safe place. Protect from freezing.

#### Note to PM: for Non-refillable Containers:

**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.

#### Note to PM: for Refillable Containers:

**PESTICIDE DISPOSAL AND/& CONTAINER HANDLING:** [Dose Pack/bottle/container.] Refillable container. [Refill this container with dose pack/product name only. Do not reuse this container for any other purpose.] **AND/OR If empty:** Place in trash or offer for recycling if available. [Follow instructions in the Dose Cap Concentrate/Product Name Directions section when reusing/refilling this bottle/container.]

#### Note to PM: for Non-refillable Containers and Refillable containers:

**If partly filled:** Call your local solid waste disposal agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

## End of pamphlet / insert directions.

Note to PM: optional text for the reusable bottle (when the bottle and dose pack are sold as a kit):

## [How to Clean the Reusable Bottle/Container]

[Prior to cleaning the bottle/container any unused product must be disposed of according to Storage & Disposal]











- 1. Fill the [brand name] bottle/container with at least 1 quart of ¼ full ]with [clean tap] water and replace the spray head/trigger sprayer/twist cap/flip cap with dip tube.
- 2. Gently shake the [brand name] bottle/container to rinse.
- 3. Empty the contents by spraying onto [the] treated area.
- 4. Repeat steps 1-3 two more times until the bottle/container and spray head/trigger sprayer/twist cap/flip cap with dip tube are clean.
- 5. DO NOT THROW AWAY. Store empty [brand name] bottle/container for reuse with additional Dose Pack/Product Name.

#### OR

[Refer to applicator label/manual for additional clean out information.]

## End of Container/Bottle Label

**Bold, italicized text is information for the reader and is not part of the label.** [Bracketed information is optional text]. Text separated by / denotes and/or options.

Note to PM: optional text when a dedicated bottle is provided for initial point of sale. Bottle is not included with Dose Pack only offering for refilling the provided bottle.

## Secondary Container/Bottle Label

[Use Solution/Dilution of]

## GC 2762/Brand Name[Bottle]

When diluted according to GC 2762/Product Name Directions for Use the resultant formula contains:

#### **ACTIVE INGREDIENTS:**

Imazapyr, isopropylamine s	alt	0.0880%
Pelargonic Acid		0.9375%
OTHER INGREDIENTS:		98.9745%
TOTAL:	1	100.0000%

#### THIS PRODUCT CONTAINS:

0.006 lb imazapyr acid equivalent per gallon or 0.071% 0.078 lb pelargonic acid per gallon

## KEEP OUT OF REACH OF CHILDREN WARNING

See accompanying label for Directions for Use.

Note to PM: optional marketing claims may be added to the bottle (e.g. reusable bottle).

Follow Directions for Use on the enclosed pamphlet/label/leaflet.

OR

See accompanying label for Directions for Use.

[FOR USE ONLY WITH Dose Pack FOR NNS 8766314]

[Best if diluted product is used within [30/X days **OR** 4/X weeks **OR** 1/X months.]

[This bottle/container holds up to xx fl oz (xx ml)] [NOT FOR RESALE]

Sold by: The Ortho Group P.O. Box 190 Marysville, OH 43040

End of Secondary Container/Bottle Label

End Dose Pack and Dose Pack + Kit label

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## Individual unit label

## GC 2762

## **ACTIVE INGREDIENTS:**

Imazapyr, isopropylamine salt	0.47%
Pelargonic Acid	5.00%
OTHER INGREDIENTS:	94.53%
TOTAL:	100.00%

### THIS PRODUCT CONTAINS:

0.033 lb imazapyr acid equivalent per gallon or 0.38% 0.417 lb pelargonic acid per gallon

## **KEEP OUT OF REACH OF CHILDREN**

#### WARNING

See accompanying label for Directions for Use.

EPA Reg. No. 239-2777 Sold by: The Ortho Group

EPA Est. No. XXXXXX P.O. Box 190

[Superscript is first letter of lot number.] Marysville, OH 43040

**NET CONTENTS**: 12 fl oz (355 mL)

End of individual unit label.

## **Optional Marketing Claims**

The following Product Facts format is optional and the information may appear inside or outside of a box.

## **IPRODUCT FACTS:1**

[What It Does:] Kills [unwanted] weeds, grasses & plants.

[Where to Use:] On driveways, sidewalks, fence lines, paver patios, walkways, gravel areas, rock and desert landscapes, under decks, parking areas, and along fences and curbs where no [weeds/[grass(es)]/[and/and all/&]/[vegetation] is desired.

[When to Use:] Apply when weeds are [present][actively growing]. For best results, apply on a sunny day with temperatures above 60°F. Apply only to areas where no vegetation growth is wanted for up to 1 year.

Questions and/&/or Comments: 
Questions and/&/or Comments:



Call 1-800-225-2883 or [Visit] [our Website at www.]ortho.com

## **Efficacy Claims**

- 1. Kills/Eliminates weeds/grasses and [all/&]vegetation for up to 1 year/1 YR/12 months/52 weeks/365 days
- 2. Kills/Eliminates weeds/grasses and [all/&]vegetation
- 3. Kills/Eliminates weeds/grasses and [all/&]vegetation and prevents regrowth for up to 1 year/1 YR/12 months/52 weeks/365 days
- 4. Kills/Eliminates weeds/grasses and [all/&]vegetation and prevents regrowth
- Continuous/Residual weed/grass/vegetation preventer/blocker/barrier/shield for up to 1 year/1 YR/12 months/52 weeks/365 days
- 6. Continuous/Residual weed/grass/vegetation preventer/blocker/barrier/shield
- 7. Kills and/& prevents [weeds] for up to 1/one YR/year
- 8. Kills and/& prevents
- 9. Prevents/Blocks/Controls weeds/grasses and [all/&]/vegetation for up to 1 year/1 YR/12 months/52 weeks/365 days
- 10. Prevents/blocks/controls/stops new growth for up to 1 year/1 YR/ 12 months/52 weeks/365
- 11. Prevents/blocks/controls weeds/grasses and [all/&]/vegetation
- 12. Keeps killing weeds for up to 1 year/1 YR/ 12 months/52 weeks/365 days
- 13. Kills existing weeds & prevents new ones for up to 1 year/1 YR/12 months/52 weeks/365 days
- 14. Kills weeds you see and/& ones you don't [see]
- 15. Kills weeds/grasses and [all/&]/vegetation to the roots<sup>†</sup>
- 16. Kills [tough] weeds to the root(s) †
- 17. Kills the toughest weeds guaranteed<sup>†</sup>
- 18. Kills the root\* [guaranteed †]
- 19. Kills existing [tough] weeds to the root guaranteed<sup>†</sup>
- 20. Kills weeds/grasses/and [all/&]/vegetation guaranteed] †
- 21. Kills existing weeds and germinating seeds
- 22. [Guaranteed<sup>†</sup> to] kill(s) tough weeds to the root(s)\*
- 23. [Guaranteed<sup>†</sup> to] kill(s) the toughest weeds\*

**Bold, italicized text is information for the reader and is not part of the label.** [Bracketed information is optional text]. Text separated by / denotes and/or options.

- 24. [Guaranteed<sup>†</sup> to] kill(s) the root\*
- 25. [Guaranteed<sup>†</sup> to] kill(s) existing [tough] weeds to the root<sup>†</sup>
- 26. [Guaranteed<sup>†</sup> to kill weeds<sup>†</sup>
- 27. Guaranteed] † Kill
- 28. Guaranteed<sup>†</sup> results or your money back
- 29. Money back guarantee
- 30. Guaranteed<sup>†</sup> results
- 31. Satisfaction guaranteed or your money back]
- 32. Up to 1 year/ 1 YR control
- 33. Up to 1 year/1 YR (extended) weeds/[grass(es)]/[and/and all/&]/[vegetation] control
- 34. Ortho's most powerful weed killer
- 35. Weed control made easy
- 36. For outdoor use
- 37. Weed free [worry free]
- 38. Weed free/no weeds for up to 1 year/1 YR/12 months/52 weeks/365 days [with GC 2762]
- 39. One application is a year-long vacation from weeds
- 40. [GC 2762] send weeds on vacation with one application
- 41. Stops weeds [and grasses] from growing for up to 1-year/1 YR
- 42. Up to 1 year/ 1 YR weed and grass control
- 43. [Up to 1 year/1 YR] long-lasting [weed and grass control]
- 44. Works for up to 1-year/1 YR
- 45. It kills weeds and prevents any re-growth for up to one/1 full year/YR with a single application
- 46. Keeps prevents weeds and grasses from growing in cracks [and joints] in sidewalks, driveways and patios
- 47. Keeps weeds from growing [for up to 1 year/1 YR/12 months/52 weeks/365 days]
- 48. [GC 2762] works two ways
- 49. One and Done
- 50. Provides long-term weed [and grass] control
- 51. Untreated, Treated Note to PM: image below can also be used for the "untreated/treated" claim
- 52. Before, After

\*when used as directed



## Formula Claims

Note to PM: Claims 52-53 may appear on any label panel for 6 months after the product is first sold or distributed.

- 53. New
- 54. New/Now
- 55. CONCENTRATE

## Weather & Speed

- 56. Visible Results in 3 Hours/3 HRS
- 57. Visible results in 3 hours/ 3 HRS, works for 1 year/1 YR/12 months/52 weeks/365 days
- 58. Fast acting
- 59. Visible Results in Hours/HRS
- 60. Fast acting formula works in 3 hours/ 3 HRS

**Bold, italicized text is information for the reader and is not part of the label.** [Bracketed information is optional text]. Text separated by / denotes and/or options.

- 61. Fast acting formula starts working immediately
- 62. Starts Working Immediately
- 63. Rainproof in 1 hour/1 HR
- 64. Control won't wash away after 1 hour/ 1 HR
- 65. [You will see] Weeds wilt/turn brown in 3 hours/ 3 HRS
- 66. Turns weeds brown in 3 hours/ 3 HRS
- 67. Same day Results
- 68. Begins working in hours
- 69. See browning in 3 hours/ 3 HRS
- 70. Fast weed killer
- 71. Weeds start dying by/on contact
- 72. Kills by/on contact
- 73. Starts killing by/on contact
- 74. Knocks weeds down in 3 hours/ 3 HRS
- 75. Results in/Starts working in/Starts to kill in/Visible [See] Results in/Weeds [and Grasses] start dying in/Works to the root[s] in 3 hours/ 3 HRS
- 76. Same Day [Visible] Results
- 77. Speedy Results
- 78. Rainproof in hours [so you don't have to re-spray]
- 79. Speed you can trust

#### Location

- 80. Apply to/for use on driveways/sidewalks/fence lines/paver patios/walkways/gravel areas/rock [and/&] desert landscapes/under decks/parking areas/cleared dirt/sandy areas/hardscapes [and] along fences [and curbs].
- 81. Apply to/for use on driveways/sidewalks/fence lines/paver patios/walkways/gravel areas/rock [and/&] desert landscapes/under decks/parking areas/cleared dirt/sandy areas]/[hardscapes] [and] [along fences (and curbs)].to kill/eliminate weeds/grasses and/& [all] vegetation and prevent/block control weeds/grasses and/& [all] vegetation
- 82. Use on driveways [and patios] to kill [and prevent] weeds [for up to 1-year]
- 83. Use on driveways, sidewalks, patios, brick walks, gravel paths, fence lines to prevent weed growth [weeds from growing].

#### **Promotional options**

- 84. Great Value
- 85. Value/Bonus [pack/size/buy/pak]
- 86. Club/Combo [pack/size/buy/pak]
- 87. X bottles [included]
- 88. Not for individual sale

#### Other

- 89. Building a new [paver] patio? Use GC 2762 to kill/eliminate and prevent/block/control weeds/grasses and/& [all]/vegetation [for up to 1 year/12 months/52 weeks/365 days]
- 90. Building a new [paver] patio? (Use GC 2762 for year-long control)
- 91. Don't let weeds ruin your driveways / sidewalks / fence lines /paver patios/ walkways/ gravel areas/ rock [and/&] desert landscapes/ [under decks/ parking areas / cleared dirt/ sandy areas /hardscapes [and] along fences [and curbs]. GC 2762 kills / eliminates and prevents/blocks/controls weeds/grasses[and/& [all] vegetation] [for up to 1 year/1 YR/12 months/52 weeks/365 days]

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- 92. [Perfect to] keep your paver/patio weed-free
- 93. Relax with no weeds for a year
- 94. Enjoy a weed-free patio
- 95. For all your Outdoor Weed needs look to/for Ortho
- 96. Ortho has a solution for your Weed needs
- 97. Ortho can help solve your Weed Control Needs
- 98. Look to/for Ortho
- 99. For more Lawn and Garden Products Visit [www.ortho.com]
- 100. Ace Promise Satisfaction Guaranteed
- 101. Ace Quality since 1924

## **Applicator Claims**

- 102. Perfect/Ideal for mixing and applying in a tank sprayer
- 103. Easy to apply with a tank sprayer

#### Flexible Packaging-specific

Note to PM: claims 103-106 may appear on any label panel for 6 months after the product is first sold or distributed.

- 104. New[!]
- 105. New container[!]
- 106. New, easy to use/easy-to-use pouch/[Pouch Name]
- 107. [New] small packaging, same GroundClear results[!]
- 108. [The] new [, easy] to kill weeds[!]
- 109. [Concentrated/Concentrate] Refill
- 110. [X] Refill pouch[es]/[Pouch Name] included inside[!]
- 111. Refill included inside[!]
- 112. Reusable bottle
- 113. [Super] Easy to pour
- 114. [For] use with refillable container
- 115. [For/Easy] use with tank sprayer
- 116. Easy to pour and mix[!]
- 117. Small package, powerful results
- 118. Empty [the] Pouch. Add [the] water. Kill [the] weeds.



- 119. Say goodbye to weeds
- 120. Combo pack
- 121. Reuse [Ortho] [bottle/container] [.] refill with [pouch/container/Pouch Name].
- 122. Reduce[s] plastic [waste] by [up to] 90%[!]++
- 123. Uses [up to] 90% less plastic[!]\*\*
- 124. Small. Powerful. Easy.
- 125. Easy to store, easy to mix, easy to use.
- 126. Easy to pour, easy to mix, easy to use.
- 127. Good/Super things come in small packages.
- 128. This little bit goes a long way.
- 129. The might of mini.
- 130. No measuring [required][.][!]

### Bold, italicized text is information for the reader and is not part of the label.

[Bracketed information is optional text]. Text separated by / denotes and/or options.

- 131. Mix &/and Go
- 132. Mini-pouch/mini pouch/[Pouch Name], mighty performance.
- 133. Little. Flexible. Powerful.
- 134. Small. But fierce.
- 135. Get ready to say "peace out" to weeds.
- 136. It may be small[,] but it is fierce.
- 137. Small pouch. Fiercely effective.
- 138. Small pouch. Simple mix. Super easy.
- 139. This little bit clears a whole lot.
- 140. Mini might. Clears weeds out of sight.
- 141. Same GroundClear power. [Just smaller.]
- 142. Small. Simple. Easy.
- 143. Behold the power of small.
- 144. GroundClear [Product Name] has a mini me.
- 145. The power of small.
- 146. Mini [pack/pouch]. Maximum easy.
- 147. Small is good.
- 148. Behold the power of small.
- 149. Mini[-]pouch/[pack] power.
- 150. The mini pouch/[Pouch Name] that packs a powerful punch.
- 151. Keep it simple.
- 152. Easy to mix. Easy to use.
- 153. Clear in a 8/eight or 16/sixteen [-]ounce pack.
- 154. Small, but powerful.
- 155. Small, but mighty.
- 156. No guesswork. No messwork.
- 157. Add to jug, fill with water. Pretty darn easy.
- 158. The no-measure, easy-mix pouch.
- 159. The no-measure, Mix & Go Pouch.
- 160. The no-measure, EZ[-]Flex Pouch.
- 161. The no-measure, Easy Flex Pouch.
- 162. The no-measure, Mix & Go Pouch.
- 163. The no-measure, Quick[-]Mix Pouch
- 164. No-measure, Quick Mix Pouch.
- 165. Same GroundClear results.
- 166. We measured so you don't have to.
- 167. [The] weeds never stood/stand a chance [against GroundClear.]
- 168. Pour contents into container. Fill with water. Done.
- 169. Mix contents with a [one] half [1/2] gallon of water. Go!
- 170. Mix contents with a/one/1 gallon of water. Go!
- 171. Makes 2L/one half gallon/1/2 gallon of solution/product
- 172. Pour. Go.
- 173. Pour. Add Water. Go.
- 174. Pour. Mix. Kill Weeds.
- 175. Just add water.
- 176. A simple mix without the mess.
- 177. The hassle-free mix.
- 178. No measuring. No mess. Just mix and go.
- 179. No mess, just mix and go.
- 180. No measure, no mess.
- 181. The seriously easy mix.
- 182. Save space. Less waste.
- 183. Less mess. Less waste.

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- 184. Small pouch. Big difference.
- 185. Reduce. Refill. Reuse.
- 186. Deliberately small to reduce unnecessary [plastic] waste.
- 187. Reuse [Ortho] [bottle/container][.] refill with [pouch/container/Pouch Name].
- 188. [Uses] [up to] 90% less plastic+
- 189. [And] now [using] [up to] 90/% less plastic++
- 190. Save[s] plastic. Reduce[s] waste.
- 191. Reduce plastic. Reduce waste.
- 192. Save[s] plastic [waste] with every refill.
- 193. Reduce[s] plastic [waste] with every refill.
- 194. Learn more [about our efforts to reduce plastic waste] at ortho.com.
- 195. Learn [more about] how we're reducing plastic waste at ortho.com.
- 196. Learn about our/Ortho's sustainability efforts at ortho.com.
- 197. Clear your space. Reduce your waste.
- 198. Every refill saves plastic [waste].
- 199. Reuse[.] refill[.] no measuring required[.]
- 200. Contact[-]free concentrate
- 201. [The] EZ[-]Flex Pouch
- 202. [The] Easy Flex Pack
- 203. [The] Quick[-]Mix Pouch
- 204. [The] Mix & Go Pouch
- 205. The [Pouch Name]
- 206. Refill
- 207. Not for individual sale
- 208. [2], [4] Refill pouch[es] [included/inside]
- 209. [2], [4] Concentrate/Concentrated [refill] pouch[es] [included/inside]
- 210. [2], [4] Pre-dosed concentrate/concentrated [refill] pouch[es] [included/inside

\*\*vs. 5L/1gal [refill] bottle

# [CLEARING [OUT] WEEDS HAS NEVER BEEN EASIER:] /[Clear weeds the easy way]/ [How it works:] / [Getting started:] / [How to use:] / [How to mix:]

Note to PM: optional images (below) may be used in association with each step.

- **1.** Unscrew cap from pouch/[pouch name] and empty entire pouch into a reusable [Ortho] bottle or tank sprayer.
- 2. Fill bottle or tank sprayer with 3.25 pt and/or (52 fl oz) of water.

3.

- **3.** Securely screw cap or top onto bottle or sprayer.
- **4.** Spray weeds [and/or] [weed prone area] as directed.











## Images for use on the flexible packaging:



















## **Optional Graphics**

The following are optional graphics that may be used on the market label. If the graphic is used, minor changes to the shape, or orientation may occur based on marketing decisions and the available space on the label.

**Driveways** 







Kills weeds

**Prevents** Weeds

**Fast Acting formula** 

Rainproof

Kills the root











What it Does







QR Code:

- Scan here to/and learn more [about [product name /dose pack]]
- Scan here/me [to/and learn more] [about] [product name/dose pack]
- Discover [dose pack]
- Have weeds? Scan here.
- Weed problems? Scan for a solution.
- Need help with weeds? Scan for a solution.
- Scan to learn how to keep your ground clear with GroundClear.

Questions &/or Comments [icon phone] [icon computer] Call 1-800-225-2883 or [visit our website] [at] [www.]ortho.com





#### **Optional Instructions for Side Clip Tape**

- Peel Here Open Resealable Label for Directions and Precautions
- Press to Reseal
- See inside booklet for details

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NOTICE: To the extent consistent with applicable law, buyer assumes all risks of use, storage or handling of this product not in accordance with directions.

## <sup>†</sup>The ORTHO® Guarantee

If for any reason you, the consumer, are not satisfied with this product, mail us your original proof of purchase to obtain a full refund of your purchase price.

#### Ortho & Your Environment

Your yard is a place for family and pets to enjoy. That's why Ortho<sup>®</sup> [subregistrant name] products are designed with care to provide effective solutions to weed problems. Follow instructions for appropriate usage, storage and disposal.

## Scotts No-Quibble Money Back Guarantee™

If for any reason you, the consumer, are not satisfied after using this product, you are entitled to get your money back. Simply send us original evidence of purchase and we will mail you a refund check promptly.

#### Dedicated to a Beautiful World™

Trusted by generations of homeowners, Scotts® is dedicated to helping you enhance and protect the beauty of your home environment.

Alternate Guarantee: †GUARANTEED RESULTS or your money back. If for any reason you are not satisfied after using this product, simply send us the original proof of purchase and we will refund the purchase price.

The [insert company/brand] Promise: If this [company/brand] product when used for its intended purpose fails to give you complete satisfaction return the item to the [company] store where purchased for free replacement of the same or similar item.

Money Back Guarantee. See back panel for details\* \*Great quality. Great Price. Guaranteed. Our quarantee is a promise that you'll be fully satisfied with the quality of every (Product Brand Name) product. If for any reason you aren't happy, we'll replace it or return your money whichever you prefer. All you need to do is return the empty packaging. It's that simple. Guaranteed. Guaranteed within 1 year of the date of purchase. Questions or comments? Call (855-481-2977)

## Questions / Information [Questions or Comments]



1-800-225-2883 and/or [visit] [our website www.]ortho.com

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Manufactured [by]/for]/[Sold by]/Distributed by]: The Ortho Group P.O. Box 190 Marysville, OH 43040

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