

# OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

WASHINGTON, D.C. 20460

August 28, 2024

Chris Zemanek Sr. Analyst, Regulatory Affairs The Scotts Company 14111 Scottslawn Road Marysville, OH 43041

Subject: Label Amendment - Registration Review Mitigation for Metsulfuron-methyl

Product Name: Granular MSM EPA Registration Number: 538-300 Application Date: July 7, 2022 Decision Number: 585672

#### Dear Chris Zemanek:

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 Metsulfuron-methy 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

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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 <a href="mailto:carr.caleb@epa.gov">carr.caleb@epa.gov</a>.

Sincerely,

Linda Arrington, Branch Chief

Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

**ENCLOSURE: Stamped label** 

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

# **Granular MSM**

EPA Reg. No. 538-300

**ACTIVE INGREDIENT:** 

100.00%

†CAS #74223-64-6

# KEEP OUT OF REACH OF CHILDREN CAUTION

See back / side / top /bottom [panel/label] for additional PRECAUTIONARY STATEMENTS [and directions for

Treats/Covers X,XXX SQ FT (per coverage examples in table below)

NET WEIGHT 11.50 lb [xx kg]

ACCEPTED

Aug 28, 2024

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

538-300

#### Coverage Examples:

Bag Weight (lbs)	Coverage (sq. ft.)	A.I. percent	# AI per acre	# Product per 1000 sq ft
2.3	1,000	0.03	0.03	2.3
9.2	4,000	0.03	0.03	2.3
11.5	5,000	0.03	0.03	2.3
23.0	10,000	0.03	0.03	2.3
46.0	15,000	0.03	0.03	2.3

#### **Optional Company Identifier**

Scotts®

#### Alternate Brand Names:

EZ Lawn Weed Killer for Southern Lawns
EZ Southern Lawn Weed Killer
EZ Weed for Southern Lawns
Touch Up™ Southern Weed Killer
Touch Up™ Southern Weed Control 2
Weed Control Granules for Southern Lawns
Weed Control Granules for Southern Lawns for SNAP
Southern Lawn Weed Control Granules
Southern Lawn Weed Control Granules for SNAP

Southern Lawn Weed Killer

Southern Lawn Weed Killer for SNAP

#### [FIRST AID AND ENVIRONMENTAL HAZARDS/INFORMATION]

[Keep Out of Reach of Children] [CAUTION]

# Precautionary Statements Hazards to Humans and Domestic Animals [icon]

CAUTION: Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet.

# FIRST AID [icon]

**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 poison control center or doctor, or going for treatment. Call: 1-XXX-XXX-XXXX (number is available 24/7/365)

#### Environmental Hazards [icon]

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 or wash pesticide off the treated area. Sweeping any product that lands on a driveway, sidewalk, or street, back into the treated area of the lawn will help to prevent run off to water bodies or drainage systems.

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#### **Groundwater Label Advisory**

Metsulfuron methyl is known to leach through soil into groundwater under certain conditions as a result of label use. This chemical may leach into groundwater if used in areas where soils are permeable, particularly where the water table is shallow.

# Surface Water Label Advisory

This product may impact surface water quality due to runoff of rain water. This is especially true for poorly draining soils and soils with shallow ground water. This product is classified as having high potential for reaching surface water via runoff for months or more after application. A level, well-maintained vegetative buffer strip between areas to which this product is applied and surface water features such as ponds, streams, and springs will reduce the potential loading of mesosulfuron-methyl from runoff water and sediment. Runoff of this product will be greatly reduced by avoiding applications when rainfall or irrigation is expected to occur within 48 hours.

# Non-target Organism Advisory Statement:

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 area. Protect the forage and habitat of non-target organisms by minimizing spray drift.

# Direction for Use Option 1

#### Directions for use

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

# [Application]

- For use on St. Augustinegrass (including Floratam), bermudagrass, centipedegrass, zoysiagrass, seashore paspalum and buffalograss. May be used on tall fescue [Kentucky bluegrass / fine fescues] if temporary discoloration can be tolerated.
- Apply anytime / when weeds are actively growing in spring, summer, or fall.
- May be applied to a wet or dry lawn.
- For best results apply to grass that is wet from dew or watering.
- Mow tall grass a day or two before application.
- If rain does not occur within 2-3 days after application, water in lightly for activation.
- [For severe weed problems, a second treatment may be required but not sooner than 30 days after the first.]
- [Apply in the fall to control winter weeds such as henbit, common chickweed, evening primrose and lawn burweed.]
- This product applies 0.03 lbs active ingredient per acre.

#### Reentry

Do not allow people or pets to enter treatment areas until the application is complete and the grass is dry.

#### Restrictions

- Do not use on bahiagrass, ryegrass (annual and perennial) and blends that contain ryegrass.
- Do not apply this product in a way that will contact any person either directly or through drift. Keep people and pets out of area during application.
- Do not apply on or under the branch spread area of trees, shrubs, bedding plants, flowers or garden plants.
- Do not apply more than two times per year.

With new lawns or Seeding/Sprigging / When seeding, sprigging, or sodding

- May be applied after sprigging/sodding a new St. Augustinegrass, bermudagrass, centipedegrass or zoysiagrass lawn.
- Do not apply to newly seeded lawns until after the new grass has been mowed at least three times.

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

• Do not plant sprigs/sod for one month or sow new grass seed for two months following application of this product / *insert product name*.

# [What to expect]

- [Weeds in treated areas will stop growing 1 2 days after application.]
- [Affected weeds will gradually die and disappear with 3 4 weeks after application.]

[How to Apply] the following statements will be included in DFU for product to be used with the Scotts SNAP® Spreader - see note to PM below

[This package applies [approximately] 2.3 lbs of product per 1,000 sq ft.] [Each pass should be within 5 feet of another pass to ensure proper overlap.]

Note to PM - For your reference, product packaged specifically for use with a Scotts SNAP® Spreader will be in a cylindrical bag with a bottom fitment that will only attach to the SNAP® Spreader System. The bottom fitment contains an aperture that is calibrated for a product application to 4,000 sq ft, and therefore no spreader settings are required for this particular application.

## [Weeds Controlled]

Controls [or suppresses] *insert one or more weeds from following weed list* [Controls [or suppresses] weeds as listed above/below] *or* Kills/Controls/Suppresses listed weeds *or* Weeds Controlled/Suppressed *Note to PM: The weed list may appear elsewhere on the label and be referenced in the Directions for Use – Icons of weeds may also appear on the label* 

Controls		
annual sowthistle	cudweed	mustard
aster	dandelion	parsley-piert
black medic	dollarweed (pennywort)	Pensacola bahiagrass
broadleaf plantain	eclipta	perennial ryegrass
buckhorn plantain	English daisy	pigweed
California burclover	evening primrose	pineapple-weed
Carolina geranium	Florida betony	prostrate knotweed
catsear	Florida pusley	puncturevine
chicory	ground ivy	purple deadnettle
common chickweed	hairy bittercress	red clover
common groundsel	henbit	shepherd's-purse
common mallow	hop clover	spurge
common purslane	horseweed	white clover
common yarrow	khakiweed	wild carrot
corn speedwell	lambsquarters	wild garlic
creeping woodsorrel	lawn burweed (spurweed)	wild violet
crown vetch	mouseear chickweed	yellow woodsorrel (Oxalis)

Suppresses	
Argentine bahiagrass	field bindweed
Canada thistle	Virginia buttonweed

2 month control		
broadleaf plantain	California burclover	dollarweed (pennywort)
buckhorn plantain	dandelion	white clover

# End of Option 1

# Option 2 – Directions for Use Quick Start Guide

#### **DIRECTIONS FOR USE**

- It is a violation of federal law to use this product in a manner inconsistent with its labeling.
- This product applies 0.03 lbs active ingredient per acre.

#### [Insert company name] Quick Start Guide

[You're just three/four/a few [simple/easy] steps away from a beautiful insert company name lawn]

[ICON – Spreader/Dial]
[1.] Fill & Set Spreader

Insert company name Broadcast/Rotary Spreaders X
[Insert company name Drop Spreaders] [X]

[Use only with *insert company name* spreaders/applicators.]

[Insert company name products are designed to work with insert company name spreaders/applicators.]

[For additional spreader settings, [please] call *insert company phone number*.]

[This package applies [approximately] 2.3 lbs of product per 1,000 sq. ft.]

[ICON - Spreader/Lawn]

[2.] Apply

- For use on St. Augustinegrass (including Floratam), bermudagrass, centipedegrass, zoysiagrass, seashore paspalum and buffalograss.
- May be used on tall fescue [Kentucky bluegrass / fine fescues] if temporary discoloration can be tolerated.
- Apply anytime/when weeds are actively growing [in spring, summer, or fall].
- May be applied to a wet or dry lawn.
- For best results apply to grass that is wet from dew or watering.
- Mow tall grass a day or two before application.
- If rain does not occur within 2-3 days after application, water in lightly for activation.
- [For even application walk at a steady pace slightly overlapping each pass.]
- [Scotts Drop Spreaders: Align hopper arrow with previous wheel track.]
- [Scotts Broadcast/Rotary Spreaders: Line up each pass approximately 5 ft. from wheel track.]

[ICON - Broom]

[3.] Clean-Up

· Sweep product from hard surfaces onto the lawn

[ICON – lower legs stepping onto grass]

[4.] You're Done! What's Next?

• Do not allow people or pets to enter treatment areas until the application is complete and the grass is dry.

Questions? [Call] [now] *insert company phone number* [icon – phone] www.scotts.com [icon – computer mouse]

#### Restrictions

- Do not use on bahiagrass, ryegrass (annual and perennial) and blends that contain ryegrass.
- Do not apply this product in a way that will contact any person either directly or through drift. Keep people and pets out of area during application.
- Do not apply on or under the branch spread area of trees, shrubs, bedding plants, flowers or garden plants.
- Do not apply more than two times per year.

# Seeding/Sprigging

- May be applied after sprigging/sodding a new St. Augustinegrass, bermudagrass, centipedegrass or zoysiagrass lawn.
- Do not apply to newly seeded lawns until after the new grass has been mowed at least three times.

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

 Do not plant sprigs/sod for one month, or sow new grass seed for two months following application of this product/ insert product name.

#### [Weeds Controlled]

- Controls [or suppresses] insert one or more weeds from following weed list [Controls [or suppresses] weeds as listed above/below] or Kills/Controls/Suppresses listed weeds or Weeds Controlled/Suppressed
   Note to PM: The weed list may appear elsewhere on the label and be referenced in the Directions for Use
- [For severe weed problems, a second treatment may be required but no sooner than 30 days after the first.]
- [Apply in the Fall to control winter weeds such as henbit, common chickweed, eveningprimrose, and lawn burweed.]

Controls		
annual sowthistle	cudweed	mustard
aster	dandelion	parsley-piert
black medic	dollarweed (pennywort)	Pensacola bahiagrass
broadleaf plantain	eclipta	perennial ryegrass
buckhorn plantain	English daisy	pigweed
California burclover	evening primrose	pineapple-weed
Carolina geranium	Florida betony	prostrate knotweed
catsear	Florida pusley	puncturevine
chicory	ground ivy	purple deadnettle
common chickweed	hairy bittercress	red clover
common groundsel	henbit	shepherd's-purse
common mallow	hop clover	spurge
common purslane	horseweed	white clover
common yarrow	khakiweed	wild carrot
corn speedwell	lambsquarters	wild garlic
creeping woodsorrel	lawn burweed (spurweed)	wild violet
crown vetch	mouseear chickweed	yellow woodsorrel (Oxalis)

Suppresses	
Argentine bahiagrass	field bindweed
Canada thistle	Virginia buttonweed

2 month control		
broadleaf plantain	California burclover	dollarweed (pennywort)
buckhorn plantain	dandelion	white clover

# [What to Expect]

[Weeds in treated areas will stop growing 1-2 days after application.]

[Affected weeds will gradually die and disappear within 3 – 4 weeks after application.]

# **End of Option 2**

# Option 3 - Shaker Jug Application

#### **Directions for use**

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

[Easy to Use Applicator]

# [Icon - bottle with cap off]

[1.] Unscrew cap and remove safety seal from jug/container.

#### [Icon - cap on the bottle]

[2.] Screw cap back onto jug/container.

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## [Icon - spout extended]

[3.] Lift lid to extend spout/open.

## [Icon - product pouring out of bottle]

[4.] Angle jug/container downward and sprinkle granules over weeds.

[Use the diagram above / below to the left / to the right as a guide for uniform distribution of granules. Apply evenly as shown.] [Icon – granules spread on lawn / surface]

The contents of this container treats X,XXX sq ft [12.5 grams (1 tbsp) covers 12 sq ft] Note to PM the application rate will be consistent with the 2.3 lbs / 1000 sq ft rate which is 0.03 lbs active ingredient per acre. The X,XXX will be included on the final printed label e.g. This 2.3 lb package covers 1,000 sq ft

## [Application]

- For use on St. Augustinegrass (including Floratam), bermudagrass, centipedegrass, zoysiagrass, seashore paspalum and buffalograss.
- May be used on tall fescue [Kentucky bluegrass / fine fescues] if temporary discoloration can be tolerated.
- Apply anytime / when weeds are actively growing in spring, summer, or fall.
- May be applied to a wet or dry lawn.
- For best results apply to grass that is wet from dew or watering.
- Mow tall grass a day or two before application.
- If rain does not occur within 2-3 days after application, water in lightly for activation.
- [For severe weed problems, a second treatment may be required but not sooner than 30 days after the first.]
- [Apply in the fall to control winter weeds such as henbit, common chickweed, evening primrose and lawn burweed.]
- This product applies 0.03 lbs active ingredient per acre.

#### Reentry

• Do not allow people or pets to enter treatment areas until the application is complete and the grass is dry.

#### Restrictions

- Do not use on bahiagrass, ryegrass (annual and perennial) and blends that contain ryegrass.
- Do not apply this product in a way that will contact any person either directly or through drift. Keep people and pets out of area during application.
- Do not apply on or under the branch spread area of trees, shrubs, bedding plants, flowers or garden plants.
- Do not apply more than two times per year.

#### With new lawns or Seeding/Sprigging / When seeding, sprigging, or sodding

- May be applied after sprigging/sodding a new St. Augustinegrass, bermudagrass, centipedegrass or zoysiagrass lawn.
- Do not apply to newly seeded lawns until after the new grass has been mowed at least three times.
- Do not plant sprigs/sod for one month or sow new grass seed for two months following application of this product / *insert product name*.

#### [Weeds Controlled]

Controls [or suppresses] insert one or more weeds from following weed list [Controls [or suppresses] weeds as listed above/below] or Kills/Controls/Suppresses listed weeds or Weeds Controlled/Suppressed
 Note to PM: The weed list may appear elsewhere on the label and be referenced in the Directions for Use

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

Controls		
annual sowthistle	cudweed	mustard
aster	dandelion	parsley-piert
black medic	dollarweed (pennywort)	Pensacola bahiagrass
broadleaf plantain	eclipta	perennial ryegrass
buckhorn plantain	English daisy	pigweed
California burclover	evening primrose	pineapple-weed
Carolina geranium	Florida betony	prostrate knotweed
catsear	Florida pusley	puncturevine
chicory	ground ivy	purple deadnettle
common chickweed	hairy bittercress	red clover
common groundsel	henbit	shepherd's-purse
common mallow	hop clover	spurge
common purslane	horseweed	white clover
common yarrow	khakiweed	wild carrot
corn speedwell	lambsquarters	wild garlic
creeping woodsorrel	lawn burweed (spurweed)	wild violet
crown vetch	mouseear chickweed	yellow woodsorrel (Oxalis)

Suppresses	
Argentine bahiagrass	field bindweed
Canada thistle	Virginia buttonweed

2 month control		
broadleaf plantain	California burclover	dollarweed (pennywort)
buckhorn plantain	dandelion	white clover

# [What to expect]

- [Weeds in treated areas will stop growing 1 2 days after application.]
- [Affected weeds will gradually die and disappear with 3 4 weeks after application.]

# **End of Option 3**

#### WINDBLOWN SOIL PARTICLES:

This product has the potential to move off-site due to wind erosion. Soils that are subject to wind erosion usually have a high silt and/or fine to very fine sand fractions and low organic matter content. Other factors which can affects the movement of windblown soil include the intensity and direction of prevailing winds, vegetative cover, site slope, rainfall, and drainage patterns. Avoid applying this product if prevailing local conditions may be expected to result in off-site movement.

#### Storage and Disposal [icon: trash can]

**PESTICIDE STORAGE:** Store in a dry place. [Reseal opened bag by folding top down and securing.] Store in original container in a secure area away from children and pets.

**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 agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

Note to PM: The following Storage and Disposal section will appear on those products intended for use with the Scotts SNAP® Spreader and the Shaker Jug

# STORAGE AND DISPOSAL [icon: trash can]

**PESTICIDE STORAGE**: Store in a dry place for your next application. Product can be used until [container is] empty. Store in original container in a secure area away from children and pets.

**PESTICIDE DISPOSAL and CONTAINER HANDLING**: Non-refillable container. Do not reuse or refill this container. **If empty**: Offer for recycling if available. **If partly filled**: Call your local solid waste agency for disposal instructions. Never place unused product down any indoor or outdoor drain.

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

SPREADER SETTING INFORMATION Note to PM: The following are optional formats to present spreader setting information. Appropriate spreader settings, spreader brand names, and coverage will be inserted on Final Printed Label

This package applies [approximately] 2.3 lbs of product per 1,000 sq ft.

#### **Spreading Tips**

[For best results, use a Scotts spreader/[Use [only] with Scotts spreaders/[Scotts products are designed to work with Scotts spreaders.]

#### **Scotts Drop Spreaders**

[Mow lawn first if grass is tall enough to touch the bottom of the spreader. First apply two header strips. Then operate spreader the longest way of the lawn. Overlap wheel marks to ensure uniform feeding. Shut off spreader when you have reached the header strips or stopped.]
(ILLUS.)

#### Scotts EasyGreen™/insert brand name Rotary:

[Shut off spreader anytime you stop. For complete coverage make each pass about 30 inches from the previous one so some overlapping occurs.]
(ILLUS.)

#### Scotts SpeedyGreen™/insert brand name Rotary:

[Shut off spreader anytime you stop. For complete coverage make each pass about five feet from the previous one so some overlapping occurs.]
(ILLUS.)

For even application walk at a steady pace slightly overlapping each pass.

Spreading Settings [And Information]/Directions Covers X,XXX sq ft [Settings]

Apply header strips. Then apply product in longest direction of lawn. For best results, use a Scotts spreader. Shut off spreader or stop each time you reach header strip.

Scotts Broadcast / Rotary Spreaders [ILLUS][Spreader]

Each pass should be within 5 feet of the other to ensure an overlap.]

[Scotts Basic<sup>™</sup>, Standard<sup>™</sup>, Deluxe<sup>™</sup> EdgeGuard®, Lawn Pro® or SpeedyGreen®/ *insert brand name* 

Scotts EasyGreen® / insert brand name [ILLUS][Spreader] [XX]

[Each pass should be within 30 inches of the other to ensure an overlap.]

Scotts Drop Spreaders [ILLUS][Spreader] [XX]

[Align hopper arrow with previous wheel track [to ensure even coverage.] [Scotts AccuGreen®/ *insert brand name*]

[For additional spreader settings, please call *insert co. phone number*]

#### Snap APPLICATOR SET UP [AND INFORMATION]

[Just pop it on, flip the lever and go!]

[Icon]: Connect/Snap/Place into Spreader

[Icon]: Lock/Flip lever to lock in place

[Icon]: Apply/Go/You're ready to go

[lcon]: [EdgeGuard/Feature/Control]

[lcon]: [[Finish] [&] [Store]]

[XX]

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See back panel for Setup Guide

 Lock/Snap & Go/Snap, Lock, Go/Cartridge/Snap / Pac connects directly to the [insert name] spreader/applicator [There's no cutting/no pouring/no spilling] [from heavy bags]/[Simply place Snap / Pac/cartridge into the spreader/applicator]

- Flip the lever to lock cartridge/Snap / Pac into place [Cartridge/Snap / Pac automatically sets the proper application rate]
- Easy to apply/Follow Directions for Use below
- [Easy to control] [The new & improved/exclusive EdgeGuard feature directs product only where you want it]
- **[Easy to finish & store]** [Just flip the lever back to remove the Snap / Pac/cartridge.] [It self-seals for no mess/no touch/no-waste/easy clean-up & storage.]

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

# **Optional Marketing Claims**

Appropriate formula and company specific information will be inserted on Final Printed Label to replace "X"

References to this product may be replaced by appropriate alternate or supplemental product names. References to the Scotts Brand may be replaced with appropriate alternate brand.

The following claims may be preceded by "new" or "now" for six (6) months from the first date of shipment to a customer in accordance with Federal and State Registrations

#### Weed Control

- [Contains a formula that] works through the leaves and roots of the weeds.
- [ICON] Weed
- [Illustration]- Before and after Example of illustration provided below
- [Southern] [Weed control / Weed killer] kills weeds to the root
- [Southern] Weed control / Weed killer works from the root up
- [Summer] weed control for broadleaf weeds.
- [Weed control] enters [the plant/weed] through the leaves and the root.
- [With] LawnGuard [Weed Control [Technology]]
- Apply once and you're done [with listed weeds] [with dollarweed/pennywort [& clover]] up to 2 months
- Clears/Takes out weeds/ Controls [dollarweed/pennywort [& clover]] [listed weeds with 2 month control] for up to 2
  months
- Contains [a proven] formula that targets/kills/eliminates/controls/destroys weeds.
- Contains a granular/proven formula that attacks weeds through the leaves killing them while leaving your grass [St. Augustine/floratam/centipedegrass/bermudagrass/zoysia/seashore paspalum/buffalograss Lawn] completely unharmed\* – guaranteed. \*when used as directed
- Controls insert weed(s) from 2 month control list for 2 months
- Controls/Kills [the] listed weed(s) / insert weed(s) from weed list down to the root
- Controls/kills [tough/hard to kill/southern] listed weeds /weeds as listed [including insert weed(s) from weed list]
- Controls/kills dollarweed/pennywort and [XX] other [common] [lawn] weeds\*\*
- Effective weed control for mixed/major southern lawn(s)/grass [types]
- Effective weed control for mixed/major southern lawn(s)/grass [types]
- Eliminates/Eradicates/Treats/Cures your lawn of tough [summer] weeds.
- Great for spot treatments
- How it works- The [*insert product name*] formula kills *insert weed(s) from weed list* in one easy step without harming your lawn\* guaranteed! \*when used as directed
- Kills insert weed(s) from weed list
- Kills dollarweed/pennywort and other [common] [lawn] weeds [as listed][\*\*]
- Kills listed weeds /weeds/southern weeds as listed / insert weeds(s) from weed list / [major] listed broadleaf weeds through the root
- Kills listed weeds/ [weed] seedlings you see and those/others you don't
- Kills listed weeds/insert weed(s) from weed list in 3 to 4 weeks.
- Kills listed weeds/weeds as listed [and won't burn mixed lawns/grass [types] when used as directed]
- Kills to the root so weeds won't come/grow back
- Kills weeds through/to the root
- Kills/controls/eliminates/eradicates/treats dollarweed/ *insert weed(s) from weed list* [and] [over 50] other [common] [lawn] weeds [as listed].
- Kills/controls/eliminates/eradicates/treats weeds/dollarweed/dandelions/clover /insert weed(s) from weed list
  [in lawns]
- Kills/controls/eliminates/eradicates/treats weeds/dollarweed/dandelions/clover /*insert weed(s) from weed list* and [many/other] [common] lawn weeds.(as listed)
- Kills/Controls/Eliminates/Eradicates/Treats/Clears out [tough] [existing] weeds.
- Kills/Controls/Eliminates/Eradicates/Treats/Clears out embarrassing lawn weeds.
- Make weeds/dollarweed/ insert weed(s) from weed list disappear/history.
- One easy solution for dollarweed and insert weed(s) from weed list

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- Penetrates to the root [zone/area] to take out /kill the whole weed
- Reduce Virginia buttonweed [problem] by up to 50%.
- Say goodbye to weeds/dollarweed/ insert weed(s) from weed list
- Scotts weed killer [killing technology].
- Small, lightweight granules provide uniform coverage and are quickly absorbed to help ensure complete
  control of weeds.
- Starts working on contact
- Stop weeds in their tracks.
- Suppresses Virginia [VA] buttonweed
- Systemic/dual-action/thorough weed control [formula] [that] enters the plant/weed through the leaves and the root
- Takes the guesswork out of weed control.
- Weed control for your lawn
- Weed control has never been easier! The [insert product name] formula kills [insert weed(s) from weed list][lawn weeds] in one easy step and keeps your lawn free of insert weed(s) from 2 month control list for up to 2 months without harming your lawn\* guaranteed! \*when used as directed
- Weed control made easy
- Weeds in treated areas will stop growing 1-2 days after application. Affected weeds will gradually die and disappear within 3-4 weeks after application.
- With Scotts weed killing technology.
- Works in/See it working in one to two weeks
- Works right the first time \* [whether the grass is wet or dry] \*when used as directed
- Works through the leaves and roots of the weeds.

<sup>\*\*</sup> as listed



#### General Claims

- [Now]It's easy for you to have a better [Southern] lawn
- Easy to spread [granules].
- Easy-to-use
- For Southern Lawns
- [Where to use] For use on St. Augustinegrass (including Floratam), bermudagrass, centipedegrass, zoysiagrass, seashore paspalum and buffalograss. [Do not use on bahiagrass, ryegrass (annual and perennial) and blends that contain ryegrass.]
- For/Made for/Specially formulated for/Formulated for [use on] St. Augustinegrass [(including Floratam)], bermudagrass, zoysia, and buffalograss lawns.
- Kills weeds, not St. Augustine/bermudagrass/ centipedegrass, zoysiagrass, seashore paspalum and buffalograss lawns.
- Made (formulated) (specially formulated) for [use on] St. Augustinegrass / (including Floratam),/ bermudagrass,/ centipedegrass,/ zoysiagrass,/ seashore paspalum and buffalograss.
- New formula!
- Now a [St. Augustinegrass /floratam/centipedegrass/bermudagrass/zoysia] weed control [formula].
- Now for use on St. Augustinegrass / (including Floratam),/ bermudagrass,/ centipedegrass,/ zoysiagrass,/ seashore paspalum and buffalograss.
- One Easy Step/Application!
- Our/Scotts best weed killing formula.
- Ready to Use [granules].
- Scotts best.
- Simple and easy

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- Specially formulated for St. Augustinegrass / (including Floratam),/ bermudagrass,/ centipedegrass,/ zoysiagrass,/ seashore paspalum and buffalograss.
- Specially formulated to kill weeds, won't harm lawns\* [grass]. \*when used as directed
- Specially formulated/designed for Southern/Florida/Texas lawns
- Targets/Kills/seeks out and destroys weeds, leaves grass/lawn unharmed \*. \*when used as directed
- Targets/Kills/seeks out and destroys weeds, while leaving the/your grass [lawn/St.
   Augustine/bermudagrass/ centipedegrass / zoysiagrass / seashore paspalum / buffalograss / zoysia/ lawn] unharmed\* guaranteed. \*when used as directed
- Treats [and feeds] bermudagrass [too]!
- Won't harm St. Augustine/Southern/bermudagrass/ centipedegrass / zoysiagrass / seashore paspalum / buffalograss lawns/grass! \* \*when used as directed
- Won't harm your lawn\* [Guaranteed] \*when used as directed

# Claims regarding Application Timing

- Apply in early/late spring: March/April/May/June
- Apply in Fall: Aug/Sep/Oct
- Apply in late spring/summer: May/June/July/Aug
- Apply in the fall to kill reoccurring insert weed(s) from weed list
- Apply in, spring, summer or fall
- Apply/Use anytime weeds are [actively] growing/active/present/visible.
- Apply/Use in the spring, summer or fall or anytime weeds are growing/active/present/visible [actively growing].

## Claims regarding Guarantee

- [Insert brand name Promise Satisfaction Guaranteed]/[The insert brand name Promise is in Every Bag]
- Guaranteed [performance/results].
- Guaranteed not to harm the lawn\* \*when used as directed
- Scotts® No-Quibble Guarantee®

#### Claims regarding Cross-Sell

For a beautiful lawn, apply [a] Scotts fertilizer [product] four times a year [every six to eight weeks].

#### Claims Regarding Packaging

- [Exclusive] club pack [size]
- [Ideal/convenient/perfect/great] for spot treating weeds in the lawn
- [Quick and] easy to apply
- [With insert product name] you can spot treat weeds throughout your lawn
- Bonus Pack [size]
- Convenient shaker jug
- Cut Here To Open [Scissors Illust]
- Easy Open
- Easy to use shaker jug
- Handy applicator makes it easy to dispense product exactly where you want it
- Kills [patches of] weeds [in your lawn]
- No spreader needed
- Open. Resealable Label for directions and precautions
- PULL HERE –
- PULL TAB and remove for pour spout(ILLUS.)
- Resealable container
- Spot treater [for lawns]
- Value Pack [size]

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## Cartridge Claims

- [All you have to do is] [just] pop it on, flip the lever and go!
- [Flip the lever to lock cartridge into place] [ICON]
- [Insert name/Self-contained/Lock/Snap & Go] cartridge/system [connects directly to the spreader/applicator] [locks into place] [and] automatically sets the proper application rate.
- [It] Take[s] the mess/quesswork out of lawn care[[so you get [the]] right application rate/great results]
- [It's/insert name is] the revolutionary/patented/specially designed/exclusive/lightweight/self-contained/nomess/no touch/no guess/guess-proof/mess-proof/lock/snap & go [lawn care] [cartridge/Snap / Pac /application/applicator/spreader] system.
- [It's] Ready to go when you are
- [Now] [there's a/the] revolutionary [new] way to take care of your lawn
- [Self contained] [lock/snap & go] cartridge/Snap / Pac connects directly to [insert name] spreader/applicator [so/means/there's] [no cutting/no pouring/no spilling/no opening] [from heavy bags]]/[no need to cut open or pour from heavy bags]
- [The EdgeGuard feature on the [*insert name*] cartridge/spreader/applicator (allows for one-sided spreading)/(lets you close off application on one side of spreader) so product is not wasted/released on [unwanted] [areas like] driveways/sidewalks/flowerbeds] [ICON]
- [The] [cartridge/Snap / Pac/system] [automatically] self-seals [upon removal] (making clean up and storage a snap/easy/easier)/ ((for no touch/no waste/no mess/easy (clean-up/storage))
- [The] [exclusive/patented/specially designed/revolutionary/lock/snap & go] [cartridge/applicator/system] automatically sets the proper application rate [so] [there are no manual spreader/applicator settings [required/to adjust.]].
- [The] [Insert name] cartridge/spreader/applicator/system improves/reinvents the lawn application experience
- [The] [lock/snap & go] Cartridge/Snap / Pac works exclusively with the [insert name] [Cartridge/Snap / Pac] spreader/applicator/system [ICON]
- [The] cartridge/Snap / Pac snaps/locks easily into place [ICON]
- [There's] no cutting/ pouring/ spilling/opening [from heavy bags] [with the [unique/self-contained] cartridge/Snap / Pac]
- A snap/easy to start/apply/finish/store
- Available in your choice of [x] formulas/cartridges/Snap / Pac [s]
- Cartridge/product can be used until empty
- Cartridge/Snap / Pac [s] locks into place [and automatically sets the proper application rate]
- Compact size fits easily in storage areas
- Easy/simple to use
- If additional cartridges/Snap / Pac [s] are needed to complete/finish your lawn application, simply flip/slide lever back [to release/unlock/re-seal/seal/close cartridge] [from spreader/applicator] [ICON]
- Insert/connect new cartridge/Snap / Pac [s] [lock into place] [and go] [and continue applying] [ICON]
- It's easy to get started
- It's easy/easier [than ever before] [to get the (the right application rate)/(great results)]
- Lock/snap & Go
- No guess/mess application
- No manual spreader/applicator settings [to adjust]
- No mess start/finish
- No mess/guess/hassle
- No touch/spill/ waste storage [with the [unique/self-sealing] cartridge/Snap / Pac/system].
- Once empty, cartridges/Snap / Pac [s] cannot be reused
- Proper application rate is set automatically [with the [insert name/self-contained/Lock/Snap & Go] [cartridge/system]
- Reduces the mess/inconvenience/effort/hassle of lawn care
- Self-sealing cartridge/Snap / Pac [makes clean-up and storage a snap]/[means [a] no waste/no spill/no touch] [clean up/storage]
- Snap / Pac/Cartridge
- Store cartridges/product in a clean, dry place [for your next application]

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- The [guess/mess proof] [self-contained] [lock/snap & go] [lawn care] [cartridge/application] system [that] [takes the guesswork out of lawn care]
- The [guess-proof/mess proof/no guess/no mess] [self-contained] [lock/snap & go] [lawn care] [cartridge/application] system [that][makes great results easy/easier/a snap]
- The [guess-proof/mess proof/no guess/no mess] [self-contained] [lock/snap & go] [lawn care] [cartridge/application] system [that] / [[gives you [the right application rate/great results]] [from start to finish]
- The [lock/snap & go] cartridge is designed to be used only in the [exclusive/specially designed/patented/revolutionary] [insert name] cartridge/spreader/applicator/system [ICON]
- The [no guess/mess] [self-contained] [lock/snap & go] [lawn care] [cartridge/application] system [that] [takes the guesswork out of lawn care]
- The [no-mess/guess/touch/pour] application system
- Use [this] [lock/snap & go] [cartridge/Snap / Pac] only with the [new] [specially designed/exclusive/patented/revolutionary] [insert name] [Cartridge/spreader/applicator] system [ICON]
- You're ready to go
- Your hands don't have to touch the product

# **Optional Product Facts Table**

Product Facts		
Treats [up to]	XXXX sq ft	
KILLS WEEDS	Dollarweed and over 50 other [common] lawn weeds as listed <b>or</b> Kills / Controls <b>insert weed(s) from weed list</b>	
WHERE TO USE	For use on St. Augustinegrass (including Floratam), bermudagrass, centipedegrass, zoysiagrass, seashore paspalum and buffalograss [– won't harm lawn grasses when used as directed.] [Do not use on bahiagrass, ryegrass (annual and perennial) and blends that contain ryegrass.]	
AMOUNT TO USE	Sprinkle granules over weeds. 12.5 grams (1 tbsp) covers 12 sq ft.or Package applies 2.3 lbs product per 1,000 sq ft or This 2.3 lb package covers 1,000 sq ft Note to PM: The package weight will reflect the actual package size and coverage. The values will be calculated on the application rate of 2.3 lbs of product per 1000 sq ft. [See Spreader Setting Information]	
Questions, Comments or Medical Information call 1-800-225-2883 (1-800-543-TURF) (www.scotts.com)		

# Scotts Tips

The best weed prevention begins with a complete lawn care program. Tips for a weed-free lawn:

- 1. Feed your lawn regularly using Scotts Annual Lawn Care Program. It provides the correct balance of nutrients to help the lawn crowd out weeds, making it difficult for them to establish.
- 2. Mow your lawn at the recommended height. Mowing too short weakens the lawn and allows sun to reach weed seeds.
- 3. Make sure the lawn gets 1-inch per week of water. Weeds thrive in drought conditions, and steal water and nutrients from the grass.

Note to PM:

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

Note to PM: This product may be used as the weed control step in our new EZ Lawn Plan which consists of various fertilizer and seed products in addition to this weed control product. The following information may appear on the weed control product label in order to explain the EZ Lawn Plan to the consumer.

#### EZ Lawn Plan Claims

The EZ Way to a Great Lawn, Guaranteed!

# FEED (illustration of product(s))

Unlike other lawn food that has to be applied 4X a year, the EZ Feed Lawn Plan™ gives you the same great results in just 2 feedings. Each feeding delivers a unique seasonal blend with innovative feeding technology that continuously provides your lawn the food it needs, when it needs it. No guesswork. No extra work. Just the healthier lawn you want.

# Feeding Plan

- 1. Apply once in Spring- Thickens and strengthens lawn all Spring to stand up to Summer stress
- 2. Apply once in Fall- Helps lawn recover from Summer damage throughout Fall for a better lawn next Spring

#### Results

Icon of unfed lawn and EZ Feed Lawn Plan

A Healthier Lawn Will: Be Greener, Thicker Better Withstand Disease Crowd Out Future Weeds Need Less Water

For best results apply Spring and Fall Feeding every year

# SEED (illustration of product)

Grows grass anywhere, Guaranteed!\*

#### WEED (illustration of product)

Kills weeds in your lawn / won't harm lawn grasses!\* \* When used as directed.

# If you have questions

We designed this Program to make having a better lawn as simple and easy as possible. But you may still have some questions about your lawn during the year. If so, you can contact the Scotts [LawnPro] retailer where you bought this Program. They are ready to answer your questions and provide any help or information that you may need. –OR- You may get the answers by talking with one of Scotts lawn counselors. Simply dial this toll-free number 1-800-543-TURF

# Scotts No-Quibble Guarantee®

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

NOTICE: To the extent permissible by law/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> subject to proper care

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#### 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.

#### 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 Scotts®

#### **Questions / Information**

[icon - phone]
Call / Consumer Helpline / phone toll-free/ Scott's [toll-free] consumer hotline/ Contact Us
1-800-543-TURF (8873)
[Open 8:00 a.m. to 5:00 p.m. Eastern time]

[icon – computer mouse] Visit [our website] www.scotts.com

[Illus]SMG listed NYSE

[Sold and Guaranteed by:] The Scotts Company 14111 Scottslawn Road Marysville, Ohio 43041

Product of USA

U.S. Patent No. XXXXXXXXXXXXX

EPA Reg. No. 538- 300 EPA Est. Nos. 538-OH-1<sup>s</sup>, XXX-XX-XXX [Superscript used is first letter of run code on end of container.]

SCOTTS.....the lawn people MARYSVILLE, OHIO 43041

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