

71995-29

2-26-2004

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Please read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060



United States Environmental Protection Agency Washington, DC 20460

Registration
 Amendment
 Other

OPP Identifier Number 296788

Application for Pesticide - Section I

1. Company/Product Number: 71995-29
2. EPA Product Manager: Mr. Jim Tompkins
3. Proposed Classification: None Restricted
Company/Product (Name): Roundup Weed & Grass Killer Concentrate Plus
PM #: 25
5. Name and Address of Applicant (Include ZIP Code): Monsanto Company, Lawn & Garden Products, 600 13th St., N.W., Suite 660, Washington, DC 20005
6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(B)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____
 Check if this is a new address

Section - II

Amendment - Explain below.
 Resubmission in response to Agency letter dated _____
 Notification - Explain below.
 Final printed labels in response to Agency letter dated _____
 "Me Too" Application.
 Other - Explain below.

NOTIFICATION

FEB 26 2004

Explanation: Use additional page(s) if necessary. (For Section I and Section II.)

Submission of revised Master Label incorporating anti-theft device language.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging <input type="checkbox"/> Yes* <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify)
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per Container	If "Yes" Package wgt. No. per Container

3. Location of Net Contents Information: Label Container
4. Size(s) Retail Container: _____
5. Location of Label Directions: On Label On Labeling accompanying product
6. Manner in Which Label is Affixed to Product: Lithograph Paper glued Stenciled Other

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)

Name: Dr. Russell Schneider	Title: Director, Regulatory Affairs DC	Telephone No. (Include Area Code): (202) 783-2866
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Certification
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

2. Signature: Rhonda M. Mannion
3. Title: Registration Manager
4. Typed Name: Rhonda M. Mannion Tel. (314) 694-8785
5. Date: 11 February 2004
6. Date Application Received (Stamped): _____

Certification with Respect to Label Integrity

Version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
71995-29	02/11/2004	071995-00029.20040211.pdf

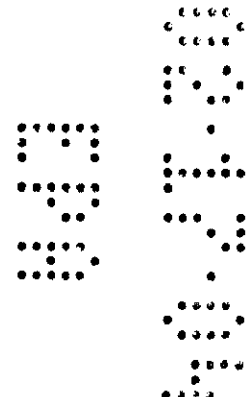
I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

Rhonda M. Mannion
Signature

11 February 2004
Date

Rhonda M. Mannion
Name (typed)

Registration Manager
Title



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EPA Reg No. 71995-29

[Editorial Notes: Bracketed text [] is for internal use or serves as a 'place holder' for graphics. Parenthetical text () denotes optional wording.]

[Refer to APPENDIX 1 for consolidated list of label claims.]

[Refer to APPENDIX 2 for packaging related claims/instructions]

Roundup Weed & Grass Killer Concentrate Plus

Alternate Brand Name : MON 78307 Herbicide

Active Ingredient

Glyphosate, isopropylamine salt	18.0 %
Diquat dibromide.....	0.73 %
Other Ingredients	81.27 %

KEEP OUT OF REACH OF CHILDREN

CAUTION

See back panel booklet for additional precautionary statements.
(Read precautions and directions on back label.)

NET [xxx]

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Product Facts	
Treats up to xx sq ft (approx. size of XX tennis courts) [When calculating coverage, one gallon treats 300 sq ft and a tennis court is 2,106 sq ft.]	
KILLS WEEDS	<i>[Illustrate grassy, broadleaf and woody weeds]</i> ALL TYPES OF WEEDS & GRASSES
WHERE TO USE	<ul style="list-style-type: none"> • On patios, walkways, driveways, gravel or mulch beds • Around flowers, shrubs or trees • Along fences • Other areas in your yard
AMOUNT TO USE	For best results • 6 fl oz (12 Tbs) per gallon of water Apply on warm days in bright sunlight
[phone icon] Questions, Comments or Medical Information call (insert contact #) www.roundup.com	

[For products where an anti-theft device has been added] This bottle contains an anti-theft device, either inside or on the back of the bottle. It does not affect [Insert Brand Name] performance.

DIRECTIONS FOR USE

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

MIXING INSTRUCTIONS
<p><i>[optional tank sprayer illustration]</i></p> <p>Tank Sprayer (plastic, aluminum, fiberglass, plastic-lined steel or stainless steel. (Do not (mix, store or) apply with (in) a galvanized or unlined steel sprayer.)</p> <ul style="list-style-type: none"> • (For tough established weeds / For best results,) add 6 fl oz (12 Tbs) to 1 gallon of water. • (For easy to kill weeds such as small seedlings, add 3 fl oz (6 Tbs) to 1 gallon of water.) • (Spot treat)

1 Tablespoon (Tbs) = 3 teaspoons (tsp) 1 fl oz = 2 Tbs

Do not (mix, store or) apply with (in) a galvanized or unlined steel (except stainless steel) sprayer, or through any irrigation system.

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To clean sprayer after use, rinse sprayer and all sprayer parts with water 3 times. Spray rinse water on bare soil or gravel. After cleaning, sprayer may be used for other products.

USER SAFETY RECOMMENDATIONS *[optional illustration]*

- Clothing and protective equipment exposed to this product should be washed in detergent and hot water. Such items should be kept and washed separate from other laundry.
- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing immediately if product gets inside; then wash thoroughly and put on clean clothing.

HOW TO APPLY *[optional illustration]*

- Spray the weeds or grasses you want to kill until thoroughly wet.
- When spot treating weeds around desirable plants, shield plants from drift with a sheet (piece) of cardboard or plastic. If desirable plants are accidentally sprayed, rinse off immediately with water.

IMPORTANT: Do not spray plants or grasses you like - they may die too. Not recommended for spot weed control in lawns since Roundup *[or insert brand name]* kills lawn grasses.

Application Restrictions: Do not apply this product in a way that will contact any person or pet, either directly or through drift. Only the person applying this product may be in the area during application.

WHEN TO APPLY *[optional illustration]*

- Use anytime weeds and grasses are actively growing. (Apply when weeds are actively growing.)
- For best results, apply during warm, sunny weather (above 60° F) to accelerate systemic movement from foliage to roots.
- Apply when air is calm to prevent drift to desirable plants.
- *[insert brand name]* is Rainproof in 2 hours (30, 45, 60, or 90 minutes; 1 hour; less than 1 hour; less than 60 minutes; less than 30 minutes)
- *[Alternate text]* (RAIN-PROOF:) Rain or watering 2 hours (30, 45, 60, or 90 minutes; 1 hour; less than 1 hour; less than 60 minutes; less than 30 minutes) after application will not wash away effectiveness.
- (Apply when weeds are small and before seeds form. Established (Hard to kill))

weeds may require a repeat application.)

ADDITIONAL TIPS [optional illustration]

- **To Kill Vines**

- If vines are growing up poles, fences, or tree trunks with mature bark, cut vines to a height of 3 to 4 feet and spray vines thoroughly.
- If vines are climbing shrubs or tree trunks with green bark, cut vines at base and treat as directed for stumps or spray regrowth. If spraying regrowth, shield shrubs and green bark from spray drift with a sheet (piece) of cardboard or plastic.

- **To Kill Stumps**

- Cut living stump close to ground.
- Drive (drill) 4 to 5 holes into freshly cut stump.
- Immediately pour undiluted product into holes.

- **Kudzu**

For best results, apply in mid to late summer when vines are mature and actively growing.

- **Wild Blackberry**

Spray anytime plants are actively growing. Dead canes should be cut down and removed. Reapplication is often required to kill deep roots.

- **Poison Ivy & Poison Oak**

Contact with these plants anytime of the year can cause an allergic reaction. Spray anytime plants are actively growing, but at least 4 weeks before the first killing frost in the fall. Reapply, if new growth appears. Handle dead plants with rubber gloves. Dispose of plants and rubber gloves in tightly sealed garbage bags.

WHEN TO REPLANT [optional illustration]

- All ornamental flowers, trees and shrubs may be planted **2 days after** application.
- Lawn grasses may be planted **7 days after** application.

HOW IT WORKS [optional illustration]

Roundup [insert brand name] enters plants through foliage and moves systemically to the roots, killing weeds by stopping the production of a substance found in plants. Any product (Roundup) [insert brand name] not absorbed by plants will be deactivated after it hits the soil. Weeds usually yellow and wilt within hours with complete kill in 1 to 2 weeks.

[Optional section]

KILLS ALL TYPES OF WEEDS & GRASSES [optional illustration]

Weeds (including): Artichoke thistle, beggarweed, black medic, blue mustard, blue toadflax, brassbuttons, broadleaf plantain, burclover, buttercup, Canada thistle, cattail, chickweed, cocklebur, common groundsel, common mullein, common plantain, common ragweed, creeping beggarweed, creeping-charlie, curly dock, dandelion, dog fennel, evening primrose, false dandelion, fiddleneck, field bindweed (wild morningglory), field pennycress, filaree, Florida pusley, garden spurge, henbit, horsenettle, horseradish, horseweed/ marestalk, iceplant, knapweed, knotweed, lambsquarters, lantana, little bittercress, London rocket, mallow, mayweed, milkweed, mouseear chickweed, narrowleaf (buckhorn) plantain, nightshade (silverleaf), oldenlandia, oxalis, Pennsylvania smartweed, pennywort, poison hemlock, prickly lettuce, primrose, prostrate spurge, puncturevine, ragweed, red clover, redroot pigweed, shepherdspurse, smooth catsear, smooth pigweed, sowthistle, spotted spurge, tansy ragwort, tansymustard, teaweed, trumpet creeper, tumble mustard, Virginia creeper, white clover, whitetop, wild barley, wild mustard, wild oats, wild sweet potato, yellow starthistle, and other broadleaf weeds

Grasses (including): Annual bluegrass, annual ryegrass, bahiagrass, barnyardgrass, bentgrass, Bermudagrass, bromegrass, Cogongrass, crabgrass, creeping bentgrass, dallisgrass, fall panicum, fescue, field sandbur, foxtail, goosegrass, guineagrass, Johnsongrass, Kentucky bluegrass, kikuyugrass, lovegrass, maidencane, nimblewill, nutsedge, orchardgrass, pampas grass, perennial ryegrass, purple nutsedge, quackgrass, sandspur, smooth bromegrass, sprangletop, St. Augustinegrass, tall fescue, Texas panicum, Timothy, torpedograss, vaseygrass, witchgrass, yellow nutgrass, zoysia and other grassy weeds

Brush (Tough Weeds), Unwanted Trees, Shrubs & Vines (including):

Alder, ash, (quacking) aspen, blackberry, bluegum eucalyptus, broom (French, Scotch), buckwheat, ceanothus, chamise, cherry, coyote brush, dewberry, elderberry, elm, eucalyptus, giant reed, hawthorn, hazel, honeysuckle, kudzu, locust, madrone, maple, oak, persimmon, poison oak, poison ivy, poplar, raspberry, sage, sagebrush, salmonberry, saltcedar, sassafras, sumac, sweetgum, tan oak, thimbleberry, tree tobacco, wild rose (multiflora) willow and other tough weeds

STORAGE AND DISPOSAL [trash can illustration]

STORAGE: Store in original container in a safe place away from direct sunlight.

DISPOSAL: Empty Container: Do not reuse container. Put in trash. (Recycle where available.) **Partially Full Container:** Call your local waste disposal service or 1-800-CLEANUP. Never pour product down any drain.

HOW TO REFILL ROUNDUP READY-TO-USE CONTAINERS

- **24 fl oz Roundup Weed & Grass Killer₁ Ready-To-Use:**
To empty container add 2 fl oz of Roundup Concentrate Plus [*or alternate brand name*] then fill with water very slowly to avoid foaming.
- **½ Gallon Roundup Weed & Grass Killer₁ Ready-To-Use:**
To empty container add 5 fl oz of Roundup Concentrate Plus [*or alternate brand name*] then fill with water very slowly to avoid foaming.
- **Gallon Roundup Weed & Grass Killer₁ Ready-To-Use:**
To empty container add 10 oz of Roundup Concentrate Plus [*or alternate brand name*] then fill with water very slowly to avoid foaming.
- **1.33 Gallon Roundup PNS (II):**
To empty container add 13 fl oz of Roundup Concentrate Plus [*or alternate brand name*] then fill with water very slowly to avoid foaming.
- **6L Roundup Weed & Grass Killer₁ Ready-To-Use:**
To empty container add 16 fl oz of Roundup Concentrate Plus [*or alternate brand name*] then fill with water very slowly to avoid foaming.
- **2 Gallon Roundup Weed & Grass Killer₁ Ready-To-Use:**
To empty container add 20 fl oz of Roundup Concentrate Plus [*or alternate brand name*] then fill with water very slowly to avoid foaming.

PRECAUTIONARY STATEMENTS [*optional illustration*]

[*Re-entry icon*] People and pets may enter treated area after spray has dried.

HAZARDS TO HUMANS & DOMESTIC ANIMALS**CAUTION:**

Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling.

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FIRST AID	
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently for 15-20 minutes. • Remove contact lenses, if present, after first 5 minutes, then continue rinsing. • Call a poison control center (insert contact telephone #) or doctor for treatment advice.
Emergency Medical Information	
<ul style="list-style-type: none"> • Have the product container or label with you when calling a poison control center or doctor, or going for treatment. • You may contact (insert contact telephone #) for emergency medical treatment information. • This product is identified as [insert brand name], Reg. No. 71995-29 	

ENVIRONMENTAL HAZARDS: This product is toxic to aquatic invertebrates. Do not apply directly to any body of water. Do not contaminate water when disposing of equipment washwaters.

NOTICE: Buyer assumes all responsibility for safety and use not in accordance with directions.

This product is protected by U.S. Patents No. 5,683,958 and No. 5,703,015 and No. 6,063,733 and No. 6,121,199 and No. 6,121,200. Other patents pending. No license granted under any non-U.S. patent(s).

This is an end-use product. Monsanto does not intend and has not registered if for reformulation or repackaging.

<p>[phone icon] Questions, Comments or Medical Information call insert contact # www.roundup.com</p>

Roundup is a trademark of Monsanto Technology LLC

©[] MONSANTO COMPANY

Manufactured for
Monsanto Company, Lawn & Garden Products
P.O. Box 418
Marysville, OH 43041-0418
Form []
EPA Reg. No. 71995-29

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EPA Reg No. 71995-29

EPA Est. 239-IA-3¹, 58996-MO-1^A
Superscript is first letter of lot number
Made in USA

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APPENDIX 1 – Consolidated List of Label Claims
[Ordered alphabetically]

- Absorbed into both broadleaf and grassy weeds
- Absorbs on contact, starts working immediately
- Approved for most (many) lawn and garden uses
- Before *[weed graphics]* / After *[weed graphics]*
- Begins absorbing on contact
- Can be used for habitat restoration, controlling exotic vegetation, and for site preparation of wildlife food plots
- Can reseed or sod lawns 7 days after treatment
- Concentrated for extra value
- Concentrated formula
- (Contains) FastAct™ (technology)
- Dead Weeds Guaranteed (or Your Money Back)
- Dead (weeds) in a day
- Does not have soil activity
- Economical
- Economical concentrate formula
- Easy to apply with a tank or (hand held) trigger sprayer
- Even if it rains – Roundup *[or insert brand name]* won't lose its effectiveness
- Exclusive Roundup *[or insert brand name]* formula
- Experience the Roundup Advantage (peel back this panel for detail) (see details inside / underneath this booklet) (see details on back panel)
- FastAct™ (Technology)
- Fast-acting formula
- Fast-acting formula works twice as fast (50% faster)
- Fast-acting formula absorbs to root more quickly
- For control that doesn't (won't) wash away
- For general weed control - kills weeds and grasses in 1 to 2 weeks - roots and all
- For weeds that are dead in a (one) day
- Guaranteed same effective results even if it rains within hours
- Guaranteed effective: Kills over 200 types of weeds and grasses, roots and all, with just one application
- Guaranteed (we guarantee it)
- Ideal for killing unwanted weeds and grasses throughout your yard. Use along fences; in cracks of walks, drives and patios; and around flower beds, trees and shrubs
- Improved extra strength formula
- Improved formula, completely kills even the toughest weeds and grasses
- Keeps driveways, walkways, landscaping beds, and flower gardens weed-free all season long
- Kills almost all (annual and perennial) weeds, grasses and other unwanted plants
- Kills existing weeds only, no residual activity in soil
- Kills more weeds in more places.

- Kills over 100 weeds
- Kills (to) the root
- Kills (the toughest weeds and grasses) the root so weeds (they) don't come back
- Kills the root so weeds don't come back
- Kills the roots of (both) broadleaf and grassy weeds
- Kills the weed you see and the root you don't
- Kills unwanted weeds and grasses, roots and all
- Kills weeds in flowerbeds, around trees, shrubs and fences, and on patios, paths, sidewalks, sidewalk cracks, walkways, driveways, and other areas in your yard
- Kills weeds, roots and all
- Lawns and gardens can be reseeded or planted soon after treatment
- Make only what you need
- Multipurpose grass and broadleaf weed control
- NEW!
- Next day (this weekend) results: Begins killing on contact, visible results in 24 hours
- No odor
- No root. No weed. No problem.
- NOW!
- Now a shorter wait for replanting!
- Once it enters the plant, it won't wash off
- One application kills over 200 types of weeds and grasses, roots and all (maximum effectiveness)
- Only Roundup's effectiveness (exclusive formula) won't be washed away by rain or watering 2 hours (30, 45, 60, 90 minutes) after treatment
- Only Roundup's effectiveness (formula) won't be washed away by rain or watering 2 hours (1 hour)(30, 45, 60, or 90 minutes; 1 hour; less than 1 hour; less than 60 minutes; less than 30 minutes) after treatment
- Proven (trusted) performance: Only Roundup [*or insert brand name*] works the first time, every time – and has for 25 years
- Provides maximum control: Kills weeds to the root so they don't ever come back
- Quick kill formula (the toughest)
- Quick-action formula lets you see results 50% faster (two times)
- Ornamental gardens can be reseeded or planted 1 day after treatment
- RainFast in hours (30, 45, 60, or 90 minutes; 1 hour; less than 1 hour; less than 60 minutes; less than 30 minutes)- enters the plant on contact
- RAIN-PROOF™ (Mistake Proof)
- RAIN-PROOF™ in two hours (30, 45, 60, or 90 minutes; 1 hour; less than 1 hour; less than 60 minutes; less than 30 minutes) (for control that won't wash away)
- Roundup [*or insert brand name*] can be used (almost) anywhere weeds and grasses grow, including patios, walkways, and driveways; along fences; in landscaping beds; or around flowers, shrubs and trees
- (Roundup) [*or insert brand name*] Kills the weed you see and the root others leave behind
- Roundup's exclusive (patented) formula (technology) kills to the root so weeds don't

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come back

- Roundup [*or insert brand name*] kills weeds and grasses in – Patios – Driveways – Sidewalks – Ornamental Gardens and other non-lawn areas
- Satisfaction guaranteed or we will gladly refund purchase price
- Satisfaction guaranteed or your money back with proof of purchase
- (See) results in hours
- (See) results in 24 hours
- Speeds absorption to the root for complete kill
- Spray weeds (Use) in flowerbeds, around trees, shrubs and around fences, and on patios, paths, sidewalks, sidewalk cracks, walkways, driveways, and other areas in your yard
- Starts to kill in hours
- Starts working immediately (in hours)
- Stronger
- Transorb technology speeds Roundup to the root to kill even tough weeds
- Twice as fast
- (Use) For Brush Control
- (Use) For General Weed Control: Use along fences, paths, patios, sidewalks and driveways, around trees, shrubs, ornamental plantings, flowerbeds, and buildings, and in brick and gravel walkways.
- Use to trim and edge landscape areas.
- (Use) For Spot Spraying: Use in and around flowerbeds, ornamental trees, shrubs, fences, driveways and walkways
- (Use) For Stumps
- (Use in) Apply with a Big Shot™ Multi-Purpose Sprayer or other tank sprayer, or a (hand held) trigger sprayer
- Visible effects are gradual wilting and yellowing advancing to complete browning and root destruction.
- Water based formula
- Won't wash off (away)
- Works first time, every time
- Works in hours
- Works overnight
- Works only when absorbed by the foliage of weeds

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[Promotional options]

- Save up to \$[x] on (your) next purchase
- [X]% Free (More)
- Free weed guide inside
- Free [] with this purchase of Roundup concentrate quart
- FREE REFILL
- FREE SAMPLE
- SAMPLE NOT FOR SALE
- Value size

APPENDIX 2 – Packaging Related Claims

- NET xx fl oz (qt or gal) (xx mL or L)
6 fl oz (177 mL)
6.5 fl oz (192 mL)
8 fl oz (237 mL)
13 oz (384 mL)
16 fl oz (1 pt) (473 mL)
32 fl oz (1 qt) 946 mL)
40 fl oz (1.18 L)
53.7 fl oz (0.42 gal) (1.5 L)
64 fl oz (1/2 gal) (1.89 L)
128 fl oz (1 gal) (3.79 L)

[corner flap]

OPEN

Resealable Label for Directions & Precautions

PULL HERE TO OPEN LABEL

PEEL HERE

PEEL OPEN FOR USE DIRECTIONS AND FURTHER INFORMATION

PRESS TO RESEAL

[Net contents] Makes up to 'X' gallons

Makes between 'X' – 'Y' gallons

Mix with water to make 'X' gallons of spray solution

Covers up to 'Z' sq ft

Mix with water to cover up to 'Z' sq ft

$$[X = \text{net contents} \div 3]$$

$$[Y = \text{net contents} \div 6]$$

$$[Z = X * 300]$$

[Pint]

Makes up to 5 gallons

Makes between 2½ - 5 gallons

Mix with water to make 5 gallons of spray solution

Covers up to 1,500 sq ft

Mix with water to cover up to 1,500 sq ft

[Quart]

Makes up to 10 gallons

Makes between 5 – 10 gallons

Mix with water to make 10 gallons of spray solution

Covers up to 3,000 sq ft

Mix with water to cover up to 3,000 sq ft

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[0.42 Gallon] Makes up to 18 gallons
Makes between 9 – 18 gallons
Mix with water to make 18 gallons of spray solution
Covers up to 5,400 sq ft
Mix with water to cover up to 5,400 sq ft

[Half Gallon] Makes up to 21 gallons
Makes between 10 – 21 gallons
Mix with water to make 21 gallons of spray solution
Covers up to 6,300 sq ft
Mix with water to cover up to 6,300 sq ft

[Gallon] Makes up to 42 gallons
Makes between 21 – 42 gallons
Mix with water to make 42 gallons of spray solution
Covers up to 12,600 sq ft
Mix with water to cover up to 12,600 sq ft

New! Larger size, covers up to ['Z'] sq ft

With (the convenient) measuring cup, mixing MON 78307 (controlling weeds around your home) has never been easier

With (the convenient) measuring cup, controlling weeds all around your home has never been this fast and easy

Description of Changes for 071995-00029.20040211.pdf

This label notification incorporates the following:

- Addition of anti-theft statement

MONSANTO
imagine



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MONSANTO COMPANY
600 13TH STREET, N.W.
SUITE 660
WASHINGTON, D.C. 20005
<http://www.monsanto.com>

10 February 2004

Hand Delivered

Document Processing Center (NOTIF)
Office of Pesticide Programs
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2,
1921 Jefferson Davis Highway
Arlington, VA 22202-4501

Attention: Mr. Jim Tompkins (7505C)
Product Manager (Team 25)

**Subject: Roundup® Weed & Grass Killer Concentrate Plus (Reg. No. 71995-29).
Notification of Label Changes.**

Dear Mr. Tompkins:

Monsanto is herein submitting a revised Master Label for *Roundup Weed & Grass Killer Concentrate Plus* (Reg. No. 71995-29). The revised label is identical to the current stamped label dated 24 September 2002 except that the following statement has been added underneath the *Product Facts Box* on page 2:

"THIS BOTTLE CONTAINS AN ANTI-THEFT DEVICE, EITHER INSIDE OR ON THE BACK OF THE BOTTLE. IT DOES NOT AFFECT *[Insert Brand Name]* PERFORMANCE."

This statement is necessary to support the addition of an anti-theft device to our Roundup Concentrate Plus products; retailers are experiencing some product theft and have asked Monsanto to incorporate an anti-theft device. The same anti-theft device and corresponding statement is currently being used for our current Roundup Super Concentrate products.

The following documents are enclosed with this letter:

- Application for Pesticide (form 8570-1)
- CD-Rom containing this cover letter, required forms, and the electronic label (filename: 071995-00029.20040211.pdf)
- Certification with Respect to Label Integrity
- Five copies of the revised Master Label

Should you require any additional information or have any questions regarding this matter, please contact Dr. Russ Schneider at our Washington office (202) 783-2866, or me directly at (314) 634-8785 or via email at rhonda.m.mannion@monsanto.com.

Sincerely,

Rhonda M. Mannion
Registration Manager

cc: R. Schneider / DC Office
V. Walters / EPA
J. Lambert / A2NC
File copy